

## STAKEHOLDER ENGAGEMENT PLAN OF OSM SOLAR DOOEL

### 1. Introduction

#### 1.1 Background

This document represents the Stakeholder Engagement Plan (SEP) for **OSM SOLAR DOOEL** which is a special purpose vehicle (SPV) registered in North Macedonia for the realisation of Project Oslomej. Project Oslomej consists of the design, construction, financing, operation, and future transfer of a photovoltaic power plant with a capacity of 65.8 MWp at the location of the old coal mine of REK Oslomej, Kitchevo, North Macedonia. The PVPP is being developed on a 75-ha land plot which is part of a disused coal mine.

The project was awarded to the SPV because of a public tender for entering a Public Private Partnership (PPP) for the project. The public partner in the PPP is ESM, which is the North Macedonian, state-owned operator of most power plants in the country.

**OSM SOLAR DOOEL** is a project company of **Renalfa IPP GmbH** which is a limited liability company (Gesellschaft mit beschränkter Haftung) duly incorporated and validly existing under the laws of Austria, with its corporate seat in Vienna and its business address at Schottenring 16, 1010 Vienna, Austria registered with the commercial register of the Commercial Court Vienna (Handelsgericht Wien) under registration number FN 577040 p. The main activity of the company is to acquire, develop, construct, own and sell projects, producing electricity from renewable energy sources (RES) and projects for the realisation of RES-related opportunities such as battery energy storage systems (BESS) and green hydrogen.

Project Oslomej is also being expanded with an adjacent battery energy storage system (BESS). The BESS component is intended to provide a rated energy capacity of 203.19 MWh and a rated power of 50 MVA, together with associated foundations, battery placement, medium-voltage, low-voltage and DC cabling, signal and fibre-optic cabling, grounding and interconnection works. This SEP is therefore updated to cover stakeholder engagement, disclosure and grievance-management arrangements relevant to both the existing PVPP and the BESS addition.

#### 1.2 Scope of this SEP

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

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

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

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

For the BESS addition, this SEP also covers communications linked to BESS-specific interfaces, including permitting and approvals, construction scheduling, abnormal-load deliveries and traffic management, emergency preparedness and response, fire-safety coordination, hazardous-material and waste-management arrangements, decommissioning planning, and the availability of the external grievance mechanism to stakeholders who may have questions or concerns regarding the BESS works or future operation.

### 1.3 Stakeholder Engagement Principles

The key principles guiding the Company’s approach to stakeholder engagement concerning the Project are:

- to be open and transparent with stakeholders, engaging in an open process and providing meaningful information on relevant aspects;
- to be accountable and willing to accept responsibility as 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, trying to manage risks before they occur by offering opportunities for dialogue;
- to engage with stakeholders such that they feel they are treated fairly, and their issues and concerns are afforded fair consideration;
- to be inclusive and accessible to stakeholders, including vulnerable and minority groups, so that they feel able to participate, receive and understand information, and be heard.

### 1.4 Stakeholder Engagement Objectives

The generic stakeholder engagement objectives of the Company concerning this Project are summarised in **Table 1** below.

**Table 1**

Objective	Rationale
Identify Project stakeholders	Identify and categorise individuals or organisations that may be affected by the Project or have an influence on how the operations are run or the Project is implemented, noting that this is an ongoing process which may change throughout the life cycle of the Project.
Distribute accurate information in an open and transparent manner	Ensure that stakeholders, particularly those directly affected by the Project, have all relevant information available to them, to enable them to make informed comments and plan for the future. This

	helps reduce levels of uncertainty and anxiety. Information should allow affected parties to develop an understanding of potential impacts, risks and benefits and an open and transparent approach is central to achieving this aim.
Form partnerships to promote constructive interaction between all parties and create benefit-sharing opportunities	Develop relationships of trust between the Project and stakeholders to contribute to proactive interactions and avoid, where possible, unnecessary conflicts based on rumour and misinformation. Identifying structures and processes to deal with conflicts and grievances allows the Company a better understanding of stakeholder concerns and expectations, thereby providing opportunities to increase the Company's value to local stakeholders.
Record meetings outcomes and address public concerns, issues, and suggestions	Document stakeholder issues, concerns, and comments to allow the rationale for Project decisions to be tracked and understood. Records also assist during reviews and audits of the Project, in identifying thematic issues, which may need a more holistic response, and during follow up engagement with the affected people.
Manage stakeholders' expectations	Expectations, both positive and negative, may not be aligned with the realities of the Project. Ensuring that expectations are kept at realistic levels (e.g. around job opportunities; provision of local infrastructure; community investments; and disruption) limits disappointments and frustrations of directly affected parties of project implementation, and therefore mitigates the potential for conflict with stakeholders.
Fulfil national and international requirements for consultation	Ensuring compliance can avoid potential business interruption risks and project delays based on procedural issues rather than substantive ones and contribute to obtaining the social licence to operate and building effective and trustful relations with stakeholders.

## 2. Brief description of the project

As stipulated in the introduction of this SEP, **OSM SOLAR DOOEL** is a special purpose vehicle (SPV) registered in North Macedonia for the realisation of Project Oslomej. The project was awarded to the SPV because of a public tender for entering a Public Private Partnership (PPP) for the project. The public partner in the PPP is ESM, which is the North Macedonian, state-owned operator of most power plants in the country. More information regarding the parameters of this tender is described in the following paragraph:

TE Oslomej is an existing thermal power plant owned by AD ESM with one block of 125 MW of installed capacity, i.e. the second largest thermal power plant in the electricity system of the Republic of North Macedonia. This power plant started work in 1980 and participates with 10% of the total domestic production of electricity and works until 2015. Achieved on average per year electricity production in a period of 15 years (1999-2015) is 430 GWh. The thermal power plant has so far used lignite as the primary fuel for electricity production from the Oslomej-East and Oslomej-West mines in the Kichevo region. Due to the exhaustion of the operating reserves of coal, the power plant in Oslomej after 2015 does not operate at full capacity in line with the projected annual production of electricity.

To consider the effects of the exploited mine on the living environment, the land from the mine must be returned to its natural state. For this measure, this land could easily be converted for the

construction of a photovoltaic power plant (PVPP) and exploited as a source of electricity from renewable sources. With the construction of the FPP Oslomej 3 in TE Oslomej, it is planned to increase the capacity of the renewable energy sources for an additional 100 MW, (2 x 50 MW). The indicative area required for the installation of the cumulative capacity will be up to 150 ha, 2 x 75 ha for the two FPPs, on an already used area of 660 ha.

- The life cycle of the project is 25 years, the investment period is 13 years;
- *Construction Phase*: activities in this phase include clearing of low-grade dirt, construction of an access road to the site itself, installation of PV panels, and construction of an electrical grid connection if there is existing infrastructure;
- *Operational phase*: includes implementation and monitoring;

BESS addition: the Project is being expanded through the installation of an adjacent BESS with a rated energy capacity of 203.19 MWh and a rated power of 50 MVA. The BESS works include delivery, procurement, equipping, construction, installation, testing and commissioning of the battery energy storage system and associated electrical, civil and communication infrastructure.

The BESS construction phase may create temporary stakeholder-relevant interfaces such as deliveries of oversized or heavy equipment, temporary traffic movements, lifting operations, dust and noise from civil works, electrical interconnection activities, and emergency-preparedness arrangements for battery-related incidents. These matters are managed through the Owner-level ESMP, the EPC contractor's project-specific plans and this SEP.

The annual electricity production will be around 65 GWh. Typical parameters for calculating the actual production are the following:

- Factor of production- 16,66 %;
- It is variable in summer months and carries around- 23-24 %;
- Efficiency of panels- 20 %.

The electricity to be produced from this plant is categorised as renewable.



credit: Oslomej Environmental Study by GEING Krebs und Kiefer International and others, DOO Skopje

### 3. National and International Framework for Stakeholder Engagement

#### 3.1 National Legislative Framework of the Republic of North Macedonia

- **Constitution of the Republic of North Macedonia:**

Article 43 of the Constitution of the Republic of North Macedonia proclaims that *“everyone has the right to a healthy environment to live in. Everyone is obliged to promote and protect the environment...”*.

- **Permitting regulations in North Macedonia:**

The Environmental Impact Assessment (EIA) process in North Macedonia is based on The Law on the Environment (Official Gazette No. 53/05) was amended several times: Official Gazette No. 81/05, 24/07, 159/08, 83/09, 48/10, 124/10, 51/11 and 123/12. Under this regulation, the EIA process in Macedonia requires Screening, Scoping, Assessment, Review, and a decision on the consent of the EIA process allowing the proponent to obtain other relevant permits. In preparing the EIA Study the proponent is obliged to engage at least one person from the list of recognized EIA experts, who signs off on the EIA Study, thereby vouching for its quality. The assessment focuses mainly on the effects on the biophysical environment.

Under this legislation the EIA report should have the following content, namely:

- description of the project with information on the location, character and size of the project and the land area needed;
- description of the environment and its media on the location;
- description of historic and cultural heritage and the landscape;
- description of emissions and wastes expected, solid wastes and wastewater, as well as other information necessary for evaluation of significant effects of the project on the environment;

- description of the measures for prevention, diminishing and elimination of the impact on the environment, as well as the substitution measures in case of intervention in the natural environment and landscape;
- description of the effects of the project on the environment having in mind the level of scientific development and accepted evaluation methods;
- description of the characteristics of the technology used; etc.

Once it is ready, the proponent submits the EIA report to the Ministry of Environment and Physical Planning (MoEPP). During this period stakeholders' engagement through the method of public participation is given under the Law on Environment. Therefore, stakeholders may make written comments during the ongoing review. The timeline for public comments is 30 days regarding the report from its submission. The public's access to environmental information is governed by Chapter VIII in Law on the Environment of the Republic of North Macedonia.

Regarding the Oslomej Project under the Law on Environment an environmental study for the project (Elaborate for the construction of a photovoltaic power plant at the site of the Oslomej - FPP Oslomej 3) has been prepared by "GEING Krebs und Kiefer International" and on 01.12.2022 the Ministry of the Environment and Spatial Planning (MoEPP) has approved the environmental elaborate and on 21.02.2023 and has issued a water management approval for the construction the Oslomej Project.

### 3.2 International Legislative Framework

The Aarhus Convention (signed in 1998 and entered into force in 2001) was adopted by the Republic of North Macedonia. On July 1, 1999, the Parliament of the country adopted the Law on Ratification of the Convention on Access to Information, Public Participation in Decision-making, and Access to Justice in Environmental Matters, and it entered into force eight days after the day of its publication in the Official Gazette (no. 40/99 from July 6, 1999).

The Aarhus 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 organisations to comment on, for example, proposals for projects affecting the environment, or plans and programs relating to the environment, these comments are 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 rights or environmental law in general ("access to justice").

### 3.3 IFC Good Practice Handbook on Stakeholder Engagement

The IFC provides a comprehensive overview of good practice in stakeholder engagement, with a dedicated focus on stakeholder groups that are "external" to the core operation of the business, such as affected communities, local government authorities, non-governmental and other civil society organisations, local institutions and other interested or affected parties. This handbook also outlines that a key aspect of meaningful stakeholder engagement is the aim to "build strong, constructive and responsive relationships".

Furthermore, IFC Performance Standard 1 outlines the following recommendations regarding stakeholder engagement:

- It should be a process on an ongoing basis that includes stakeholder analysis, planning, dissemination of information etc.;
- The SEP should be developed and implemented on a Project level and scaled to its risks and impacts;
- Affected communities should be provided with relevant information regarding the purpose, nature and scale of the Project, its activities, risks and potential impacts, and external grievance mechanism;
- When affected communities are subject to identified risks and adverse impacts from a Project, a process of consultation will be undertaken in a manner that provides the affected communities with opportunities to express their views on Project risks, impacts and mitigation measures, and allows the client to consider and respond to them;
- The extent and degree of engagement should be commensurate with the Project's risks adverse impacts and concerns raised by affected communities.;
- An external grievance mechanism will be established to receive and facilitate the resolution of concerns and grievances about the client's environmental and social performance from affected communities, etc.

## 4. PROJECT STAKEHOLDERS' IDENTIFICATION AND ANALYSIS

The objective of stakeholder identification is to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) or have an interest in the Project or activity. Stakeholder groups and communication methods identified to date are included in **Table 2 below**. The communication methods are tailored depending on each stakeholder group to allow adequate information disclosure and enable participation in the decision-making process. The Company will annually review, amend, and further detail the identification and analysis of stakeholder groups (based on the in-depth knowledge of local context and stakeholder relationship with the Company and the Project) to allow understanding of:

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

**OSM SOLAR DOOEL** has identified our key stakeholders using a question-answer-based approach regarding the relevancy of our project and determined supposed relevant stakeholder groups (both internal and external). The initial set of questions we have based our analysis on are as follows (Who cares about this project?; Who will be impacted by this project?; Who can influence this project?; Who can approve/reject this project?).

After we have made sure that all relevant stakeholder groups are identified, we have proceeded with determining their stakeholder influence-interest levels. In that regard we have defined the following levels of influence:

- **High influence and high interest-** this level has been assigned to stakeholders that have direct influence over the project approvals and operation as well as direct interests, benefits or potential losses from the project outcomes;
- **High influence and low interest-** this level has been assigned to stakeholders who can block or support the project, but they do not have a particular interest, benefit, or potential loss of doing either of those actions;
- **Low influence and high interest-** this level has been assigned to stakeholders who are not involved from the perspective of required project-related approvals. However, they might have direct interests, benefits or potential losses from the project outcomes;
- **Low influence and low interest-** this level is assigned to secondary types of stakeholders. They do not have a particular influence or interest over the project and are not subjected to project stats reports. However, they are subjected to periodical monitoring to identify whether their influence-interest level has shifted to one of the upper three categories.

**Table 2**

Stakeholder	Brief description of their interest in the project	Type of Stakeholder	Stakeholder Description	Influence and Interest level	Engagement Plans and Frequency	Means of Communication	Responsible
Shareholders, employees and contractor staff	Those are parties that are directly engaged in the day-to-day operations of the project and have first-hand experience with implementing the project processes and procedures.	Internal and External	Responsible for Managing the project during the operation and management stage	High influence and high interest	Hold regular meetings ( <b>at least once per month or ad hoc by prior request from each of the parties</b> ) to resolve issues which get in the way of the operation of the project or other discovered key project	Meetings; Emails; Phone calls	CLO

	Therefore, they are the stakeholder group that obtains and also has the most direct impact on the project activities and areas of improvement of the project.				issues during the O and M stage		
ESM	ESM is a joint stock company and energy enterprise in Northern Macedonia, wholly owned by the North Macedonian state. The company is the main producer of electricity for the country's electricity system. They are also our partner in the project and help us to navigate the Macedonian energy market as well as give insight into the performance and needed areas of improvem	External	PPP Private Partner & Balancing Partner	High influence and high interest	lar meetings <b>once per year by prior from each of the</b> to resolve issues in the way of ting the PPP nt for Project or other d key project ing the O and	Meetings; Formal Letters; Emails; Phone calls	CLO

	ent of the project.						
Macedonian State	Since North Macedonia is the country of origin of the project and the project is in partnership with the biggest electricity producer in the country the electricity policy and governance of the country must ensure that such projects follow the national legislative framework in the country and that this compliance is up to date with the legislative course in the state. Therefore, fostering good communication between the government and the project is vital.	External	Secretary of the Economy; the Government	High influence and low interest	<b>Hold ad hoc meetings (upon prior request from both parties)</b> to resolve issues regarding the implementation of the Oslomej Project or discuss other discovered key project issues during the O and M stage	Meetings; Formal Letters	CLO
MEPSO	MEPSO is the Macedonian Electricity	External	TSO	High influence and high interest	<b>Hold ad hoc meetings upon prior request from both parties</b>	Meetings; Formal Letters; Emails; Phone calls	CLO

	<p>Transmission System, which is a state-owned transmission system operator company. The main activity of MEPSO is to provide uninterrupted transmission of electricity through the transmission network and management of the power system, to ensure a reliable supply of consumers with quality electricity. Therefore, their participation in the project is vital for the sustainable energy transmission of energy.</p>				<p>to resolve issues regarding the implementation of the Oslomej Project or discuss other discovered key project issues during the O and M stage</p>		
MEMO	<p>The national operator of the electricity market. MEMO is a company wholly owned by the Electric Transmissi</p>	External	Electricity market operator	High influence and high interest	<p><b>Hold ad hoc meetings (upon prior request from both parties) to resolve issues regarding the implementation of the Oslomej</b></p>	Meetings; Formal Letters; Emails; Phone calls	CLO

	<p>on System Operator in the Republic of North Macedonia - A.D. MEPSO. MEMO was licensed to organize and manage the electricity market by the Regulatory Commission for Energy and Water Services of the Republic of North Macedonia. It helps the project to navigate and operate in line with the tendencies of the Macedonian energy market.</p>				<p>Project or discuss other discovered key project issues during the O and M stage</p>		
<p>Energy and Water Regulatory Commission</p>	<p>The Energy and Water Services Regulatory Commission (ERC) is the multi-sector independent Regulatory Authority of the Republic of North Macedonia. As the Regulatory Authority</p>	<p>External</p>	<p>Regulatory Authority</p>	<p>High influence and high interest</p>	<p><b>Hold ad hoc meetings (upon prior request from both parties)</b> to resolve issues regarding the implementation of the Oslomej Project or discuss other discovered key project issues during the</p>	<p>Meetings; Formal Letters; Emails; Phone calls</p>	<p>CLO</p>



	<p>for Water, ERC main responsibilities are- setting cost-reflective tariffs, improving service delivery of the operators following the developed performance indicators, and improving the effectiveness of water management in the Republic of North Macedonia. Therefore, as an authority that is part of our permitting compliance, we engage with them to assure compliance with the permits obtained as well as to gain insight and together to navigate how the project could positively influence the question of</p>				<p>O and M stage</p>		
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	effective water management in the country.						
Kitchevo Municipality	<p>Kitchevo municipality is the local authority of the closest to the project populated area, namely Kitchevo. Therefore, establishing a good interface of communication and collaboration between the local government body and the management of the project is crucial to ensure that the project does not impose any danger or discomfort on the locals. Furthermore, good communication with the mayor allows us to know which area of the day-to-day lives of the local people we can</p>	External	Mayor	High influence and high interest	<p>Hold regular meetings <b>(quarterly or ad hoc (upon prior request from both parties) to resolve issues regarding the implementation of the Oslomej Project. Address local community concerns with the project (such as community health and safety, illegal waste dumping on roads, etc.) or discuss other discovered key project issues during the O and M stage</b></p>	<p>Meetings; Formal Letters; Emails; Phone calls</p>	CLO

	influence positively and can contribute to.						
Local Community (Kitchevo, Oslomej, Crvica, Strelci & Shutovo)	<p>Those are the five locally populated areas that are in proximity to the project. However, their interests in the involvement in the project are as follows:</p> <p>-Oslomej- is the closest village to the project, therefore the local people that live in the most proximity to the project is there. Thus, their day-to-day lives and well-being are highly influenced by the operation of the project.</p> <p>Crvica, Strelci &amp; Shutovo- are the other three villages that are also in proximity to the project.</p>	External	Local affected community members, Various local organisations e.g. hunting and fishing clubs	Low influence and high interest	<p><b>Hold annual CSR campaign,</b> namely Annual Balkan Fishing Competition at the Oslomej Lake. We have sponsored the event in 2022 and 2023. <b>Hold quarterly meetings</b> based on prior request for conducting such addressed to local community members. The agenda of those meetings will be community health and safety concerns, external grievances and other discovered key project issues during the O and M stage</p>	Meetings, website, information leaflets, Dedicated CSR events	CLO

	<p>They are not that close to the location, however, in case of emergencies, there might be potential effects on their citizens so their participation in the stakeholder engagement activities of the project is crucial.</p> <p>Kichevo as it was stipulated above the municipality is the local authority of the closest to the project populated area, namely Kichevo. All the abovementioned villages are part of this municipality.</p>						
<p>Vulnerable Persons/Groups Vulnerable groups*</p>	<p>Those are the groups that due to social, economic or other objective factors might not be able to access or</p>	<p>External</p>	<p>Female-headed households, including single mothers, widows; Women, in general, are considered as a</p>	<p>Low influence and high interest</p>	<p>Hold quarterly meetings based on prior requests for conducting such addresses to vulnerable</p>	<p>Meetings, leaflets, Phone calls</p>	<p>CLO</p>

	<p>participate in the stakeholder engagement activities as the rest of the members of the local affected communities. Therefore, having an individual approach and personal face-to-face relationship with those groups is crucial, so that their interest is represented and protected.</p>		<p>vulnerable group; Unemployed youth, reliant on other household members, Elderly and orphans; Disabled persons.</p>		<p>groups. The agenda of those meetings will be community health and safety concerns, external grievances and other discovered key project issues during the O and M stage</p>		
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*\*The identification process of potential vulnerable persons/groups is still ongoing, and it is supported by the local municipal authorities who are knowledgeable of such people and groups through their social, state aid and support programs with such vulnerable individuals.*

BESS-specific stakeholder considerations: In addition to the stakeholder groups identified above for the PVPP, the BESS addition requires focused engagement with stakeholders that may be affected by, or may influence, the BESS permitting, delivery, construction, emergency response and operational interfaces. The table below records the principal BESS-related stakeholder interfaces to be maintained and evidenced through the stakeholder dialogue log.

BESS stakeholder / interface	BESS-related topic	Engagement record / evidence to be retained	Responsible party
EPC contractor, BESS suppliers and subcontractors	BESS construction schedule, ESHS documents, traffic and abnormal-load management, work permits, emergency preparedness, incident reporting and implementation of E&S commitments.	Meeting minutes, emails, approved plans, risk/commitment registers, method statements, incident and corrective-action records.	Project Manager / CLO / ESG Officer, with EPC representative.
ESM and other project counterparties	Interface between the PVPP, PPP arrangements, site access, operations, and any BESS-related project implementation matters requiring coordination.	Meeting notes, correspondence, formal letters and agreed action items.	CLO / Managing Director / Project Manager.
Competent authorities, MEPSO, MEMO and regulatory bodies, as applicable	Permitting, grid connection, market/dispatch interfaces, authority notifications and evidence required for the BESS component.	Permit Register entries, applications, approvals, correspondence, minutes and evidence of compliance with permit conditions.	Managing Director / Project Manager / CLO.
Municipality of Kichevo and local authorities	Local information on BESS works, construction schedule, traffic/abnormal loads, emergency contacts, grievance mechanism and community-health-and-safety matters.	Meeting minutes, letters, emails, stakeholder dialogue log and follow-up action records.	CLO.
Emergency services, local fire/protection and rescue authorities, and relevant neighbours	BESS fire and emergency-response arrangements, site access for emergency response, emergency contacts, coordination with the EPC EPRP and disclosure of relevant non-confidential emergency information.	Emergency coordination notes, disclosed EPRP summaries where appropriate, drills/briefings records, attendance lists and action close-out evidence.	CLO / EHS Manager / EPC H&S representative.
Nearby communities, road users and other external stakeholders	Information on temporary construction impacts, traffic movements, noise/dust controls, grievance channels and how to raise BESS-related concerns.	Public notices where used, CLO notes, grievance-log entries, meeting notes and evidence of responses provided.	CLO.

## 5. SUMMARY OF THE PREVIOUS ENGAGEMENT OF THE PROJECT

Firstly, the Stakeholder engagement concerning the Project was performed as part of the Project permitting process and consisted of interaction with the relevant authorities as part of the permitting procedures.

Public information disclosure was performed as part of the Project construction permitting process, in line with national regulations. Under the Law on Environment, the information was

available in the public domain at the permitting stage and in line with the regulatory requirements on public access to information 30 days to make comments was given to the public. No public comments were received regarding the project during this information disclosure period and on 01.12.2022 the Ministry of the Environment and Spatial Planning (MoEPP) approved the environmental elaborate and on 21.02.2023 it issued a water management approval for the construction of the Oslomej Project.

Furthermore, during the construction phase, the Managing Director of **OSM Solar DOOEL**- Mr Konstantin Nenov has executed the role of a Community Liaison Officer (CLO), he has established and maintained a relationship of proximity with the local authorities such as the mayor of Kichevo- Mr. Farmir Dehari, with whom he has made all necessary efforts to ongoingly exchange information regarding the Project development while aiming to receive from them promptly comments, complaints, concerns of the external stakeholders of the Project and address them immediately. However, based on the ongoing exchange of information regarding potential comments, complaints, and concerns, there were no such established during the construction period. An official statement letter from the mayor regarding the engagement with the management of the project is available in Appendix B to this SEP.

Furthermore, **OSM SOLAR DOOEL** understands the importance of the project for local communities and their acceptance of it. Therefore, we have made the effort to engage in their day-to-day life and to support the communities when and where they needed our support. For example, during the construction period of the project, significant amounts of rain fell between October and November 2023, flooding and dislodging parts of the road providing access for the local fishing society to Lake Oslomej occurred. Therefore, since we had an already established good relationship with the local fishing society and we have also sponsored the Annual Balkan Fishing Competition at the Oslomej Lake in 2022 and 2023, you can see the pictures from this even below, we immediately responded to a request from the chairman of the fishing society, Besy Elesi, for help in repairing the access road to the lake. In that regard, we have provided equipment (bulldozer, truck) to level the displaced areas and a few extra cubic yards of coarse pad (crushed rock) was provided and laid to strengthen the strength of the road to assure the safe access and proper enjoyment of the lake by the members of the fishing society. During the works we were in constant contact with the mayor of the municipality, Fatmir Dehari as well.

Furthermore, we have been aware through our communication with the local authorities that the municipality of Kichevo has an ongoing issue with dealing with the municipal waste. Therefore, on several occasions, we have responded to the municipality's calls to help with the dealing with municipal garbage, providing several tons (3-5t of naphtha per month) for the operation of the municipality's garbage trucks. We have also, sent some of our heavy equipment (mainly bulldozers) to dumpsites in surrounding villages to clear and push some of the garbage, thus helping to speed up the process. Assisting Kichevo with its waste issue and increasing awareness in that regard is a crucial part of our stakeholder engagement strategy as well and a vital topic of discussion with local affected communities during our stakeholder engagement activities.

Furthermore, in September 2023, the EPC contractor Solarpro Power was contacted by the women's monastery "Prechista" (in the area near the town of Kichevo) asking us to provide them with a coarse pad with which to finish the construction of the road to the monastery. The EPC immediately sent approximately 200 m<sup>3</sup> of the requested material, which was taken to by Solarpro's own trucks to the site and laid down on the road with the help of a bulldozer provided by our EPC contractor.

BESS-related stakeholder communications include communications with the EPC contractor and subcontractors on ESHS requirements, traffic and emergency preparedness; communications with competent authorities and project counterparties on permits, approvals and grid/operational interfaces; and communications with local authorities, emergency services, neighbours and affected communities on construction scheduling, emergency contacts, community health and safety and the external grievance mechanism.



Source: Hunter-Fish Kichevo

## 6. STAKEHOLDER ENGAGEMENT ACTION PLAN

This SEP addresses the engagement activities, and the Project information disclosure and provides a high-level outline of the engagement to be implemented throughout the operation and maintenance phase of the Project, see **Table 2** above for more information.

The engagement objectives and the type of engagement activities to be performed during the operation and maintenance phase of the Project are indicated below in **Table 3**.

For the BESS addition, stakeholder engagement actions will include: (i) disclosure of the updated SEP, NTS and relevant non-confidential ESMP information; (ii) provision of understandable information on BESS construction timing, abnormal-load deliveries, emergency-preparedness interfaces and waste/hazardous-material management; (iii) targeted engagement with local authorities and emergency services regarding BESS-related emergency response and access arrangements; and (iv) recording of all BESS-related engagement, questions, commitments and follow-up actions in the stakeholder dialogue log.

**Table 3**

Operation and Maintenance	<ul style="list-style-type: none"> <li>• maintain social licence and consolidate trust;</li> <li>• manage expectations;</li> <li>• receive, record and address stakeholder grievances;</li> </ul>	<ul style="list-style-type: none"> <li>• meetings / newsletter to report on Project E&amp;S performance; dissemination of the external grievance mechanism information and external grievance form;</li> <li>• meetings on community investment-related initiatives;</li> </ul>
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## 7. COMMUNICATION AND ENGAGEMENT TOOLS

The consistent use of best practice tools that have been tailored to local context and stakeholders' needs to maximise the effectiveness of the engagement action plan. The tools outlined below illustrate (Table 4) the way we plan to continue our stakeholder engagement strategy:

**Table 4**

Tool	Description
Project online information page or website	The Project Non-technical summary (NTS) and this SEP will be made available in English and Macedonian on the website of <a href="#">Renalfa IPP</a> . Alongside these documents, the External Grievance Form ( <b>Appendix A</b> ) will be made available there as well.
Information leaflets	The information leaflets will serve as an information dissemination tool where external grievance mechanism contact details, as well as link to the Renalfa website with project information will be outlined. The CLO will be responsible to discuss with the Kitchevo municipality authority the best way to disseminate the leaflets that will be easily accessible to the local communities.
Meetings	Discuss and present Project information to stakeholders. This will allow the stakeholder groups to provide their views and opinions on the Project.
Dedicated corporate social responsibilities (CSR) events	Participation and organisation of events designated to contribute to society by getting involved in different ethical and social causes.
Formal letters	Discuss in a formal manner with authorities questions regarding the implementation of the Project or discuss other discovered key Project issues.
Electronic and phone correspondence	Invite stakeholders to meetings, or directly using those channels for Project information dissemination tools.
Information/Contact channels (e.g. telephone, email)	A serviced Project Information channel (+38970277870, <a href="mailto:a.gigov@renalfa.com">a.gigov@renalfa.com</a> ) by the CLO will be available during normal business hours to all stakeholders.
Regular Internal Reporting	The CLO will report regularly to the Management team on engagement performed. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations, or non-compliances to the requirements of this SEP, planned activities for the next reporting period and any other issues of potential concern.
Reporting to Stakeholders	The CLO will provide Project updates to different stakeholder groups at agreed timelines and following engagements conducted. Reports on environmental and social performance of the Project and on the community investment initiatives will be published on <a href="#">Renalfa IPP</a> website annually.

## 8. Resources and Responsibilities

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

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

### 8.1 CLO specific responsibilities

The specific responsibilities of the CLO are:

- act as a liaison between the community/stakeholders and the Company; maintain a regular presence in the affected communities and engage 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 External 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 the external grievance mechanism dissemination, communication, monitoring and reporting;
- take an active role in the identification of community/stakeholder needs and assist in the successful development and implementation of the Company's community investment initiatives for the Project;
- take an active role in preserving the community health and safety by communicating information regarding the emergency preparedness and response plan of the Project's operator and providing assistance in communicating its measures with local authorities and potential affected communities; produce reports on the management and resolution of all potential community risk-imposing situations and scenarios;

For the BESS addition, the CLO will also coordinate the recording and follow-up of BESS-related stakeholder communications, including communications with local authorities, emergency services, relevant neighbours and affected communities. The CLO will make sure that BESS-related concerns are captured in the external grievance mechanism and that stakeholder questions on traffic, emergency preparedness, fire-safety interfaces, waste management and construction scheduling are escalated to the Project team or EPC contractor for response.

- produce stakeholder engagement monitoring reports and update the SEP accordingly.

**ALEXANDAR GIGOV** is acting as Project CLO and can be contacted through the following communication channels:

- By telephone at: +38970277870
- By email at: a.gigov@renalfa.com

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

## 9. EXTERNAL GRIEVANCE MECHANISM

- **Purpose**

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

The External Grievance Mechanism is available for any BESS-related concern, including concerns regarding traffic or abnormal-load movements, noise, dust, access, emergency preparedness, fire-safety arrangements, waste handling, worker/community interactions, or any perceived environmental, social, health or safety impact associated with the BESS addition.

For the Project-affected stakeholders, the grievance mechanism provides an accessible, yet formalised (identification, tracking and resolving of grievances) alternative to an external dispute resolution process. However, a stakeholder will always have the right to complain to the relevant authorities under the legislation of the Republic of North Macedonia.

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

This external grievance mechanism form is available on the following site. <https://renalfa.com/news/> in English and Macedonian. It can be downloaded, filled in and submitted via the CLO email- [a.gigov@renalfa.com](mailto:a.gigov@renalfa.com). It can be submitted over the phone to the CLO at +38970277870, as well as it can be sent via post to the CLO office address- 14-1/9 Miroslav Krleza Str., Skopje-Centar, 1000 Skopje, Republic of North Macedonia.

Information regarding this external grievance mechanism can be found also in the information table of the local municipality of Kichevo, as well as a leaflet with this information to be given to the stakeholders during the stakeholder meetings.

- **Definitions**

**Grievance** - within the scope of this SEP it is an expression of dissatisfaction that is related to an impact caused by the Project activity, which has affected or disturbed negatively an individual or group of individuals in proximity of the Project. Such negative impacts could be connected with livelihood disruption, health and safety, noise, dust, public traffic and other topics that the grieving individual believes have led to his dissatisfaction.

- **Grievance resolution process**

The Company commits to process any grievance received promptly, via a procedure that is transparent, culturally appropriate, at no cost, and without retribution for the party presenting the grievance. The External Grievance mechanism for the Project is structured as follows:

- **STEP 1:** A grievance is recorded regardless of whether it was received verbally or in writing, using the External Grievance Form (**Appendix A**). It will be then registered in the Grievance Log/Database by the Community Liaison Officer.
- **STEP 2:** The CLO will formally acknowledge the receipt of the grievance to the complainant, in written form (within **10 days of receiving the grievance if it is not submitted anonymously**). If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this

step. If the grievance is submitted anonymously, although the CLO won't be able to send a formal acknowledgement of the receipt, he will still investigate and address the issue and the information regarding the outcome and proposed resolution of this grievance will be published on the news section of Renlafa website within **1 month** of concluding the investigation, if the issues that are investigated is complex and needs further investigation the publication period will be up to **2 months**.

- **STEP 3:** CLO will assess priority and assign responsibility for resolution: significant concerns and incidents will be immediately brought to the attention of the management team. Currently, the management team is composed of the Managing Director of **OSM SOLAR**- Mr. Konstantin Nenov (knenov@renalfa.com), supported by Renalfa's ESG Officer Tsvetelina Rizova (t.rizova@renalfa.com) and EHS Manager – Anna Ananieva (annar@alfafinance.bg) in the execution of this external grievance mechanism.
- The issue will be investigated, and a resolution will be identified. The investigation will not exceed **1 month** from formally acknowledging the receipt. Should the issue raised be complex and need further investigation, the complainant will be notified of the time necessary to respond, in any case, this period will not exceed **2 months**. The CLO will then respond to the complainant with the proposed solution.
- **STEP 4:** CLO will follow up with the complainant and close out the grievance. The overall process of closing a grievance will not exceed **1 month** from concluding the investigation. Should the complainant not accept the resolution, he can always pursue external legal remedies, this option is not impeded by this external grievance mechanism or notify the CLO via one of his contact points that he wishes to appeal the grievance before the senior management of the company. In that case, the CLO is responsible for communicating the information regarding the grievance to the senior management. The timeframes for the different actions performed during the appeal stage are the same as the ones outlined for the initial grievance process steps.
- **STEP 5:** The CLO is responsible for monitoring and evaluating the effectiveness of the external grievance procedure and making suggestions for its improvement to the management of the company.

FIGURE 9-1 EXTERNAL GRIEVANCE MECHANISM FOR THE PROJECT

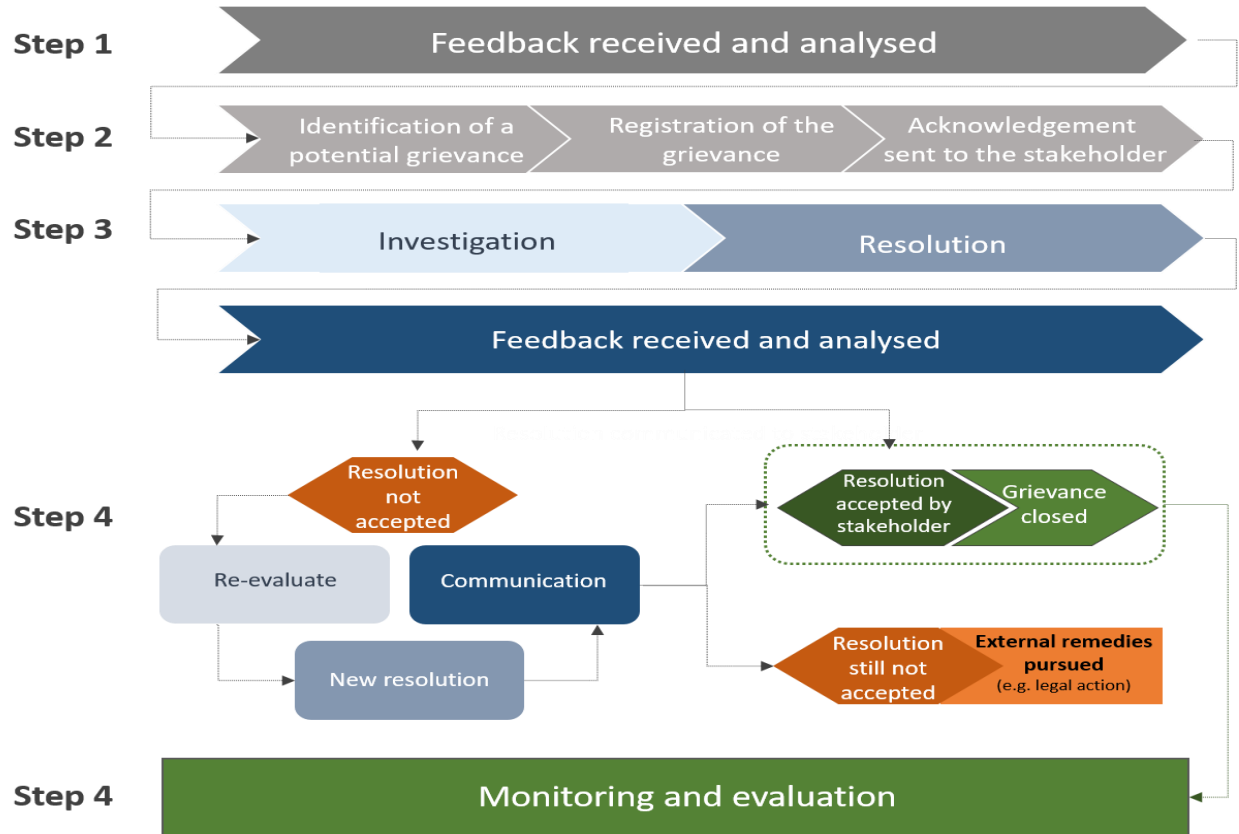


FIGURE 9-2 SAMPLE EXTERNAL GRIEVANCE REGISTER

Description of the problem															
Initiator				Person delegated to address in SSW/DPM				Problem							
Settlement	Type of the problem	Name	Date	Phone number	Name	Phone number	Others comment	Number	Description of the problem	Responsible department	Responsible person	Actions to be done	Due date	Results of the intervention	Closing date of the issue

## 10. MONITORING, EVALUATION AND REPORTING

- **Overview**

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

- **Monitoring and evaluation activities**

Stakeholder engagement activities will be documented and filed to ensure accountable delivery of commitments made to stakeholders. The following documentation will be used and maintained by the Company during the Project execution:

- **Stakeholder dialogue log:** Used to store, 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;
- **Meeting minute template:** used to collect meeting minutes; to be filed within the stakeholder database and SEP updates;
- **Stakeholder list:** ongoing updates to the list, including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified;
- **External Grievance log:** will record all grievances received, management actions taken and whether it has been closed out to the complainant's satisfaction. Records will be reviewed **quarterly** to ensure these are being used and maintained. Commitments and actions recorded during stakeholder interaction activities will also be regularly reviewed to ensure they are taken forward.
- Indicators to be monitored- the number of conducted meetings, as well as the place they have taken place. The number of received grievances and the percentage of positive resolution of such should be monitored as well.

## 11. Reporting to stakeholders

- **Internal Reporting**

The following internal reports will be developed:

- **Red Flag Reports: weekly reports** for urgent items (e.g. critical concerns or grievances) or incidents of a significant nature. These red flag reports will be prepared by the CLO and sent to the Company management team.
- **Quarterly Progress Reports: internal quarterly progress reports** will be prepared by the CLO. These reports will review the dialogue activities undertaken, stakeholders met, key topics discussed, main concerns and expectations, positioning towards Project activities; grievance mechanism- participation, main grievances reported, progress summary (action to be taken and status); risks to the project; priorities for the next quarter.

These reports will be discussed between the CLO and the Project management team.

- **External Reporting**

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

The annual environmental and social performance reporting will include a short summary of BESS-related stakeholder engagement undertaken during the reporting period, including key stakeholder groups engaged, topics discussed, grievances received and closed, and any material BESS-related commitments or corrective actions.



Reference No:

**Full Name**

Note: *you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent*

First name \_\_\_\_\_

Last name \_\_\_\_\_

I wish to raise my grievance anonymously

I request not to disclose my identity without my consent

**Contact Information**

Please mark how you wish to be contacted (mail, telephone, e-mail).

By Post: Please provide mailing address:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

By Telephone: \_\_\_\_\_

By E-mail \_\_\_\_\_

**Preferred Language for communication**

Macedonian

English

**Description of Incident or Grievance:**

What happened? Where did it happen? Who did it happen to? What is the result of the problem?

**Date of Incident/ Grievance**

One time incident/grievance (date \_\_\_\_\_)

Happened more than once (how many times? \_\_\_\_\_)

On-going (currently experiencing problem)

**What would you like to see happen to resolve the problem?**

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Please return this form to OSM SOLAR DOOEL

Address: 14-1/9 Miroslav Krleza Str., Skopje-Centar, 1000 Skopje, Republic of North Macedonia

Tel.: +38970277870

Email: a.gigov@renalfa.com

APPENDIX B LETTER FROM MAYOR OF KICHEVO

ОПШТИНА КИЧЕВО  
[www.kicevo.gov.mk](http://www.kicevo.gov.mk)  
[kercova2013@yahoo.com](mailto:kercova2013@yahoo.com)  
[krvetari@kercova.gov.mk](mailto:krvetari@kercova.gov.mk)  
 тел.: 045/ 223 – 001  
 045/ 223 – 120  
 Факс: 045/ 223 – 100

Р. СЕБЕРНА МАКЕДОНИЈА / Р. Е МАКЕДОНИЈЕ  
 ОПШТИНА КИЧЕВО / KOMUNA E KËRÇOVËS  
 Бр. / N°: 03-1878/11

КОМУНА Е КËРÇОВËС  
[www.kercova.gov.mk](http://www.kercova.gov.mk)  
[kercova2013@yahoo.com](mailto:kercova2013@yahoo.com)  
[krvetari@kercova.gov.mk](mailto:krvetari@kercova.gov.mk)  
 tel: 045/ 223 – 001  
 045/ 223 – 120  
 Fax: 045/ 223 – 100

18-07-2024 год. / vll  
 КИЧЕВО - KËRÇOVË

Од почетокот на проектирањето на проектот Осломеј во 2022 година, сопственикот на проектот OSM СОЛАР ДООЕЛ и ЕПЦ изведувачот и актуелен оператор на проектот, Соларпро Пауер Македонија ДООЕЛ, покажаа голема посветеност на значаен ангажман со локалните заедници и власти. Управниот директор на OSM СОЛАР ДООЕЛ, г. Константин Ненов, заедно со менаџерот на Solarpro Power, г. Христо Христов, беа и продолжуваат да бидат во контакт со мене и мојот тим за време на сите работи што се одвиваа на местото на проектот и обезбедија целосна усогласеност и разбирање на регулаторната рамка за нивните операции.

Преку електронска пошта и телефонски повици воспоставивме и продолжуваме да одржуваме значајна размена на информации што овозможи двете страни да оценат какви мерки треба да преземе сопственикот на проектот за да се осигура заштитата и сигурноста на локалните жители што живеат во близина на нивниот проект. Во ниедна од тековните фази на животниот век на проектот не сум добил или не сум бил известен од страна на локалните жители за какви било грижи или проблеми во врска со извршувањето на проектот. Напротив, проектот, неговиот сопственик и оператор дури ја поддржаа локалната економија на позитивен начин преку вработување на локални жители во проектот, што резултираше со многу позитивен став кон проектот од страна на локалните заедници.

Со почит,

Since the beginning of the designing of the Oslomej project in 2022 the owner of the project OSM SOLAR DOOEL and the EPC Contractor and current operator of the project, Solarpro Power Macedonia DOOEL have shown great dedication to meaningful engagement with the local communities and authorities. The managing director of OSM SOLAR DOOEL - Mr. Konstantin Nenov, together with the manager of Solarpro Power- Mr. Hristo Hristov have been and continue to be in touch with me and my team during all the works that have taken place on the project site and have assured complete compliance and understanding of the regulatory framework in place of their operations.

Through the means of email and phone calls we have established and continue to maintain a meaningful exchange of information which has allowed both parties to evaluate what measures should the project owner take in order to assure the protection and safeguard of the local citizens living in proximity to their project. In any of the current stages of the lifespan of the project I have not received or have not been notified from any of the local people for any concerns or issues regarding the project execution. On the contrary the project its owner and operator have even supported through employing local citizens in the project the local economy in a positive manner which has resulted in an altogether very positive outlook to the project by local communities.

Sincerely,

Општина Кичево / Komuna e Kërçovës  
 Градоначалник / Kryetar

