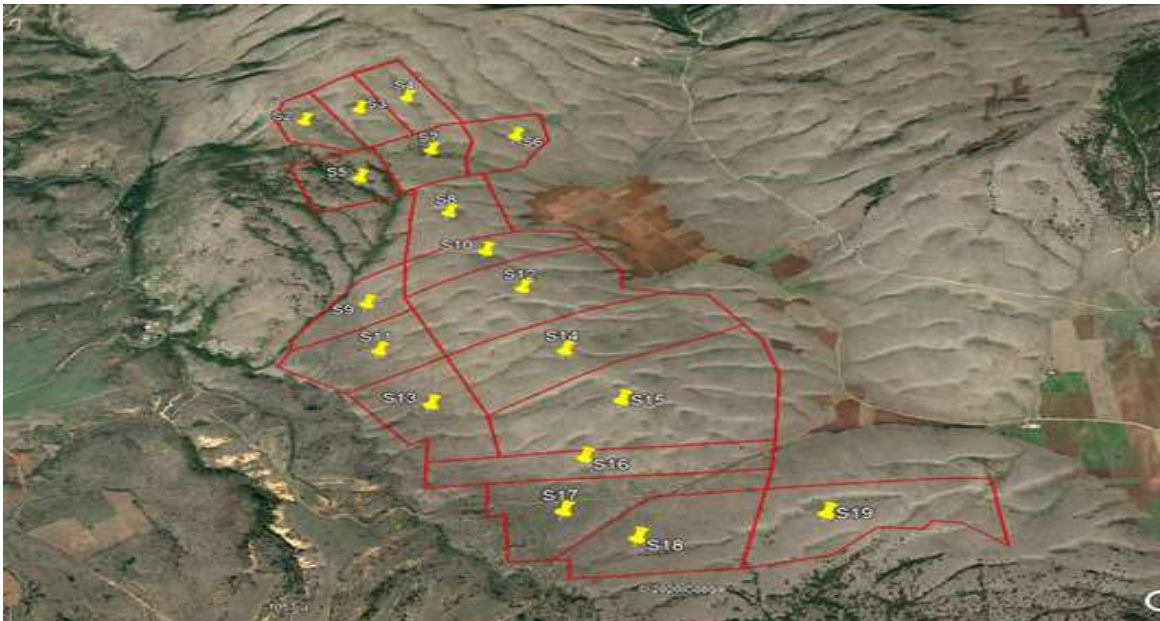




**HELLENIC
PETROLEUM**

204,23 MW solar park in Kozani Greece

STAKEHOLDER ENGAGEMENT PLAN



Contents

CHAPTER 1. INTRODUCTION	2
1.1 PURPOSE OF THE STAKEHOLDER ACTION PLAN.....	2
CHAPTER 2. PROJECT DESCRIPTION	3
2.1 WHAT IS THE PROJECT	3
2.2 WHY IS THE PROJECT NEEDED	4
2.3 WHO IS HELLENIC PETROLEUM S.A.	4
2.4 SUMMARY OF EXPECTED IMPACTS	4
CHAPTER 3. REGULATORY REQUIREMENTS.....	5
3.1 NATIONAL REQUIREMENTS.....	5
3.2 EBRD REQUIREMENTS.....	6
CHAPTER 4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES.....	7
CHAPTER 5. STAKEHOLDER IDENTIFICATION AND ANALYSIS.....	8
5.1 PURPOSE AND RESPONSIBILITY FOR SEP IMPLEMENTATION	8
5.2 INTERNAL STAKEHOLDERS	9
5.3 EXTERNAL STAKEHOLDERS.....	9
5.4 PLANNED INFORMATION AND COMMUNICATION TOOLS.....	11
CHAPTER 6. MONITORING AND REPORTING.....	13
CHAPTER 7. GRIEVANCE MECHANISM	13
7.1 INTRODUCTION TO THE MECHANISM	13
7.2 GRIEVANCES SUBMISSION	14
7.3 PROCESSING AND RESOLVING OF GRIEVANCES	15

CHAPTER 1. INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) of the environmental and social due diligence assessment of the 204,23 MW solar park in Western Macedonia, Kozani, Greece (hereinafter the “project”).

This stakeholder engagement plan is designed to supplement the public engagement and information disclosure activities that have already taken place as part of the permitting and EIA process.

The 204,23 MW solar park in Western Macedonia, Kozani will be run by HELLENIC PETROLEUM S.A. (hereinafter HELPE).

1.1 Purpose of the Stakeholder Action Plan

The purpose of the SEP is to take into consideration the stakeholders' concerns during the Project's development phases. Stakeholder engagement is a process describing the consultations with the affected stakeholders, the ways and regulations/standards by which the stakeholders are identified, categorized and consulted, and how their concerns are taken into consideration by the Developer. The SEP aims to ensure that all the relevant information/data on a proposed project is disclosed to all the potential stakeholders affected and interested by this project.

The stakeholders' engagement process starts from the early stages of the project development and continues through the life span of the Project as new stakeholders may be identified through different phases of this life span. The SEP should ensure the identification of all stakeholders with an interest in the Project, and to engage these stakeholders during the later stages of Project implementation. SEP should ensure that issues raised by stakeholders as part of the implementation of the SEP are feedback to the Project to generate corrective actions, revising the objectives and planning next steps. For this reason, the SEP includes a grievance mechanism that intends to resolve in a friendly and comprehensible way the concerns raised by the public and other stakeholders and provide feedback and complaints/comments on the potential impacts of the Project and on how these complaints/comments have been taken into consideration in the decision-making process during the Project implementation phases.

The main goals of this SEP are:

- Identification of all stakeholders with an interest in the Project and those persons/groups/entities that can be affected by the Project' s implementation or influence the course of the Project, and
- Proactive, effective and continuous engagement with these stakeholders throughout the Project lifecycle.

This SEP also outlines the previous consultation activities of the Company and future plans to engage with stakeholders during the preparation of project documentation, comprising but not limited to the EIA process, as required by the relevant legislative framework. Timely and meaningful consultation is conducted throughout the life of the Project, relevant to its size, its lifespan and the scale of associated impacts.

CHAPTER 2. PROJECT DESCRIPTION

2.1 What is the project

The 204,23 MW solar park in Western Macedonia, Kozani is an energy generation development proposed by HELPE.

The project is located in the area with local name “Bekrevenikos – Mikri Petra” in the Municipal Community of “Liberon”, Municipal Unit of Dimitrios Ipsilantis, Municipality of Kozani, Region of Western Macedonia, Greece

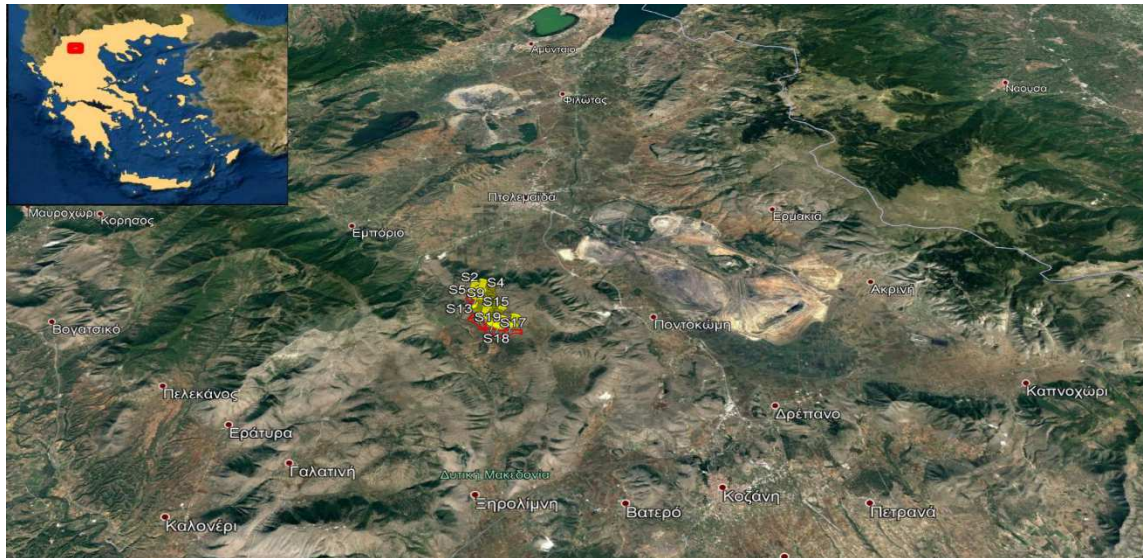


Figure: Project location in North-West Greece

The solar park configuration includes:

- ✓ 18 solar parks with at total power of 204,232 MWp
- ✓ Coverage of a total surface of 4.397.900 m² or 437,90 hectares
- ✓ 559.526 solar panels (with a possibility to be modified).
- ✓ 60 central inverters for the conversion of the array's power output from DC to AC.
- ✓ 1 high voltage, three phase step up transformer (substation) 33/150 KV for the establishment of connection to the Distribution Network Operator, which will be connected to the utility grid. The transformer will be located in the area of the individual solar park No14.
- ✓ 13,3 km of infrastructure for high voltage power transmission and control cables for the connection to the grid;
 - 8.5 km of overhead (air) high voltage power transmission infrastructure
 - 4,5 km of underground high voltage power transmission infrastructure
- ✓ 4,49 Km of inner access roads to individual solar parks.

2.2 Why is the project needed

The Project is needed to meet the increasing energy demand in Greece. The Greek Renewable Energy Sector ("RES") has experienced substantial growth in recent years as a result of the country's commitment to comply with its national targets for renewables under the Renewables Directive. The shift in national energy policy from over dependence on lignite to renewables is demonstrated by significant RES tariff changes, ongoing public consultations with stakeholders on proposed amendments to the RES support framework and the market entry of international players who benefit from opportunities of both wind and solar projects. One of the objectives of the strategy is to increase the share of renewable energy sources including further increasing the use of solar power.

The project will have an installed capacity of 204,23 MW and will generate more than 300.000 GWh of energy annually (according to the project's EIA). This is the equivalent of the annual electricity requirements of 16.600 residents in Greece. About 70% of the country's electricity production comes from the exploitation of lignite, a non-renewable natural resource, extremely onerous in terms of greenhouse gas emissions. A key objective in the context of the new revised government strategy for the NECP is the highly ambitious, but realistic programme for sharply and definitively reducing the share of lignite in power generation, i.e. the so-called lignite phase-out, by implementing a relevant front-loaded programme in the following decade and putting a complete end to the use of lignite for power generation in Greece by 2028. The NECP also sets out the timeframe for shutting down the lignite-fired power plants that are currently in operation, which will be completed by 2023. Given the fact that the location suggested for the Kozani solar park is next to a lignite mining area (see image below), the investment has also a "symbolic character" for the area of development as well as the country in total.

2.3 Who is HELLENIC PETROLEUM S.A.

Founded in 1998, HELLENIC PETROLEUM is one of the leading energy groups in South East Europe, with activities spanning across the energy value chain and presence in 6 countries. Its shares are primarily listed on the Athens Exchange (ATHEX: ELPE) with a secondary listing on the London Stock exchange (LSE: HLPD/98LQ).

More information can be addressed here:

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Send request: <https://www.helpe.gr/en/media-center/ContactUs/>

Web address: <https://www.helpe.gr/>

2.4 Summary of Expected Impacts

The expected negative impacts from the operation of project are of low or moderate intensity. On the contrary, the positive effects of a solar park operation are very important related to the use of Renewable Energy Resources in an area, where economy is heavily dependent on fossil fuel and linked to the delignitization strategy of the area:

- > Generation of renewable energy and reduction of greenhouse gases emission and pollutants such as particulate matter, sulphur dioxide and NOx, in comparison to conventional power plant
- > Expected increase of income to the community and the Municipality and increase of employment, especially during the construction phase
- > The impact on the flora of the area due to the proposed project will be small and reversible, mainly due to the limited extent of the proposed interventions, and will be further minimized by the implementation of the proposed measures.
- > Similarly, no significant effects on the fauna of the area are expected, apart from the expected impacts on birds due to the lake-effect caused by the surface covered by solar panels.
- > Considerable change in land use from pasture land to industrial with an impact on local grazing patterns in the around project area.
- > The operation of the project will not cause an increase beyond the permissible limits of the noise in the residential environment of the area.
- > The visual aesthetics will not be severely impacted despite the large area of coverage.
- > Cumulative impacts are observed due to the dense investment interest for solar parks in the area.

CHAPTER 3. REGULATORY REQUIREMENTS

3.1 National Requirements

Requirements in relation to public disclosure, participation and access to information relevant to A class projects, works and activities in Greece are prescribed by the Ministerial Decision (MD) 1649/45 (GG 45B/2014) "Specialisation of the procedures of opinion and public information and participation of the interested public in the public consultation during the environmental licensing of projects and activities of Category A of the decision of the Minister of Environment, Energy and Climate Change no. 1958/2012 (GG 21/A), in accordance with the provisions of article 19 paragraph 9 of Law 4014/2011 (GG 209 / A), as well as any other relevant details".

The MD sets the stakeholder engagement requirements during environmental permitting procedures for new projects and for the renewal, modification, improvement, modernisation or extension of Approved Environmental Terms of existing projects and activities. The procedure described is the following:

- After the initial approval of the Environmental dossier by the regional or the national Environmental authorities, the contents of the dossier are submitted to relevant bodies (such as Forest departments, archaeological authorities, ministries, etc.) according to the type of project or activity, so that they can share their opinion about the project and the relevant Environmental Terms

- The Regional Councils relevant to the project are also called to give their opinion on the EIA or the Environmental dossier. The Regional authorities also must contact all local stakeholders (Municipalities, small communities, Life Quality Committees, etc.) so that they can share their opinion on the project/activity.
- For public disclosure, all the main information of the project/activity and are presented in a regional newspaper and the public is called to be informed about it and share their opinion during the disclosure procedure.
- All opinions must be formed within the available timeframe of the public disclosure procedure and they are taken into consideration for the approval of the Environmental Terms.

Also, the public access to environmental information has been established with the Joint Ministerial Decision 11764/653/2006 "Public access to information to the public in accordance with the provisions of Directive 2003/4 / EC on public access to environmental information and repealing Council Directive 90/313 / EEC. Replacement of Ref. 77921/1440/95 Joint Ministerial Decision (795 / B)" (GG 327B/2006).

The Kozani Solar Park has been through this procedure many times during the initial process for the first Approval of Environmental Terms (2013) until more recent modifications of Environmental Terms in 2020 and therefore it is fully compliant with the national regulation about stakeholder engagement.

3.2 EBRD Requirements

The consultation process is a critical part of EBRD Environmental and Social Policy¹ (ESP), specifically **Performance Requirement (PR) 10 "Information Disclosure and Stakeholder Engagement"** points out the importance of an open and transparent engagement between the project developer and the different stakeholders at an early stage of the project cycle². EBRD's PR10, which is guided by the Aarhus Convention principles, states that "The nature and frequency of stakeholder engagement at all phases of the project development will be proportionate to the nature and scale of the project, its potential adverse environmental or social risks and impacts and the level of stakeholder interest". According to this PR, "The client will comply with the applicable requirements of national law with respect to public information and consultation, including those laws implementing host country obligations under public international law³". The requirements of the EBRD PR 10 related to Information Disclosure and Stakeholder Engagement can be summarized as follows:

- Stakeholder consultation is an ongoing process that continues throughout the Project's life span;
- Stakeholder engagement involves the following:
 - stakeholder identification;
 - Proactive stakeholder engagement;
 - Availability of a grievance mechanism open to all; and monitoring.

¹EBRD Environmental and Social Policy, April 2019

² EBRD Performance Requirement 10 (Information Disclosure and Stakeholder Engagement)

³ EBRD Performance Requirement 10, paragraph 8

- The nature and frequency of stakeholder engagement actions is proportionate to the nature and scale of the project, its potential adverse impacts, and to the level of public and other stakeholders concerns.
- The required regulations, standards and guidelines used for the purposes of the grievance mechanism on the proposed project include the following:
 - Grievance Management Guidance Note⁴
 - Project Complaint Mechanism user's guide and Rules of Procedure⁵
 - Environment and Social Policy (2014)

In addition to PR 10, other crosscutting issues covered by the other PRs, play an important role in the consultation process. Of particular interest is **Performance Requirement 5 “Land Acquisition, Restrictions on Land Use and Involuntary Resettlement”**, which requires to organize meaningful consultation of affected persons and communities, including host communities, throughout the process of resettlement planning and implementation in accordance with principles and processes outlined in PR 10.

CHAPTER 4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

All previous stakeholder engagement activities were carried out within the framework of the All previous stakeholder engagement activities were carried out within the framework of the environmental permitting procedures for the project, according to the national regulations, as mentioned above. In particular, the main stakeholder engagement activities which have taken place so far since the project's start in 2004 are the following:

- 1. Preliminary Stakeholder Information (2013 – 2014):** During this period, the relevant authorities were contacted to give their opinion and their opinions on the EIAs of the project. These include: the Department of Renewable Energy Sources and Energy Saving (Ministry of Development), the Department of Environment and Spatial Planning (Region of WM), the Directorate of Protection of Forests and Natural Environment (Ministry of Agriculture), the Forestry of Kozani (Region of WM), the 17th Ephorate of Byzantine Antiquities (Ministry of Culture), the Ephorate of Modern Monuments of central Macedonia (Ministry of Culture), the Ephorate of Antiquities of Kozani (Ministry of Culture), the Town Planning office of Kozani (Municipality of Kozani), the Civil Aviation Service (Ministry of Transportations and Communications), the Hellenic National Defence General Staff (Ministry of Defence), the General Directorate of Development (Greek Tourism Organisation), the Directorate of Electronic Studies and Development (Hellenic Broadcasting Corporation), the Hellenic Transmission System Operator S.A. (DESMHE), the Regional Council of WM, the Energy Regulatory Authority (RAE) and the Directorate of Agricultural Economy (Region of WM) Their answers were included in the Environmental Impact Assessment of 2013.
- 2. Stakeholder Engagement during the review of the Environmental Impact Assessment (2019 – 2020):** During this period, the following authorities presented their opinion on the EIA: the Regional Council of WM, Forest Directorate of WM (Decentralized region of Epirus-W.

⁴ <https://www.ebrd.com/downloads/about/sustainability/grievance-mechanism.pdf>

⁵ <https://www.ebrd.com/news/publications/guides/pcm-user-guide.html>

Macedonia), the forestry of Kozani and the Regional Committee of Spatial Planning and Environment (PECHOP, former NECHOP). Their answers were taken into consideration for the Approval of Environmental Terms in 2020, which is still ongoing.

Additionally, current communication needs of the Project are covered by the representatives of the Company. Stakeholder communications can be informal, verbal or over the phone, as the representatives have formed close relationships with the local communities, the Municipal Council of Kozani and the Regional Council of WM. Any requests and complaints are forwarded to the main headquarters of the Parent Company if necessary and they are addressed appropriately.

CHAPTER 5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

In order to adequately respond to the needs of different groups, communication and information channels have been designed for all identified stakeholders in accordance with their needs.

5.1 Purpose and Responsibility for SEP Implementation

HELPE recognizes that meaningful engagement with local communities, Project Affected People (PAP) and other stakeholders will ensure the success of the Project. The engagement process will be used to obtain comments and suggestions for the development of the Project, which may enhance the Project design and lead to extended local benefits.

In order to ensure an adequate and timely consultation process, the company will establish a Social Team consisting of:

- A competent Social/Community Liaison Officer (CLO) with the relevant skills and qualifications who will contact with the local community and authorities regularly as part of the SEP, disclose information, solicit feedback, facilitate grievance management and update the Project management procedures providing improvement recommendations
- Two members with relevant experience to manage communication as well as compensation issues. (it is suggested to use an agronomist with knowledge on compensation issues and the economics and a social expert)

The social team will be responsible for the implementation of the SEP, including communicating with Municipalities, the affected local communities and PAP. Furthermore, all contractors in charge of carrying out specific Project activities will be required to implement the SEP. The provisions of SEP implementation, including the grievance mechanism, entrusted to contractors will be laid out in the tender documentation and contracts signed with the contractors.

The list of stakeholders presented below, as key impact stakeholders, is not extensive and can be revised during the different phases of the project.

Table 5-1: Identification and Analysis of the Stakeholders of the project

Stakeholders to be affected, directly or indirectly, by the outcomes of the Project implementation	Stakeholders that participate in the Project implementation	Stakeholders being able to influence and decide on the Project implementation
Inhabitants of both the communities	Design company / companies	Decentralized region of Epirus-Western

Stakeholders to be affected, directly or indirectly, by the outcomes of the Project implementation	Stakeholders that participate in the Project implementation	Stakeholders being able to influence and decide on the Project implementation
located next to the project area (Livera and Sideras and other communities) and mainly shepherds. Inhabitants of the city of Kozani and Eordaia, who reside close to the project. Agricultural cooperatives and other Unions. NGOs operating at the local, regional, national and international level (including environmental organizations). Cultural and sports clubs in the area and local inhabitant-supporting organizations. Local and regional media. Users of the area including herders, farmers, bee-keepers, hikers, hunters etc	(JUWI). Investor/Electricity Producer company (HELPE). Contractors for the construction phase, suppliers, local shops and suppliers, services and facilities in the area to assist construction	Macedonia / Regional administration and governmental administration / Local administration

5.2 Internal Stakeholders

The following categories of stakeholders have been identified as internal:

- Shareholders of the Company
- Company employees: it is planned that Project realisation will create 350 during construction and 20 during operation new work places; and
- Project internal stakeholders: sub-contractors, mainly at the construction stage.

5.3 External Stakeholders

In this chapter, a brief list of stakeholders identified as external stakeholders is identified. In ANNEX I a detailed list of all project affected stakeholders is presented with appropriate ranking. The categories of stakeholders been identified as external are presented in the following table, including a stakeholder concern analysis:

Table 5-1: Identification and Analysis of the Stakeholders and key Expectations and Concern Analysis

No	Identified Stakeholder Group	Definition of Stakeholders	Key concerns	Recommendations
1	Project Affected People ⁶	Individuals, households and businesses, owners or users, who will be affected by land acquisition and/or land use (permanent/temporary) related to project activities	Social and environmental issues Loss of income; Lack of compensation	Continue with consultations; repeatedly explain the Project plans. Work further to identify and manage issues / expectations. Held meetings with community leaders and residents. Inform the communities of the Project progress.
2	Affected vulnerable groups	Vulnerable groups refers to people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by	Changes in the routine lifestyle To be identified / analysed	

⁶ The precise number of people affected by land acquisition activities for the needs of the project will be known after the Resettlement Action Plan is prepared.

No	Identified Stakeholder Group	Definition of Stakeholders	Key concerns	Recommendations
		<p>Project impacts than others and who may be limited in their ability to claim or take advantage of project benefits (exact data on these group will also derive from the census that will be developed in the Resettlement Action Plan):</p> <ul style="list-style-type: none"> • Elderly and ill; People with special needs; • Households with very low or no income, particularly those who depend on public transportation; • Elementary and high school children inhabiting the vicinity of road construction sites or passing the construction sites on a daily basis. 		
3	Government authorities within the Project area, relevant ministries and public institutions:	<ul style="list-style-type: none"> • Ministry of Environment, Energy and Climate Change • Ministry of Rural Development and Food • Ministry of Culture: <ul style="list-style-type: none"> ◦ Ephorate of Antiquities of Kozani ◦ Ephorate of Modern Monuments of central Macedonia • Regulatory Authority for Energy (RAE) / Operator of Electricity Market (LAGIE) / Independent Power Transmission Operator (ADMIE) • Decentralized Administration of Epirus-Western Macedonia: <ul style="list-style-type: none"> ◦ Directorate of Coordination and Inspection of Forests ◦ General Directorate for Spatial Planning & Environmental Policy, Directorate of Technical Control • Region of Western Macedonia <ul style="list-style-type: none"> ◦ Directorate of Forests (Kozani) • Municipality of Kozani <ul style="list-style-type: none"> ◦ Directorate of Spatial Planning Office of Thiva • Local communities: <ul style="list-style-type: none"> ◦ Livera ◦ Sidera 	Environmental deterioration; Failure to comply with the national requirements	Continue with consultations and dialogue. Formal communication through the project permit and modification procedure Keep contact with the Mayor and the Regional Governor in order to record grievances and expectation directly reported to them
4	Interested NGOs at local and national level	<p>Local NGOs:</p> <ul style="list-style-type: none"> • Ecological movement - historical and cultural association of Ano Komi 	Transparency of the decision-making and communication	Maintain an open-door approach with those who have concerns with respect to the

No	Identified Stakeholder Group	Definition of Stakeholders	Key concerns	Recommendations
		<ul style="list-style-type: none"> Ecological movement of Kozani Club for the environment and quality of life Municipality of Ypsilantis Forest Research Institute Friends of the Forest Group National/international: <ul style="list-style-type: none"> WWF Greece Greenpeace Greece Mediterranean SOS Arktouros Hellenic Ornithological Society Others 	processes. Compliance with regulations	Project construction and operation
5	Cultural associations and athletic clubs	The region has a broad variety of cultural groups as well as sports clubs that the project needs to take into account, especially during its operation. Religious related institutions in the area are also significant for the project	Changes in the routine lifestyle To be identified/analysed	Part of the corporate social responsibility program Support their societal functions
6	Associations and agricultural cooperatives	Commercial Chamber of Kozani Labor unions of Kozani, DEI (PPC) etc Medical union of Kozani Scientific bodies (TEE-GEOTEE) Hunter's union Agricultural and Farming cooperatives	Concerns for land use	Continue with consultations and dialogue. Develop grievance mechanism Develop compensation mechanism
6	Formal and informal users of the land	Including herders, farmers, bee-keepers, hikers, hunters etc	Concerns for land use	
8	Media	Newspapers, TV stations, local and regional blogs	Social and environmental issues Compliance with regulations	Maintain an open-door approach. Deliver press conferences and press releases Support of their societal functions through their CSR

5.4 Planned Information and Communication Tools

The methods to maintain communication with external stakeholders are provided below

Table 5-1: Identification and Analysis of the Stakeholders and key Expectations and Concern Analysis

No	Identified Stakeholder Group	Key issues	Proposed communication method	
1	Project Affected People ⁷	Providing timely information the project phases Providing timely information	<ul style="list-style-type: none"> Individual consultative meetings to discuss Project impacts Public consultation meetings 	Prior to construction During project

⁷ The precise number of people affected by land acquisition activities for the needs of the project will be known after the Resettlement Action Plan is prepared.

No	Identified Stakeholder Group	Key issues	Proposed communication method	
		on construction activities, potential traffic delays, road closures and access restrictions	<p>(preferably through Municipal and Local Communities' Councils)</p> <ul style="list-style-type: none"> Disclosure of information through the websites of the Company and daily media. 	<p>implementation</p> <p>Weekly update on grievances and bi-annual update on vacancies</p>
2	Affected vulnerable groups	<p>Providing timely information the project phases</p> <p>Providing timely information on construction activities, potential traffic delays, road closures and access restrictions</p> <p>Assistance in interpreting and understanding the submitted information</p>	<ul style="list-style-type: none"> Public consultation meetings (preferably through Municipal and Local Communities' Councils as well as local schools, where elementary and high school children are recognized as affected vulnerable groups) Individual meetings organized by the CLO and the Social team as necessary to provide information and assistance in understanding the provided information and submitted documentation 	<p>Prior to construction</p> <p>During project implementation</p> <p>Weekly update on grievances and bi-annual update on vacancies</p>
3	Government authorities within the Project area, relevant ministries and public institutions:	<p>Providing timely information on planned construction works, consultations regarding the final designs plans and documentation</p> <p>Reporting according to the issued permits</p>	<ul style="list-style-type: none"> Regular contacts through internal communication channels such as contacts and meetings with the representatives of the Municipalities, including Mayors, Deputy Mayors coming from minority communities, Cadastral and urban development Departments, Public Service Departments, Local Community and relevant Offices etc. 	<p>Prior to construction, semi-annual update on progress of the project, unless otherwise stated in project's permits</p> <p>Timely update for necessary monitoring activities (e.g. Ephorate of Antiquities for monitoring)</p> <p>Timely update for design modifications</p>
4	Interested NGOs at local and national level	<p>Providing timely information, communication and consultation, grievance management</p>	<ul style="list-style-type: none"> Disclosure of information through the project's websites and daily media Public consultative meetings and consultative meetings if necessary 	<p>Semi-annual update</p>
5	Cultural associations and athletic clubs		<ul style="list-style-type: none"> Individual consultative meetings to discuss Project impacts Public consultation meetings (preferably through Municipal and Local Communities' Councils) Disclosure of information through the websites of the Company and daily media 	<p>Semi-annual update</p>
6	Associations and agricultural cooperatives		<ul style="list-style-type: none"> Individual consultative meetings to discuss Project impacts Public consultation meetings (preferably through Municipal and 	<p>Semi-annual update</p>

No	Identified Stakeholder Group	Key issues	Proposed communication method	
			Local Communities' Councils) <ul style="list-style-type: none"> • Disclosure of information through the websites of the Company and daily media. 	
6	Formal and informal users of the land		<ul style="list-style-type: none"> • Individual consultative meetings to discuss Project impacts • Public consultation meetings (preferably through Municipal and Local Communities' Councils) 	Daily communication until their issues are resolved Quarterly update after completion of issue and during monitoring
8	Media	Providing timely information the project phases, community activities, provision of benefits, CSR etc	<ul style="list-style-type: none"> • Participate in press conferences • Prepare press releases 	Quarterly update with press releases.

CHAPTER 6. Monitoring and reporting

The Stakeholder Engagement Plan will be periodically revised and updated as necessary during the operation of the solar park and any potential future modifications.

An annual report to the public on environmental and social performance, including on the implementation of the Environmental and Social Action Plan will be provided on the website and to the authorities in each of the communities identified. The report will include summaries of incidents/grievances and the status of implementation of corrective/preventive actions and will be also available on the Project's website. Any significant project updates (e.g. changes in the schedule) will be publicised on the Project's website and, if necessary, on the web sites of the regional and local authorities. Notes of each meeting will be kept, and made available to the public. Notes of meetings with individual persons and statutory and non-statutory stakeholders will be sent to each attendee, where contact information has been provided. Notes of public meetings will be sent to the Municipality of Tanagra and will be available to view at the Town Hall. A feedback form will be made available to those attending public meetings so that they can record any comments, concerns or issues.

CHAPTER 7. Grievance mechanism

7.1 Introduction to the mechanism

A grievance can be a complaint, concern, question, suggestion or other comment about the project and how it is implemented. Receiving and processing grievances is a valuable tool in order to know any concerns and to meet them, thus preventing problems and conflicts.

The grievance mechanism is dedicated to receiving, recording, investigating requests, complaints, and questions about the project and submitting answers to them. It is designed to enable any interested stakeholder to submit their grievances about the project.

A grievance may take the form of specific complaint about impacts, damages or harm caused by the project. Similarly, a grievance may refer to concerns about access to the stakeholder engagement process or about how comments have been addressed. Grievances can also be related to project activities, or perceived incidents or impacts.

The Grievance Mechanism, as with the overall SEP, will be in place over the whole life of the project.

7.2 Grievances Submission

A Public Grievance Form should be used for submitting grievances. It should be available in hard copies in local administration (local communities, municipalities and the regional offices) as well as in an electronic version on the project's website. However, other written letters, emails, text messages and phone calls can also be used for submitting grievances, as described below. Stakeholders will be able to submit a grievance in relation to the project, at any time and at no cost, by using one or several of the following ways:

- Through the electronic grievance form on the project's website.
- Submitting a written or verbal grievance during a public meeting.
- Handing or mailing a written grievance to the Local Team or the Community Liaison Officer.
- Calling the CLO and the Social Team.

7.3 Processing and resolving of Grievances

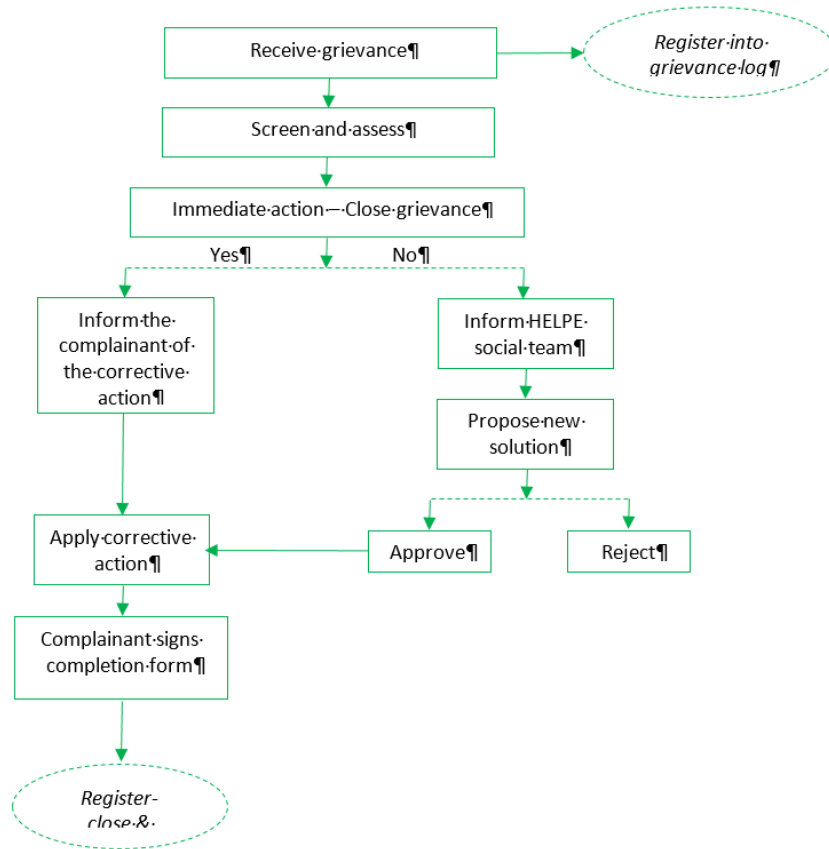


Figure: Flowchart for Processing Grievances

An indicative grievance form in the format of a “Communication form” is presented here:

Communication Form

Reference:	
Name	
Contact information and preferred method of communication <i>Mark how you wish to be contacted (mail, telephone, e-mail).</i>	<input type="radio"/> By Post: Please provide postal address: _____ _____ <input type="radio"/> By Telephone: Please provide phone number _____ <input type="radio"/> By e-mail: _____
Date of incident:	
<i>Choose accordingly</i>	<input type="radio"/> One time incident <input type="radio"/> Happened ____ times <input type="radio"/> Ongoing (currently happening)
Description of grievance:	<i>What happened? Where? Who did it happen to? What is the result of the problem? Source and duration of the problem?</i>

How would the issue be resolved? What do you expect?

Date:

Signature:

Please return this form to: