





Stakeholders Engagement Plan Zielona/Dębsk Project Poland

Prepared for: POLENERGIA

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1 Introduction

POLENERGIA (the Company) is developing via its daughter companies, a wind farm complex (the Project) that consists of a first site located at the area of municipalities of Kuczbork-Osada and Żuromin (Zielona WF) and a second site located at the area of the municipality of Żuromin (Dębsk WF). Both sites are situated in Żuromiński county (powiat), Mazowieckie voivodeship (województwo). The project will consist of 57 wind turbine generators (WTGs), of a total capacity of over 100MW altogether at both sites, although the preliminary configurations assumed development of almost 190 MW (up to 87 MW at the Zielona WF and up to 99 MW at the Dębsk WF). For the project Vestas V110 (capacity of each 2 MW) WTGs have been considered by the company, however, the ultimate selection of the WTGs model and manufacturer has not been done yet.

The project consists also of an internal infrastructure of power transmission and control cables, roads and assembly yards, as well as a dedicated main transforming station (MTS) located nearby the village of Dębsk (municipality of Żuromin) which will serve both sites. Connection to the national power grid nearby Płock will be via underground cables, and this investment will be developed separately by a Distribution System Operator (ENERGA Operator S.A.).

The project will be developed on green fields that are currently used for agricultural purposes, but which are dedicated in the local zoning plans of the communes for the development of wind farm facilities. For the first site, the Local Zoning Plans were issued on July 9, 2010 (Żuromin municipality) and on September 27, 2010 (Kuczbork Osada municipality). In case of the second site, the Local Zoning Plan dedicated for development of wind farm facilities was issued on September 17, 2010.

The environmental decisions were granted to the Project, based on the completed environmental impact assessment (EIA) procedures conducted by the local authorities. The environmental decision for the first site was issued on January 4, 2011 by the Kuczbork-Osada Commune Head. The environmental decision for the second site was issued on January 7, 2011 by the Żuromin Commune Head.

The process of obtaining of the construction permit for the project was commissioned. Application is planned to be submitted to relevant authority in the middle of October 2014. For the project, grid connection conditions for the capacity of 90MW were obtained from the Distribution System Operator. Moreover, conditions for additionally 24MW of installed capacity are currently agreed with the Distribution System Operator. Due to power loss on transmission, the installed capacity is overestimated.

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.

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2 Requirements

Public disclosure of the project related information is required for newly developed projects at the stage of its EIA. 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 to undertake 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. However, it should be stressed that based on issued environmental decisions, repetition of the EIA procedure is not required while applying for a building permit.

The company and its daughter companies have completed all of the local requirements for public consultation during the local EIA process. 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 the stockholders.

Although not legally required, some project stakeholders, such as e.g. the lenders, may require additional disclosure of project related information, e.g. in a form of a performance reports. At the discretion of such stakeholders, the performance reports may also be required to be publicly available. In order to be transparent, Company intend to release additional information for public comment, and to update people at least annually (and potentially more often during the construction period) on the environmental and social performance, including how any complaints are handled.

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3 Summary of Previous Stakeholder 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 2013.
- Formal contacts with the Distribution System Operator while negotiating conditions of wind farm connection to the distribution networks and connection contracts.
- 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. Kuczbork-Osada Commune Office in case of the first site and Żuromin Commune Office in case of the second site. 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 to the stakeholders by posting appropriate notifications on their websites and information boards in the commune offices and involved villages. No meetings with local citizens and other stakeholders were arranged by the company.

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4 Stakeholders Identification and Analysis

4.1 Stakeholders Identification

The following major stakeholders groups were identified:

Societies and individuals:

- Residents of Żuromin and Kuczbork-Osada municipalities;
- · Land owners of investment site;
- Residences of the villages along transportation roads, including: Kuczbork –Osada,
 Olszewko, Kliczewo Duże, Olszewo, Dębsk and Chamsk;
- Employees of the company and contractors of the civil works and wind farm operation;

Commercial organizations:

Power 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);
- State Labour Inspectorate (Panstwowa Inspekcja Pracy);
- Construction Inspectorate (Inspektorat Nadzoru Budowlanego);
- Voivodeship Marshalls (Marszałek Województwa);
- State Sanitary and Epidemiological Inspectorate (Państwowy Inspektorat Santarno-Epidemiologiczny);
- Local, self-governmental administration (i.e. Żuromin Commune Office, Kuczbork-Osada Commune Office and commune villages offices);
- Road administration at commune, county, Voivodeship and national level;
- Police;
- Fire brigades;

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Non-Governmental Organizations:

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

Organizational stakeholders:

- Contractors and subcontractors executing the works of the investment plan;
- Equipment suppliers;

Lenders:

International Finance Institutions which may consider financing the project.

4.2 Stakeholder Characteristics

Characteristic of the stakeholders is provided in the following table:

On station and to that			
Societies and individuals			
Residents of places where investment works will be implemented	The project is being developed in Żuromin and Kuczbork-Osada municipalities (i.e. Gościszka, Kuczbork, Olszewo, Zielona in Kuczbork-Osada commune and Kliczewo Małe, Kosewo, Sadowo, Cierpigórz, Chamsko, Dębsko, Olszewo, Kliczewo Duże, Franciszkowo and Wólka Kliczewska in Żuromin commune), which occupy app. 254 km² (i.e.132 km² Żuromin commune and 122 km² Kuczbork-Osada commune) and have app. 20,000 inhabitants.		
Land owners of investment sites			
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.		
Residents and institutions along transport routes during construction	The following villages have been identified as the most likely affected by the increased traffic during construction works: Kuczbork –Osada, Olszewko, Kliczewo Duże, Olszewo, Dębsk and Chamsk. No vulnerable institutions have been identified to be located in these villages by the transportation routes.		
Commercial organizations			
Distribution System Operator	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 ENERGA Operator S.A. o/ Płock Ul. Wyszogrodzka 106 09-400 Płock Tel.: 24 266 52 00 Fax.: 24 266 52 02 operator.plock@energa.pl		

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Administrative Stakeholders			
Ministry of Economy / Ministry of Environment / Ministry of Transport, Engineering and Marin Economy	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	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	Ministerstwo Transportu, Budownictwa i Gospodarki Morskiej. 00-928 Warszawa ul. Chałubińskiego 4/6 Tel.: 022 6301000, Fax.: 022 6301116 info@transport.gov.pl www.transport.gov.pl
Voivodeship Office	Mazowiecki Urząd Wojewódzki w Warszawie pl. Bankowy 3/5 00-950 Warszawa Tel.: 22 695 63 64 Fax.: 22 695 66 87 www.mazowieckie.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		
GDOŚ /General Directorate of Environmental Protection/ RDOŚ /Regional Directorate of Environmental Protection/	Generalna Dyrekcja Ochrony Środowiska w Warszawie ul. Wawelska 52/54 00-922 Warszawa e-mail: kancelaria@gdos.gov.pl Regionalna Dyrekcja Ochrony Środowiska w Warszawie ul. H. Sienkiewicza 3, 00-015 Warszawa Tel.: 22 556-56-00 Fax.: 22 556-56-02 e-mail: rdos.warszawa@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		
Construction Inspectorate /Inspektorat Nadzoru Budowlanego/	Główny Urząd Nadzoru Budowlanego ul. Krucza 38/42 00-926 Warszawa Fax.: 22 661-81-42 Powiatowy Inspektorat Nadzoru Budowlanego ul. Lidzbarska 27 09-300 Żuromin Tel. 23 657 31 37		
State and Province Sanitary and Epidemiological Inspectorate	Wojewódzka Stacja Sanitarno-Epidemiologiczna w Warszawie ul. Żelazna 79, 00-875 Warszawa Tel.: 22 620 90 01 do 06 sekretariat@wsse.waw.pl		

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	Powiatowa Stacja Sanitarno Epidemiologiczna w Żurominie ul. Przemysłowa 10, 09-300 Żuromin Tel.: 23 657 22 17 Fax.: (0-23) 657 38 88 http://www.zuromin.psse.waw.pl/		
Voivodeship Marshall	Urząd Marszałkowski Województwa Mazowieckiego w Warszawie ul. Jagiellońska 26, 03-719 Warszawa Tel.: 22 5979-100 Fax.: 22 5979-290 e-mail: urzad_marszalkowski@mazovia.pl		
Local, self-governmental administration	Urząd Gminy i Miasta Żuromin Pl. J. Piłsudskiego 3 09-300 Żuromin Tel.: 23 657 25 58, Fax.: 23 657 25 40 e-mail: ugimz@go2.pl Urząd Gminy w Kuczborku-Osadzie, ul. Mickiewicza 7, 09-310 Kuczbork, Tel./fax.: 23 657 62 59 Starostwo Powiatowe w Żurominie Pl. J. Piłsudskiego 4, 09-300 Żuromin Tel.: 23 657-47-00, Fax.: 23 657-35-35 e-mail: zuromin-powiat@home.pl		
Road Administration	Generalna Dyrekcja Dróg Krajowych i Autostrad ul. Żelazna 59 00 - 848 Warszawa tel. (+48 22) 375 88 88 email: kancelaria@gddkia.gov.pl Mazowiecki Zarząd Dróg Wojewódzkich w Warszawie ul. Mazowiecka 14, 00-048 Warszawa Tel.:22 244 90 00 do 12 Fax: 22 244 90 13 e-mail: dyrekcja@mzdw.pl Powiatowy Obwód Dróg ul. Warszawska 32 09-300 Żuromin Tel.: 23 657 23 19 e-mail: podzuromin@wp.pl		
Police	Police stations at Voivodeship, county and commune level.		

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Fire brigades	Fire brigades stations at Voivodeship, county and commune level.				
Non-Governmental Organiz	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			
Local ecological NGOs	None identified.				
Organizational stakeholder	rs				
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.				
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 and other commercial banks providing financial service to the company				

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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.

Disclosure of project related information will be arranged following the legal requirements as well as the international standards of project development and internal POLENERGIA standards.

The disclosure of project related information is required by law in the following circumstances:

- while applying for environmental decision for the projects which significantly affect the environment or may significantly affect the environment, or, which may affect Natura 2000 zones;
- while applying for a building permit if another EIA is required by the authorities; however based on issued environmental decisions, repetition of the EIA procedure is not required while applying for a building permit;
- in reaction to requests of the environmental control authorities if significant breaches
 of the environmental law or permit conditions were indicated by such authorities.

The company will strictly follow legal requirements for disclosure of information.

In order to meet the highest international standards, the company will also implement the additional transparency procedures of information disclosure. These will comprise:

- presentation of the projects on the company web page (<u>www.polenergia.pl</u>), which will include (but not be limited to): environmental impact assessment reports (in Polish) non-technical summary (in English and Polish), Stakeholder Engagement Plan (in English and Polish), Environmental and Social Action Plan (in English and Polish), Supplementary Report and Shadow Flicker study (both in English and Polish), copies of administrative decisions, and a grievance form for complaints. The web page will be updated on regular basis;
- presentation of the Annual EHS reports of the company environmental, social, and health and safety practices and performance on the company web page;
- at the discretion of the company, PR actions in local newspapers (e.g. in Kurier Żuromiński) and nationwide, radio (e.g. Polish Radio programs 1 and 3) and TV (e.g. TVP1, TVP2, Polsat, TVN);
- active participation in public consultation process arranged and managed by the administrative stakeholders;
- the company will communicate directly with interested stakeholders, as appropriate,:

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 distribution of the project related information among the own employees and employees of the daughter companies through internal mechanisms.

Following good international practice the company will arrange public consultations with the residents of Żuromin, Kuczbork and all villages in the project influence area, as well as any other interested stakeholders. Such consultations are preliminarily planned for the second half of November 2014. Although the details of consultation process have not been determined yet it is planned to organize them in a form of meetings with the residents at the consultation points arranged in such places as village's common rooms. During consultations, the representatives of the company and experts will clear any doubts that may be of concern for the participants. The copies of the project information package, as presented in the first item above, will be available for review.

As the detailed locations and dates are not known yet, in due advance the Company will inform the local societies about planned consultations. The relevant information will be distributed via local press (Kurier Żuromiński) internet and written notifications. Notices about consultations will be posted on the Company and Commune Offices' webpages and on the Communes' information boards in the Offices and the villages.

The project information package will be also available for review in the Commune Offices in Żuromin and Kuczbork-Osada, which has already been agreed upon between Polenergia and the Commune Offices. The Communes appointed the following as the contact persons (for address details please refer to section 4):

Żuromin:

Head of the Department of Infrastructure, Construction, Spatial Planning and Environment Protection.

Ms. Marianna Budzińska

e-mail: budownictwo.zuromin@gmail.com

direct phone: 23 652 25 58 int. 42

Kuczbork-Osada

Mr. Andrzej Koper

e-mail: andrzej.koper@ugkuczbork.pl direct phone: 23 657 26 37 int. 25

6 Stakeholders Engagement Program

The consultation with the stakeholders will be conducted by the Mrs. Marta Porzuczek, of EHS Department with co-operation with the Company Managers . For contact details please refer to section 7.

Consultations with the administrative stakeholders will follow the project planned time schedule. The objective of the consultation plan is to inform stakeholders in advance of the planned project milestones, i.e. commencement and completion of the construction works and to manage any questions or concerns. Commencement of the construction works will depend on availability of project financing by the lenders.

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 among others:

- Environmental Impact Assessment reports in Polish,
- Stakeholder Engagement Plan in English and Polish;
- Environmental and Social Action Plan in English and Polish;
- · Non-technical summary in English and Polish;
- Supplementary report in English and Polish;
- Shadow flicker study report in English and Polish
- Administrative decisions related to the project in Polish;
- Annual project-related reports in English and Polish;

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.

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	
Directly or indirectly influenced by the Program				
Residents of places where investment works will be implemented	Company and local administration websites. Information boards at the commune offices. Local press (e.g. Kurier Żuromiński) Direct contacts initiated by	Commencement and completion of the construction works and in reaction to submitted grievances during and after the	The Company Commune administration	

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	residents	investment process	
Land owners of investment sites	Company and local administration websites Direct contacts with residents	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
Residents and institutions along transport routes during construction	Company and local administration websites. Communal information boards at affected villages of: Kuczbork –Osada, Olszewko, Kliczewo Duże, Olszewo, Dębsk and Chamsk.	Prior commencement and during construction works.	The company. Commune administration.
	Local press (e.g. Kurier Żuromiński)		
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 Stakeholde	rs		
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

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Construction Inspectorate /Inspektorat Nadzoru Budowlanego/ Consultation meetings information, exchange documentation and correspondence regard 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
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 Organi	izations	1	,
NGOs – birdlife associations local and international, local ecological NGOs Company website, information meetings, and answers to direct questions or complaints		During the project lifetime	Project Managers Environmental Specialist
Organizational Stakeholde	ers		
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
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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

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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, which is Grupa PEP-Farma Wiatrowa 3 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 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.

The company will inform the local authorities in the communes about the grievance mechanism and provide them with contact details on which grievances can be submitted. All grievances should be addressed to:

Marta Porzuczek Environmental and Health&Safety Specialist 24/26 Krucza Str., Warsaw

Phone: +48 22 522 38 00

e-mail: Marta.Porzuczek@polenergia.pl

and/or

Marcin Lohmann Operation and Maintenance Wind Farms Manager 24/26 Krucza Str., Warsaw

Phone: +48 22 522 38 00

e-mail: Marcin.Lohmann@polenergia.pl

and/or

Tomasz Klimek Implementation and Operational Wind Farms Manager 24/26 Krucza Str., Warsaw

Phone: +48 22 522 38 00

e-mail: Tomasz.Klimek@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. The grievance form and description of the grievance mechanism will be also available in the office of local authorities and after completion of the construction works also at the sites.

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Table. Proposed Public Grievance Form.

Reference No:		
Full Name		
Contact Information	☐ By Post: Please pro	ovide mailing address:
Please mark how you wish to be contacted (mail, telephone,		
e-mail).	☐ By Telephone:	
	☐ By E-mail	
Preferred Language for	Polish	
communication	☐ English	
	_ English	
Description of Incident or Grie		What happened? Where did it happen? Who did it happen to?
		What is the result of the problem?
Date of Incident/Grievance		
		cident/grievance (date)
		nore than once (how many times?)
	On-going (ca	urrently experiencing problem)
777 . 11 111		
What would you like	o see happen to resolve th	e problem?

8 Monitoring

The SEP will be monitored by a person assigned by the company management.

9 Resources and Responsibilities

This SEP will be implemented by the employees of the company and with allocation of the company resources.

Responsibility for the plan implementation will bear Mrs. Marta Porzuczek of EHS Department.

10 Timetable

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

- Application for the building permit in the middle of October 2014;
- Project Disclosure Package posting on the company website by October 16, 2014 (60 days before decision on financing from International Finance Institutions).
- Public consultations at the wind farm sites will be arranged in late November 2014.
 Information on the consultations will be announced in advance at the information boards of the communes, on the communes' web pages and in local newspapers.
- 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 2015.
- Presentation of EH&S reports on the facilities performance on annual basis, starting a year following commissioning of the first wind farm.

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