



CRNI VRH WINDFARM, SERBIA

Stakeholder Engagement Plan



Crni Vrh Power doo, Žagubica

August 2022

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Crni Vrh Windfarm, Serbia

Stakeholder Engagement Plan

1 Introduction

Crni Vrh Power d.o.o. (“CVP” or “the Developer”) founded in August 2019, by Kodar Energomontaža doo Belgrade, is planning to develop the Crni Vrh wind power plant (WPP) in Eastern Serbia (the Project). The WPP will have up to 32 wind turbines with a maximum total installed capacity of 158.4 MW.

As CVP is likely to seek financial support for the Project from an International Finance Institute or a major commercial bank, they have chosen to adopt Good International Industry Practice (GIIP) in the environmental and social impact assessment (ESIA) of the Crni Vrh Project. This means that in addition to the regulatory requirements of Serbia, the ESIA has been developed in line with the requirements of the Equator Principles and the International Finance Corporation (IFC) Performance Standards. Engagement with Project stakeholders is an integral part of the ESIA process to assist with the identification of impacts, the development and implementation of mitigation measures, as well as the implementation of monitoring and evaluation.

This document is the Project Stakeholder Engagement Plan (SEP) and its purpose is to present identified Project stakeholders and how CVP disclosed Project related information to them and consulted them during the ESIA scoping and preparation process. The SEP also presents plans for disclosure and consultation activities which will be organised during the ESIA approval process and beyond, during the construction and operation phases of the Project. The SEP describes the Grievance Mechanism which is being implemented by CVP to receive and respond to Project related grievances, comments or questions from stakeholders.

The full ESIA in English, as well as the ESIA Non Technical Summary (NTS) and the SEP, in English and Serbian, will be publicly disclosed on the CVP WPP website (<https://www.cvpower.rs>) from September 2022 and available for comments and questions from stakeholders, using the contact details presented in section 9 of this SEP or through the online form available on the CVP WPP website.

External stakeholders of the Project include local communities that might be affected directly by the Project, as well as those groups that may influence the development of the Project, such as local and national government authorities and civil society organisations. Internal stakeholders include Project employees, as well as contractors and suppliers.

2 Aims of Engagement and Objectives of the SEP

The aim of engaging with stakeholders is to build strong, constructive and responsive relationships for the successful management of a Project’s environmental and social impacts and issues.

To facilitate these aims, CVP has developed this SEP to:

- Provide a brief description of the Project, to set the context for identifying stakeholders and to serve as a non-technical tool for communication with stakeholders;
- Identify the stakeholders who have concerns about, or influence on the Project and in particular any vulnerable communities or groups;
- Identify and record key issues and concerns that stakeholders may have about the Project;
- Build open, positive relationships with stakeholders based on the timely supply of information and the provision of opportunities for stakeholders to voice their opinions and concerns.
- Ensure that stakeholders are informed regularly about the Project’s activities, describing the construction and operation stages, and the overall Project duration;
- Demonstrate how national requirements, GIIP and IFC guidelines have been addressed in the national EIA and the international ESIA;
- Provide tools for maintaining a record of all consultations;
- Implement a Grievance Mechanism (GM) and maintain a record of the grievances received.

This SEP was developed by CVP, with assistance from a team of environmental and social consultants engaged by the company for the preparation of the ESIA scoping study report and the ESIA¹. The document will be periodically updated by CVP, to reflect changes in the development and implementation of the Project, throughout the life of the Project.

3 Project Overview

The proposed wind power Project site is situated in East Serbia on Crni Vrh Mountain, in a scarcely populated area, between the towns of Bor and Žagubica (see Figure 1), spreading across the territory of these two municipalities.

Crni Vrh WPP will include up to 32 wind turbines with a total installed capacity up to 158.4 MW. Figure 2 presents the layout of the WPP that was used as the basis of the ESIA.

The development of Crni Vrh wind power plant comprises the following main activities:

- Lease or purchase of land plots for the siting of wind turbines;
- Clearance of land required for the wind turbine foundations and maintenance platforms;
- Construction of appropriate foundations for the wind turbines;
- Transport of turbine components to the site;
- Installation of the wind turbines using large cranes;
- Construction of appropriate infrastructure including underground power cables, a substation and connection to the main grid, with three 110 kV overhead transmission lines (OHLs); one at 1.6 km, one at 2.4 km and one at 4.0 km in length.
- Operation of the wind turbines for approximately 25 years; and,
- Replacement or decommissioning of the wind turbines once the WPP comes to the end of its operational life.



Figure 1 – Wider Site Area

¹ Pepper Advisory Limited (UK), LINK 011 (Serbia), Insitu (Serbia), Fauna C&M (Serbia) and Ion Acoustics Limited (UK).

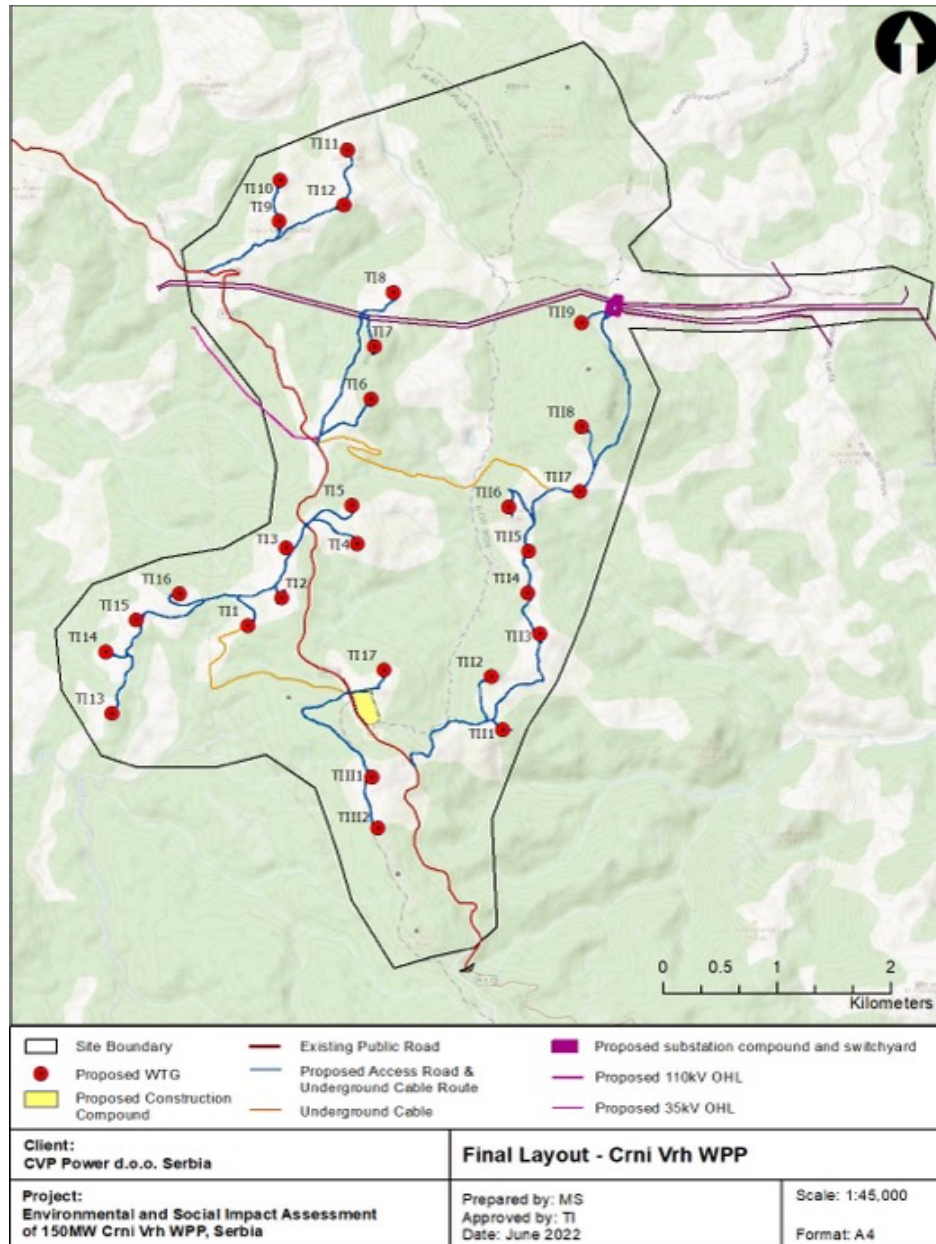


Figure 2 – Final Layout of Crni Vrh WPP

The Project also requires the construction of new or upgrading of existing access tracks, to link the wind turbines to the infrastructure on the site and the acquisition of the needed land will be carried out by relevant authorities through a process of expropriation. During construction, a compound will be established for the site offices, welfare facilities, vehicle parking, temporary stores and a lay-down area for turbine components. The compound will be removed once construction is finished.

The turbines will be sourced internationally and will be delivered by river barges via the Danube River to the Port of Prahovo. From there, the turbines will be brought to site in sections by large vehicles (typically 10 to 12 large vehicles per turbine), escorted by traffic police, after which they will be installed by international contractors. The main access point to the Crni Vrh WPP will be from the state road No. 161 Žagubica-Brestovac which also passes through the Brestovac spa and the Bor lake area, popular among local people and tourists particularly during the summer season.

To the extent possible, construction materials, such as reinforcing steel and concrete for turbine foundations, will be sourced locally and local labour will be used during the construction phase. In the operations phase there will be no significant positive impact on employment in general, as the management and maintenance of wind power plants requires a limited workforce.

At the time of developing this SEP, the planned construction timeline is as follows:

- Start of construction: autumn 2022
- Site tracks and roads construction: autumn 2022 to spring 2023
- Foundations and wind turbine generator (WTG) crane pad construction: summer 2023
- OHL 110 kV and switchyard 110kV construction: autumn 2022 to autumn 2023
- WTG installation: summer 2023 to spring 2024
- WPP commissioning: autumn 2024.

The Project site is surrounded by the villages Laznica and Krivelj, however the centres of these villages are not in the vicinity of the site. There are few houses within or near the site and most of these structures are in a very poor condition or fully abandoned. However, a few are occasionally used as weekend or holiday houses.

Forest land surrounding the Project site is mainly used for the exploitation of timber/ firewood, as well as limited mushroom and herb picking. Sport hunting is also widespread in the area and various hunting associations, from the two municipalities, are active in these locations. The higher pastures and meadows are used for grazing sheep, cattle and horses.

Project Area of Influence considered in the SEP

All projects have direct and indirect impacts on the environmental and social setting where they will be placed. Consideration of these impacts means that the scope of the SEP (and the ESIA) goes beyond the immediate vicinity of the Project; this is defined as the Project Area of Influence.

The SEP has identified the stakeholders associated with the Project Area of Influence. The Project Area of Influence for the Crni Vrh wind power plant is defined as:

- The municipalities where the WPP is located as well as the local communities that may provide labour or other support services. This includes the potential for economic displacement and or social disruption as well as any benefits due to the presence of the construction teams within the local communities.
- The Project site and local approaching road network where physical disturbance might take place. The transport route to site for heavy vehicles and, in particular, the delivery of the WTG components.
- The wider landscape as defined by a Zone of Theoretical Visibility.
- The benefit to the local communities of tax paid by Crni Vrh.

The definition of the Area of Influence for the SEP takes into account the activities undertaken during the construction, operation and decommissioning of the Project.

4 Applicable Standards

The Serbian Regulatory Framework

In Serbia, as in most other countries in the world, the right to be informed accurately, fully and timely about issues of public importance, is guaranteed under the country's constitution. This right is further elaborated in the Law on Free Access to Information of Public Importance of the RS, which requires representatives of the public sector to provide information and respond to any queries in relation to their activities, including planning documents, permits, audits, etc.

The development and adoption of planning documents in Serbia, such as the Plans of Detailed Regulation needed for this Project, is subject to a public disclosure and consultation process (2 stages - early public disclosure and public disclosure), as prescribed by the Law on Planning and Construction of the RS, as well as the accompanying bylaws. An additional disclosure and consultation process is required under environmental laws, including the Law on Environmental Impact Assessment of the RS and accompanying bylaws.

Public disclosure of information on the EIA procedure is required in all three stages – screening stage (decision on the need for an EIA), scoping (decision on the scope and content of the EIA) and decision-making stage (approval or rejection of a Project). The EIA study must be publicly disclosed and is subject to a mandatory public hearing, organised by the competent authority, in the case of this Project, the Ministry of Environmental Protection of the RS.

International Standards

The IFC Performance Standards on Environmental and Social Sustainability (2012) specify the requirements for stakeholder engagement and public consultations that Projects are required to meet, in line with international good practice. According to these standards², stakeholder engagement is an ongoing process which involves the implementation of the following activities:

- Identification of project stakeholders and planning of engagement activities and events through the preparation of a Stakeholder Engagement Plan,
- Timely public disclosure of appropriate project related information to enable meaningful consultation with stakeholders,
- Meaningful consultations with potentially affected parties and communities on matters that directly affect them, and
- Implementation of a procedure or policy by which people can make comments or complaints in relation to the project and receive a response (Grievance Mechanism).

This SEP builds on engagement activities which are required under national legislation of the Republic of Serbia and includes additional activities that have been and will be undertaken by CVP to fully comply with IFC requirements.

5 Initial Stakeholder Engagement

Engagement with stakeholders for the Project has occurred both in response to national legislative requirements and in response to international requirements, connected to the preparation of the ESIA.

In line with national requirements, early public hearings were organised at the end of 2020 for the development of preliminary Plans for Detailed Regulation. Comments on these documents were submitted by a local organisation active in the field of environmental protection – the Association of Young Researchers Bor. Following these preliminary plans and their disclosure, full Plans for Detailed Regulation, accompanied by Strategic EIAs were developed and publicly disclosed. Public hearings were held in the affected municipalities during July 2021 and again, comments were submitted only by the Association of Young Researchers Bor. Other than procedural comments, the majority of issues raised by this organisation were in relation to requests for information on environmental impacts of the Project, which were to be included in the national EIA, at a later stage of project development.

The development of Plans for Detailed Regulations also required CVP to consult with various state and local government stakeholders and ask for their opinions and conditions under which a development is possible. Close to 30 opinions were issued by statutory stakeholders. They provided requirements related to: biodiversity and natural heritage, cultural heritage and archaeology, forest management, water supply, wastewater discharge, fire protection, gas supply, electricity supply, local and state road network, telecommunications, radio communications, aviation, oil pipeline transport, military, etc.

In July 2022, the draft national Project EIA was prepared and disclosed to the public by the Ministry of Environmental Protection of the RS. In addition to representatives of relevant local authorities, one local person³ attended the public hearing and also submitted comments on the EIA to the Ministry. Most of the comments were requests for more detailed information on certain environmental topics, or requests for additional studies. CVP responded to comments received from the Technical Committee that reviewed the EIA and also to each comment submitted by the interested local person. The EIA is expected to be finalised in September 2022.

Additional and targeted stakeholder meetings were held by CVP, with guidance from the ESIA consultant team, for the development of the ESIA document. The majority of these meetings were held in October 2021, as presented in detail, in Table 1 below. It should be noted that a meeting was held with representatives of the municipality Majdanpek, although since, the four wind turbines located on the territory of this municipality have been removed from the scheme and the territory of this municipality will no longer be affected.

Meetings were also held by CVP with Srbijašume to present the Project and deal with property legal issues in relation to land owned by this company. In addition, CVP representatives held meetings with individual households who own

² Stakeholder engagement and grievance management are presented in IFC Performance Standard 1, see full policy at: https://www.ifc.org/wps/wcm/connect/24e6bfc3-5de3-444d-be9b-226188c95454/PS_English_2012_Full-Documents.pdf?MOD=AJPERES&CVID=jkV-X6h

³ The same individual previously attended public hearings as a representative of the Association of Young Researchers Bor, however for the EIA, the comments were signed by him personally, with no mention of the organisation.

structures which may be impacted by noise levels exceeding permitted limits and/or shadow flicker and these are described in detail in the relevant sections of the ESIA. A total of seven structures, belonging to four affected households were compensated by CVP, while one household refused the option of compensation for the affected structure (and its demolition) and requested compensation to implement noise mitigation measures. To realise these agreements, CVP had numerous contacts and meetings with the affected households, which have all been documented in detail.

Table 1 – ESIA Stakeholder Meetings

Stakeholder	Meeting participants	Date of the meeting	Main feedback
Municipality Majdanpek	Urban planning dept. Local economic development dept.	20.10.2021	<p>The municipality is looking forward to the implementation of the Project and is ready to contribute and support the Project. The number of turbines on the territory of this municipality is the smallest, but nevertheless any development opportunities are welcomed. Any employment opportunities are also important for the municipality.</p> <p>The affected land is on a higher altitude, while all arable land is lower, closer to the villages. The roads/tracks to access the affected land are in poor condition or non-existent. This is why the land is largely unused.</p> <p>There have been no negative comments in relation to the Project, either from citizens of any civil society organisations.</p> <p>The municipality is experiencing growth due to the recent restart of mining activities with the acquisition of the state-owned mines by the company Zijin Copper. Many young people are coming back to the municipality because of the employment opportunities and the standard of living is increasing.</p> <p>The tourism areas in this municipality are all along the Danube River and tourism is expanding.</p>
Municipality Žagubica	Urban planning dept. Local economic development dept.	21.10.2021	<p>The municipality welcomes the Project as it will increase the municipal budget (local taxes, i.e. property tax) and open up some employment opportunities. The improvements of access roads are also significant. The main road going through the project site is used by people from Žagubica to travel to Bor where they work, and for recreation at the Bor lake, so traffic needs to be managed well and particularly people must be informed on time of any changes or increased traffic.</p>
City Bor	Urban planning dept. Local economic development dept.	22.10.2021	<p>The discussion held with the municipality was largely the same as the discussion in the other two municipalities, presented above. The municipality was interested in the status of planning documents and when the project is expected to start. The municipality is expecting the implementation of a state highway (Vožd Karađorđe) which will bring in many benefits for this region in Serbia and they hope that the WPP project has been aligned with this future, planned highway project.</p>
9 owners of affected land	7 men 2 women	20, 21, & 22.10.2021	<p>Many owners, especially those living in municipal towns, have inherited the land and do not use it; some don't even know its exact location. All owners were extremely satisfied with the amount of compensation that has been provided and hope that the arrangement will continue (i.e. that CVP will select their land for the WTG and/or that CVP will acquire more land from them for other purposes) and they will continue to receive compensation. The land has almost no value, as no one is interested in buying it.</p>

Stakeholder	Meeting participants	Date of the meeting	Main feedback
			<p>According to one land owner, owners of some of the nearby non affected properties are sorry that they could not benefit from the compensation and are hoping that a part of their land may be needed in the future.</p> <p>Land owners are excited about the Project because they also expect that the access roads will enable them to use their land more intensely, particularly to harvest wood (to the extent allowed by the law). However, it is possible that illegal loggers will also benefit from the access roads (CVP explained that there will be cameras on site, which should deter people from performing any such activities).</p> <p>Some owners have problems with property and legal issues (they did not register ownership in the Cadastre or had disputes with other owners) and CVP assisted them significantly to resolve all issues, to be able to benefit from the compensation arrangements. The owners in some cases had minimal expenses in relation to this, however they could easily offset these expenses with the compensation payments they received.</p> <p>One owner attempted to grow crops on the affected land, however wild hogs kept destroying it, so he gave up. He cuts the grass sometimes to use for animal feed. A few of the interviewed owners live from agriculture, but the affected land is not among the land they actually farm.</p> <p>None of the owners plan to acquire new land with the compensation payments; they will all invest in other things, such as renovation of their houses, contribution towards buying apartments, investment into agriculture (repairs of machinery), but also some investments into children (education).</p> <p>There is some mushroom picking, but no organised purchasing in the villages. It was something more frequent in the past, but now its individual households and they mainly pick on their land or in the vicinity of it, in accessible places, which are not so numerous.</p> <p>Some of the landowners are interested in Project employment opportunities and hope to benefit from them as well.</p>
Hunting Association, Majdanpek (Srna)	4 individuals	20.10.2021	<p>The affected area is used for hunting. However, the hunting association uses 60,000 ha in total, and the affected area is a very small part of it. Different game is hunted in different seasons, all year round. The association has 450 active members (2 women). They engage in well organised hunting tourism, including for foreigners.</p> <p>The benefit of the WPP may be improved fire protection, as fires pose a serious threat to the animals. The members of the association expect that animals may be disturbed during construction, but they hope that they will adapt once the WPP is complete and return to normal.</p> <p>The hunters should be aware of any field activities of CVP and other involved companies, to prevent any accidents. Hunting most often happens on weekends, but occasionally also on weekdays.</p> <p>The hunters provided the same feedback on mushroom picking and herb collection as the land owners, i.e. that there is no</p>

Stakeholder	Meeting participants	Date of the meeting	Main feedback
			organised activity or purchasing any longer and some individuals engage it in only occasionally, more for household consumption and not for sale or income.
Hunting Association, Žagubica (Jovan Šerbanović)	2 individuals	21.10.2021	The discussion was largely the same as in Majdanpek, as presented above. This hunting association uses an even larger area of 72,000 ha and has more members (500). The hunting association feels that there should be some compensation for the disturbance that the project will cause during construction and hopes that CVP can finance some animal feeding facilities. In Žagubica, the wolf is their biggest attraction and they have tourists come from all over the region and western Europe to hunt it. Other than that, they hunt deer, rabbit, wild hogs, etc. as do the other associations.
Hunting Association, Bor (Bakar)	6 individuals	22.10.2021	The same topics were covered as with the previous two hunting associations. This association operates on 65,000 ha and has 400 members.
NGO Young Explorers, Bor	1 individual	21.10.2021	The organisation is very active in the city, however most of their activities are directed towards mining and the serious environmental impacts caused by it. The organisation welcomes the use of green energy and therefore the WPP is seen as positive, provided that any environmental impacts are mitigated. The organisation is ready to cooperate with CVP and can provide access to local NGO networks, for any information sharing or other activities. The Bor lake is an important local resource and people use it in the summer. There is a 'weekend' settlement there, which probably has over 1,000 structures (weekend houses, private accommodation for rent, cafes, restaurants, organised beaches, etc.) and is continuing to grow. The nearby spa is also visited by many people in the summer.

6 Stakeholder Identification and Engagement Methods

Stakeholder groups that may be affected by and/or are interested in the Project, as well as proposed communication methods for each group, have been identified by CVP with assistance from consultants and are presented in Table 1 below.

The identification carried out during the ESIA scoping phase has been greatly influenced by experience gained on other wind power projects in Serbia. The list has been further refined during the preparation of the ESIA document in 2021 and 2022.

Table 1 – External and Internal Project Stakeholders

Stakeholder Group	Type of Communication and Proposed Method	Issues of interest / concern
External stakeholders		
Owners and users of land acquired for Project components on a voluntary basis	Meetings (group or individual) Grievance mechanism	Land acquisition contracts, payment terms

Stakeholder Group	Type of Communication and Proposed Method	Issues of interest / concern
Owners and users of land that may be disturbed during construction (e.g. clearing of trees for access of vehicles / equipment)	Meetings (group or individual) Grievance mechanism	Compensation for damages
Owners and users of land that will be acquired through expropriation (access roads / tracks)	Meetings (group or individual) Grievance mechanism	Expropriation process, land documentation, compensation amounts, appeals, etc.
People occasionally occupying identified noise and shadow flicker sensitive receptors	Meetings (group or individual) Grievance mechanism	Noise or shadow flicker impacts and mitigation measures; any other impacts such as access to properties during construction and operation, health and safety risks, etc.
People working and residing in areas potentially affected by project related transport and traffic impacts, in the Bor spa and lake area.	Meetings (group or individual) Grievance mechanism	Expected transport and traffic impacts, mitigation measures
Hunting associations: "Bakar", Bor "Jovan Šerbanović", Žagubica Local people engaged in herb, mushroom picking and people using areas near the future WPP for livestock grazing Users the affected area for recreational purposes (trekkers, mountain bikers, skiers, etc.)	Individual meetings Public hearings and / or consultation meetings Project website Grievance mechanism	Biodiversity impacts, for example impacts on wildlife and habitats, vegetation Landscape and visual impacts Noise impacts Impacts on ecosystem services Transport and traffic impacts Support for local initiatives and development
Organisations and citizens associations: • Association of Young Researchers Bor Note: other organisations may be added if they show an interest in the Project at a later stage.	Individual meetings Public hearings and / or consultation meetings Project website Grievance mechanism	Environmental and social impacts of the Project and foreseen mitigation measures Planned engagement activities Support for local initiatives and development
General public, particularly residents of Žagubica and Bor, as well as small villages surrounding the Project site (Laznica, and Krivelj)	Public hearings and / or consultation meetings Project website Media Grievance mechanism	Project benefits Environmental and social impacts Employment / procurement opportunities Transport and traffic impacts
Municipalities: Žagubica and Bor	Meetings Official correspondence	Project timeline and progress Project benefits Environmental and social impacts Employment / procurement opportunities Transport and traffic impacts Support for local initiatives and development
Srbijašume	Official correspondence and meetings when necessary	Fire risk; other health and safety risks Biodiversity impacts, impacts on ecosystem services, impacts on logging, etc. Compensation for land use and damages

Stakeholder Group	Type of Communication and Proposed Method	Issues of interest / concern
Elektromreža Srbije (EMS)	Official correspondence and meetings when necessary	Planning, design and construction of OHLs and the substation Land acquisition for OHL towers
Statutory stakeholders, for example, relevant Ministries, institutes, utility companies, directorates, etc.	Official correspondence and meetings when necessary	Planning documents Location conditions / permits EIA applications and permits
Internal stakeholders		
CVP employees	Direct notifications, announcement boards Office meetings Internal grievance mechanism for employees	Labour contracts Human Resources Policy Health and Safety procedures
Contractors, subcontractors, suppliers	Information in contracts Meetings and official correspondence	Worker grievance mechanism Worker Code of Conduct Health and safety at work Security Interaction with the community and Project Grievance Mechanism Environmental protection

7 Stakeholder Engagement Programme

As previously mentioned, CVP has established a Project website which is being used for communication with stakeholders through the provision of updated Project information, including contact details for questions or grievances.

An initial stakeholder engagement programme was developed by CVP during the ESIA scoping stage, that reflected the needs of the ESIA process, to ensure that engagement activities were undertaken regularly and reflected the key milestones in the Project programme. The engagement programme and the status of completion of planned meetings is available in Appendix B of this SEP, as well as a description of newly planned engagement activities during the ESIA disclosure and pre-construction phase. The engagement programme may be further amended in response to stakeholder feedback, prior to significant Project changes or following any unplanned events.

The aim of the stakeholder engagement programme is to:

- Build and maintain stakeholder relationships;
- Continue to disclose Project information (including any access restrictions, employment and procurement opportunities, and community health and safety issues);
- Monitor and evaluate stakeholder engagement;
- Provide stakeholders the opportunity to provide comment and opinions to CVP.

The stakeholder engagement programme includes consideration of:

- Notification methods: Used to inform the identified stakeholders of the SEP activities and the Project development process;
- Disclosure and consultation methods: Used to provide information to stakeholders or to engage in a two-way dialogue by which information is shared with the stakeholders and these in turn can express their views and concerns about the Project.

In the following period, the most significant stakeholder engagement opportunity will be the disclosure of the draft ESIA which is planned for September 2022. CVP will make available the ESIA in English and the NTS, as well as this updated SEP, in English and in Serbian, for any stakeholder questions or comments in relation to these documents.

To ensure stakeholders are informed about the availability of these documents on the website, CVP will send notification emails to relevant stakeholders and if any requests for hard copies of the documents are made, CVP will make arrangements to provide them.

A specific event planned to be carried out before the start of any transport and traffic related impacts occur, is the consultation process in relation to the Traffic Management Plan. CVP will contact local representatives from the Bor lake and spa communities and will organise a meeting with local people and businesses to present the Traffic Management Plan to them for any comments or suggestions. CVP will also present the Grievance Mechanism to them, to ensure that anyone can contact CVP in case of any questions or grievances in relation to the Project.

As mentioned earlier, land needed for the construction and/ or upgrading of existing access roads, will be acquired by the respective municipalities, through a process of expropriation. However, having in mind the low capacity of the relevant municipal departments and the need to complete this process as quickly as possible in the interest of the Project, CVP will play a significant role in identifying and contacting owners of affected land and assisting them to complete all necessary administrative tasks in the expropriation procedure. CVP will be engaging directly with each affected owner and/or user of land in this process, both by phone and in person.

All engagement activities will be carried out with full respect of Covid-19 prevention measures in force at the time of engagement. This may require greater online communication than face to face meetings, smaller focus group meetings rather than large, public meetings, etc.

8 Roles and Responsibilities

Effective stakeholder engagement requires clear lines of communication and effective coordination within the Project, between the Project and partners, and with stakeholders.

CVP is responsible for Project related stakeholder engagement activities described in this SEP. CVP is responsible for stakeholder engagement throughout the life of the Project. The CVP management team has appointed a Community Liaison Manager and has provided sufficient resources to meet the requirements of this SEP.

The Community Liaison Manager (CLM) has a key role to play in the successful delivery of this SEP. The CLM is responsible for ensuring that there is a clear and well-defined strategy to guide stakeholder engagement activities and that the staff, resources and systems are in place to enable the strategy and this SEP to be implemented. Specifically, the CLM is required to:

- Ensure this SEP is updated as and when appropriate;
- Plan and conduct day-to-day stakeholder engagement, including resolving any grievances raised;
- Maintain records of formal and informal stakeholder engagement activities;
- Organise, arrange and attend stakeholder meetings;
- Prepare information for dissemination to stakeholders in accessible formats;
- Ensure that the Grievance Mechanism is implemented and that a log of raised grievances is regularly maintained.
- Monitor engagement activities and prepare reports.

9 Grievance Management

The Project Grievance Mechanism ("GM") is managed by the Community Liaison Manager. A copy of the GM is available on the Project website. The main features of the GM are:

- Any person or organisation may submit comments or complaints in person, by phone, by post or email. A template for the GM Form is provided at the end of this document (Appendix A), however the use of this form is not obligatory. Contact information for CVP is provided at the end of the Grievance Form.
- Individuals who submit a grievance have the right to request that their name is kept confidential. Grievances may also be submitted anonymously, however this could limit CVP's options for investigating and responding to the grievance.
- All grievances will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant.

- CVP will keep a central record of all the grievances received, the GM Log. The CG Log is maintained by the CLM. Worker/ employee grievances will be addressed through a separate, internal grievance mechanism (the Workers Grievance Mechanism) and should not be submitted through the contact details provided in this SEP.
- All grievances will be registered in the GM Log and acknowledged within 5 working days. A formal response to the grievances raised must be provided within 20 working days.
- In cases when the complainant is not satisfied with the way their grievance has been responded to, CVP will invite representatives of the relevant local community or other mutually agreed third party, to participate in the process so that a solution, acceptable to both sides, can be found.
- The GM Log will be used to track the resolution of all grievances raised and to prepare management reports. The GM Log and management reports will be shared with the Lenders, as requested.

The submission of grievances to CVP does not prevent anyone from exercising their legal rights and / or seeking remedies in accordance with the laws and regulations of the Republic of Serbia.

Questions and / or grievances can be submitted to CVP by post, email, fax or by telephone through the following contact details:

Contact person: Predrag Pavlović, Community Liaison Officer

Crni Vrh Power d.o.o

Address: Autoput za Zagreb 22, Beograd

Phone: +381 64 858 4460

e-mail: predragca@gmail.com

web address: www.cvpower.rs

10 Monitoring and Reporting

CVP will monitor any Project related engagement activities not directly organised by the Company, as already done with public hearings for the Plans of Detailed Regulation and the Project EIA. In line with international good practice, CVP has also engaged directly with interested stakeholders from these events and sought to address their views and concerns in the ESIA, to the extent possible.

A record of each stakeholder engagement activity will continue to be kept by the CLM. Notes of meetings include the notice or invitation to the meeting, date and location of the meeting, a list of the topics discussed, the names of the individuals who attended, their affiliation to any group of stakeholders, comments made by the attendees and a summary of the subsequent conversations, and feedback on the meeting. Photographs will be taken as appropriate. CVP will also note any relevant press comments. CVP will keep a record of any social events or Community Investment activities. These notes will be grouped on an annual basis and recorded in an Appendix to this SEP. This initial SEP includes templates for 2022 and 2023 (Appendix C and D).

CVP will report on the status of SEP implementation including grievance management annually, as a section in the Company's Environmental, Health, Safety and Social Performance Reports.

APPENDIX A – Grievance Form

Reference No (to be filled in by responsible person in CVP):	
Full Name	
Contact Information and Preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide postal address: <input type="checkbox"/> By Telephone: Please provide telephone number: <input type="checkbox"/> By E-mail: Please provide E-mail address:
Preferred language (please tick)	<input type="checkbox"/> Serbian <input type="checkbox"/> English
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem?	
Date of Incident/ Grievance	
	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____ Date: _____

Please return this form to:

Contact person: Predrag Pavlović, Community Liaison Officer

Crni Vrh Power d.o.o

Address: Autoput za Zagreb 22, Beograd

Phone: +381 64 858 4460

e-mail: predragca@gmail.com

APPENDIX B – Stakeholder Engagement Programme

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Means of Advance Notification	Status
ESIA Development Phase						
Owners and users of land that will be acquired through expropriation (access roads / tracks)	Group meetings (one or more, depending on number of people and their availability)	Municipality meeting room	<p>To present the Project and highlight CVP's intention to cooperate with stakeholders</p> <p>To hear owners' views of the planned expropriation and any particular concerns or expectations</p> <p>To understand how the owners use this land and whether their livelihoods may be impacted either negatively or positively</p> <p>If any reside in the Project area occasionally, hear their views on the Project and impacts they would like to see addressed in the ESIA (noise, safety, etc.)</p>	Description of the Project and planned expropriation process Grievance mechanism summary and contact details	Direct invitations by phone	<p>Completed meetings with landowners as described in section 5 of the SEP.</p> <p>Some of the interviewed owners (who signed voluntary agreements with CVP) will also be affected by expropriation or land disturbance during construction.</p>
Hunting associations: "Bakar", Bor "Srna", Majdanpek "Jovan Šerbanović", Žagubica	Group meeting	Office of the hunting association	<p>To present the Project and highlight CVP's intention to cooperate with stakeholders</p> <p>To understand stakeholder views of the Project in general and particularly E&S impacts:</p> <ul style="list-style-type: none"> - Biodiversity impacts - Landscape and visual impacts - Noise impacts - Impacts on ecosystem services 	Description of the Project and preliminary identified impacts (experience from other, implemented projects) Grievance mechanism summary and contact details	Direct invitations by phone, followed by a group email invitation	Completed, as described in section 5 of the SEP.

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Means of Advance Notification	Status
			To receive stakeholders' proposals for potential mitigation measures			
Srbijašume	Meeting	Offices of Srbijašume	To present the Project and highlight CVP's intention to cooperate with stakeholders To discuss fire risk and other health and safety risks and obtain Srbijašume's views on how these can be managed. Discuss ways of cooperation on managing these risks.	Description of the Project and preliminary identified impacts (experience from other, implemented projects)	Official invitation, followed up by phone.	CVP has had many contacts with Srbijašume to date, primarily in relation to property legal issues, but also to present the Project, its impacts and mitigation measures. Contacts will continue, as the Project progresses.
<p>Note:</p> <p>In addition to originally planned activities listed above, meetings were also held with the following stakeholders as described in section 5 of the SEP:</p> <ul style="list-style-type: none"> - Representatives of the municipalities (Majdanpek, Žagubica and Bor) - NGO Young Explorers from Bor - People who are occasionally occupying identified noise and shadow flicker sensitive receptors (5 households) 						
ESIA Disclosure and Pre-construction Phase						
Municipal representatives Civil society organisations	Email and/or telephone call	N/A	To inform stakeholders that the ESIA, NTS and SEP are available for review and comments/questions on the Project website	Electronic versions of the ESIA in English and the NTS and SEP in English and Serbian Hard copies to be delivered upon request	N/A	
Owners and users of land that will be acquired through expropriation (access roads / tracks)	Individual meetings	Offices of the local property administrations	To present the Project and highlight CVP's intention to cooperate with stakeholders and acquire land through amicable agreements to the extent possible. To assist owners in the expropriation process.	Compensation offers Expropriation requests and decisions	Official invitation, followed up by phone.	

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Means of Advance Notification	Status
			<p>To understand how the owners use this land and whether their livelihoods may be negatively impacted by land acquisition, and if yes, prepare assistance measures.</p> <p>To understand if there is any particular vulnerability of the owners/users in relation to land acquisition and if yes, prepare assistance measures.</p>			
Local people and businesses operating in the Bor lake and spa area who may be impacted by Project related transport and increased traffic	Notifications and meeting	To be determined	To present the Traffic Management Plan and hear stakeholder suggestions and present the Grievance Mechanism	Handout materials summarising the key features of the Traffic Management Plan and Grievance Mechanism	Contacts with local representatives and meeting notifications in key locations (as advised by local representatives)	
Construction Phase						
Operation Phase						

APPENDIX C – Stakeholder Engagement Activities in 2022

Summary of Grievances Raised under the GM

To be completed

Stakeholder Meetings

To be completed

Social Events

To be completed

Community Investment

To be completed

Press Releases and Comment

To be completed

APPENDIX D – Stakeholder Engagement Activities in 2023

Summary of Grievances Raised under the GM

To be completed

Stakeholder Meetings

To be completed

Social Events

To be completed

Community Investment

To be completed

Press Releases and Comment

To be completed