Stakeholder Engagement Plan (SEP)

PREPARED FOR
Tenevo Solar Technologies EAD

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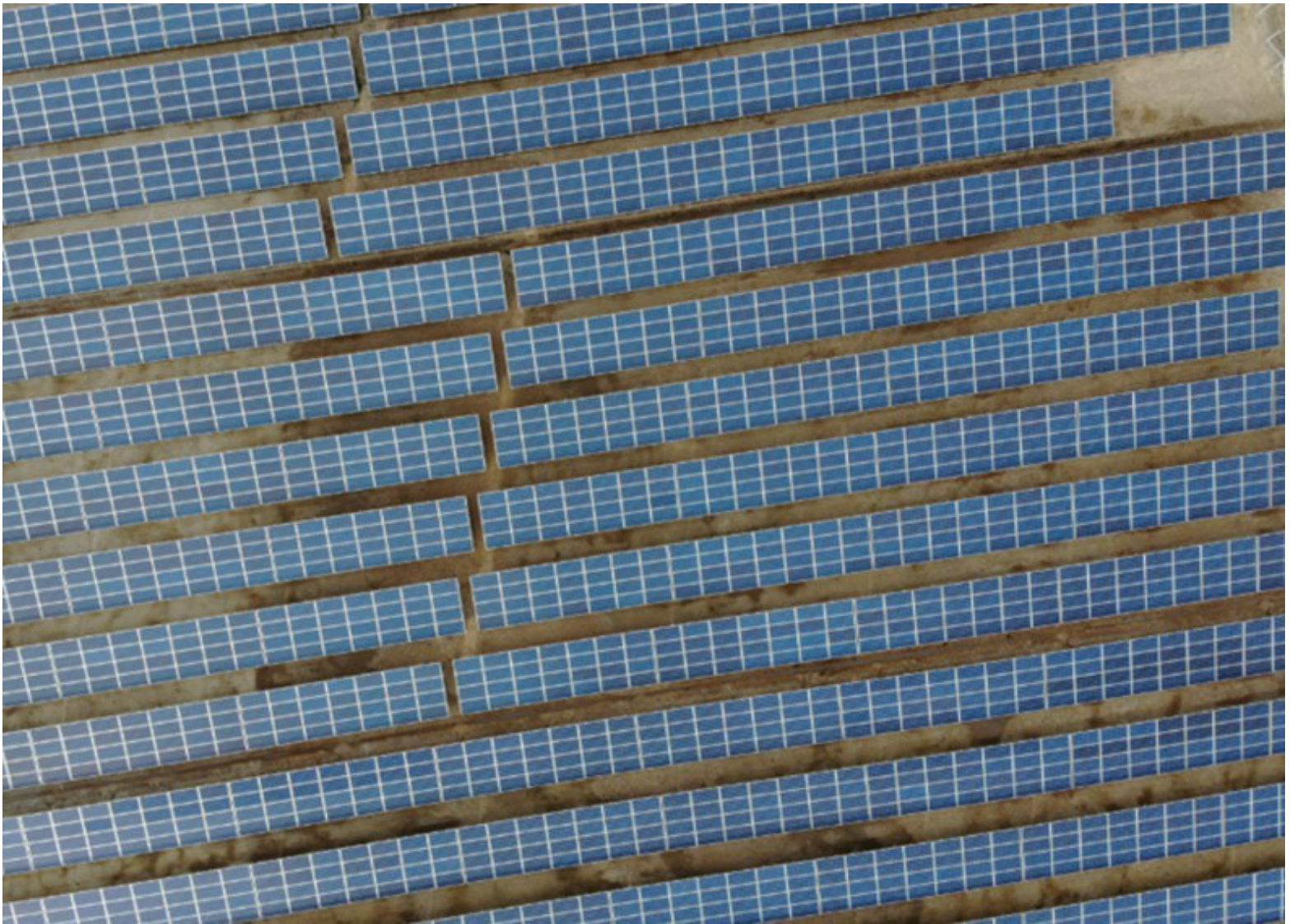

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
E&S	Environmental and Social
ESAP	Environmental Social Action Plan
MV	Medium-Voltage
PV	Photovoltaic
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

1.1 BACKGROUND

This document represents the Stakeholder Engagement Plan (SEP) for the 237.58 MW solar photovoltaic (PV) power plant project (the Project), developed by Tenevo Solar Technologies EAD (the "Company").

The Project is located in South-East Bulgaria, near Tenevo Village, Yambol region.

The proposed PV Plant comprises two interconnected plots, northern and southern, connected by a 3 km 33 kV underground cable. A substation, situated 80 m south of the southern plot, links to the grid through two 400 kV overhead lines, tying into an existing 400 kV line 60 m south of the substation for efficient power distribution.

Tenevo BESS Phase I is a 65 MW / 260 MWh BESS. The project has a signed subsidy agreement under procedure BG-RRP-4.033 „ BG-RRP-4.033 - "Support of new capacities for the production of electricity from renewable sources and storage of electricity with an installed capacity of more than 200 kW" (Procedure BG-RRP-4.033) which is Investment C4.I6 „Support for new capacities for electricity production from renewable sources and electricity storage" under the Recovery and Resilience Plan.

All equipment has been delivered on site, installation works are complete, and the BESS project is in testing mode. The BESS project has been contractually structured with three separate agreements (see below):

1. Supply agreement between Tenevo Solar Technologies EAD and Hithium Energy Storage Technology Deutschland GmbH, for project Tenevo S, Bulgaria, Bulgaria BESS (33kV) 65MW / 260MWh - Hithium ∞ Block L5016-0.5P V2.0.

2. Contract for the supply, construction and putting into operation of BESS between Tenevo Solar Technologies EAD and PROMENERGOMONTAZH AD.

3. Contract between Tenevo Solar Technologies EAD and Solarpro Technology AD for project and site management services, preparation of detailed executive design of the BESS and delivery, installation, integration and testing of SCADA EMS System.

1.2 SCOPE OF THIS SEP

In line with international good practice, the Company recognizes that stakeholder engagement represents the basis for building constructive and strong relationships with all interested parties.

The Company's commitment to effective engagement translates in an ongoing process that involves different elements such as stakeholder analysis, planning, consultation and participation, grievance management and ongoing reporting to affected communities, scaled to each phase of the Project.

The approach presented in this SEP builds on public engagement provisions of Bulgarian legislation and is guided by the international good industry practice. The SEP outlines the Company's commitments and strategy in terms of engaging external stakeholders during Project construction and operation.

The SEP is a living document and will be updated and amended as the Project progresses and outcomes of engagement conducted are integrated in the decision-making process.

1.3 STAKEHOLDER ENGAGEMENT PRINCIPLES

The key principles guiding the Company's approach to stakeholder engagement in relation to the Project are:

- to be open and transparent with stakeholders, engaging in an open process and providing meaningful information on relevant aspects;
- to be accountable and willing to accept responsibility as Company and to account for impacts associated with the Project activities;
- to have a relationship with stakeholders that is based on trust and a mutual commitment to acting in good faith;
- to respect stakeholders' interests, opinions and aspirations;
- to work collaboratively and cooperatively with stakeholders to find solutions that meet common interests;
- to be responsive and to coherently respond in good time to stakeholders;
- to be pro-active and to act in anticipation of the need for information or potential issues, trying to manage risks before they occur by offering opportunities for dialogue;

- to engage with stakeholders such that they feel they are treated fairly, and their issues and concerns are afforded fair consideration;
- to be inclusive and accessible to stakeholders, including vulnerable and minority groups, so that they feel able to participate, to receive and understand information, and to be heard.

1.4 STAKEHOLDER ENGAGEMENT OBJECTIVES

The generic stakeholder engagement objectives of the Company with respect to this Project are summarized in Table 1-1 below.

TABLE 1-1 STAKEHOLDER ENGAGEMENT OBJECTIVES

Objective	Rationale
Identify Project stakeholders	Identify and categorize individuals or organizations that may be affected by the Project or have an influence on how the operations are run or the Project is implemented, noting that this is an ongoing process which may change throughout the life cycle of the Project.
Distribute accurate information in an open and transparent manner	Ensure that stakeholders, particularly those directly affected by the Project, have all relevant information available to them, to enable them to make informed comments and plan for the future. This helps reduce levels of uncertainty and anxiety. Information should allow affected parties to develop an understanding of potential impacts, risks and benefits and an open and transparent approach is central to achieving this aim.
Form partnerships to promote constructive interaction between all parties and create benefit-sharing opportunities	Develop relationships of trust between the Project and stakeholders to contribute to proactive interactions and avoid, where possible, unnecessary conflicts based on rumor and misinformation. Identifying structures and processes to deal with conflicts and grievances from early stages allows the Company a better understanding of stakeholder concerns and expectations, thereby providing opportunities to increase the Company's value to local stakeholders.
Record meetings outcomes and address public concerns, issues and suggestions	Document stakeholder issues, concerns, and comments to allow the rationale for Project decisions to be tracked and understood. Records also assist during reviews and audits of the Project, in identifying thematic issues, which may need a more holistic response, and during follow up engagement with the affected people.
Manage stakeholders' expectations	Expectations, both positive and negative, may not be aligned with the realities of the Project. Ensuring that expectations are kept at realistic levels (e.g. around job opportunities; provision of local infrastructure; community investments; and disruption) limits disappointments and frustrations of directly affected parties at later stages of project implementation, and therefore mitigates the potential for conflict with stakeholders.
Fulfil national and international requirements for consultation	Ensuring compliance can avoid potential business interruption risks and project delays based on procedural issues rather than substantive ones and

Objective	Rationale
	contribute to obtaining the social license to operate and building effective and trustful relations with stakeholders.

2. BRIEF PROJECT DESCRIPTION

The Project is located near Tenevo Village, Yambol region in South-East Bulgaria. The Project location is represented in Figure 1 overleaf.

The proposed PV Plant consists of two individual sites ("the northern PV Plant plot and "the southern PV Plant plot") that will be interconnected via an underground medium voltage (MV) cable. The two PV Plant plots will be interconnected via a 33 kV underground cable with a total length of approximately 3 km.

The Project will also comprise a substation located approximately 80 m to the south of the southern plot.

The southern PV Plant site, consisting of two individual land plots with a total area of approximately 265 ha, is a former dual-use (military and agricultural) airfield.

The northern plot, with an area of approximately 17 ha, while formerly owned by the Ministry of Defence and formally zoned for transport infrastructure land use, was previously used for agricultural cropping.

The substation site with an area of approximately 10 ha, was previously occupied by a poultry farm, currently demolished. The substation site will comprise a 33/400 kV Project substation as well as a 400 kV substation and switchyard to be built as part of the Project but subsequently transferred to the Transmission System Operator (TSO) who will own and operate it. The substation site also accommodates the land area required for a future 400/110 kV step-down substation and associated 110 kV switchyard. This land area was provided by the Project Developer, as contractual condition, for a potential future expansion by the ESO and is not part of the Project.

The project connection to the grid is ensured via two short 400 kV overhead lines, tying into an existing 400 kV line, approximately 60 m south of the substation site. Two poles will sustain each of the two overhead 400 kV power lines in length of approximately 73 m (western branch) and 68 m (eastern branch). The grid connection overhead lines, each supported by a pole to be build as part of the Project, will pass over agricultural land in the immediate site vicinity.

FIGURE 1-1 PROJECT LOCATION

3. NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

3.1. BULGARIAN NATIONAL REGULATIONS

3.1.1 BULGARIAN CONSTITUTION

The following are main national laws and regulations governing the legal context of the Project, in terms of public consultation

Article 55 of Chapter II of Bulgarian Constitution guarantees the right to a healthy environment:

- the Citizens have the right to a healthy and favorable environment corresponding to the established standards and norms.
- The Citizens have the right to protect the environment.
- The State shall ensure the protection and reproduction of the environment, the conservation of living Nature in all its variety, and the sensible utilization of the country's natural and other resources.

According to Bulgarian Environmental Protection Act, anyone shall have the right of access to available information relating to the environment without having to prove a specific interest.

Based on article 19 of the Bulgarian Environmental Protection Act, "Information relating to the environment" shall mean any information in written, visual, aural, electronic, or other physical.

3.1.2 BULGARIAN PERMITTING REGULATIONS

In Bulgaria, disclosure of project information and public consultation in decision-making for investment projects is regulated by several laws, regulations and guidelines, including:

- Environmental Protection Act (full transposition of the EUEIA Directives) – 2002 (last amended 2010)
- Ordinance on the conditions and procedures for the Environmental Assessment of Plans and Programmes – 2004 (last amendmended 2010).

3.2 INTERNATIONAL REQUIREMENTS

3.2.1 AARHUS CONVENTION

The Aarhus Convention (signed in 1998 and entered into force in 2001) was ratified by Bulgaria in 2003. The Convention establishes several rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional, or local level) will contribute to these rights becoming effective. The Convention provides for the following:

- The right of everyone to receive environmental information that is held by public authorities ("access to environmental information"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession.
- The right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organizations to comment on, for example, proposals for projects affecting the environment, or plans and programs relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("public participation in environmental decision-making").
- The right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").

3.2.2 EU DIRECTIVE 2003/35/EC FOR PUBLIC PARTICIPATION

The European Parliament and Council Directive 2003/35/EC provides for public participation regarding drawing up certain plans and programs relating to the environment. According to this Directive, Member States shall ensure that:

- "The public is informed, whether by public notices or other appropriate means such as electronic media where available, about any proposals for such plans or programs or for their modification or review and that relevant information about such proposals is made available to the public including inter alia information about the right to participate in decision-making and about the competent authority to which comments or questions may be submitted;

- The public is entitled to express comments and opinions when all options are open, before decisions on the plans and programs are made;
- In making those decisions, due account shall be taken of the results of the public participation;
- Having examined the comments and opinions expressed by the public, the competent authority makes reasonable efforts to inform the public about the decisions taken and the reasons and considerations upon which those decisions are based, including information about the public participation process".

3.2.3 THE EBRD ENVIRONMENTAL AND SOCIAL PERFORMANCE REQUIREMENTS

The EBRD Environmental and Social Performance Requirements (PRs) are relevant in the context of a potential finance of the Project by the EBRD.

The EBRD PRs are considered a benchmark for good practice for environmental and social risk management in private sector developments. The PRs require that clients engage affected communities through disclosure of information, consultation, and informed participation, in a manner that is meaningful for stakeholders and commensurate with the risks to and impacts of the Project on the affected communities.

The EBRD PRs include specific guidance on conducting stakeholder engagement throughout the project lifecycle. Stakeholder engagement requirements are outlined in PR10 (EBRD): Information Disclosure and Stakeholder Engagement. The key requirements for consultation and disclosure through the life of the project are summarized in Box 3-1 below (Environmental and Social Policy 2019).

Box 3-1 Outline of EBRD PR 10

Stakeholder Identification, Analysis and Engagement Planning

Stakeholder engagement is an on-going process that may involve, in varying degrees, the following elements: stakeholder identification, analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and on-going reporting to Affected Stakeholders.

Disclosure of Relevant Project Information

Information should be provided to stakeholders on relevant aspects of the project:: (i) the purpose, nature, scale and duration of the project activities; (ii) risks to, and potential impacts on, stakeholders and proposed mitigation plans; (iii) the envisaged stakeholder engagement process, if any, and opportunities and ways in which the public can participate; (iv) the time and venue of any envisaged public consultation meetings, and the process by which meetings are notified, summarized and reported; and (v) the process by which any grievances will be managed.

Meaningful Consultation

Consultation will be in line with the degree of impact of the Project and will be: (i) inclusive and culturally appropriate; (ii) free of external manipulation, interference, coercion or intimidation; (iii) depending on the nature and scale of the project's potential adverse impacts on affected communities; (iv) begin early as possible and continue throughout the project, and (v) be documented.

Informed Consultation and Participation

Disclosure and consultation requirements will be embedded into each stage of the Project development, leading to the client's incorporating into its decision-making process the views of the affected parties on matters that affect them directly, such as proposed mitigation measures, the equitable sharing of benefits and opportunities from projects, and implementation issues. The process should be documented, in particular the measures taken to avoid or minimize risks

to and adverse impacts on the affected stakeholders. The stakeholders should be informed about how their concerns have been considered. In addition, the consultation process must meet any applicable requirements under national environmental impact assessment laws and other relevant legislation.

Engagement During Project Implementation and External Reporting

The Company will provide information to identified stakeholders, on an ongoing basis, appropriate to the nature of the project and its adverse environmental and social impacts and issues, and the level of public interest throughout the life of the project. In addition, clients are encouraged to make publicly available periodic reports on their environmental and social sustainability.

Grievance Mechanism

Establish a grievance mechanism, process, or procedure, to receive and facilitate resolution of affected stakeholders' concerns and grievances about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and potential adverse impacts of the project.

On-going Reporting to Affected Stakeholders

Provide periodic reports to the affected stakeholders that describe progress with implementation of the project Action Plans on issues that involve on-going risk to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism have identified as a concern to those stakeholders.

4. SUMMARY OF PREVIOUS ENGAGEMENT FOR THE PROJECT

Stakeholder engagement in relation to the Project was performed as part of the Project permitting process and consisted in interaction with the relevant authorities as part of the permitting procedures. Further, direct engagement with the owners and administrators of the land plots affected by the Project was conducted for securing the land rights for Project construction and for the placement of the grid connection cable.

Public information disclosure was performed as part of the Project construction permitting process, in line with the national regulations. Formal Project information disclosure entailed the publication on the environmental authority's website of a document describing the Project and its associated potential environmental impacts. The information was available on the public domain at the permitting stage, for a period of 14 days, in line with the regulatory requirements on public access to information. No public comments were received as result of Project information disclosure.

5. PROJECT STAKEHOLDERS IDENTIFICATION AND ANALYSIS

The objective of stakeholder identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively) or have an interest in the Project or activity.

Stakeholder groups and communication methods identified to date are included in Table 2 below. The communication methods will be tailored depending on each stakeholder group in order to allow adequate information disclosure and enable participation in the decision-making process.

The Company will review, amend, and further detail the identification and analysis of stakeholder groups (based on the in-depth knowledge of local context and stakeholder relationship with the Company and the Project) with the aim of allowing understanding of:

- why each stakeholder group is relevant to the Company, what is their influence, interest in, and impact on the Project/ Company activities;
- stakeholder groups that may be differentially or disproportionately affected by the Company activities due to their vulnerabilities and may have different concerns and priorities about the impacts, mitigations, and benefits.

TABLE 2 STAKEHOLDER GROUPS, ANALYSIS AND COMMUNICATION METHODS

Stakeholder Category. Analysis	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
National Regulatory Authorities National Government is of primary importance to the business and/or projects/activities in terms of establishing policy, granting permits or other approvals, and monitoring and enforcing compliance with Bulgarian regulations throughout all stages of the Project life cycle.	• National Government • Key Ministries • National Regulatory bodies • Government Agencies and Institutions •	• Ministries and Government Agencies with responsibilities in regulating the Project	Communication with authorities will follow established procedures in line with Bulgarian regulations. The communication should take place through the following channels: • online portals and interfaces established for formal communication and reporting of Project-related data • official reports, letters, phone or email, • meetings with the authority representatives,	• Energy Policy Alignment • Regulatory Compliance • Economic Impact
Local Administration Bodies Local government and administration bodies are of importance to the business and Project as they are responsible for implementation of legislation, and development plans and policies at local level. In addition, the municipalities in the Project area are to be kept informed of Project implementation progress to consider the Project activities in their policy-making, regulatory and other duties and activities.	• Country and • Municipal authorities	• Local government Offices • Municipality Offices • City Mayor • Villages Mayors	Communication with local Government and Municipalities will follow established procedures in line with Bulgarian regulations. The communication will take place through available channels: official letters, meetings with the administration representatives phone and email.	• Local Economic Development • Infrastructure Development • Community Welfare

Stakeholder Category. Analysis	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
Project-affected People and Communities Land owners/users and communities directly or indirectly affected by the project and/or activity. This includes owners/users of land affected by the Project in relation with installation (and later on maintenance) of grid connection cable, residents and land users along the grid connection route and Project site potentially affected by Project construction and Project-related activities	• Land-affected stakeholders • Residents of settlements where Project construction workforce is accommodated, particularly those nearby facilities used for workforce accommodation. • Other local population affected in some form by the Project	• Land owners/users directly-affected by the Project • Land owners/users of land nearby Project site and grid connection route • Residents in areas along grid connection route. • Community members who use access roads to access nearby natural resources • Residents of settlements located near roads used for project activities, such as transporting materials during construction and operation, contractor and supplier vehicles • Social / public infrastructure and service companies	• Land owners/users directly-affected will be informed individually of the initiation of the construction activities affecting their land plots upfront the works initiation. Communication will be through personal meetings, letters, telephone and other direct means of communication. • Communication with other local residents of municipalities affected will be performed through local municipality and village councils, or other relevant bodies. This will differ depending on location, rural/urban setting, and types of impacts and interest levels. • Distribution of flyers briefly explaining the Project, informing on execution schedule and providing contact information for direct contact with the Project. • Local communication will focus on disclosure of routine information, meetings with relevant authorities and councils, and implementation of the grievance mechanism.	• Land Use and Compensation • Project schedule • Employment opportunities
Vulnerable Persons/Groups	Vulnerable groups	• Female-headed households, including single mothers, widows, and single	• Once the Company identifies vulnerable groups and/or individuals, these will be engaged with to	• Social Impact

Stakeholder Category. Analysis	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
Vulnerable groups may be affected by the Project by virtue of their physical disability, social or economic standing, limited education, lack of employment or access to land. Appropriate engagement practices and tools will be adopted to ensure the identification of vulnerable groups and their adequate access to information and participation.		women without children. Women, in general, should be considered as a potential vulnerable group • Unemployed youth, reliant on other household members, which means that youth are often disenfranchised • Elderly and orphans • Disabled persons	identify any specific information or consultation needs in order to take any concerns or impacts into account. Communication is to be tailored based on their needs and will include face-to-face meetings, phone, email/ mail communication. • Dedicated CSR campaigns for vulnerable groups are implemented throughout the year. •	
Non-Governmental Organizations (NGOs) and civil society NGOs with direct interest in the Project and/or activity & associated facilities and their social and environmental aspects and that are able to influence the project and/or activity directly or through public opinion.	▪ Local, National NGOs	Identification of relevant local NGOs	• Project website • Formal consultation mechanisms. • Meetings • Letters • Email • Phone	• Environmental Sustainability • Community Health and Safety • Regulatory Compliance
Other interest groups Municipal and national level media will typically have a higher level of influence over the project and may be leveraged to influence local stakeholders' perceptions of the Project.	• Media	• Municipal, local- and national radio stations • Municipal and national newspapers • TV stations • Internet	Communication with the media will be done through the Company website, press releases, and newspaper announcements.	• Transparency • Public Perception
Internal Stakeholders	• Employees and contractor staff	• Employees • Contractor staff	Engagement with these groups is subject to different plans	• Workplace Safety • Project Success

Stakeholder Category. Analysis	Stakeholder Group	Stakeholders	Communication Method	Stakeholders' interests
Groups or individuals who work within the Company.	• Company shareholders	• Shareholders	and procedures, including information disclosure and grievance mechanism. They are not covered in this document. • General Meeting of Shareholders • Financial reports • Letters • Internal meetings with the administration / Human Resource representatives • Internal releases • Posters • Internal competitions • Training courses. • Email • Phone	•
Business Environment Businesses and individuals with direct interest in the project and/or activity e.g. running businesses or providing services and supplies to the Company.	• Contractors and subcontractors (construction, maintenance, consulting and engineering services providers, installations and equipment suppliers) • Suppliers • Project Developers and Investors	• Construction contractors • Maintenance contractors • Equipment and spare parts suppliers • Other Businesses	Project website along with its log for registering requests of information from suppliers. The communication with potential partners will take place through the following communication channels: • meetings • tenders for the purchase of services or goods • letters, press releases • public events • email, phone.	• Project Success • Quality Assurance • Financial Return • Project Viability • Community Engagement

6. STAKEHOLDER ENGAGEMENT ACTION PLAN

This SEP addresses the engagement activities, the Project information disclosure and provides a high-level outline of the engagement to be implemented throughout all the phases of the Project.

For each phase, specific Engagement Action Plans will be developed as needed (and added as appendices to this SEP), to guide the Project stakeholder engagement during the respective activities, prior to their initiation.

The engagement objectives and the type of engagement activities to be performed at the various Project implementation stages are indicated in Table 6.1.

Table 6.2 provides a proposed Engagement Action Plan including action items for stakeholder engagement at different stages of the project lifecycle. This action plan will be amended as required for each project phase.

The proposed Stakeholder Engagement Action Plan will be further detailed and refined in order to:

- include further engagement activities intended to disclose information on project's E&S performance and potential impacts;
- enable stakeholders to understand the risks, impacts and opportunities of the project.
- feed back into communities at appropriate levels how stakeholders opinion and inputs were considered by the Company.

TABLE 6-1 ENGAGEMENT OBJECTIVES AND ACTIVITIES DURING EACH PROJECT PHASE

Project Phase	Engagement Objectives	Engagement activities
Construction	• inform Project-affected people (eg land owners/users) of Project activities impacting them • update stakeholders on progress, eg main construction milestones; • maintain social licence and consolidate trust; • manage expectations; • obtain requisite licences and permits; • receive, record and address stakeholder grievances;	• appointment of a Community Liaison Officer (CLO) and dissemination of contact details with the stakeholders; • direct contact with land owners/users affected by the Project to inform on scheduled works affecting them • regular announcements of key construction milestones/ major equipment deliveries impacting local traffic or causing potential utilities disruption; • dissemination of grievance mechanism and grievance forms;
Operation	• maintain social licence and consolidate trust; • manage expectations; • receive, record and address stakeholder grievances;	• update SEP for operation phase; • meetings / newsletter to report on Project E&S performance; dissemination of grievance mechanism information and grievance form; • meetings on community investment-related initiatives;

TABLE 6-2 ENGAGEMENT ACTION PLAN

Activity/Action	Target Stakeholders Groups	Purpose of activity/action	Timeframe	Responsibility
Construction Phase				
Appoint Community Liaison Officer to act as key contact person for external stakeholders	Local community	The Company will allocate Community Liaison Officer (CLO) responsibilities to a Bulgarian national, from the Project's team, with knowledge of local context. The CLO will be responsible for communicating all relevant information to the Project-affected people and local community and for managing the grievance mechanism (receiving, recording and resolving external grievances) and maintaining the grievance records.	Throughout all Project phases	Company
Establish the Project online information page or website	All stakeholders	Set up and maintain a Project website providing information on project progress, work schedules, online grievance forms, press releases, contact information and etc.	Maintained during the entire project cycle	Company/CLO
Set-up/disclose Project Information/Contact channels (e.g. telephone, email)	All stakeholders	Maintain communication channels during normal business hours available to all stakeholders. The details will be advertised via the communication channels described in this SEP.	Hotline will be available the entire construction and operational phase	Company/CLO
Disseminate grievance mechanism	All stakeholders	The Grievance mechanism, along with the grievance form (as included in this SEP) will be made widely available to the public, via the online and offline communication channels. Grievances can be raised directly with the CLO, in	Throughout construction and operation phases	Company/CLO

Activity/Action	Target Stakeholders Groups	Purpose of activity/action	Timeframe	Responsibility
		person, via the phone or by email (details specified above).		
Conduct tailored engagement activities	Affected land owners and users Vulnerable groups	Land-related comments and grievances may require additional engagement to ensure transparency and effective management of these impacts. If vulnerable groups are identified in the affected communities, the CLO will verify if special engagement measures are needed to enable their informed participation in the decision making process and take appropriate actions.	Throughout construction and operation phases	Company/CLO
Operation Phase				
Meetings and dissemination of Community Investment Initiatives	Local community	Community Investment initiative defined on annual basis and disclosed via Project website.	Ongoing	Company
Disclose information on environmental and social performance of the Project	All stakeholders;	Inform stakeholders of the project annual environmental and social performance and on community support initiatives via the Project website	Yearly	Company

7. COMMUNICATION AND ENGAGEMENT TOOLS

The consistent use of best practice tools that have been tailored to local context and stakeholders needs maximize the effectiveness of the engagement action plan.

The tools outlined in Table7-1, will be used across the different stages of the Project, benefitting from updates of the contents and messages as the Project progresses; these will be formulated as updates to this current SEP and be subject to management approval prior to dissemination.

TABLE 7-1 STAKEHOLDER COMMUNICATION AND ENGAGEMENT METHODS

Tool	Description
Project online information page or website	The Project website will provide relevant and up to date information regarding construction works and operational aspects. The Project NTS and SEP will be translated into Bulgarian and made available, online and offline, to all interested stakeholders. Alongside these documents, the External Grievance Form will be made available to the public.
Notice Boards	Notice boards will be erected at the entrance to the construction worksites and at other agreed locations (e.g. contractor workforce accommodation locations). The notice board will serve as an information dissemination tool. For example, the Project team will be able to display grievance mechanism contact details, work schedule, and recruitment opportunities with the Project as applicable. Wherever possible, visual aids will be employed to increase accessibility of the notices.
Information/Contact channels (e.g. telephone, email)	A serviced Project Information channels (telephone, email) will be available during normal business hours to all stakeholders.
Regular Internal Reporting	The CLO will report regularly to the Management team on engagement performed. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or non-compliances to the requirements of this SEP, planned activities for the next reporting period and any other issues of potential concern –see section 10 for further details.
Reporting to Stakeholders	The CLO will provide Project updates to different stakeholder groups at agreed timelines and following engagements conducted. Reports on environmental and social performance of the Project and on the community investment initiatives will be published on the Project website annually.

8. RESOURCES AND RESPONSIBILITIES

The overall responsibility for the effective engagement of the project stakeholders, as outlined in this SEP, lies with the Company's management team. To ensure continuous and systematic communication with stakeholders of the project, the Company designated a Community Liaison Officer (CLO).

The Community Liaison Officer (CLO) has overall responsibility for the implementation and updates of this SEP and for dealing with community relations, including the external grievance

mechanism. To achieve this, the CLO works closely with the Project team and contractors to achieve the engagement objectives outlined in this SEP.

CLO specific responsibilities

The specific responsibilities of the CLO are:

- act as liaison between the community/stakeholders and the Company; maintains regular presence in the affected communities and engagement with community members to monitor opinions, provide updates on Project activities and ensure communication with community members and vulnerable groups;
- lead day-to-day implementation of the SEP and Grievance Mechanism and manages the grievance resolution process; plans the stakeholder engagement activities and ensures they are appropriately implemented by Company and contracted staff;
- is responsible for ensuring grievance mechanism dissemination and training, communication, monitoring and reporting;
- take active role in the identification of community/stakeholder needs and assists in the successful development and implementation of the Company community investment initiatives for the Project;
- produce stakeholder engagement monitoring reports and updates the SEP accordingly.

Boyan Bakardjiev is acting as Project CLO and can be contacted trough the following communication channels:

- By telephone at: **+359 89 5557542**
- By email at: **tenevoworkersgrievance@tenevoproject.bg**

The contact details of the CLO will be made available to the contractors, local communities, and residents of the area in order to ensure that any grievances including related to environmental, social and H&S aspects of the wind farm can be easily communicated to the Company.

9. EXTERNAL GRIEVANCE MECHANISM

9.1 PURPOSE

The External Grievance Mechanism enables any stakeholder to file a grievance about the way the Project is being implemented. Grievances may take the form of specific complaints for damages/injury, concerns about routine Project activities, or perceived incidents or impacts.

For the Project-affected stakeholders, the grievance mechanism provides an accessible, yet formalised (identification, tracking and resolving of grievances) alternative to an external dispute resolution process. However, a stakeholder will always have the right to complain to the relevant authorities or the legal system, in accordance with the existing legislation in Bulgaria.

The grievance mechanism is tailored to the local context of the Project environment and has the aim of finding mutually beneficial solutions to settle issues and developing a trust-based Company-community relationship. The Company commits to process any grievance received in a timely manner, via a procedure that is transparent, culturally appropriate, at no cost, and without retribution for the party presenting the grievance.

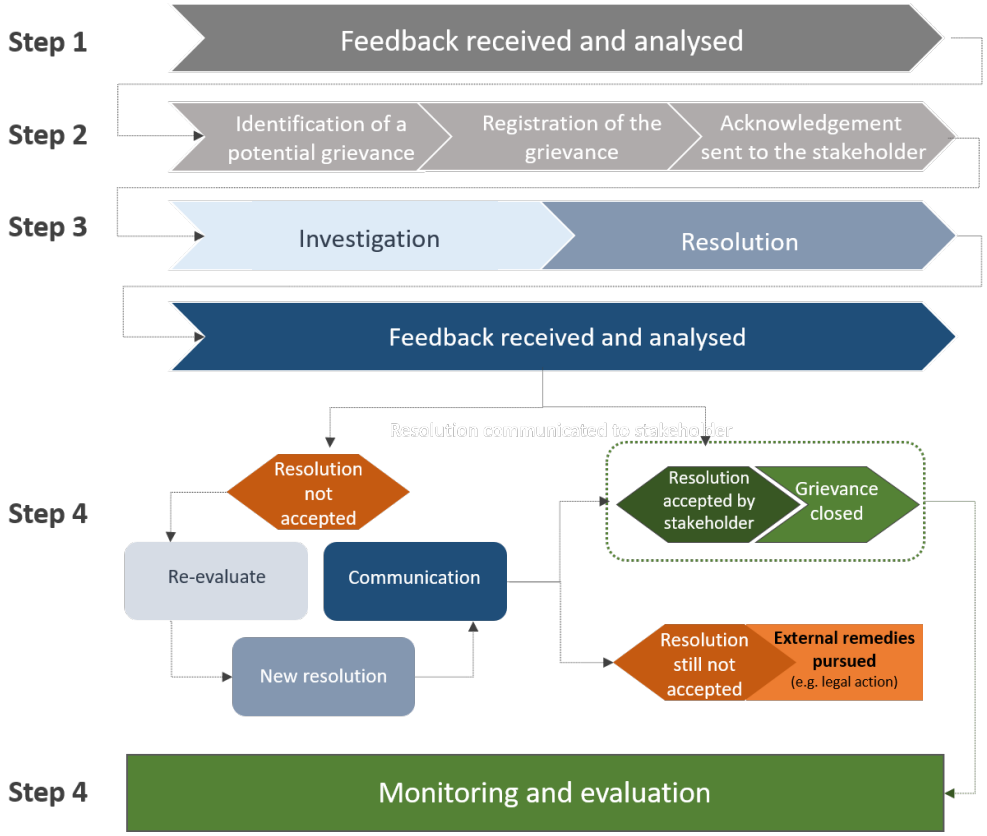
9.2 GRIEVANCE RESOLUTION PROCESS

The Company commits to process any grievance received in a timely manner, via a procedure that is transparent, culturally appropriate, at no cost, and without retribution for the party presenting the grievance.

The Grievance mechanism for the Project is structured as follows (please also see Figure 9 1 below):

- STEP 1: a grievance is recorded regardless whether it was received verbally or in writing, using the Grievance Form; it will be then registered in the Grievance Log/Database by the Community Liaison Officer. The grievance form and the Grievance Log are provided in Appendices A and B to this SEP;
- STEP 2: the CLO will formally acknowledge the receipt of the grievance to the complainant, in written form (within 7 days of receiving the grievance); if the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step;
- STEP 3: CLO will assess priority and assign responsibility for resolution: significant concerns and incidents will be immediately brought to the attention of management team; investigate the issue and identify resolution; CLO will then respond to the complainant with the proposed solution;
- STEP 4: CLO will follow up with the complainant and close out grievance; the overall process of closing a grievance will not exceed 30 calendar days as per the EBRD Guidance Note. Should the issue raised be complex and needing further investigation, the complainant will be notified of the time necessary to respond. Should the complainant not accept the resolution, legal remedies can be pursued.
- STEP 5. The CLO is responsible to monitor and evaluate the grievance procedure in line with Section 10.

FIGURE 9-1 GRIEVANCE MECHANISM FOR PROJECT CONSTRUCTION AND OPERATION PHASES



Source: ERM, 2022

10. MONITORING, EVALUATION AND REPORTING

10.1 OVERVIEW

In order to assess the effectiveness of this SEP and associated community engagement activities, the Company will implement a data management and monitoring process, as outlined in this section. This process will further support reporting to external stakeholders, as an integral step in building trust locally and generating shared value.

10.2 MONITORING AND EVALUATION ACTIVITIES

Stakeholder engagement activities will be documented and filed in order to ensure accountable delivery of commitments made to stakeholders.

The following documentation will be used and maintained by the Company during the Project execution:

Stakeholder dialogue log: Used to store, analyze and report on stakeholder dialogue activities. It will be populated with details on information presented, audience questions, Company responses and actions, and meeting evaluation results, when appropriate. The database will also be used to track frequency of meetings over the life of the Project.

Meeting minute template: used to collect meeting minutes; to be filed within the stakeholder database and SEP updates.

Stakeholder list: ongoing updates to the list, including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified.

Grievance log will record all grievances received, management actions taken and whether it has been closed out to the complainant satisfaction.

Records will be reviewed on a quarterly basis to ensure these are being used and maintained. Commitments and actions recorded during stakeholder interaction activities will also be regularly reviewed to ensure they are taken forward.

10.3 REPORTING TO STAKEHOLDERS

10.3.1 INTERNAL REPORTING

The following internal reports will be developed:

- Red Flag Reports: weekly or daily reports for urgent items (e.g. critical concerns or grievances) or incidents of significant nature. These red flag reports will be prepared by the CLO and sent to the Company management team. The Grievance Mechanism will set the level of incident to be communicated in the red flag reports together with reporting time requirements.
- Quarterly Progress reports: internal quarterly progress reports will be prepared by the CLO. These reports will review:
    - dialogue activities undertaken: stakeholders met, key topics discussed, main concerns and expectations, positioning towards Project activities;
    - grievance mechanism: participation, main grievances reported, progress summary (actions to be taken and status);
    - risks to the Project;
    - limitations (e.g. resources, internal alignment);
    - priorities for next quarter.

These reports will be discussed between the CLO and the Project team. The reports will be circulated internally as required.

10.3.2 EXTERNAL REPORTING

In addition to the reporting required under the grievance mechanism, the Company will publish annually on the Project website reports on the on environmental and social performance of the Project including on performed stakeholder engagement.

11. APPENDIX A SAMPLE GRIEVANCE FORM[1]

Reference No:

Full Name Note: *you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent*	First name _____ Last name _____ ❑ I wish to raise my grievance anonymously ❑ I request not to disclose my identity without my consent
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	❑ Bulgarian ❑ 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?

Signature: _____

Date: _____

[1] Based on EBRD *Guidance Note on Grievance Management*, 2012

Please return this form to: Tenevo Solar Technologies EAD

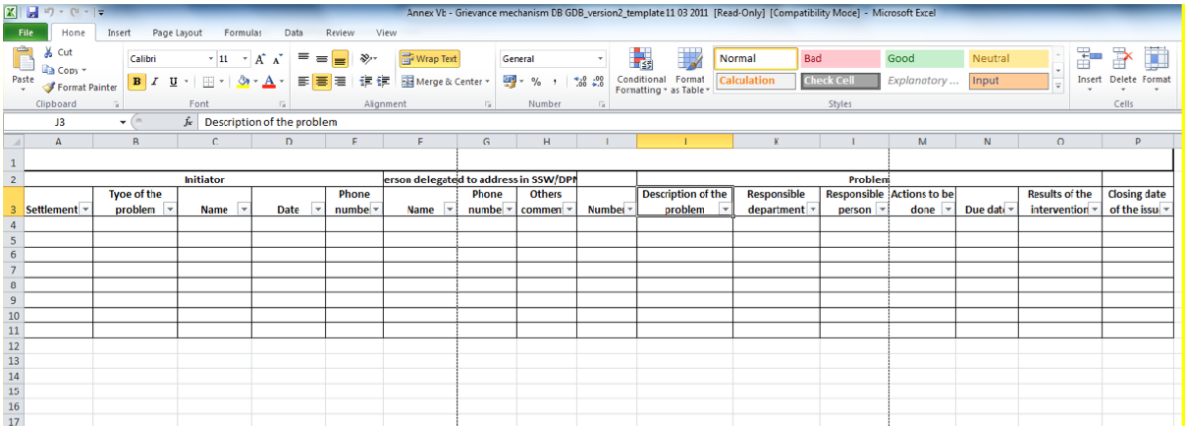
Address: 14 Tsar Osvoboditel Blvd., Sofia

Tel.: +359 89 5557542

E-mail: tenevoworkersgrievance@tenevoproject.bg

[2] Based on EBRD *Guidance Note on Grievance Management*, 2012

12. APPENDIX B SAMPLE GRIEVANCE REGISTR



[3] Based on EBRD *Guidance Note on Grievance Management*, 2012