

Stakeholder Engagement Plan and Grievance Mechanism
for
Vetrozelena Wind Power Project



July 2022

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Abbreviation list

CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
EP	Equator Principles
ESIA	Environmental and Social Impact Assessment
GWh	Gigawatt hours
IFI	International Financing Institutions
KPI	Key Performance Indicator
MW	Megawatt
OHL	Overhead line
SEP	Stakeholder Engagement Plan
SPV	Special purpose vehicle
WPP	Wind Power Plant
WTG	Wind turbine generator

1. Introduction

Developer CWP Global intends to develop a new Wind Power Plant (“WPP”) project in the municipality of Pančevo (northeast Serbia), named Vetrozelena WPP. The Vetrozelena WPP Project (the “Project”) is expected to consist of a maximum 50 wind turbine generators (WTGs), each with the capacity between 5 MW and 7 MW. The estimated net annual energy production of the wind farm is 822.7 GWh, which is equal to the average annual consumption of 200,000 households. The Project is expected to contribute over 860,000 tonnes of emissions reduction of CO₂ equivalent, per annum.

CWP Global is the leading international developer active in southeast Europe, which also developed the largest wind farm in the Republic of Serbia - the 158 MW Čibuk Project. The Company has a successful track record of developing, managing, and owning renewable energy projects, using a proven approach for advancing each project from inception to full operation, while ensuring genuine engagement with all stakeholders.

Vetrozelena d.o.o. is a Serbian registered special purpose vehicle (SPV) established by CWP Global, that holds rights, permits, authorisations, and land for construction of the Project.

The Project development began in 2019. A Detailed Urbanistic Plan for Vetrozelena WPP was adopted in September 2021. The permitting and approval process is in an advanced stage and the Project is targeting ready-to-build status Q12023 while construction is expected to commence in Q2 2023.

This document is the Stakeholder Engagement Plan (SEP) developed specifically for this Project which describes the planned stakeholder consultation and engagement process for the Project. It outlines a systematic approach to stakeholder engagement which will assist Vetrozelena d.o.o. to develop and maintain a constructive relationship with their stakeholders over time. The engagement procedures shall identify all stakeholders, be inclusive (not allow barriers of any kind to prevent from participation, like gender, ethnicity, age, etc.) and take into account the needs of particularly vulnerable groups. The document also includes a grievance mechanism for stakeholders to raise any concerns about the Project.

The responsibility for implementation of the Project and this SEP lies with Vetrozelena d.o.o. Certain aspects of stakeholder engagement and grievances management, specifically related to construction activities, will be delegated to the Contractor and managed by the Contractors’ nominated Grievance officer and further overseen by the Supervision Consultant to be appointed to act as the Engineer in accordance with the Contract for Construction works.

The SEP will be periodically reviewed and updated by Vetrozelena d.o.o., as important Project information becomes available.

2. Project Description

2.1 Project Location

The Project site is in a rural, predominantly agricultural region of the Republic of Serbia. The centre of the site is about 20 km north-east of the town of Pančevo and 40 km east of the capital City of Belgrade. The Project site covers an area of about 50 square kilometres and about 98% of this land is agricultural land. The land is predominantly used for growing clover, sunflower and wheat. There are no farms with livestock within the Project affected area, and no grazing fields.

The closest settlement is Dolovo, southeast from the site, where the nearest residential houses are located about 1-2 km from the site boundary. Second closest is Banatsko Novo Selo to the northeast,

and Mramorak to the southwest. For each of these the nearest residential houses are over 2km away from the site boundary.

Figure 1 Project Location



2.2 Project Characteristics

The Project will include the construction of up to 50 WTGs and the associated energy transmission infrastructure, as well as improvements in road infrastructure, through upgrades of existing roads and construction of additional access roads. In addition to these permanent (long term) structures the project includes construction of temporary structures – Met masts 1 and 2, Construction Camp and Storage area. Temporary structures will be removed once they are no longer needed, but no later than the end of the construction phase.

The wind farm includes the following infrastructure:

- WTGs which will require a piled reinforced concrete foundation with approximate dimensions 30x30 m. The total maximum height of each wind turbine will be no more than 250m, with maximum rotor diameter of 170 m.
- 35 kV underground cables connecting the turbines with a transformer station (approximately 120km total length of cables along the new and existing road infrastructure),
- 400/35 kV main transformer station, located within the boundary of the wind farm, next to the existing Čibuk 1 switchyard,
- about 7.4 km-long double overhead line (OHL) connecting Čibuk1 switchgear to the existing 400 kV OHL Pančevo2 – Resita via an in-out connection. The overhead line includes 21 OHL towers. The towers will be steel lattice structure on concrete foundations dimensions 20 x 20 meters. Tower height is 71m for suspension towers and 63m for angle/tension towers
- Improvements in the system of local roads – improvements on the existing roads (widening of certain local roads, widening and increase capacity of agricultural access roads) and construction of new access roads (typically from existing road to the location of the tower).

- The expected operational life of the Proposed Development is 30-35 years from the date of commissioning. Towards the end of this period, a decision would be made as to whether to refurbish, remove, or replace the turbines and other associated infrastructure.

2.3 Project Benefits

The main benefits of the proposed Project are:

- Provision of a valuable source of renewable energy for use within Republic of Serbia,
- Reduction of the Country's energy import from the neighbouring countries,
- Reduction of the Country's reliance on fossil fuel consumption,
- Strengthening of Republic of Serbia's energy sector by helping to diversify its energy sources,
- Support to infrastructure development and national building program,
- Contribution for Republic of Serbia to achieve its 2030 targets (32% of total consumption needs to come from renewable energy sources by 2030),
- Displacement of about 860,000 tons of carbon dioxide per year that would normally be emitted if the same amount of electricity was produced from a coal fired power station,
- Provision of employment opportunities, especially during the construction phase.

2.4 Impact Assessment

Environmental Impact Assessment (EIA) in line with national requirements is currently under development. Additionally, as the Project may involve financing from one or more International Financing Institutions (IFIs), Environmental and Social Impact Assessment (ESIA) in line with Equator Principles will be carried out as well. Environmental and social impact assessment will be carried out for the construction and operation phases of the Project. Identified impacts will be managed and mitigated in accordance with international best practice.

3. About this Document

As noted above, this document is a Stakeholder Engagement Plan (SEP) and describes the planned stakeholder consultation and engagement process for the Project. The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The main objectives of the SEP are to:

- Ensure that adequate and timely information is provided to persons affected or likely to be affected (both directly and indirectly) by the Project ("affected parties") or that may have an interest in the Project ("other interested parties") or that have influence over the Project. Provide these groups with such forums and opportunities to voice their concerns and opinions,
- Ensure that comments are received in a timely manner so that they can be taken into account during the decision-making processes,
- Establish effective communication and cooperation facilitating community support in general,
- Establish an effective grievance and mediation mechanisms with the main goal to intervene in disputes in order to resolve and close out and minimize the number of cases referred to judicial authorities.

This SEP describes the approach in engaging with stakeholders throughout the Project cycle i.e., for, pre-construction, construction activities and operation. Activities related to pre-construction phase are ongoing, while the other two phases are still to begin. The SEP does not consider activities related to decommissioning phase, primarily due to the considerable time gap to decommissioning (30-35

years), but also because expected stakeholder engagement activities for this phase are similar to activities related to construction phase.

The SEP is a “live document” and will be reviewed and updated as necessary during the Environmental and Social Impact Assessment (ESIA) phase (pre-construction stage), construction stage, as well as operational and decommissioning stages. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during Project implementation and updated as necessary.

4. Regulatory Requirements for Stakeholder Engagement

4.1 Legislation of the Republic of Serbia

Requirements in relation to public disclosure, participation and access to information kept by state bodies and organisations, as well as the right to petition the state authorities and the right to a healthy environment are guaranteed under the Constitution of the Republic of Serbia (Official Gazette of the RS No. 98-2006).

Republic of Serbia ratified the Aarhus Convention in 2009, by adopting the Law on Confirming the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Official Gazette of the RS No. 38/09). The basic principles contained in this Convention are supported by other Serbian laws and bylaws, including:

- The Environmental Protection Law (Official Gazette of the RS 135/2004 ... 95/2018)
- The Law on Environmental Impact Assessment of the Republic of Serbia (Official Gazette of the RS 135/04 and 36/09),
- The Law on Strategic Environmental Impact Assessments (Official Gazette of the RS 135/2004 and 88/2010).

These regulations require the public to be informed about and involved in all matters concerning the environment. Depending on a number of factors, including the size / scale of the project, relevant municipal or republic level authorities in charge of environmental protection determine whether an EIA for a particular project is required. If it is required, as is the case with this Project, the same authorities are in charge of organising disclosure and a one-off public hearing.

Law on Free Access to Information of Public Importance (Official Gazette of the RS, No. 120/04, 54/07, 104/09, 36/2010) regulates citizens' rights of access to information possessed, used or controlled by public bodies, sets out the principles and exceptions to these rights, as well as the procedures for their achievement and protection.

The Law on Planning and Construction of the Republic of Serbia (Official Gazette of the RS 72/09, 81/09, 64/10, 24/11, 9/2020) regulates the development and adoption of spatial and urban planning documents in the Republic of Serbia, which are all subject to a public disclosure and consultation process. This process is managed by the Agency for Spatial Planning of the Republic of Serbia i.e., the body of the local self-government unit responsible for spatial and urban planning.

In 2015, Republic of Serbia adopted the Energy Development Strategy till year 2025, with projection to 2030 (Official Gazette no 101, dated 8 December 2015). The strategy makes no reference to the requirement for stakeholder engagement, or public disclosure of information. The strategy itself was publicly disclosed and a public hearing for the Strategy was organised by the Ministry of Energy, Development and Environmental Protection in September 2016 in Novi Sad.

The Ministry of Energy, Development and Environmental Protection also adopted the National renewable Energy Action Plan for the Republic of Serbia in 2013 (In accordance with the template foreseen in the Directive 2008/29/EC- Decision 2009/548/EC). Draft National Action Plan was presented at the public presentation in December 2012 and published on the official website of the Ministry of Energy, Development and Environmental Protection. At the same time, it was officially submitted to all competent ministries and institutions for their opinion.

Public disclosure and stakeholder engagement process carried out by the government bodies is described below:

- Informing the public through the media about details of disclosure of the draft plan/document (i.e., where the hard copy is available for review, the dates and time when it can be reviewed) and inviting citizens/organisations to submit comments and/or attend a public hearing. Citizens can request that their comments are responded to in writing.
- Organising a public hearing to present the draft plan/document (usually in the town hall or other appropriate local venue).
- Processing comments received from all stakeholders and revising the plan/document to reflect them, as well as preparing a report to justify why certain comments were not adopted.
- Submitting the revised plan/document and report to relevant authorities whose task is to determine whether the comments have been meaningfully considered and addressed.

4.2 IFI Requirements

All projects funded by the International Financing Institutions (e.g., IFC, EBRD) are required to meet best international practice regarding stakeholder engagement, public consultations and information disclosure. The Equator Principles (EP) are intended to serve as a common baseline and risk management framework for financial institutions to identify, assess and manage environmental and social risks when financing Projects. The Equator Principles (Principle 5 Stakeholder Engagement and Principle 6 Grievance Mechanism in particular) promote the principle of strong stakeholder engagement as a focal point to achieve and build strong, constructive, and responsible relationship essential for the successful management of environmental and social impacts and issues.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy 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 EBRD 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 EBRD.

The overall objectives of PR10 are to:

- Outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders, in particular the directly affected communities,
- Provide means for effective and inclusive engagement with project stakeholders throughout the project cycle,

- Ensure that appropriate environmental and social information is disclosed and meaningful consultation is held with the project's stakeholders and where appropriate, feedback provided through the consultation is taken into consideration, and
- Ensure that grievances from the affected communities and other stakeholders are responded to and managed appropriately.

PR10 recognizes that stakeholder engagement is central to building strong, constructive, and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts. To achieve this, stakeholder engagement shall be such to incorporate the following elements:

- Stakeholder identification and analysis,
- Stakeholder engagement planning,
- Disclosure of information,
- Meaningful consultation,
- Implementation of grievance mechanism, and
- Ongoing reporting to relevant stakeholders.

4.3 Gaps between National and IFI Requirements

The national framework in Republic of Serbia is broadly compatible with the IFI requirements for public consultation and stakeholder engagement but there still remain gaps to be addressed. The national requirements stay at the level of procedural engagement and do not tackle in depth meaningful and empowered consultation. Furthermore, the requirements are scattered across various documents and laws without sublimation even at sector level. The requirement of an effective procedure or mechanism by which people can make comments or raise grievances beyond the formal administrative and judicial grievance forums is also recognized as a shortcoming in the national framework comparing to the IFI requirements.

Therefore, this SEP has taken into consideration all these requirements and has produced a plan that avoids duplication of processes on one hand but on the other complies with the more stringent IFI standards and requirements of stakeholder engagement.

5. General Approach to Stakeholder Engagement and Responsibilities

The implementation of the Stakeholder Engagement Plan is the overall responsibility of Vetrozelena d.o.o. The Company recognizes that the successful delivery of the Project requires development of an open relationship with a wide range of local, regional, and national stakeholders. Vetrozelena d.o.o. has committed to working closely with relevant local municipal authorities and departments during the design phase and throughout the construction of the windfarm. Regular meetings will be held to discuss any issues and progress reports will be prepared. Social Investment Plan (SIP) will be developed to support the local communities. The content of this plan is tailored to fit the needs of the affected communities and consultation meetings were organized to discuss it.

A series of public meetings will be organized to present the Project information and disclose Project-related documentation, during the pre-construction and construction phases. Ongoing communication will be maintained with the stakeholders through face-to-face meetings, media announcements, notice boards in the local communities, etc. Vetrozelena d.o.o. will create a Project Notification Board and a Project Document Library on their website, consisting of relevant documents available to public, maps and contact information. Vetrozelena d.o.o. will be responsible to regularly update the

information and have at least one open-door day during each month starting from Q4 2022, answering the questions in person and providing additional information.

The overall responsibility for the implementation of this Stakeholder Engagement Plan is with Vetrozelena d.o.o. Responsibilities for the SEP implementation, grievance management and managing and implementing the company's Stakeholder Engagement Program are defined.

Certain activities, as described in Chapter 8, are expected to be implemented by the appointed Contractor during the implementation of works. The Contractor will be expected to nominate a Contractor's Community Liaison Officer (CLO) responsible for disbursement of information to the community, grievance collection and management related to construction activities.

6. Identification of Stakeholders and Communication Methods

Stakeholder groups, as referred to in this document, are groups that may be affected by and/or are interested in the implementation of the project. The objective of stakeholder identification, which is closely connected to the identification of impacts, is to establish which individuals and organizations may be directly or indirectly, positively or negatively impacted by the project and to bring them forward to the first line of information.

The stakeholder list, outlined in Table 2 below, can change in the course of the process implementation. It shall therefore be reviewed on a six-monthly basis, to ensure that any new stakeholders are correctly identified, and their concerns addressed. The interest and influence associated with each stakeholder group can also be subject to changes and shall be reassessed from time to time.

Table 1 Identified Stakeholders

Description	Stakeholders	Proposed Communication Method
External Stakeholders		
National Governmental Stakeholders – high interest, high influence, high power and key high-level decision-making groups	<ul style="list-style-type: none"> • Government of Republic of Serbia • Ministry of Mining and Energy • Ministry of Environmental Protection • Ministry of Construction, Transport and Infrastructure • Ministry of Agriculture, Forestry and Water Economy • Republic of Serbia Geodetic Authority (Cadastr) 	<ul style="list-style-type: none"> • Official correspondence and meetings • Progress reports • Permitting procedures
Regional and Local Government Stakeholders – high interest, high local influence, high local power and locally important decision-making group	<ul style="list-style-type: none"> • Provincial Secretariat for Urban Planning and Environmental Protection • Provincial Secretariat for Energy, Construction and Transport • City of Pancevo (transportation and police departments, department for environmental protection) • Institute for Protection of Cultural Monuments in Pancevo 	<ul style="list-style-type: none"> • Official correspondence and meetings • Progress reports • Permitting procedures
Affected Population and Enterprises – high interest, low power, low to medium influence	<ul style="list-style-type: none"> • Land owners affected by land acquisition (Dolovo and Mramorak) • Land owners affected by easement and lease (Banatsko Novo Selo and Dolovo) 	<ul style="list-style-type: none"> • Public meetings • Brochures and leaflets • Grievance mechanism

Description	Stakeholders	Proposed Communication Method
over the decision-making process	<ul style="list-style-type: none"> • Local community members and their representatives affected by the project – including consideration of the following aspects: air quality, noise, shadow flicker, visual impacts, ecology, biodiversity, ecosystem services, community health and safety. The identified communities within the area of influence include: Dolovo, Banatsko Novo Selo, Bavanište, Mramorak, Vladimirovac, Devojački bunar, Leanka • Users of public land that will be affected by transportation routes 	<ul style="list-style-type: none"> • Notice boards • Media • Company website http://vetrozelena.com/
Affected Public Service Facilities – high interest, medium power, low to medium influence over the decision-making process	<ul style="list-style-type: none"> • Local utility companies (e.g., water, electricity, phone or internet providers) • Local service providers (schools, cultural centres, medical centres) 	<ul style="list-style-type: none"> • Public meetings • Brochures and leaflets • Grievance mechanism • Notice boards • Media • Company website
Vulnerable groups – high interest and higher risk of poverty, low interest, low power	<p><i>Potentially</i></p> <ul style="list-style-type: none"> • Women • Elderly/Pensioners • Persons with disabilities • Minority communities • Persons receiving income support • Illiterate persons 	<ul style="list-style-type: none"> • Public meetings • Brochures and leaflets • Grievance mechanism • Notice boards • Media • Company website • Other communication methods as identified on a case by case basis
External Stakeholders affected by construction – medium to high interest, medium influence	<ul style="list-style-type: none"> • Interested NGOs and other organisations. Some of the identified organisations include: <ul style="list-style-type: none"> ○ Društvo za zaštitu i proučavanje ptica Srbije https://pticesrbije.rs/ ○ Fondacija za zaštitu ptica grabljivica http://vulture.org.rs/?lang=en 	<ul style="list-style-type: none"> • Project notifications • Progress reports • Company website • Grievance mechanism

Description	Stakeholders	Proposed Communication Method
	<ul style="list-style-type: none"> ○ The Association for the Protection of Great Bustard http://www.velikadroplja.rs/en/association ○ Arhus Centar Novi Sad https://aarhusns.rs/o-nama/ ○ RERI – Renewables and Environmental Regulatory Institute https://www.reri.org.rs/en/projects/ ○ WWF Adria Srbija https://www.wwfadria.org/sr/ ● Local media ● Lender(s) 	
Internal Stakeholders		
Workers on the Project	<ul style="list-style-type: none"> ● Vetrozelena d.o.o. management ● Vetrozelena d.o.o. workers ● Contractor(s) and subcontractor(s) workers ● Supervision Engineer 	<ul style="list-style-type: none"> ● Website ● Project meetings ● Notice boards ● Internal grievance procedure ● Employment contracts ● Code of Conduct ● Inductions ● Trainings

7. Summary of Previous Stakeholder Engagement Activities

During the initial planning stages of the project, stakeholder engagement focused on negotiations undertaken to purchase land and secure the easement and lease agreements. Additionally, meetings were organized with the local community members and local administrative representatives, to present the Project and receive insights from the public in the preparation of the Social Investment Plan. The summary of previously organized stakeholder engagement activities is shown in the Table 2 below.

Table 2 Previous Stakeholder Engagement

Date	Stakeholder	Description
November 2019	Land owners affected by permanent land acquisition in Dolovo and Mramorak	<p>Individual meetings were organized with each parcel owner to explain the terms of the contract, including restrictions in land use, and negotiate the price.</p> <p>Respecting the preemptive rights, meetings were also organized with the owners of the surrounding parcels to confirm they are not interested in the purchase.</p> <p>There were no cases when the owners of the surrounding parcels were interested in practice their preemptive rights and buy the parcel.</p>
January 2020 – June 2020 July 2021 – September 2021	Land owners affected by lease in Dolovo	<p>From the beginning of 2020, individual meetings were organized with all affected land owners.</p> <p>Public meetings were organized in March 2020 to discuss the form of the contracts, after which minor amendments were incorporated in the contracts.</p> <p>Negotiations and signing of the contracts took place by June 2020 for the area required for the first meteorological mast and between July and September 2021 for the second meteorological mast.</p>
March 2020 – August 2021	Land owners affected by easement in Dolovo and Banatsko Novo Selo	<p>Due to the COVID-19 pandemic, it was not possible to organize public consultation meetings.</p> <p>Individual meetings were organized with each parcel owner to negotiate the price. Contact with parcel owners was initiated through local community offices.</p> <p>Contract signing started from July 2020, with the majority of contracts signed by the end of 2021.</p>
December 2021	Local community representatives of Banatsko Novo Selo	<p>Meeting to discuss the Project and understand the community needs in the preparation of the Social Investment Plan.</p> <p>The main focus of the activities will be on empowering young people and women and connecting the population with nature.</p>

Date	Stakeholder	Description
February 2022	Local community representatives of Banatsko Novo Selo	Meeting to discuss the Project and understand the community needs in the preparation of the Social Investment Plan. The main focus of the activities will be on empowering young people and women and connecting the population with nature.
March 2022	Local community representatives of Dolovo	Meeting to discuss the Project and understand the community needs in the preparation of the Social Investment Plan.
May 2022	Local community representatives of Dolovo and Banatsko Novo Selo	Meeting during ESIA consultant's initial site visit to understand affected communities, discuss effectiveness of potential communication methods including preferable timing (considering that the majority of the population is engaged in agricultural activities) and assess capacities for public consultation in the local village centres. During the meeting in Dolovo, positive experience with Cibuk I project was highlighted, especially in terms of employment opportunities and road infrastructure maintenance. The experienced from the previous projects has shown that the grievance mechanism is effective. Regular communication was maintained through the meetings in local community offices, and this approach should be kept.

8. Stakeholder Engagement Plan

8.1 Consultation Requirements

During 2022, the main focus of the stakeholder engagement activities will be to initiate and maintain communication with the communities affected by the Project and other identified stakeholder groups. As Dolovo and Banatsko Novo Selo are the communities where the WTGs will be located, public meetings will be organized here first and are planned for mid-September 2022. Meetings in Mramorak and Vladimirovac are planned to be organized in the early Q4 of 2022. Monthly open-door meetings in all communities affected by the Project are expected to start from Q4 of 2022.

Environmental Impact Assessment (EIA) in line with national requirements and the Environmental and Social Impact Assessment (ESIA) in line with EBRD Performance Requirements are currently being carried out. Upon their completion, these documents will be disclosed and made available to the public for commenting, for 30 days in case of the national EIA and for 60 days in case of the ESIA. Consultation meetings will be organized to present the findings of these documents and provide clarifications to the interested parties. The documents will be available at the Vetrozelena d.o.o. website (www.vetrozelena.com), as well in the local community offices. During the preparation of the ESIA a socio-economic survey will be organised to help define the socio-economic profile of the affected communities and better assess the potential impacts from the Project. These surveys will be announced to the community ahead of any site activities.

8.2 Construction and Traffic management

In line with the construction timeline, Vetrozelena d.o.o. will provide information to the local community authorities and residents prior to the commencement of construction works, any major increases in traffic, including special purpose transport along the entire route (for WTGs) or other project activities that could affect them. The company will make available all supplemental analyses and documents to stakeholders well before the commencement of construction. This will ensure that the local communities are brought up to date and made aware of the project activities, its key impacts, the mitigation measures and implementation mechanism. Separate meetings will be held with owners and users of private and public land that will be disturbed during construction for the transport and installation of WTGs. The topics to cover will include evaluation of crop and other damages, mechanism for making claims and receiving payment, any land use restrictions as well as expected difficulties in accessing land plots during road upgrades.

Other stakeholders, including traffic police, emergency health services, fire brigades, etc. will be informed about the planned construction works ahead of any works in line with national requirements.

All relevant documents will be disclosed to the stakeholders, including, but not limited to:

- Calendar of planned activities,
- map of roads that will be reconstructed/upgraded/rebuilt,
- layout of the construction area and
- notifications to any changes/restrictions that may occur in the normal traffic at the windfarm site.

The Contractor(s) will secure all construction sites prior to any construction activities taking place and will ensure appropriate construction and warning signs are in place.

Detailed information on the planned stakeholder engagement activities is presented in the Table 3 through Table 5.

8.3 Calendar of Activities

Table 3 Planned Stakeholder Activities for Pre-construction Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
Pre-construction phase							
1.	Announcement of socio-economic surveys	Local community; Local authorities	Q3 2022	Vetrozelena d.o.o. in cooperation with local authorities and local media	Vetrozelena d.o.o. website http://vetrozelena.com/ Poster at the local community offices Media (newspapers Pančevac, Libertatea and radio Pančevo)	Vetrozelena d.o.o. designated channels of communication	Notification as announced on local community notice boards, Vetrozelena d.o.o. website and the media Comments log
2.	Disclosure of EIA (currently under preparation)	All	Expected to start Q4 2022 For a period of 30 days	Vetrozelena d.o.o.	Vetrozelena d.o.o. website City of Pančevo website Paper copies at local community offices Leaflets and brochures Media (newspapers Pančevac, Libertatea and radio Pančevo)	Enquires and comments via Vetrozelena d.o.o. designated channels of communication Response via official correspondence	Notification as announced on local community notice boards, Vetrozelena d.o.o. website and the media Comments log
3.	Public consultation meetings in relation to EIA	All	Upon expiration of the disclosure period	Vetrozelena d.o.o.	Vetrozelena d.o.o. website Local community notice boards to publish	Enquires and comments via Vetrozelena d.o.o. designated	Notification as announced on local community notice boards, Vetrozelena d.o.o.

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
			Notification with date, time and location of the public hearing to be announced at least 20 days prior to the scheduled hearing (formal requirement)		notification of the scheduled public hearing Leaflets and brochures Media (newspapers Pančevac, Libertatea and radio Pančevo)	channels of communication Response via official correspondence	website and the media MoMs, list of attendees, photos
4.	Disclosure of ESIA package (currently under preparation)	All	Expected to start Q4 2022 For a period of 60 days	Vetrozelena d.o.o.	Vetrozelena d.o.o. website Local community offices Leaflets and brochures Media (newspapers Pančevac, Libertatea and radio Pančevo)	Enquires and comments via Vetrozelena d.o.o. designated channels of communication Response via official correspondence	Notification as announced on local community notice boards, Vetrozelena d.o.o. website and the media Comments log
5.	Public consultation meetings in relation to ESIA	All	At the end of the disclosure period Notification with the date, time and location of the	Vetrozelena d.o.o.	Vetrozelena d.o.o. website Local community notice boards Leaflets and brochures	Enquires and comments via Vetrozelena d.o.o. designated channels of communication	Notification as announced on local community notice boards, Vetrozelena d.o.o. website and the media

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
			<p>public hearing to be announced at least 20 days prior to the scheduled hearing</p> <p>Hearing to be scheduled at a time most convenient to ensure availability of affected persons to attend</p>			Response via official correspondence	MoMs, list of attendees, photos
6.	Notify the stakeholders on the planned Works programme and grievance mechanism	<p>Land owners affected by land acquisition</p> <p>Land owners affected by easement and lease</p> <p>Users of public land that will be affected by</p>	Q3 of 2022	Vetrozelena d.o.o.	Local community notice boards (5 days in advance)	<p>Enquires and comments via Vetrozelena d.o.o. designated channels of communication</p> <p>Response via official correspondence</p>	<p>Notification as announced on local community notice boards</p> <p>MoMs, List of attendees, Photos</p>

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
		transportation routes Local service providers Local utility companies					
7.	Meetings to explain the construction process of the WTGs and its impact on land	Land owners affected by land acquisition Land owners affected by easement and lease Users of public land that will be affected by transportation routes Interested NGOs	At least 6 months prior to commencement of construction works	Vetrozelena d.o.o.	For notifications of scheduled meetings: <ul style="list-style-type: none"> Local community notice boards Media (newspapers Pančevac. Libertatea and radio Pančevo) Leaflets and brochures 	Enquires and comments via Vetrozelena d.o.o. designated channels of communication Response via official correspondence	Notification as announced on local community notice boards and the media MoMs, List of attendees, Photos
8.	Particular efforts with regards to	Vulnerable groups / persons	As defined under each item	Vetrozelena d.o.o.	In addition to communication tools described above, vulnerable groups will receive house visits and/ or invitation to	In addition to channels defined above, communication will be made	As defined above

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
	activities from 1 through 7				individual or small group meetings as agreed with the specific group/ individuals. Assistance will be provided in transportation to and from the venues. Simplified easy understandable brochures, print-out of salient features of documents, using non-technical language will be prepared for information to be disseminated and disclosed. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third person and sign language by a knowledgeable person if needed.	available through direct phone lines and follow up agreed visits/meetings (within the next 7 days from each event) to allow the information to settle in and collect comments and concerns.	

Table 4 Planned Stakeholder Engagement Activities for Construction Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
Construction phase							

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
1.	Keep stakeholders informed of any project or construction-related activities that may affect them	<p>Land owners affected by land acquisition</p> <p>Land owners affected by easement and lease</p> <p>Users of public land that will be affected by transportation routes</p> <p>Local service providers</p> <p>Local utility companies</p>	Monthly starting from 6 months prior to start of construction	Vetrozelena d.o.o.	Meetings to be announced on local community notice boards 5 days in advance	Grievance mechanism	<p>Notification as announced on local community notice boards</p> <p>MoMs, List of attendees, Photos</p> <p>Grievance register</p>
2.	Keep stakeholders informed about local employment opportunities	Affected communities, relevant local/regional/national authorities, general public	After closing the contract for construction works during mobilisation period and later as needed	Contractor Local Employment office	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Employers website Local Employments office	Via Contractor's website Via Contractor's CLO	Notifications as published in affected municipalities, websites and the media
3.	Disclose information on Project environmental and social performance	All	Semi-annually	Contractor	Contractor's website	-	Notifications as published on websites

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
4.	Particular efforts with regards to activities from 1 through 3	Vulnerable groups / persons	As defined under each item	Vetrozelena d.o.o.	In addition to communication tools described above, vulnerable groups will receive house visits and/ or invitation to individual or small group meetings as agreed with the specific group/ individuals. Assistance will be provided in transportation to and from the venues. Simplified easy understandable brochures, print-out of salient features of documents, using non- technical language will be prepared for information to be disseminated and disclosed. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third	In addition to channels defined above, communication will be made available through direct phone lines and follow up agreed visits/meetings (within the next 7 days from each event) to allow the information to settle in and collect comments and concerns.	As defined above

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
					person and sign language by a knowledgeable person if needed		

Table 5 Planned Stakeholder Engagement Activities for Operation Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
Operation phase							
1.	Disseminate information about transition of responsibilities and liabilities from Contractor to Vetrozelena d.o.o.	All	At least starting from two months prior to termination of works	Contractor Vetrozelena d.o.o.	CLO Vetrozelena d.o.o. website Media Local communities notice boards	CLO Vetrozelena d.o.o. designated channels of communication	Notifications as published on Vetrozelena d.o.o. website, media and notice boards Written correspondence
2.	Keep stakeholders informed of any operation-related activities that may affect them	All	From the commencement of operation phase and ongoing	Vetrozelena d.o.o.	Vetrozelena d.o.o. website Media Local communities notice boards	Vetrozelena d.o.o. designated channels of communication Grievance mechanism	Notifications as published on Vetrozelena d.o.o. website, media and notice boards Grievance register

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholders to Comment	Records
3.	Update stakeholder information	All	From the commencement of operation phase and ongoing	Vetrozelena d.o.o	Vetrozelena d.o.o. website	Vetrozelena d.o.o. designated channels of communication	Notifications as published on Vetrozelena d.o.o. website Written correspondence

9. Grievance Mechanism

Respecting the grievance panels and its authorities made available under the national legislation, a Project Specific Grievance Mechanism shall be designed for the Project. Any person or organisation may send comments and/or complaints in person, by phone or via post or email using the contact information provided at the end of the document (**Error! Reference source not found.**). Project-related grievance will be collected during the pre-construction phase, during the implementation of construction works and also during the operation phase.

The mechanism will allow that complaints are raised anonymously. Raising grievances will not incur any costs for the grievance holder. All grievances, whether they are received verbally or in writing, should be categorized and recorded in the Grievance Log Register. The Grievance Log Register will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the register with the following information:

- name and contact details of the grievance holder, if the grievance is not raised anonymously,
- description of grievance,
- date of receipt / acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures) and how were they communicated to the grievance holder,
- date of resolution and closure,
- provision of feedback to the complainant and their response (satisfied/dissatisfied),
- whether long-term management actions have been taken to avoid the recurrence of similar grievances in future, if applicable.

All information on the grievance holder will be treated with confidentiality and in compliance with national and EU requirements on recording and processing personal data.

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. Grievances submitted anonymously will be addressed but not responded to. All grievances will be registered and acknowledged within 5 working days and responded to within 20 working days of receiving the grievance.

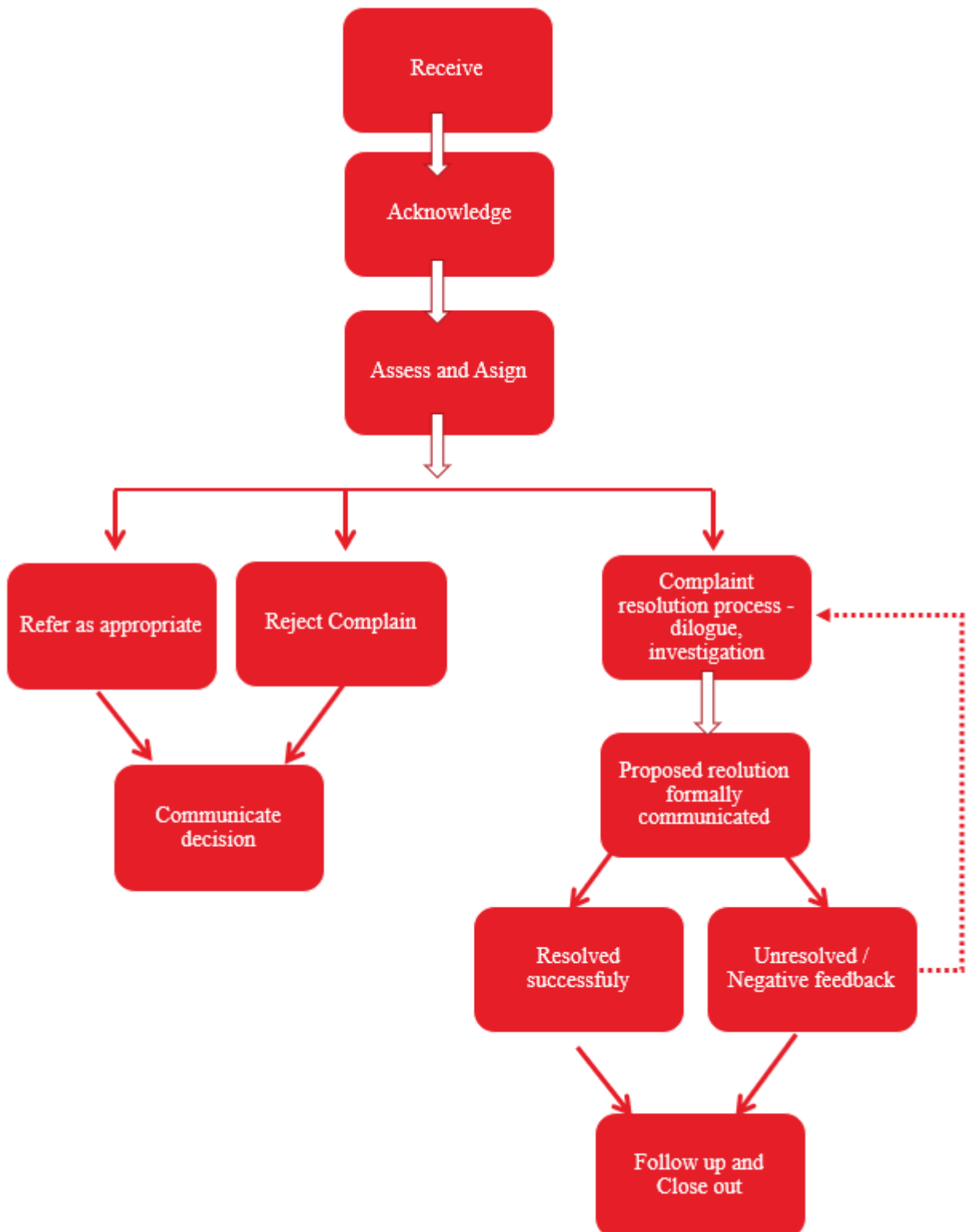
The proposed resolution should be confirmed with the complainant before implementation to minimise unnecessary/unwarranted actions. If they agree with the approach, required actions will be implemented to deal with the issue. Following the implemented actions, it should be confirmed with the complainant that they are satisfied with the outcomes. Any further response from the complainant should be in order to assess whether the grievance is closed or whether further action is required. If they are unsatisfied with the proposed action or with the final outcome, the complaint should be reviewed once again. If the final resolution is not accepted, the complainant is informed of the available legal remedies. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of Serbia. Grievance resolving process is shown in the Figure 2 below.

The overall responsibility for the implementation of this Stakeholder Engagement Plan is with Vetrozelena d.o.o. Responsibilities for the SEP implementation, grievance management and managing and implementing the company's Stakeholder Engagement Program are defined. The

Contractor will have Community Liaison Officer (CLO) appointed as a focal point, to liaise with local communities and collect their grievances related to construction activities and grievance management. Grievance management will be incorporated in monthly reports to the Supervising Engineer, and further to Vetrozelena d.o.o. Vetrozelena d.o.o. will monitor the way in which grievances are being handled by the Contractor and ensure they are properly addressed within deadlines specified above.

A separate, internal grievance mechanism is available for Vetrozelena d.o.o. and other Project employees and will also be made available for contracted workers, once they begin working.

Figure 2 Grievance Resolving Process



10. Monitoring and Evaluation

10.1 Recordkeeping

All stakeholder activities have to be properly recorded (e.g., in a stakeholder engagement register):

- Public announcements – date of announcement, content, outlets (newspapers, radio or TV stations, websites, etc.),
- Public meetings – invitations (how and when were the meetings announced), content, list of attendees, comments or remarks noted, photographs,
- Individual meetings - invitations (how and when was the meeting arranged), content, list of attendees, comments or remarks noted, photographs,
- Official correspondence with authorities,
- Grievance Log Register – to include date the grievance was received, name of grievant (or anonymous), content of the grievance, location, assigned responsibility, measures taken to resolve the grievance, date of resolution (time taken to resolve the grievance), communication with the grievant.

10.2 Monitoring

The outcomes of stakeholder engagement will be monitored through the following key performance indicators (KPI):

- SEP is up to date and Project information is available for the public to comment.
- Actions listed in the SEP are implemented as scheduled.
- The minutes of consultation meetings are recorded, and meetings logged in a register.
- Grievances are logged and tracked through to resolution within a timeframe of 20 working days from receiving grievance (noted in updated Grievance Log Register).
- Semi-annual Grievance Report are prepared and made publicly available.
- Contractors and subcontractors' contracts include clauses obliging them to adopt SEP requirements, as appropriate.
- Contractors progress reports include summary of the grievance mechanism (summary of new grievances recorded and update on the resolution of existing grievances).
- Annual reports on the implementation of the SEP and grievance process are made available as part of annual external reporting on the E&S performance of the Project which shall be made publicly available.

In addition to this, quarterly internal meetings will be organized to assess the grievance redress process, identify the root causes of grievances in order to adequately address them and avoid repetition of similar complaints.