

Stakeholder Engagement Plan

“Eldrive Charging” EAD



ACRONYMS AND ABBREVIATIONS

Acronyms	Description
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
EU	European Union
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

The Company (Eldrive Charging EAD) shall develop, build, operate, and promote a network of electric vehicle charging stations in Bulgaria via the mobile application "Eldrive" in accordance with the company's business strategy. The Company is 100% owned by Eldrive Holding GmbH (AUT), which is incorporated in Austria and is an 80:20 joint venture between UAB Renalfa Europe ("Renalfa") and European Bank for Reconstruction and Development ("EBRD").

2. SCOPE OF THIS SEP

In line with international best practices, the Company recognises that stakeholder engagement is the basis for building constructive and strong relationships with all interested parties.

This SEP is guided by the EBRD's Environmental and Social Policy (2024) and international good industry practice. It outlines the Company's approach and commitments to engaging internal and external stakeholders during the construction and operation of the charging point project locations and hubs.

As a living document, the SEP will be updated as the Project progresses, incorporating feedback from stakeholders and outcomes of engagement activities into the decision-making process.

3. STAKEHOLDER ENGAGEMENT PRINCIPLES

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

- to be open and transparent with the stakeholders, engaging in an open process and providing meaningful information on the Project;
- to be accountable and willing to accept responsibility as a Company and to account for impacts associated with the Project activities;
- to have a relationship with stakeholders that is based on trust and a mutual commitment to acting in good faith;
- to respect stakeholders' interests, opinions and aspirations;
- to work collaboratively and cooperatively with stakeholders to find solutions that meet common interests;
- to be responsive and to coherently respond in good time to stakeholders;
- to be proactive and to act in anticipation of the need for information or potential issues, aiming at addressing potential risks before they occur, by offering opportunities for dialogue;
- to engage with stakeholders in a way that ensures they feel treated fairly and that their concerns are given genuine and balanced consideration;
- to be inclusive and accessible to stakeholders, including vulnerable and minority groups, so that they feel able to participate, to receive and understand information, and to be heard.

4. STAKEHOLDER ENGAGEMENT OBJECTIVES

The stakeholder engagement objectives of the Company are summarised below:

Objective	Rationale
Identify the Project stakeholders.	Identify and categorise individuals or organisations that may be affected by the Company's activity, or that may influence its operations.
Provide accurate Project information openly and transparently.	Ensure that stakeholders, particularly those directly affected by the Company's activities, are provided with timely and relevant information to support informed feedback and future planning. Clear communication helps reduce uncertainty and anxiety. Information shared should enable stakeholders to understand potential impacts, risks, and benefits. An open and transparent approach is essential to achieving this objective.
Establish partnerships that encourage constructive engagement among all parties and create opportunities for benefit-sharing.	Build trust-based relationships between the Company and stakeholders to support proactive communication and minimise the risk of conflict arising from rumours or misinformation. Early identification of mechanisms for addressing conflicts and grievances enables the Company to better understand stakeholder concerns and expectations, thereby enhancing its value and legitimacy within the local context.
Document meeting outcomes and respond to public concerns, issues, and suggestions.	Maintain clear records of stakeholder feedback, including concerns, issues, and suggestions, to ensure that the rationale behind the Company's decisions is transparent and traceable. These records support periodic reviews and audits, help identify recurring or thematic issues that may require a broader response, and facilitate more effective follow-up engagement with affected communities.
Manage stakeholder expectations.	Stakeholder expectations, regardless of whether they are positive or negative, may not always be aligned with the realities of the Company. By communicating clearly and early about what the Company can and cannot deliver (e.g. in terms of employment, infrastructure, community investments, or potential disruptions), the risk of future disappointment and frustration among affected parties can be reduced. This helps prevent

	misunderstandings and lowers the likelihood of conflict during implementation.
Fulfil national and international consultation requirements.	Ensuring compliance with legal and regulatory consultation obligations helps prevent project delays or disruptions arising from procedural shortcomings rather than substantive issues. It also supports the achievement of a social license to operate and fosters effective, trust-based relationships with stakeholders.

5. NATIONAL AND INTERNATIONAL REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

• BULGARIAN CONSTITUTION

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

- Article 55 of Chapter II of the Bulgarian Constitution guarantees the right to a healthy environment:
 - The citizens have the right to a healthy and favourable environment corresponding to the established standards and norms.
 - The citizens have the right to protect the environment.
 - The State shall ensure the protection and reproduction of the environment, the conservation of living Nature in all its variety, and the sustainable utilisation of the country's natural and other resources.

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

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

• BULGARIAN PERMITTING REGULATIONS

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

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

• INTERNATIONAL REQUIREMENTS

- AARHUS CONVENTION

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

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

• **EU DIRECTIVE 2003/35/EC FOR PUBLIC PARTICIPATION**

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

- “The public is informed, whether by public notices or other appropriate means such as electronic media where available, about any proposals for such plans or programs or for their modification or review and that relevant information about such proposals is made available to the public including inter alia information about the right to participate in decision-making and about the competent authority to which comments or questions may be submitted;
- The public is entitled to express comments and opinions when all options are open, before decisions on the plans and programs are made;
- In making those decisions, due account shall be taken of the results of the public participation.
- Having examined the comments and opinions expressed by the public, the competent authority makes reasonable efforts to inform the public about the decisions taken and the reasons and considerations upon which those decisions are based, including information about the public participation process.

• **THE EBRD ENVIRONMENTAL AND SOCIAL PERFORMANCE REQUIREMENTS**

The EBRD Environmental and Social Performance Requirements (ESRs) are relevant in the context of the equity partnership between the Company and EBRD.

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

The EBRD ESRs include specific guidance on conducting stakeholder engagement throughout the lifecycle of the development and operation of charging points locations and hubs. Stakeholder engagement requirements are outlined in ESR10, Information Disclosure and Stakeholder Engagement.

The key requirements for consultation and disclosure throughout the life of the project are summarised below:

Engagement Planning	Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder identification, analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Stakeholders.
Disclosure of Relevant Project Location Information	Project information must be disclosed in a timely, accessible, and culturally appropriate manner to enable stakeholders to understand potential project risks, impacts, and benefits. Key information includes: (i) the purpose, nature, scale and duration of the project activities; (ii) Potential environmental and social risks and impacts, and proposed mitigation and management measures; (iii) The stakeholder engagement process, and opportunities for participation;; (iv) The schedule and format of planned public consultation activities, and how feedback will be recorded and considered; and (v) the process by which any grievances will be managed.
Meaningful Consultation	<p>Consultation should be:</p> <ul style="list-style-type: none"> • proportional to the project's risks and potential impacts; • inclusive and accessible, ensuring that all stakeholder groups (including women, men, vulnerable persons, and minorities) have equal opportunity to participate and provide input;

	<ul style="list-style-type: none"> • free of manipulation, coercion or intimidation; (iv) initiated early and maintained throughout the project lifecycle, and • documented with feedback integrated into project decision-making where relevant. <p>To ensure inclusivity and accessibility, the Company will:</p> <ul style="list-style-type: none"> • actively encourage participation from all segments of the community, including women and minority groups, through targeted outreach; • monitor participation in engagement activities by gender and other relevant characteristics, and adapt engagement strategies if gaps are identified; • ensure that all information is provided in accessible formats and plain language, and that venues for meetings are physically accessible to all.
Informed Consultation and Participation	<p>For projects with potentially significant adverse impacts on Affected Communities, enhanced engagement in the form of Informed Consultation and Participation (ICP) may be required. This includes: (i) sharing project design, mitigation, and benefit-sharing details, (ii) integrating stakeholder perspectives into project decisions, (iii) documenting consultation outcomes and demonstrating how views have been considered, and (iv) meeting applicable national legal requirements for disclosure and consultation.</p>
Engagement During Project Implementation and External Reporting	<p>Stakeholder engagement does not end with project location approval. The Company shall:</p> <ul style="list-style-type: none"> • continue ongoing engagement and information sharing with identified stakeholders, tailored to project location

	<p>changes, stakeholder concerns, and emerging risks;</p> <ul style="list-style-type: none"> • report regularly on the implementation of mitigation measures and progress against action plans, and • where appropriate, publish external E&S performance reports and make them available to third-party repositories.
Grievance Mechanism	<p>The Company shall establish a grievance mechanism that is:</p> <ul style="list-style-type: none"> • accessible, transparent, and free to use; • confidential, with protections for those fearing retaliation; • scaled to project location risks and tailored to local context; • open to anonymous submissions, and • responsive and capable of tracking, resolving, and reporting on concerns related to project E&S performance.
Ongoing Reporting to Affected Stakeholders	<p>The Company shall provide periodic updates to affected stakeholders on:</p> <ul style="list-style-type: none"> • progress with mitigation measures and Action Plans; • key topics raised through engagement or the grievance mechanism; • any changes to project risks, timelines, or operations, and • follow-up actions taken to address stakeholder concerns. <p>Reporting should be in plain language and accessible formats, allowing stakeholders to track the Company's environmental and social performance over time.</p>

6. SUMMARY OF PREVIOUS ENGAGEMENT

- In the period 2022 - 2023, representatives of Eldrive were part of the work group dedicated to the Sustainable Mobility Commission of the European Green Deal Advisory Council in Bulgaria. The main task of this commission was to write a Vision for green mobility in Bulgaria and a draft version of the first Bulgarian Electric Mobility Act. The Act was presented in 2025.
- In May 2024, on a dedicated ceremony in Luxembourg, as a part of the EIB AdVenture Debt Summit, Eldrive received the EIB Advisory award and was recognised as an Innovation Champion. Eldrive was selected by the EIB Advisory team after careful consideration of over 300 advisory projects. Securing the trust of the EIB is a substantial milestone for Eldrive. It is an important recognition of the resilience of our business strategy, implementation and growth achieved over the past few years - <https://www.renalfa.com/milestones/eldrive-receives-two-awards-on-eibs-adventure-debt-summit>
- In December 2024, Eldrive hosted the Eldrive ESG Breakfast in the Hyatt Regency Sofia hotel. This was the first B2B event of the company dedicated to one of the most topical issues in corporate sustainability – the electrification of the automotive fleet. https://www.linkedin.com/posts/eldriveulgaria_%D0%B4%D0%BD%D0%B5%D1%81-%D1%81%D0%B5-%D0%BF%D1%80%D0%BE%D0%B2%D0%B5%D0%B4%D0%B5-esg-breakfast-%D0%BF%D1%8A%D1%80%D0%B2%D0%BE%D1%82%D0%BE-%D1%81%D1%8A%D0%B1%D0%B8%D1%82%D0%B8%D0%B5-activity-7269683602248847383-lljo?utm_source=social_share_send&utm_medium=member_desktop_web&rcm=ACoAAALi wX8BDI0MGn_eutNNHcci_QFesubLt-M
- In May 2025, Eldrive published a “white paper” dedicated to the partnership between the Company and Burgas Municipality that began almost 10 years ago. Because of that partnership, the municipality of Burgas is not only very well equipped with public charging infrastructure, but it is also one of the few municipalities in the country that is purposefully and systematically developing the charging infrastructure on its territory. And not just around the city's entry and exit points, but also in the neighbourhoods and the centre, where Burgas residents and visitors can use it without disrupting their daily lives and with maximum convenience. - https://www.capital.bg/biznes/kompanii/2025/05/17/4777512_eldrive_i_obshtina_burgas_primer_za_efektivno/
- In June 2025, Dimo Kolchev, CEO of Eldrive Bulgaria, was part of the Capital Cities conference dedicated to the Black Sea region of Bulgaria. He was in a panel with the mayor of Burgas, Dimitar Nikolov, and they talked about the public–private partnership between the municipality and Eldrive. - https://www.capital.bg/politika_i_ikonomika/gradove/2025/06/10/4792616_industriia_en_ergetika_obshtinski_planove_i_sinia/
- In September 2025, Eldrive and Burgas Municipality hosted the first edition of the Electric Mobility Festival 2025 at Burgas Sea Station on Saturday, September 20. The event brought together over 200 electric cars from across the country, as well as a significant number of guests. The festival was attended by representatives of the car brands Mercedes, Renault, Volvo, Lynk

& Co, Geely, KIA, and Hyundai, who presented their current electric models and offered test drives, as well as ProCredit Bank, which presented and explained their special loan product for purchasing an electric car. The highlight of the festival was the impressive light show organised by CLBD with over 50 Tesla cars, which was held for the first time in Burgas. The Eldrive Electric Mobility Festival 2025 was part of the European Mobility Week calendar, which was organised for the 12th time in Burgas. <https://bnr.bg/burgas/post/102211807/festival-na-elektromobilnostta-shte-se-provede-v-burgas>

7. PROJECT STAKEHOLDERS IDENTIFICATION AND ANALYSIS

The objective of stakeholder identification is to determine which organisations and individuals may be directly or indirectly affected—whether positively or negatively—by the Company, or who may otherwise have an interest in its development and implementation.

The stakeholder groups identified to date, along with the corresponding communication methods proposed for engaging with each group, are presented below. Communication approaches are tailored to the characteristics and needs of each stakeholder group to ensure meaningful information disclosure and to enable their participation in the decision-making process.

Stakeholder identification and analysis is a dynamic and iterative process that requires regular review and refinement. As such, the list and categorisation of the Company stakeholders will be updated throughout the lifecycle of the development and operation of the charging points, locations and hubs, with particular consideration given to:

- The relevance of each stakeholder group for the Company, including their potential influence on, interest in, or impacts on the Company;
- Stakeholder groups that may be disproportionately or differentially affected due to their vulnerability, and who may therefore have distinct concerns, priorities, or expectations related to the Company's impacts, mitigation measures, or potential benefits.

As part of this SEP, a mapping of the identified Company stakeholders has been performed as an exercise aimed at identifying and analysing their capacity to influence the Company.

Influence is defined as the degree of orchestration with other Stakeholders and the capacity to influence, and has been determined using the following criteria:

Influence Level	Description
Low	Stakeholders have limited ability to influence the Company's development and/or maintain a few connections with other local stakeholders.
Medium	Stakeholders have a moderate capacity to mobilise and influence and are active within social networks that connect with key local actors such as residents, workers, or local community leaders.

High	Stakeholders have a strong capacity to influence and shape the Company's development and maintain extensive and influential relationships with key local stakeholders such as residents, workers, and local community leaders.
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The potential stakeholders' position towards the Company was determined based on the following considerations:

Potential position	Description
In favour	Stakeholders are aware of and perceive alignment between their interests and the Company's development. They do not intend to use their influence, regardless of its extent, against the Company. Their overall perception of the Company is positive.
Neutral	Stakeholders are either unaware of or do not perceive alignment between their interests and the Company's development. They do not intend to use their influence, regardless of its extent, against the Company. Their perception of the Company is neither positive nor negative.
Against	Stakeholders are aware of and perceive misalignment between their interests and the Company's development. They may use their influence, regardless of its extent, against the Company. Their overall perception of the Company is negative.

Stakeholder group	Stakeholders	Interest in / Influence on the Company	Impact of the Company on the stakeholder group	Envisaged level of engagement
National and local government / Regulatory Bodies	<ul style="list-style-type: none"> National government Transport ministry National energy regulators National Road Agency Environmental agencies municipalities & local permitting offices Transport authorities Utilities & grid operators 	<ul style="list-style-type: none"> Regulatory, monitoring and compliance-enforcing authorities National government and regulatory bodies are of primary national regulatory importance to each Project in terms of establishing policy, granting 	<p>Communication with national authorities will follow established procedures in line with Bulgarian regulations. This will include:</p> <ul style="list-style-type: none"> Use of official platforms and channels for submitting project-related documentation and updates. Formal correspondence via reports, 	<p>Monitor/ keep informed and</p> <p>Focused engagement / Partnership</p>

		<p>permits or other approvals, and monitoring and enforcing compliance with Bulgarian regulations throughout all stages of a project's life cycle.</p> <ul style="list-style-type: none"> • Key regulatory oversight, monitoring, and enforcement authorities. • Key regulatory oversight, monitoring, and enforcement authorities at the county and municipal level. • Local governments are responsible for implementing national legislation, issuing permits, and integrating the Project into local development plans. • Municipalities in the project location areas 	<p>letters, phone, or email.</p> <ul style="list-style-type: none"> • Scheduled meetings with representatives of permitting and environmental authorities. • The Company stimulates the regional and local economy by creating jobs and increasing demand for local services and products. • It creates indirect employment opportunities, which local governments can support to reduce unemployment in the area. • The Company contributes to local sustainability goals and supports GHG emissions reduction. • Cooperation with local authorities can enable community- 	
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		<p>must be kept informed to align planning and land use decisions with project activities.</p> <ul style="list-style-type: none"> Local authorities may promote the Project through public engagement and awareness campaigns, supporting EV transport development. They may also help manage potential community concerns related to construction, land use, or environmental impacts. 	<p>focused programmes, enhancing public services and engagement.</p> <ul style="list-style-type: none"> The Company implementation may lead to infrastructure improvements (e.g., roads), supporting local service delivery. 	
External Stakeholders – Private Sector	<ul style="list-style-type: none"> Retail chains (supermarkets, malls) Location owners Petrol stations Car parks (public or private) Hotels, restaurants, workplaces Real estate developers EV manufacturer 	<ul style="list-style-type: none"> Private-sector partners provide access to strategic locations (retail chains, malls, petrol stations, car parks, hotels, workplaces) and therefore have a strong influence over 	<ul style="list-style-type: none"> The Company creates new or enhanced revenue streams for location owners and operators (lease income, shared charging revenues, higher footfall, increased 	<p>Focused engagement/partnership and</p> <p>Consult/ Seek feedback</p>

	<p>s and dealerships</p> <ul style="list-style-type: none"> • Charging hardware suppliers • Software/IT vendors (payment solutions, back-end CMS providers) • energy suppliers (utilities, DNOs, DSOs) • Renewable energy providers • Taxi fleets • Ride-hailing companies • Logistics/delivery companies • Car-sharing services • B2B clients 	<p>the pace and geographic coverage of network rollout.</p> <ul style="list-style-type: none"> • They have a commercial interest in increasing footfall, dwell time, and customer satisfaction and can negotiate commercial terms, branding, and service levels that affect the Company's profitability and visibility. • EV manufacturers and dealerships, charging hardware suppliers, software/IT vendors, energy suppliers, and renewable energy providers influence the Company's technology choices, interoperability 	<p>ancillary sales, and improved attractiveness of properties).</p> <ul style="list-style-type: none"> • It supports petrol stations, car parks, real estate developers, and hospitality venues in diversifying their business models towards e-mobility services and in strengthening their sustainability and ESG credentials. • For hardware, software, and energy/renewable suppliers, the Company provides long-term demand for equipment, digital solutions, and green electricity, while also setting requirements for quality, uptime, data protection, H&S, and 	
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		<p>y, grid connection solutions, and cost of energy, which in turn affect reliability, pricing, and ESG performance.</p> <ul style="list-style-type: none"> • Taxi fleets, ride-hailing, logistics/delivery companies, car-sharing providers, and other B2B clients shape demand, utilisation rates, and service design by signalling their operational needs and decarbonisation targets, thereby influencing investment decisions and prioritisation of locations. 	<p>environmental performance.</p> <ul style="list-style-type: none"> • For fleets and B2B clients, the Company enables the transition to low-carbon transport by providing reliable charging infrastructure that can improve operational efficiency and help them meet climate-related commitments; at the same time, under-performance or outages could disrupt their operations or customer service. 	
Community & Civil Society Stakeholders	<ul style="list-style-type: none"> • Clean transport NGOs • Climate action groups 	<ul style="list-style-type: none"> • Act as key intermediaries between the Company and local communities, helping to communicate 	<ul style="list-style-type: none"> • The Company will significantly contribute to the local settlements' budget through the payment of applicable local taxes. 	<p>Focused engagement/partnership and</p> <p>Consult/ Seek feedback</p>

	<ul style="list-style-type: none"> • EV driver associations • Car owners (potential EV adopters) 	<p>project updates and gather feedback.</p> <ul style="list-style-type: none"> • Hold formal or informal leadership roles and can shape public opinion and acceptance of the Company projects. • Can influence how local residents perceive the Company's benefits and potential concerns in place of charging points locations and hubs. • Provide valuable insights into local needs, social priorities, and vulnerable groups. • May support the design and implementation of community initiatives and promote local employment opportunities. • Can influence the Company through public campaigns, media, or engagement 	<ul style="list-style-type: none"> • May contribute to community development through support for cultural initiatives or local events. • Can help create local employment opportunities in construction, maintenance, which community leaders can promote. • The Company can offer support to NGOs through joint initiatives aligned with environmental and social goals. • Collaboration with NGOs can support educational programs on green transportation for local communities, schools, and businesses. • Partnerships with NGOs can enhance transparency, build trust, and contribute to the Company's long-term sustainability. 	
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		<p>with authorities.</p> <ul style="list-style-type: none"> • May provide valuable ecological data and support for mitigation or monitoring efforts. 		
Financial & Investment	<ul style="list-style-type: none"> • Investors • Banks financing infrastructure • Insurance companies • EU & Government grant schemes 	<ul style="list-style-type: none"> • Provision of project finance and oversight of E&S risk management. • Support for alignment with GIIP and EBRD Environmental and Social Requirements. • Monitoring of compliance with applicable international E&S standards. • May request corrective actions in case of deviation from GIIP or EBRD standards. 	<ul style="list-style-type: none"> • Changes in renewable energy regulations, subsidies, or environmental standards may affect the Company's bankability; lenders monitor these to manage financial risk. • The Company supports its lenders and equity partners' sustainability goals by contributing to Bulgaria's green energy transition and alignment with EU climate targets. 	Focused engagement/partnership
Media & Public Relations	<ul style="list-style-type: none"> • Local media • Industry press • Online communities 	<ul style="list-style-type: none"> • National and regional media outlets (TV, radio, online platforms) can shape public perception and influence stakeholder attitudes toward the Company. • Local newspapers and radio stations may 	<ul style="list-style-type: none"> • The Company may become a source of news and public interest, attracting media attention during the planning, construction, and operation phases of the project locations and hubs. • Companies associated with the Company may invest in local media through 	Monitor/ keep informed.

		<p>serve as key channels for community-level communication and feedback.</p> <ul style="list-style-type: none"> • Media coverage can amplify both support and concerns, making proactive engagement relevant. • Social media can act as a platform for local community members to express their concerns, and for supporters to express opinions promoting the benefits and positive aspects of the Company's activities. 	<p>advertising, sponsorships, or public announcements, contributing to media revenue.</p> <ul style="list-style-type: none"> • Media outlets may benefit from access to exclusive content, interviews, or educational materials related to green transport and sustainability. • Social media may be used by the Company to convey project-related information to specific groups or stakeholders, including to address concerns in relation to the Company's activities. • The Company can be used as an example to educate the public about the benefits of EV transport. • EV organisations can conduct outreach campaigns on social media to promote awareness of EV technology, sustainability, and environmental protection. • The Company can use social media to respond to 	
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			community questions and concerns. Transparency and open communication can help build trust and community support. Social media offers a platform to gather community feedback and engage in dialogue with residents and other stakeholders.	
Internal Stakeholders	<ul style="list-style-type: none"> • Executive leadership • Operations & maintenance teams • Installation & construction teams • Customer support • Legal, finance, ESG • Business development and Marketing 	<ul style="list-style-type: none"> • Executive leadership sets the overall strategy, risk appetite, investment priorities, and ESG commitments, and therefore has high influence over the design, phasing, and governance of the Company's projects. • Operations & maintenance, and installation & construction teams are central to safe, timely, 	<ul style="list-style-type: none"> • The Company provides employment, remuneration, and career development opportunities in emerging sectors such as EV infrastructure, digital services, and sustainability, including specialised training in H&S, technical, and ESG topics. • Expansion of the charging network can affect workload, responsibilities, and required competencies across internal teams, leading to the need for additional 	Focused engagement/partnership and Consult / Seek feedback.

		<p>and high-quality delivery of the infrastructure and ongoing uptime of the charging network. Their day-to-day decisions and performance directly affect user experience, compliance with H&S and environmental requirements, and the Company's reputation.</p> <ul style="list-style-type: none"> • Customer support teams manage user queries, complaints, and feedback, influencing customer satisfaction, adoption of EV charging services, and early identification of operational or safety issues. • Legal, finance, and ESG 	<p>resources, capacity-building, and structured internal communication and change management.</p> <ul style="list-style-type: none"> • Strong commitments to safety, environmental performance, and social responsibility influence internal culture, expectations, and performance management, requiring teams to integrate E&S considerations into everyday decision-making and planning. • Improved internal systems, procedures, and tools (e.g. for project management, asset management, incident reporting, and stakeholder engagement) can enhance job quality, clarity of roles, and collaboration 	
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		<p>teams ensure compliance with national legislation, permits, financing requirements, and international E&S standards (including lenders' requirements) , and integrate ESG and risk considerations into contracts, policies, and reporting.</p> <ul style="list-style-type: none"> • Business development and Marketing teams identify and negotiate new locations and partnerships, shape product offerings and tariffs, and build the Company's brand and public profile in relation to green transport and innovation. 	<p>between departments.</p>	
Vulnerable Persons/Groups	<ul style="list-style-type: none"> • Low-income households in place of project locations. 	<ul style="list-style-type: none"> • Vulnerable groups may be affected by the project locations' 	<ul style="list-style-type: none"> • The operation of the Company creates new jobs in the regions of the project locations 	<p>Monitor/ Keep informed.</p>

	<ul style="list-style-type: none"> • Female-headed households, including single mothers and widows, are in place of project locations. • Unemployed youth in place of project locations. • Children attending schools and kindergartens near construction or transport routes in place of project locations. • Ethnic and national minority groups (e.g., Roma communities) in place of project locations. • Persons with disabilities in place of project locations. 	<p>activities by virtue of their physical disability, social or economic standing, limited education, or lack of employment.</p> <ul style="list-style-type: none"> • These stakeholders may benefit from community funds and initiatives supported by revenues generated from the Company. 	<p>and hubs, which is especially important for the unemployed.</p> <ul style="list-style-type: none"> • The Company can offer training programs and internships, targeting the unemployed, people with disabilities and minorities, which can increase their skills and employability. • The Company provides improvements in local infrastructure, which can facilitate access to services and jobs for people with disabilities. • The Company can support local social initiatives that promote the integration of ethnic minorities, people with disabilities, and the unemployed. • People employed by the Company can be encouraged to volunteer and get involved in local community projects, which can help build stronger social ties. 	
Local emergency response services	<ul style="list-style-type: none"> • Directorates for Disaster Management • National Ambulances • Police Headquarters • Fire Stations 	<ul style="list-style-type: none"> • Interest related to H&S within the project locations and hubs area in cases of emergency response due to 	<ul style="list-style-type: none"> • The Company may cooperate with local emergency services within the framework of common drills or intervention training. 	Monitor/ keep informed.

		incidents at the locations.		
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8. STAKEHOLDER ENGAGEMENT ACTION PLAN

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

The engagement objectives and the type of engagement activities to be performed at the various project locations implementation stages are indicated below.

Type of Activity	Target Stakeholder Groups	Engagement activity/measures	Timing	Responsibility
Resources Allocation	All stakeholders	Appoint a Community Liaison Officer (CLO) and deploy/ensure regular presence in the affected communities.	Q1, 2025	Company management
Project Information Disclosure	All stakeholders	Disclose information on the Company webpage, including: <ul style="list-style-type: none"> • SEP, including the Grievance Mechanism – in Bulgarian and English; Provide on the Project webpage clear instructions for grievance submissions, including: <ul style="list-style-type: none"> • A downloadable Grievance Form; • Postal address for submitting grievances in paper format; 	Q1, 2025	Company management
Stakeholder Engagement	All stakeholders	Hold regular meetings in the communities to: <ul style="list-style-type: none"> • Provide an overview of the project developed in their area and its key implementation milestones; • Explain potential impacts on local communities (including those associated with workforce housing in the community) and how these will be managed; • Highlight anticipated benefits of the project for local residents; • Introduce the CLO and explain how they can be contacted; • Indicate the Company information disclosure channels; 	Quarterly meetings with respective stakeholder groups	CLO, Company management

Type of Activity	Target Stakeholder Groups	Engagement activity/measures	Timing	Responsibility
		<ul style="list-style-type: none"> • Explain the grievance mechanism and available grievance submission channels; • Answer questions and address community members' concerns; 		

9. COMMUNICATION AND ENGAGEMENT TOOLS

The tools outlined below will be used across the different stages of the stakeholder engagement performed by the Company.

Tool	Description
Online information page or website	The website will provide relevant and up-to-date information regarding construction works and operational aspects. The SEP will be translated into Bulgarian and made available, online and offline, to all interested stakeholders. Alongside these documents, the External Grievance Form will be made available to the public.
Information/Contact channels (e.g. telephone, email)	Information channels (telephone, email) will be available during normal business hours to all stakeholders.
Regular Internal Reporting	The CLO will report regularly to the Management team on engagement performed. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or non-compliances with the requirements of this SEP.
Reporting to Stakeholders	The CLO will provide updates to different stakeholder groups at agreed timelines and following engagements conducted

10. RESOURCES AND RESPONSIBILITIES

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

The Community Liaison Officer (CLO) has overall responsibility for the implementation and updates of this SEP and for dealing with community relations, including the external grievance mechanism. To achieve this, the CLO works closely with the project teams and contractors to achieve the engagement objectives outlined in this SEP.

The specific responsibilities of the CLO are:

- Act as liaison between the community/stakeholders and the Company; maintains regular presence in the affected communities and engagement with community members to monitor opinions, provide updates on project activities and ensure communication with community members and vulnerable groups;

- Lead day-to-day implementation of the SEP and Grievance Mechanism and manage the grievance resolution process; plan the stakeholder engagement activities and ensure they are appropriately implemented by the Company and contracted staff;
- Is responsible for ensuring grievance mechanism dissemination and training, communication, monitoring and reporting;
- Take active role in the identification of community/stakeholder needs and assist in the successful development and implementation of the Company's community investment initiatives;
- Produce stakeholder engagement monitoring reports and update the SEP accordingly.

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

11. EXTERNAL GRIEVANCE MECHANISM

The complete text of the External Grievance Mechanism is available in a separate document published on the website of the Company on the following link:

<https://www.eldrive.eu/sustainability>

12. MONITORING, EVALUATION AND REPORTING

To assess the effectiveness of this SEP and associated community engagement activities, the Company will establish and maintain a data management and monitoring process, as outlined in this section. This process will also facilitate transparent reporting to external stakeholders, serving as a key step in strengthening local trust and fostering shared value.

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

The following documentation will be maintained by the Company:

- **Meeting Minutes Template:** Used to store, analyse and report on stakeholder dialogue activities. It will be populated with details on information presented, audience questions, Company responses and actions, and meeting evaluation results, when appropriate. The database will also be used to track the frequency of meetings over the life of the Project.
- **Stakeholder List:** Continuously updated to include newly identified stakeholders, including key contact information (e.g., phone numbers, email addresses).
- **Grievance Log:** used to record all grievances received, actions taken in response, and whether the grievance was resolved to the complainant's satisfaction.

All records will be reviewed quarterly to ensure they are properly maintained and up to date. Commitments and action items resulting from stakeholder engagement activities will also be reviewed regularly to ensure appropriate follow-up and implementation.

• INTERNAL REPORTING

The following internal reports will be developed:

- **Red Flag Reports:** these reports will cover urgent matters such as critical grievances, major concerns or incidents of significant nature. Red flag reports will be prepared by the Grievance Manager or the CLO and submitted to the Company management team.
- **Quarterly Progress Reports:** Internal quarterly progress reports will be prepared by the CLO. These reports will review stakeholder engagement activities conducted: stakeholders met, key topics discussed, main concerns and expectations, and positioning towards Project activities. Grievance mechanism performance: participation levels, grievances reported, progress summary (actions to be taken and status), risks and limitations associated with the project locations. Priorities/planned activities for next quarter. These reports will be discussed by the CLO and the executive management of the Company.
- **EXTERNAL REPORTING**

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