

European Bank of Reconstruction and  
Development (EBRD)

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# STAKEHOLDER ENGAGEMENT PLAN (SEP)

MYTILINEOS 826MW CCGT, Agios Nikolaos,  
Greece



**PUBLIC**

**DATE: SEPTEMBER 2021**

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# 1

## INTRODUCTION

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# 1 INTRODUCTION

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## 1.1 STAKEHOLDER ENGAGEMENT PLAN

This Stakeholder Engagement Plan (SEP) is a live public document which sets out MYTILINEOS' commitments relating to stakeholder engagement, consultation and disclosure activities in connection with the Project. This SEP has been developed in line with the EBRD's Environmental and Social policy (2019).

Stakeholder engagement and consultation are undertaken with the aim of informing and improving Project decision-making and build understanding by actively involving individuals, groups and organisations in the Project. Stakeholder engagement and consultation helps to:

- Identify and involve all potentially affected groups and individuals;
- Generate a good understanding of the Project amongst those who will be affected;
- Identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders;
- Ensure that mitigation measures are appropriate (implementable, effective and meaningful); and
- Establish a system for long-term communications between the Project and communities that is of benefit to all parties.

This SEP details engagement undertaken with stakeholders during the early stages of the Project and serves as a guide during future phases. This SEP will need to be revised following Project approval, to inform on-going stakeholder engagement through the various stages of Project development (construction, operation and decommissioning).

## 1.2 THE PROJECT

1.2.1 MYTILINEOS S.A. (hereafter 'The Company'), a major industrial company, intends to construct a new natural gas-fired Combined Cycle Gas Turbine (CCGT) (hereafter 'the Project'), which will be located within its existing industrial complex near to Agios Nikolaos, in Central Greece (see Fig.1.1). The new CCGT will be connected to the gas pipeline and cooling water facilities used for an existing CCGT on this site, but new c.14km 400kV overhead transmission lines (OHTL) (as shown in Figure 1.1 in orange) will be built to connect the new CCGT to the nearby substation in Distomo, and modifications to the existing OHTL will be required (the land upon which the Project is to be built is hereafter referred to as 'the Site'). Figure 1.1 shows the following:

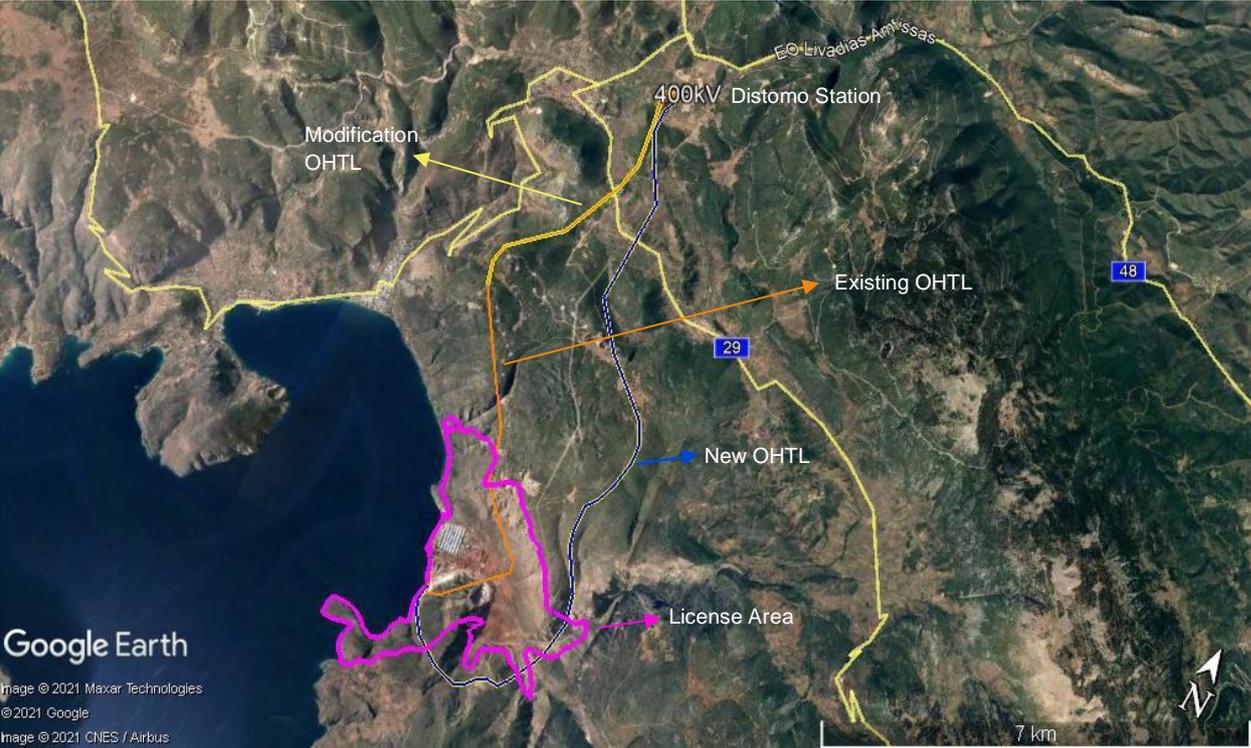
- The left orange line is the existing overhead high voltage line ("existing path"), the last section of which is yellow (to the left – Modification OHTL) will be rerouted going north. The line highlighted in blue connected to Distomo substation is the new OHTL.
- The pink link is the boundary of the Company land property.

MYTILINEOS S.A. has already been in this area since the 1960s, operating an alumina and aluminium plant, quarries and two power plants (a CHP plant and a CCTG power plant).

1.2.2 The European Bank for Reconstruction and Development (EBRD) (hereafter 'the Lenders') is considering financing the Project.

1.2.3 The aim of the Project is to increase energy generation capacity in the area. Natural gas leads to lower CO<sub>2</sub> emissions than other fossil fuels, hence the Project will contribute to reducing the carbon intensity of the grid, reduce energy prices for consumers and increase community access to energy. The Project will create employment opportunities and will contribute to local economy through increased expenditure resulting from construction workforce.

**Figure 1-1 - Location of the Project including New OHTL and Substation**



## 2 KEY REGULATIONS

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### 2.1 INTRODUCTION

2.1.1 The purpose of this chapter is to outline the national legislative requirements and Lender's social policy requirements of relevance to stakeholder engagement and consultation.

### 2.2 NATIONAL LEGISLATIVE REQUIREMENTS

Table 2-1 - National legislation

| Legislation   | Key Requirements   |
|---|--|
| Constitution of Greece (2001)   | <ul style="list-style-type: none"><li>Article 5A: All persons have the right to information, as specified by law.</li><li>Article 10: Each person, acting on his own or together with others, shall have the right, observing the laws of the State, to petition in writing public authorities, who shall be obliged to take prompt action in accordance with provisions in force, and to give a written and reasoned reply to the petitioner as provided by law.</li><li>Article 14: Every person may express and propagate his thoughts orally, in writing and through the press in compliance with the laws of the State.</li><li>Article 17: Property is under the protection of the State; rights deriving there from, however, may not be exercised contrary to the public interest.</li><li>Article 24: The protection of the natural and cultural environment constitutes a duty of the State and a right of every person. The State is bound to adopt special preventive or repressive measures for the preservation of the environment in the context of the principle of sustainable development.</li></ul> |
| Law 4014/2011 "on the environmental licensing of projects and activities...." (as amended)<br>Ministerial Decision 1915/2018<br>Ministerial Decision 1649/45 (GG 45B/2014)<br>Law No. 4685/2020 | <ul style="list-style-type: none"><li>Regulates the EIA process, including stakeholder engagement elements<sup>1</sup></li><li>The public is entitled to a 60-day period in relation to the CCGT EIA; and 30-day period in relation to the OHTL EIAs; in which they may submit comments relating to the proposed development</li></ul>   |

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<sup>1</sup> United Nations Economic Commission for Europe (2017), *2<sup>nd</sup> Statement of the Hellenic Ministry of Environment and Energy concerning the Communication PRE/ACCC/C/2017/148*. Available online at: ([https://unece.org/DAM/env/pp/compliance/C2017-148\\_Greece/Correspondence\\_with\\_the\\_Party\\_concerned/frPartyC148\\_16.02.2018\\_response.pdf](https://unece.org/DAM/env/pp/compliance/C2017-148_Greece/Correspondence_with_the_Party_concerned/frPartyC148_16.02.2018_response.pdf))

| Legislation   | Key Requirements   |
|---|--|
| Law 3422/2005   | <ul style="list-style-type: none"> <li>▪ Ratifies the Aarhus Convention in Greek law</li> <li>▪ Regulates access to environmental information by the public<sup>2</sup></li> </ul> |
| Joint Ministerial Decision 11764/653/2006 on "Public access to information" | <ul style="list-style-type: none"> <li>▪ Establishes public access to environmental information</li> </ul>   |

## 2.3 LENDER'S REQUIREMENTS

### EBRD's Environmental and Social Policy and Performance Requirements and Independent Project Accountability Mechanism

- 2.3.1 All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (ESP) which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.
- 2.3.2 The Project has been assessed against PRs 1, 2, 3, 4, 5, 6, 8 and 10. PR7 (Indigenous Peoples) and PR9 (Financial Intermediaries) are not applicable, as there are no indigenous peoples within the Project area, and no financial intermediaries are involved. The main PR associated with stakeholder consultation and information disclosure is PR10.
- 2.3.3 The pertinent objectives and requirements of PR10 are presented in Table 2-2 below.

**Table 2-2 - EBRD PR10 Requirements**

| Objective                  | Key Requirements   |
|----------------------------|--|
| Stakeholder Identification | <ul style="list-style-type: none"> <li>▪ Identify Project affected stakeholders, including disadvantaged or vulnerable groups who are affected or likely affected by the Project; or may have an interest in the Project.</li> <li>▪ Develop and implement a Stakeholder Engagement Plan and Grievance Mechanism.</li> </ul> |

<sup>2</sup> United Nations Economic Commission for Europe (2008), *Aarhus Convention Implementation Report*. Available online at: [https://unece.org/DAM/env/pp/Implementation%20reports%202008/Greece as revised 2008\\_04\\_16.pdf](https://unece.org/DAM/env/pp/Implementation%20reports%202008/Greece%20as%20revised%202008_04_16.pdf)

| Objective                                 | Key Requirements   |
|---|--|
| Information Disclosure                    | <ul style="list-style-type: none"> <li>■ Provide stakeholders with access to timely, relevant, understand, accessible information in a culturally appropriate manner. Including access to:               <ul style="list-style-type: none"> <li>● The purpose, nature, scale and durations of the Project;</li> <li>● Any risks, potential impacts and mitigation measures;</li> <li>● Proposed stakeholder engagement process;</li> <li>● Time and venue of public consultation meetings; and</li> <li>● A Grievance Mechanism.</li> </ul> </li> <li>■ Where applicable, differentiated measures will be implemented to allow the effective participation of those identified as disadvantaged or vulnerable groups.</li> </ul> |
| Meaningful Consultation                   | <ul style="list-style-type: none"> <li>■ Consultation will be in line with the degree of potential project impacts and will:               <ul style="list-style-type: none"> <li>● Begin early and continue throughout the Project lifecycle;</li> <li>● Be based on prior disclosure and dissemination of information;</li> <li>● Be free of manipulation, interference, coercion or intimidation;</li> <li>● Enable meaningful participation; and</li> <li>● Be documented.</li> </ul> </li> </ul>  |
| Ongoing Engagement and External Reporting | <ul style="list-style-type: none"> <li>■ Provide stakeholders, on an ongoing basis, with appropriate information on the Project regarding risks, impacts and grievances raised.</li> <li>■ Communicate any updates to stakeholders on the Project, including disclosure of updated ESMP if adverse impacts, risks, concerns are identified or raised.</li> <li>■ Report to the community with frequency that is proportionate to the concerns of affected communities but not less than annually.</li> </ul>   |
| Grievance Mechanism                       | <ul style="list-style-type: none"> <li>■ Establish a Grievance Mechanism to receive and facilitate resolution of stakeholders' concerns and grievances about the Project.</li> <li>■ The Grievance Mechanism should:               <ul style="list-style-type: none"> <li>● Resolve concerns promptly and effectively;</li> <li>● Use a transparent, culturally appropriate and readily accessible consultative process; and</li> <li>● Allow for anonymous complaints to be raised and addressed.</li> </ul> </li> </ul>  |

## EBRD'S COVID-19 STAKEHOLDER ENGAGEMENT (PR10) BRIEFING NOTE 2020

2.3.4 EBRD has developed a guidance presenting recommendations and considerations for continuing effective information disclosure and stakeholder engagement during the COVID-19 pandemic. The guidance provides alternate information disclosure and stakeholder engagement measures considering short-term and long-term consultation methods. The EBRD's key alternative measures for consultation activities have been included in this SEP (e.g. social media, Project leaflet, on-line campaign, telephone engagement, video presentation).

### 3 STAKEHOLDER ENGAGEMENTS AND AWARENESS PROGRAMME

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#### 3.1 PREVIOUS AND EXISTING STAKEHOLDER CONSULTATION AND ENGAGEMENT

##### CONSULTATION UNDERTAKEN FOR THE NATIONAL EIA (ENVIRONMENTAL IMPACT ASSESSMENT)

3.1.1 Stakeholder consultation was undertaken during the preparation of the national EIAs for the Project in accordance with national requirements. Information about the project was made available in the local press, at the site and online (on the Electronic Environmental Register, on the Portal of the Greek Ministry of Energy and the Environment, and the Portal of Decisions of the Greek Government, Ministries, Regions, Municipalities and Public Authorities). The public were given a 60-day period for the CCGT and a 30-day period for each of the OHLs in which to submit their comments.

The timeline for the EIA consultations is as follows:

- Consultation on the development of the new CCGT Power Plant (09 April 2019 – 10 June 2019)
- Consultation on rerouting of the existing high voltage line (3 Nov 2020 – 2 Dec 2020)
- Consultation on development of the new high voltage line (19 Jan 2021 – 25 Feb 2021)

All the consultations for national EIAs have been completed. The results of the consultations and decision-making process are to be published on the online portal.

The Company had proposed and was present at the stakeholders' meetings to present and discuss about the project. The stakeholders consulted include:

- City Council of Distomo – Arachova – Antikyra
- Management Body of the Korinthian Gulf
- Environmental Committee of the Region of Central Greece
- Local council of Kyriaki
- Local Council for Monuments of Central Greece
- Central Archeological Council
- in continuous contact with the Ministry of Environment and the Forestry Department

##### ENGAGEMENT WITH POTENTIALLY AFFECTED LANDOWNERS AND USERS

The Company has identified the potentially affected landowners based on the national land registry records and have engaged three local consultants to confirm the land ownership details. One-to-one discussions have been initiated and are currently in progress with the landowners and price offers are being made by the Company based on the intended use of the land and how the land parcel is affected. Negotiations are then carried out until a mutually agreed price can be agreed, subsequent to which agreements are finalised for the lease or purchase of land.

## INFORMATION DISCLOSURE

The following online portals have been used to disclose information about the Project including national EIAs:

- Electronic Environmental Register – this is used to publish all EIAs and responses from relevant authorities, including environmental permitting bodies, and the general public, including NGOs. The portal is publicly available, and anyone can create an account. The Project company upload the documents and monitor the responses. This is the only formal channel for direct engagement with the EIA process in Greece, available at: <https://eprm.yopen.gr/>
- Portal of the Greek Ministry of Energy and the Environment – the environmental decisions are available here: [CCGT 1st permit](#), [CCGT 826MV](#), [CCGT construction](#), [HVL 400kV \(rerouting\)](#), [HVL 400kV \(new line\)](#).
- Portal of Decisions of the Greek Government, Ministries, Regions, Municipalities and Public Authorities <https://diavgeia.gov.gr/>

## 4 STAKEHOLDER IDENTIFICATION

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- 4.1.1 The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.
- 4.1.2 As a result of the stakeholder mapping, Project stakeholders are categorised into two main groups:
- **Primary Stakeholders** – the individuals and groups who are affected directly by the Project (such as through the acquisition of land); and
  - **Secondary Stakeholders** – those parties which have influence on but are not necessarily directly impacted by the Project (such as community disturbance).
- 4.1.3 The key stakeholders identified are presented in **Table 4-1** overleaf.

**Table 4-1 - Key Identified Stakeholders and Methods of Engagement**

| Type  | Stakeholder Category | Name  | Impact / Influence  | Method of Engagement   |
|---|----------------------|---|---|--|
| <b>Project Shareholders / Internal Stakeholders</b> | Primary              | <ul style="list-style-type: none"> <li>■ MYTILINEOS S.A. – Protergia (Power &amp; Gas Business Unit)</li> <li>■ MYTILINEOS S.A. – METKA (Sustainable Engineering Solutions Business Unit)</li> </ul>  | The Company will construct, own and operate the CCGT MYTILINEOS.  | The Company will conduct either face to face meetings, emails and online meetings with Project shareholders.   |
| <b>National Government Authorities</b>              | Primary              | <ul style="list-style-type: none"> <li>■ Ministry of the Environment and Energy (includes Forestry)</li> <li>■ Ministry of Culture (includes Archaeology and Heritage)</li> <li>■ Ministry of Labour and Social Affairs</li> </ul>                | This group has direct influence / impact on the Project through regulatory and permit controls.   | The Company will inform decisions through online portals and conduct meetings with related authorities.  |
| <b>Local Government Departments</b>                 | Primary              | <ul style="list-style-type: none"> <li>■ Decentralised Region of Thessaly and Central Greece</li> <li>■ Central Greece Regional Government</li> <li>■ Distomo-Arachova-Antikyra Municipal Council</li> <li>■ Livadia Municipal Council</li> </ul> | This group has direct influence / impact on the Project through regulatory enforcement.   | The Company consulted with this group through meetings and emails.   |
| <b>Potential Lenders</b>                            | Primary              | <ul style="list-style-type: none"> <li>■ EBRD</li> </ul>  | Potential lenders will directly impact / influence the Project through decisions making at each stage of the Project.                                 | The Company will report to the EBRD through emails, phone calls and online meetings.   |
| <b>Local Communities</b>                            | Primary              | <ul style="list-style-type: none"> <li>■ Affected Communities: Tarsos, Agios Nikolaos, Aspra Spitia, Distomo, Antikyra, Agios Isodoros, Steiri and Kyriaki</li> <li>■ Landowners</li> <li>■ Land Users (farmers)</li> </ul>                       | Local individuals and communities will be able to influence the Project both directly and indirectly through providing their views and comments about | The Company will be available to local communities through the Project Community Liaison Officer (Ms Georgia Tsompanidou), Company emails, phone calls and online portals. |

| Type  | Stakeholder Category | Name  | Impact / Influence   | Method of Engagement   |
|---|----------------------|---|--|--|
|   |                      | <ul style="list-style-type: none"> <li>■ Local fishermen</li> <li>■ Local workers at the aluminium plant</li> </ul>   | the Project. There will be local communities who may negatively and positively be affected directly and indirectly as a result of the Project.             |  |
| <b>Local Businesses</b>                           | Primary              | <ul style="list-style-type: none"> <li>■ Local commercial farmers</li> <li>■ Hospitality and retail businesses in local towns</li> <li>■ Local commercial fishermen</li> </ul>  | Local businesses could benefit from increased expenditure and sales of services as a result of new workers residing in the Project area.                   | The Company Community Liaison Officer will be available to affected local businesses and affected businesses can also raise their concerns through the Project grievance mechanism.                          |
| <b>Universities and Educational Organisations</b> | Secondary            | <ul style="list-style-type: none"> <li>■ Professional High Schools in Livadia</li> <li>■ Local secondary schools</li> <li>■ Technical Universities.</li> </ul>  | Local educational institutions will benefit from the Project through employment opportunities for their alumni and potential capacity building programmes. | The Company commissions universities to undertake studies, including projects relating to energy and electricity (National Technical University of Athens NTUA, Schools of Mines and Electrical Engineering) |
| <b>Media</b>                                      | Secondary            | <ul style="list-style-type: none"> <li>■ Radio / newspaper</li> <li>■ MYTILINEOS website - <a href="https://www.MYTILINEOS.gr/">https://www.MYTILINEOS.gr/</a></li> <li>■ Social media- Facebook site and Instagram, YouTube channel</li> </ul> | The media could influence the Project both directly and indirectly through broadcasts / publications / posts about the Project.                            | The Company provides information and updates to the public through social media: Facebook, YouTube Channel, Instagram, and Company website.  |
| <b>Contractors</b>                                | Primary              | <ul style="list-style-type: none"> <li>■ Contractors</li> </ul>   | The Contractors will directly affect the Project through undertaking construction activities.  | The Company will supervise and regularly inspect contractors through face to face meetings, emails for monitoring their environmental and social performance.  |

## 5 STAKEHOLDER ENGAGEMENT PROGRAMME

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This section has been developed to address community concerns with regard to key environmental and social effects through the implementation of the stakeholder consultation and information disclosure activities as outlined in Table 5-2.

### 5.1 POTENTIAL ENVIRONMENTAL AND SOCIAL EFFECTS

5.1.1 Beneficial environmental and social effects may be inclusive of but not limited to:

- Direct and indirect employment opportunities (for both men and women) resulting in improved local economy;
- Improved local economy through increased expenditure resulting from new workers in the Project area; and
- Reduced carbon intensity of the grid and better access to energy.

5.1.2 Adverse environmental and social effects may be inclusive of but not limited to:

- Potential impact on nearby residents resulting from noise, access restriction as a result of construction activities and movement of vehicles and trucks.
- Potential impact on landowners and land users affected due to loss of land or access of rights of way due to the new and modification of the OHTLs

MYTILINEOS S.A. is operating in this particular area since the 1960s (see figure 1.1), including a CCGT power plant.

### 5.2 STAKEHOLDER CONSULTATION AND INFORMATION DISCLOSURE

The Project has an assigned Community Liaison Officer (CLO) who is responsible for the following activities:

- Undertaking the initial contact with affected local communities, in order to present the Project and discuss about it.
- Undertaking contacts with affected local communities to obtain any concerns and views about the Project, whenever such concerns emerge
- Reviewing the grievances registered by the community and implementing actions to mitigate them where possible
- Reporting any grievances and concerns to the Power & Gas Business Unit general directorate for resolution

5.2.1 The Project has been presented at the local councils, during which the local communities have also been consulted.

#### INFORMATION DISCLOSURE ACTIVITIES

5.2.2 In addition to the previous stakeholder consultation and engagement undertaken for the Project (as summarised in Section 3.1), the Company will be available to the stakeholders as the Project evolves. The information will be provided in Greek and English and will cover all the key stages of the Project including the construction and operational phases. The following documents will be disclosed for effective stakeholder communication:

- **National EIAs** (already disclosed);
- **Non-Technical Summary (NTS)**; and
- **SEP** (this document).
- **Environmental and Social Action Plan (ESAP)**

5.2.3 The documents will be disclosed in both Greek and English online on the Company website: <https://www.MYTILINEOS.gr>

## CONSULTATION METHODS

5.2.4 The Project will apply different consultation approaches and methods for different stages of the Project activities and stakeholder groups. The main communication methods and mechanisms that will be used to consult with key stakeholders are:

### ■ **Meetings and contacts with local communities**

The Company CLO will be responsible for direct consultations with affected communities

### ■ **Meetings with affected land users and landowners**

A company representative is responsible for negotiations with affected land users and owners. The representative will conduct direct engagement with affected land users and owners and will ensure reaching an agreement to lease or purchase the land through a willing buyer-willing seller arrangement. If land cannot be acquired on a willing seller-willing buyer basis, expropriation will be carried out by the designated national authority. The Company will ensure that the expropriation process is in compliance with the EBRD's PR 5 and Resettlement Guidance and Good Practice, and will ensure the communication during the expropriation process is carried out in accordance with this SEP.

In light of COVID restrictions, the Company will follow national health guidelines on any existing and future consultations.

5.2.5 Additional information on these approaches and methods are provided in the sections below.

### **Project Implementation Meetings**

The General Director of Power & Gas Business Unit receives monthly reports on the execution of the Project, and he/she will be responsible for addressing activities regarding implementation of the Project. The Project monthly discussions will be with regard to the following:

- Overall supervision of Project activities (technical and financial aspects and delivery of the Project)
- Integration of the provision of services of day-to-day activities at different stages, from preparation to implementation and evaluation, including procurement.
- Drafting of Terms of References and management of construction contractors and consultants
- Implementation of other activities identified, including training and information exchange for implementation of the Project
- Discussing new employment opportunities during the construction stage, and potential new jobs for locals

**Licensing and Permitting Meetings**

Consultations with relevant authorities will be conducted through the Electronic Environmental Register Online portal and emails. The Ministry of Environment will inform the company about their decisions.

Apart from the above, the Company proposes to be present at the meetings of each group involved in the public consultation and present the Project. More presentations are made according to the stakeholders’ needs, as discussed under 3.1.1.

**Community Meetings**

5.2.6 Engagement with community representatives through the municipalities can take place on an ongoing basis throughout the Project life cycle. Consultation meetings between the Company and the community will take place at the town hall or other appropriate place in Distomo or Livadia, and *ad hoc* communication with community representatives will be undertaken through the Company emails and telephone.

5.2.7 The CLO, Georgia Tsompanidou, is responsible for receiving comments from members of the public. Her contact details are publicly available, including in this document, and she can also be contacted through MYTILINEOS or through community leaders (e.g. the Mayor, presidents of local athletic or cultural societies). Ms Tsompanidou reports to the General Director of the Power & Gas Business Unit of MYTILINEOS.

5.2.8 Table 5-2 below details all the stakeholder engagement activities that will be undertaken.

**VULNERABLE GROUPS**

5.2.9 Vulnerable groups refer to people who, by virtue of gender identity, ethnicity, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits<sup>3</sup>. are defined as a group of people who might suffer disproportionately or face the risk of being further marginalised by the effects of land-related project impacts. Such people within the context of the Project are categorised as:

- Those living below the poverty line;
- Single-parent households;
- Households with disabled members; and
- the elderly.

MYTILINEOS has had a strong presence in the area since the 1960s and maintains very good relations with the community. No vulnerable groups negatively affected by the Project have been identified. If any case arises, MYTILINEOS is willing to cover the needs, continuing to maintain good relations.

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## COMMUNITY PROGRAMMES

The Company will continue its community programmes to ensure creating value for local communities. Some of key existing programmes are:

**Table 5-1 - The Company community programmes**

|  |  |
|--|--|
| <p>“Lending Libraries” Program</p>                         | <p>The Company wishing to ensure the children’s right to equitable access to and completion of quality primary education, is an active participant of the “Lending Libraries” program of the “Hellenic Book Club”, whose goal is to create 20 libraries in primary schools located in the Prefectures of Viotia, Magnesia and Preveza. The program’s main objective is to promote quality books, while at the same time supporting the work of educators and helping cultivate the students’ love of reading. (Partner Organization: “Hellenic Book Club”)</p> |
| <p>“S.T.E.M. Education - Educational Robotics” Program</p> | <p>MYTILINEOS, realising the potential of the S.T.E.M (Science, Technology, Engineering and Mathematics) education method, as well as the need for a broader modernisation of Greek schools, offers educational robotics equipment (LEGO Education Wedo2 sets) to Primary and Secondary Education public schools, giving to hundreds of students an opportunity to develop both their imagination and their technological and scientific skill sets. (Partner Organization: Organization for Educational Robotics &amp; Science - WRO Hellas)</p>              |
| <p>“Engineers in Action” Program</p>                       | <p>With the aim of substantially supporting young engineers and creating quality jobs, the Company, has implemented the 12-month paid internship program “Engineers in Action”. It is an initiative with key pillars of professional experience / training, apprenticeship and skills acquisition giving young engineers the opportunity to work in real working conditions.</p>   |

**Table 5-2 - Stakeholder Engagement Activities for the Project**

| Stakeholders   | Activity   | Information Materials   | Timeframe / Frequency   | Responsibility                                   | Location                                       |
|--|--|---|---|--|--|
| <b>Public EIA Information Disclosure</b>                   |  |   |   |  |  |
| Communities and local businesses                           | Disclose information about the Project to local communities and businesses   | <ul style="list-style-type: none"> <li>■ National EIAs and updates as disclosed</li> </ul>                                    | Prior to construction   | The Company and Ministry of Environment          | Online (Electronic Environmental Register)     |
| <b>The Project Information Disclosure and Consultation</b> |  |   |   |  |  |
| Affected communities including landowners and users        | Disclose information on construction timetable, activities, public access rights, grievance mechanism process using the Company website and YouTube Channel.   | <ul style="list-style-type: none"> <li>■ NTS</li> <li>■ SEP</li> <li>■ ESAP</li> <li>■ Informative videos</li> </ul>          | <p>Prior to construction</p> <p>Ongoing during Construction</p>               | The Company CLO                                  | Company website and YouTube Channel.           |
| University and Technical Colleges                          | Post jobs and employment opportunities on the Company website to attract engineers and graduates and offer internship programmes   | <ul style="list-style-type: none"> <li>■ NTS</li> <li>■ Jobs adverts</li> <li>■ Employment and graduate programmes</li> </ul> | Prior to Construction, and throughout the Project lifecycle                   | The Company                                      | the Company website                            |
| <b>Land Acquisition</b>                                    |  |   |   |  |  |
| Local landowners and land users                            | Reach a negotiated settlement with affected land users and owners on lease or purchase of lands and lease of any lands for OHL tower lines<br>In case of expropriation, the compensation will be provided in accordance with the Land Acquisition and Resettlement Framework which will be disclosed on the company's website. | <ul style="list-style-type: none"> <li>■ NTS</li> <li>■ SEP</li> <li>■ ESAP</li> <li>■ Land purchase agreements</li> </ul>    | Prior to construction   | The Company                                      | On their land or other appropriate place.      |
| <b>Permitting Meetings</b>                                 |  |   |   |  |  |
| National stakeholders                                      | Consult with key stakeholders, including Ministry of Energy and the Environment, for any related permits such as water supply  | NTS   | Immediate and ongoing, as necessary (frequency to be agreed with authorities) | The Company                                      | Ministry offices or through emails and letters |
| <b>Public Consultation</b>                                 |  |   |   |  |  |
| Local communities  | Initial consultation at Mayors' offices to ensure overall concerns and views of local communities have been addressed and also in relation to any cumulative impacts of overall projects in the Project area. The communities will be given prior notice of the  | Grievance Mechanism forms (Appendix A)  | Operation and Post Operation  | The Company, Local Mayors (Distomon and Livadia) | Local Mayors Offices at Town Hall              |

| Stakeholders | Activity  | Information Materials | Timeframe / Frequency | Responsibility          | Location |
|--------------|---|-----------------------|-----------------------|-------------------------|----------|
|              | <p>consultation event on the company's website, through notices displayed at local mayor's offices and at town hall.</p> <p>Subsequent consultations with communities /individuals to resolve any grievances raised</p> |                       |                       | Project Site/Town Halls |          |

## 6 GRIEVANCE MECHANISM

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The Company will be responsible for developing and implementing a formal grievance (complaint) procedure to receive the affected communities' concerns and views through a transparent and impartial process. The complaint procedure will be used as a tool to assist the timely and successful resolution of stakeholder concerns, as well as to monitor the Project's relationship with the affected communities. A summary of complaints and the measures taken to resolve them will be made public on a regular basis, in accordance with EBRD PR 10.

Stakeholders will be informed about the complaint's procedure during consultation activities, via the Company consultation meetings and the Company website.

The General Director of MYTILINEOS' Power & Gas Business Unit and Community Liaison Officer (CLO) will be responsible for coordination and handling of all grievances received from the community. Any verbal or written complaints will be raised to the CLO via the phone number and email address provided below:

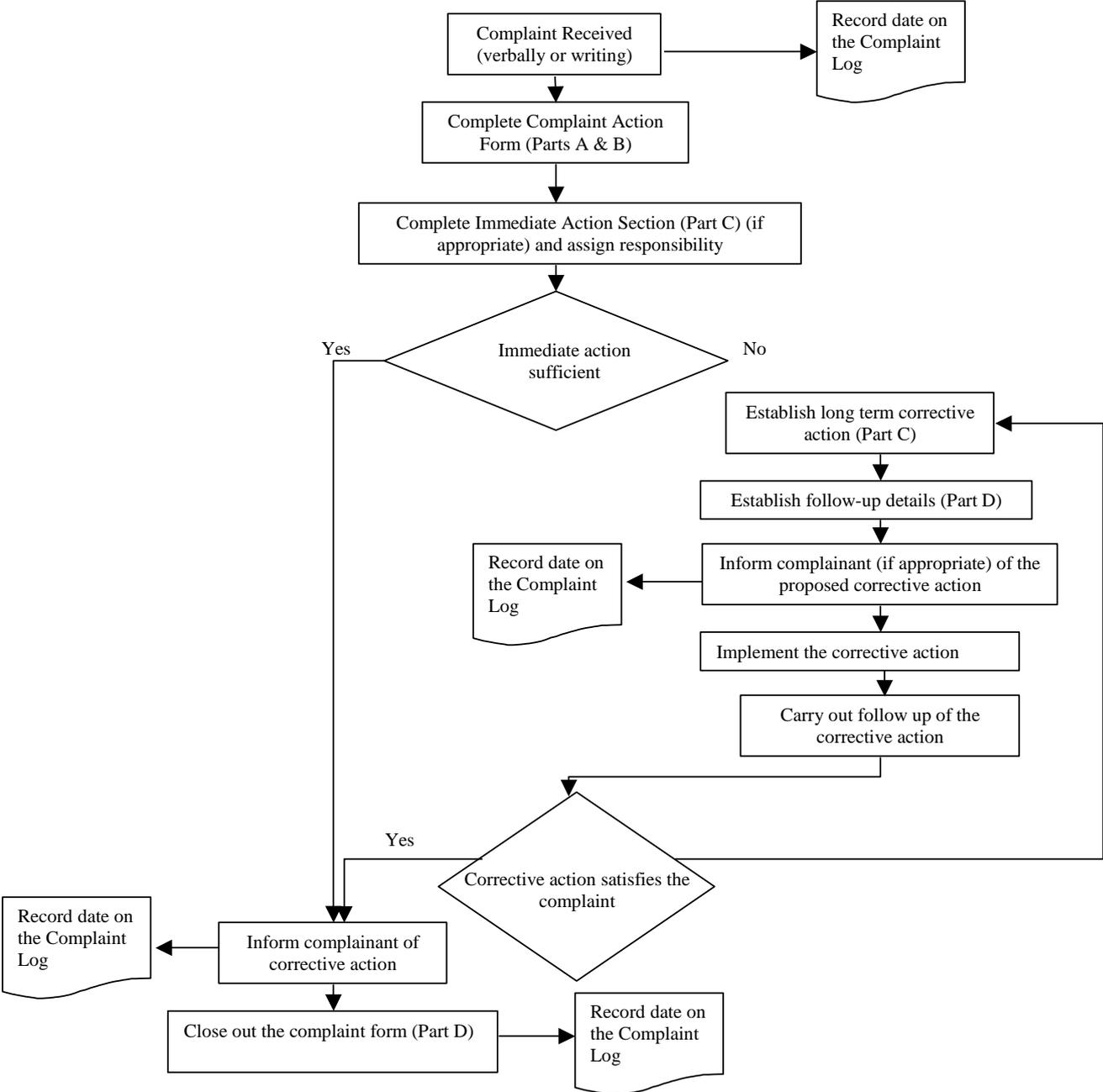
### **The Project CLO contact details:**

- Name: Georgia Tsompanidou
- Position: CLO
- Company: MYTILINEOS S.A. – Power & Gas Business Unit (Protergia)
- Tel: +302103448321, +306980709741
- Email: [Georgia.Tsompanidou@protergia.gr](mailto:Georgia.Tsompanidou@protergia.gr)

A grievance form (Appendix A) is available in this SEP for use by the public, and hard copies will be made available at the Company office and Agios Nikolaos municipality. It will be a requirement to record all complaints in the logbook within 5 working days of the complaint being received and responded to within a maximum period of 30 working days (shorter time period if the complaint is straightforward). Both signed and anonymous grievances will be accepted. Each complaint will initially be screened, and the facts of the case verified by the CLO.

The agreed solution or response will be signed off by the CLO and General Director. The corrective action and status of a complaint (closed, open) will be recorded in the grievance/complaint's logbook and will be communicated to the complainant.

# APPENDIX A: COMPLAINT PROCEDURE AND GRIEVANCE FORM



## Public Grievance Form

|   |   |
|---|---|
| Reference No:   |   |
| Full Name   | Date Received   |
| Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>                  | <input type="checkbox"/> I wish to raise my grievance anonymously<br><input type="checkbox"/> I request not to disclose my identity without my consent  |
| Contact Information<br><br>Please mark how you wish to be contacted (mail, telephone, e-mail).  | <input type="checkbox"/> By Post: Please provide mailing address:<br>_____<br>_____<br><input type="checkbox"/> By Telephone:<br>_____<br><input type="checkbox"/> By E-mail: _____                                 |
| Language<br><br>Please mark your preferred language for communication   | <input type="checkbox"/> Greek<br><input type="checkbox"/> Other  |
|   |   |
| 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  |   |
|   | <input type="checkbox"/> One-time incident/grievance (date _____)<br><input type="checkbox"/> Happened more than once (how many times? _____)<br><input type="checkbox"/> On-going (currently experiencing problem) |
|   |   |
| What would you like to see happen to resolve the problem?   |   |
|   |   |

Please return this form to:

- Name: Georgia Tsompanidou
- Tel: +302103448321, +306980709741
- Email: [Georgia.Tsompanidou@protergia.gr](mailto:Georgia.Tsompanidou@protergia.gr)

