



Environmental and Social Assessment

Stakeholder Engagement Plan

Project: Mihăilești - Bulbucata (68.115 MW) of solar PV and 70 MW of BESS (140 MWh) capacity, Giurgiu County, Romania

Client: Enna Solar, part of Enna Group

Prepared by Green Partners Ltd.

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1. Introduction

This document has been prepared as part of the Environmental and Social Assessment process for the Mihăilești - Bulbucata Project, located in Giurgiu County. The project is currently under development by ENNA Solar, part of Enna Group.

The development is supported by the Romanian Special Purpose Vehicle (SPV) company: PVP Cepheus Ltd. The project consists of a 68.115 MWp solar PV park and a co-located Battery Energy Storage System (BESS) to be installed adjacent to the new 33/1100 kV Substation. The BESS capacity is envisaged at 70 MW, respectively 140 MWh.

The Stakeholders Engagement Plan (SEP) is a management plan which will be used during the construction and operation period of the Project. The SEP includes generic and specific stakeholders' engagement actions, adapted to the project needs.

Stakeholder engagement within ENNA Solar is governed by the overarching stakeholder engagement framework established at ENNA Group level. The Group defines common principles, procedures, and governance arrangements for engagement with stakeholders across all business divisions, ensuring consistency, transparency, and alignment with applicable regulatory and sustainability standards.

Stakeholder engagement is conducted in a structured and continuous manner, aligned with the Group's sustainability governance framework and with the requirements of the European Sustainability Reporting Standards (ESRS). Engagement activities are designed to support transparency, accountability, risk management, and the identification of material impacts, risks, and opportunities across the value chain.

The SEP is a guiding document that maps the main categories of stakeholders that will be meaningfully engaged within the construction and implementation of a project. This SEP highlights the way the Project plans to communicate with these stakeholder groups who may be affected by or interested in the Project's operations and activities. It focuses on:

- Identification of stakeholders who are likely to be affected and have an interest to the project;
- Establishment of engagement methods that are suitable for each identified category of stakeholder;
- Documentation of previous engagement activities and stakeholder feedback;
- Development and implementation of the future stakeholder engagement programme, and methods of engagement;
- Introduction of the Project's grievance mechanism;
- Monitoring and evaluation of engagement actions, and;
- Roles and Responsibilities.

The development of the SEP was done following a participatory approach. ENNA's team, together with the consultants' team identified the key stakeholders relevant for this Project and defined the appropriate engagement methods for each of them.

The SEP is a 'live' document that will be progressively developed through updated versions in line with the phases of the Project. The SEP will be made publicly available on ENNA's website

and will also be made accessible to local communities as part of the project information disclosure policy and programme as described below.

The project respects each stakeholder's Right to Privacy, which is relevant to this SEP in terms of handling personal or private information and ensuring the confidentiality of communications, including those related to grievances.

The current version of SEP focuses on the activities that will take place during the initial stages of the construction phase.

2. Regulations, Requirements and Practices Regarding Stakeholder Engagement

2.1. National Legal Framework

At national level, there are no specific requirements for preparing a dedicated Stakeholder Engagement Plan. Nevertheless, some provisions for stakeholder engagement are included in several regulations and procedures, including:

- ❖ The Romanian Constitution, which stipulates in article 31 (1) that “a person's right of access to any information of public interest cannot be restricted” and in article 31 (2) that “the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest”;
- ❖ Law no. 86/2000, for ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998 (Aarhus Convention).
- ❖ Law no. 544 of October 12th, 2001 regarding the free access to information of public interest, which defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania.
- ❖ Law no. 544/2001 stipulates further that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of the department for public relations or through the intermediary of the person appointed for this purpose.
- ❖ Government Decision no. 878/2005 on right to access to environmental information transposes EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive no. 90/313/CEE) and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- ❖ Emergency Government Ordinance no. 195/2005, related to the environmental protection, as amended from time to time, clearly stipulates in article 5 that the state recognizes the right of any person to an “ecologically healthy and balanced environment” and for this purpose, the state warrants, inter alia, free access to environment related information, including the right of any person to be consulted

- during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice.
- ❖ Further, article 20 of Emergency Government Ordinance no. 195/2005 clearly stipulates that the Competent Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;
 - ❖ Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects. In accordance with the stipulations of this Law, the relevant information has to be made publicly available by the investor and/or the national authorities during each of the EIA stages listed in article 8 of the same. Public Consultations and open disclosure of documentation connected with the Project have to be carried out and financed by the Investor in close connection with the guidance given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, Section 3 Public information and participation in the environmental impact assessment procedure, art. 15 and 16 of the Law).
 - ❖ Order 1825 / 2016 on the approval of the guidelines for environmental impact assessment. These guidelines have been developed for the following categories of projects: groundwater abstraction and water supply systems, wastewater treatment plants and sewerage networks, flood prevention and protection works, integrated waste management system projects, highway and road construction projects, railway construction projects, flue gas desulphurization projects for large combustion plants.
 - ❖ Order 269 / 2020 on the approval of the general guide applicable to the stages of the environmental impact assessment procedure, the guide for environmental impact assessment in a transboundary context and other specific guides for different areas and categories of projects. This order sets out general guidance applicable to all stages of the environmental impact assessment procedure, including aspects related to transboundary contexts. Apart from the general guidance, it addresses municipal waste incineration, quarries and surface mining operations (including industrial installations for extraction), facilities for the intensive rearing of farm animals, hydroelectric power production facilities, and land use changes involving afforestation or deforestation.
 - ❖ Order 1682 / 2023 on the approval of the Methodological Guide on the appropriate assessment of the potential effects of plans or projects on protected natural areas of community interest. Order no. 2701/2010, the Methodology regarding the mechanism of information and consultation of the public on the occasion of preparing or revising the zonal planning and urbanism plans enacted by the Ministry for Regional Development and Tourism, which provides the legal framework for performing the information disclosure and public consultation as a prerequisite for approving any urbanism and zonal planning documents.
 - ❖ Law no. 52/2003 on decisional transparency in public administration. This law has the role to enhance the accountability of government to the citizen and the beneficiary of the administrative decision, and to increase the involvement of citizens in decision-making processes of the administrative and legislative drafting process, to enhance transparency across government.

2.2. EBRD Requirements

Due to the fact that this Project is co-financed with the financial support of International Financing Institutions, their requirements and social policies, especially the ones on stakeholders' engagement are also applicable. The stakeholder engagement is important for building strong, constructive and response relationships with all interested and impacted persons/institutions. **EBRD's Environment and Social Requirements 10 (ESR10)** states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project. Also, EBRD's Environment and Social Requirements 8 (ESR8) states that consultation with stakeholders and affected communities should be made in the context of cultural heritage issues.

In the event that national laws are insufficient or there are significant discrepancies between national and ESR 10 provisions, then the following principles will be considered:

- ❖ Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- ❖ The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation.
- ❖ The involvement of the stakeholders has to be adapted on the basis of the project impacts over them (direct/indirect) and their level of influence and interest towards the project. Vulnerable groups will be identified, and specific actions will be undertaken to ensure that the Project will not contribute to the existing vulnerabilities and possible barriers to their participation in the engagement process are eliminated;
- ❖ The involvement of stakeholders is a process which must take place in the early stages of the project, and continue throughout the entire life of the project; and

Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.

2.3. Company Practices

Stakeholder engagement within ENNA Solar is governed by the overarching stakeholder engagement framework established at ENNA Group level.

Engagement with stakeholders takes place through a combination of formal and informal channels, adapted to the nature of each stakeholder group. Employees are engaged through regular internal communication, direct dialogue with line management, access to policies and procedures via the intranet, and structured processes related to occupational health and safety, training, and professional development. Mechanisms are also in place for confidential reporting of irregularities through internal whistleblowing procedures.

Customers and business partners are engaged through contractual relationships, ongoing commercial communication, customer support services, and feedback mechanisms. Product quality, reliability of supply, and transparency regarding sustainability performance are central elements of this engagement.

Local communities are engaged primarily in connection with operational activities and investment projects, particularly in the energy and logistics sectors. Engagement focuses on minimizing negative environmental and social impacts, ensuring compliance with applicable regulations, and contributing positively to local development through responsible operations and employment opportunities.

Suppliers and contractors are engaged through procurement processes, contractual requirements, and monitoring compliance with quality, safety, and sustainability standards. ENNA Group places particular emphasis on working conditions, health and safety, and ethical business conduct within its value chain.

Public authorities and regulators are engaged through permitting processes, regulatory reporting, and participation in policy-relevant discussions related to energy transition, logistics development, and agri-food markets.

3. Project Description

3.1. Brief Project Description

The Mihăilești–Bulbucata Solar PV Project is a large-scale renewable energy development located in Giurgiu County, Romania, designed to generate clean electricity and support the decarbonisation of the national energy system. The project combines a utility-scale photovoltaic (PV) plant, grid connection infrastructure, and a battery energy storage system (BESS), ensuring both high generation capacity and operational flexibility.

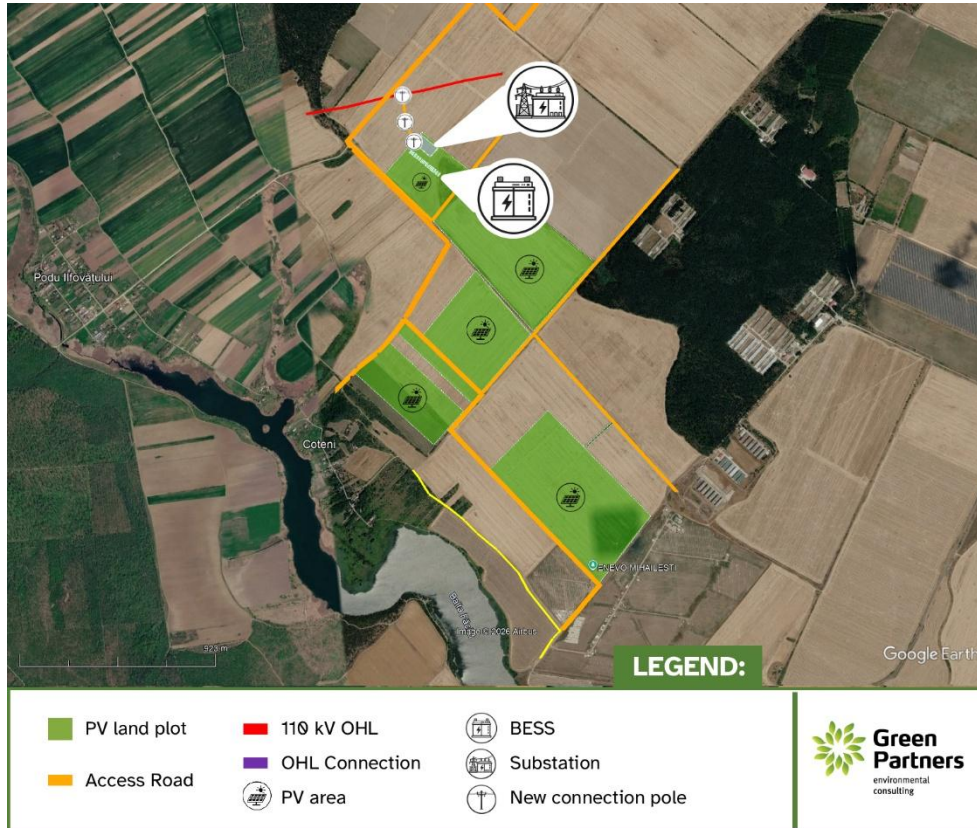


Figure 1 Project location and components

The solar PV plant will have a minimum installed capacity of approximately 87.5 MWp (DC), with inverter capacity of around 79.2–79.36 MW, while the maximum power injected into the national grid will be limited to 68.115 MW, in accordance with the approved Grid Connection Permit (ATR). The installation will use bifacial monocrystalline PV modules mounted on single-axis tracking systems, allowing panels to follow the sun's movement and optimise energy yield. The generated electricity will be converted from DC to AC through string inverters and transmitted via underground medium-voltage cables to an on-site 33/110 kV substation.

The project will be developed in three main phases. **Phase I** includes the construction of the solar PV park and the 33/110 kV substation. The PV park will cover a total built area of approximately 415,000 m² and will include panel arrays, inverter stations, internal access roads, administrative and SCADA containers, lighting systems, and security infrastructure. The

associated substation will step up the voltage to 110 kV for grid export and incorporates environmental protection measures such as oil containment systems, drainage control, grounding networks, and secure fencing to minimise environmental risks.

Phase II consists of the development of the grid connection infrastructure and associated upgrades. This includes a new 110 kV connection substation, connection to the existing Mihăilești–Clețani overhead transmission line, and the installation of approximately 300 m of new overhead line supported by 5 new poles. In addition, significant grid reinforcement works—covering nearly 119 km of 110 kV lines—will be undertaken to ensure compliance with national grid stability requirements (N and N-1 criteria). These works, implemented by the distribution and transmission operators, are essential for the safe evacuation of electricity generated by the project.

Phase III introduces a co-located Battery Energy Storage System (BESS) with a capacity of 70 MW / 140 MWh. The system will use lithium iron phosphate (LFP) technology and consist of 28 modular battery containers. The BESS will enhance grid stability, enable energy shifting, and support participation in balancing and ancillary service markets. It will be equipped with advanced safety systems, including thermal management, fire detection and suppression, and real-time monitoring through an integrated Energy Management System (EMS) and SCADA platform.

Construction will be carried out within a dedicated site area of approximately 10,100 m², using temporary facilities and a workforce of 70-150 workers on average. Existing agricultural roads will be upgraded to provide access, and all works will comply with applicable environmental, safety, and technical regulations. The project has already secured land rights, construction permits, and grid connection agreements, and construction started in December 2025 for the solar park and substation components, while the BESS component is still under permitting process. The estimated timeline for obtaining the BESS construction permit is mid Q3 2026.

Overall, the Mihăilești–Bulbucata Solar PV Project represents a significant investment in Romania's renewable energy infrastructure, combining solar generation and energy storage to deliver reliable, low-carbon electricity while contributing to national and European climate objectives.

3.2. Activities Foreseen for 2026

In 2026, it is estimated that the construction works will start both at the solar park, UTLs, 33/110 kV substation. The EPC contractor finalised the technical design of BESS component by February 2026; in case the construction site or the project design requires modifications/ adjustments, these will be notified to authorities for approval, including Giurgiu EPA.

The table below presents the scheduled activities for 2026.

Activity	June	July	August	September	November	December
Civil Works	X	X	X	X	X	X
Mounting structure installation	X	X				
PV Module installation	X	X	X			
Inverter installation	X					
MV station installation		X	X	X		
Electrical and cable installation	X	X	X	X	X	X
SCADA and auxiliary systems installation			X	X		
110/33kV Substation construction works	X	X	X	X	X	X
Testing and commissioning activities					X	X
Civil works for BESS			X	X	X	X
Grid reinforcement works	X	X	X	X	X	X
Operational power limitation (ALO)	X	X	X	X	X	X

Figure 2 2026 activities

3.3. Institutional Setup for Project Development and Implementation

The project is owned by ENNA Solar (100%) and will be developed via one SPV: PVP Cepheus Ltd.

The shares were acquired in the ready-to-be-built stage of the project.

The institutional structure which will be used during the construction phase includes the following entities:

- **The SPV – PVP Cepheus Ltd** – engaged in obtaining all the permits, engaged in Engineering, Procurement and Construction (EPC), Operation and Maintenance (O&M) and procurements agreements for the project and will also supervise the construction works;
- **ENNA Solar** – holds 100 % the capital of PVP Cepheus Ltd. and is owned by Energia Naturalis.
- **Energia Naturalis.** – decision makers and project owners (100% shares) of ENNA Solar.
- **EPC contractor(s)**
 - **ENEVO Group**– covers all design, procurement, construction, testing, commissioning, for the PV Plant, including all LV and MV electrical infrastructure, underground cabling, tracking systems, inverters, modules, civil works, and SCADA systems up to the substation MV input; the 33/110 kV substation and BESS (to be added).
 - **BUREAU VERITAS SERVICII Ltd.** - the Engineer.

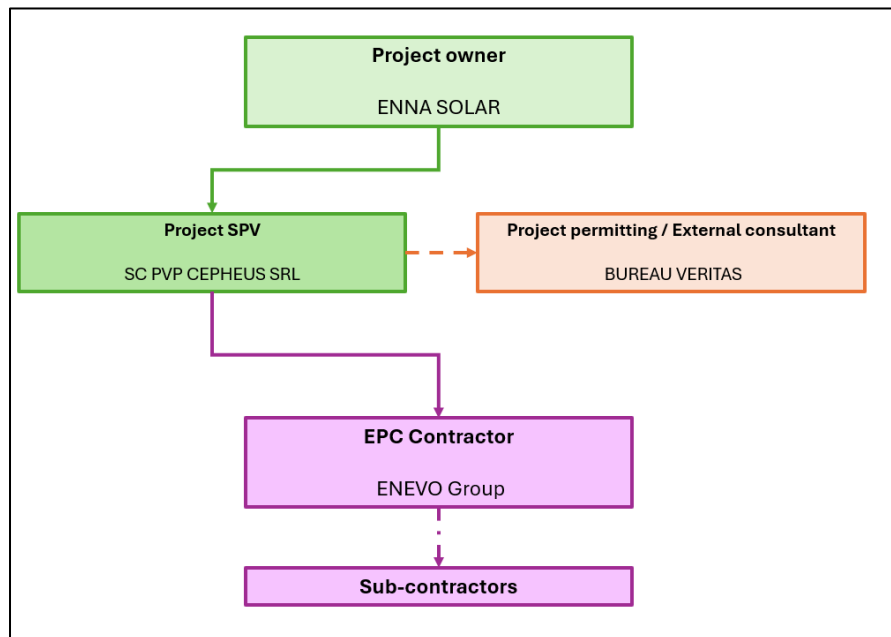


Figure 3 Project Institutional Setup

4. Stakeholder Identification and Analysis

Stakeholder identification is a key step in managing the stakeholder engagement process. The objective of this task is to identify which groups, organizations and individuals may be affected by the project or have interest in the development of the project.

Taking into consideration the status and scope of the project, the categories of identified stakeholders are detailed in the upcoming table. Based on the interaction between the Project and the stakeholders this list will be updated, if necessary, during the annual SEP update.

Stakeholder analysis is achieved by assessing the position of each stakeholder in the context of the project preparation phase.

Each identified stakeholder has been analysed from following perspectives: the project impacts on them, their estimated interest in the project and their potential influence over the project. To determine engagement priority levels (High, Medium, Low), stakeholders were assessed based on two core criteria:

1. **Degree of Impact** – the extent to which the stakeholder is directly or indirectly affected by project activities (e.g., land use, access disruption, noise, safety risks).
2. **Interest in the project** – the stakeholder’s level of interest in the Project and their potential influence on its successful implementation (e.g., land rights, regulatory authority, community leadership).

Based on this assessment, stakeholders were categorized as follows:

- **High Priority:** Stakeholders likely to experience direct, significant, or sustained impacts from the project and/or who have strong influence or decision-making power. This includes neighbouring landowners, vulnerable community members, and permitting authorities. These groups require regular, direct, and proactive engagement (e.g., one-on-one meetings, safety briefings, targeted consultations).
- **Medium Priority:** Stakeholders with moderate impact or influence, such as local businesses or general community members not directly affected by construction. These groups are engaged through periodic updates, group meetings, and grievance mechanisms.
- **Low Priority:** Stakeholders with limited impact or interest, typically with indirect or no exposure to project impacts. These are informed primarily through public communications and have access to the grievance mechanism if needed.

The below table presents the main outcomes of this analysis.

Category of Stakeholders	Stakeholders	Interest in the Project	Potential Impacts	Engagement Priority
Authorities	National / Regional Authorities (Ministry of Energy, ANRE, Environmental Authorities, Giurgiu County Council)	Ensuring the project is developed in compliance with national regulations, permitting conditions, energy policy objectives, and	<ul style="list-style-type: none"> • Reputational or compliance risks if project obligations are not met • Regulatory alignment critical for project approvals and grid connection 	High

Category of Stakeholders	Stakeholders	Interest in the Project	Potential Impacts	Engagement Priority
		environmental standards.		
Authorities	Transelectrica – National Grid Operator	The project will connect to Transelectrica's transmission infrastructure. Company has direct interest in the substation and grid connection point.	<ul style="list-style-type: none"> • Direct impact on transmission line(s) during grid connection • Infrastructure must be built to Transelectrica's technical specifications 	High
Local Authorities	Local Authorities from ATUs where PV parks, BESS, and substation are located – Mihăilești, Bulbucata, and surrounding communes in Giurgiu County	Ensuring project respects local construction permits. Interested in community benefits via CSR programmes and local employment.	<ul style="list-style-type: none"> • Reputational or compliance risks if project obligations are not met • Potential economic benefits for local communities through taxes and CSR 	High
Local Communities	Members of local communities in the proximity of project sites – Mihăilești, Bulbucata, and neighbouring villages	Interested in project impacts (positive and negative), employment opportunities, and CSR programmes.	<ul style="list-style-type: none"> • Construction disturbances: noise, dust, traffic, temporary access restrictions • Long-term visual and land-use changes • Employment and economic opportunities 	High
Local Communities	Vulnerable Persons – children, elderly, persons with disabilities living near construction areas (PV plant, BESS, OHL corridor)	Understanding limitations and safety measures during construction works, particularly along OHL routes through inhabited areas.	<ul style="list-style-type: none"> • Disproportionate risks related to safety, restricted mobility, and access limitations during construction • Increased traffic near inhabited areas 	High
Landowners & Neighbours	Neighbours – owners and users of land plots and access roads adjacent to the PV plant, BESS, and OHL corridor	Understanding actions on neighbouring lands; any restrictions or disruptions on access roads used for agricultural activities.	<ul style="list-style-type: none"> • Restricted access, increased traffic, noise, and disruption to agricultural activities • Temporary or permanent changes to land access routes 	High
Landowners & Neighbours	Owners and users of land plots used for the OHL corridor	Understanding restrictions imposed by the OHL easement and potential impacts of maintenance works and mitigation measures.	<ul style="list-style-type: none"> • Land use restrictions, visual intrusion, and need to accommodate long-term maintenance of transmission infrastructure 	High
Landowners & Neighbours	Neighbouring agricultural farmers and sheep farmers in Giurgiu County	Interested in construction timeline and restrictions; continuation of grazing and farming activities near the project area.	<ul style="list-style-type: none"> • Temporary restrictions on grazing routes and access to pasture • Disturbance to livestock from noise, fencing, or vehicle movement 	Medium
Community Organisations	Community Based Organisations (CBOs) from ATUs where the project will be located	Local community development, support for vulnerable persons, and environmental protection. Potential	<ul style="list-style-type: none"> • May be concerned with environmental quality, vulnerable groups, and equitable distribution of community benefits 	Medium

Category of Stakeholders	Stakeholders	Interest in the Project	Potential Impacts	Engagement Priority
		beneficiaries/partners in CSR programmes.		
Businesses	Businesses nearby project land plots in Giurgiu County	Understanding limitations or disturbances due to project activities during construction and operation phases.	<ul style="list-style-type: none"> Disruptions from construction noise, dust, limited access for clients or deliveries, or changes to local operating environment 	Medium
Shareholders & IFIs	Shareholders and International Financial Institutions (EBRD, EIB, BCR or other financing parties)	Timely and effective project implementation in line with all permit provisions, IFI performance standards, and compliance documents.	<ul style="list-style-type: none"> Reputational or compliance risks if project obligations are not met Financial risk if environmental and social standards are not upheld 	High
Contractors & Suppliers	All contractors and suppliers engaged in project implementation (EPC, civil works, electrical, BESS installation, consultants)	Performing contracted work effectively. Interested in clear scope, safe working conditions, and timely payment.	<ul style="list-style-type: none"> Impact on project implementation timeline, quality of work, and relations with local community 	High
Contractors & Suppliers	Employees of contractors – all persons engaged in construction and development works	Good working conditions, timely payment, and safe working environment.	<ul style="list-style-type: none"> Occupational health and safety risks, employment condition concerns, and need for clear communication on rights and grievance options 	High
Media	National / Regional and Local Mass Media	Understanding and following the project's development and key milestones.	<ul style="list-style-type: none"> Plays key role in shaping public perception and disseminating information about the project 	Medium
Media	Social Media	Posting information about project development and implementation.	<ul style="list-style-type: none"> Shapes public perception; misinformation risk if not proactively managed 	Medium
Other Stakeholders	National and/or International NGOs	Monitoring internationally financed projects for compliance with IFI standards and environmental/social best practices.	<ul style="list-style-type: none"> May raise concerns about environmental and social impacts, compliance with international standards, and protection of community and ecological rights 	Medium
Other Stakeholders	Community of Practitioners – other renewable energy producers	Sharing experience and knowledge, particularly around grid access and regulatory developments in the Romanian energy sector.	<ul style="list-style-type: none"> Not directly affected; may have concerns related to grid access, regulatory consistency, or competition for local resources 	Low–Medium
Other Stakeholders	Public at Large	Obtaining information on project outcomes, key milestones, and contribution to Romania's energy transition.	<ul style="list-style-type: none"> Indirectly affected; may have broad concerns about environmental impacts, energy transition, land use, or public benefits 	Low–Medium

Figure 4 Stakeholder Analysis

5. Previous Engagement Activities

The project developer has undertaken a public consultation process as part of the permitting process. As part of the Environmental Impact Assessment (EIA) screening, the Project documentation has been made available for public consultation at the Environmental Protection Agency's (EPA) headquarters for Giurgiu County and on its website, and announcements have been published in local newspapers. No grievances have been received during the process.

Project documents have been made available to the public on the relevant Municipalities' websites (www.primariamihalesti.ro) as part of the stakeholder engagement process during the permitting phase.



Figure 5. Example of online publishing of local decisions related to the project - Mihăilești municipality

The land required for the Mihăilești–Bulbucata Solar PV Project was secured primarily through superficies agreements negotiated with private landowners, enabling the developer to use the land while ownership remained with the original titleholders. For the development of the overhead transmission line (OHL) corridor, BESS infrastructure, and associated works, agreements were concluded with relevant parties, including local authorities where public land is involved. These agreements were facilitated through direct consultations and one-on-one meetings with affected landowners and institutional stakeholders, aimed at ensuring clarity on land use terms, timelines, and potential access restrictions.

As part of this Due Diligence process, the consultant team has engaged mainly with the representatives of the EPC contractor. A site visit at the project location was performed with no additional interaction with other stakeholders.

A dedicated section for the Project has been established on the developer's website, serving as a platform for disseminating updates, key project milestones, and relevant documents. In parallel, all key project documents have been published on the websites of the relevant Municipalities as well as the Environmental Protection Agency (EPA) of Giurgiu County. This approach was designed to ensure accessibility during the environmental permitting phase and to promote informed public participation.

As of today, and considering also the fact that the construction activities have started in December 2025, the engagement process with different stakeholders is ongoing. The EPC contractor has made the necessary arrangements to properly inform the local community about the start of work and installed information boards near the construction site. Also, the EPC contractor together with ENNA's project manager are constantly in contact with representatives of local municipality and other authorities for permitting aspects related to the BESS component. A community liaison officer has been nominated and is already active at EPC contractor (contact details provided in the current SEP)

6. Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) will serve as the framework for the stakeholder engagement process developed for the Project. The following action plan is developed for the year 2026, which coincides with the initial stages of the Project's construction phase. The objective of these external communications is to provide continuous engagement with identified stakeholders to inform them about the activities, performance, development and investment plans and their implementation. The exact dates and venues of the proposed activities will be communicated with the stakeholders prior to and during construction and operation phases.

The tables below include information on engagement actions to be performed by ENNA and the EPC contractors during the construction period. This plan will be updated at least once per year, or according to the project needs and the achieved results.

Activity	Stakeholders targeted	Purpose of Engagement	Information Disclosed	Estimated Timeline	Responsibility
Publishing the SEP on the company website	All stakeholders	Dissemination of key project information	Stakeholders Engagement Plan	Q3 2026	ENNA
Project Announcement	Local communities, municipal authorities	Inform about the project and its benefits	Project overview, location, timeline, environmental commitments	Prior to construction start	ENNA
Grievance Mechanism Rollout	All stakeholders	Enable feedback, manage complaints	Grievance procedure, contact points, response timelines	Prior to construction start	ENNA and EPC Contractors

Activity	Stakeholders targeted	Purpose of Engagement	Information Disclosed	Estimated Timeline	Responsibility
Local Employment Campaign	Local workforce	Promote hiring of local labour	Job requirements , recruitment process, training programs	Prior to construction start	EPC Contractors
Community Information Materials	Local residents, schools, interest groups	Build awareness and trust	Employment opportunities , safety measures, timeline updates	Ongoing	ENNA and EPC Contractors
Engagement with local, regional and national authorities for any permit which might be needed	Local / regional or national authorities	Permits	Information required for obtaining the permits	Ongoing	ENNA and EPC Contractors
Conduct direct meetings for discussing the work conditions and timeline	Businesses located in the proximity of the project	Avoid complaints related to disturbances	Project information regarding the construction works, type, timeline, restrictions if any	Ongoing	ENNA and EPC Contractors
Press releases	All stakeholders	Dissemination of key project information	Start of work Expected construction duration Impacted area Positive impacts of the project	Ongoing	ENNA

Activity	Stakeholders targeted	Purpose of Engagement	Information Disclosed	Estimated Timeline	Responsibility
Publishing project updates	All stakeholders	Dissemination of key project information	Key milestones	Ongoing	ENNA
One-on-one Meetings	Affected landowners and farmers	Discuss land access and mitigation	Land acquisition plans, grievance mechanism	Ongoing	ENNA and EPC Contractors
Door-to-door engagement	Vulnerable groups such as elderly or immobile persons in the vicinity of the project	Explain impacts and obtain feedback on accessibility issues	Start of work Expected construction duration Impacted area	Ongoing	CLO
Reporting	IFIs	Update on investment progress	Status of construction activities Status of company activity	End of 2026	ENNA

Figure 6 Stakeholder Engagement Plan

7. Enhancing Disclosure and Consultation Methods

While direct engagement with key stakeholder groups is already planned as part of this SEP, a more thorough breakdown of disclosure and consultation methods is provided below to strengthen transparency, accessibility, and inclusivity—especially for vulnerable and hard-to-reach stakeholders. This chapter outlines both digital and in-person communication tools, and the benefits and limitations of digital channels.

7.1. Communication Channels

To ensure timely, transparent, and inclusive stakeholder engagement, the project employs a combination of digital and non-digital communication methods. These channels are selected based on their suitability for different stakeholder groups, with particular attention to accessibility for vulnerable or rural populations.

The use of multiple formats ensures that all project-affected people have the opportunity to receive information, ask questions, and provide feedback in a manner that is convenient and meaningful for them.

Digital Communication Tools

The project will make use of a range of digital tools to disseminate information and enable feedback:

- **Social media** (Facebook): To provide real-time updates and facilitate informal communication
- **Email**: For official communication with authorities, NGOs, and individual stakeholders who request digital correspondence

In-Person and Non-Digital Methods

To ensure inclusivity and accessibility, these tools will be maintained in parallel:

- **Public meetings and community briefings**
- **Printed materials** (leaflets, posters) distributed at key locations such as town halls
- **Community noticeboards** in each project-affected administrative unit
- **Direct engagement** through door-to-door visits by the Community Liaison Officer (CLO)

7.2. Benefits and Limitations of Digital Tools

Digital communication tools offer important benefits in stakeholder engagement, particularly in terms of speed, reach, and convenience. They allow for the rapid dissemination of updates, cost-effective messaging over time, and easier documentation and archiving of interactions. Digital platforms can also be adapted to support multiple languages and formats, potentially broadening accessibility across diverse stakeholder groups.

However, these tools are not without limitations. In rural areas, internet connectivity may be poor or unreliable, and not all residents may have access to smartphones or be familiar with digital platforms. Vulnerable groups—such as the elderly, persons with disabilities, or individuals with low literacy—may face additional barriers to using these channels. Moreover, informal platforms like WhatsApp or social media can spread misinformation if not carefully monitored, and it is often difficult to confirm whether messages sent digitally have been received, understood, or acted upon.

As such, while digital tools are valuable, they must be complemented by in-person engagement, printed materials, and trusted local communication channels to ensure no stakeholder is left behind.

8. Grievance Mechanism

Grievances are managed through formal, transparent, and accessible grievance mechanisms integrated into its Environmental and Social Management Systems (ESMS). These mechanisms

are implemented at the project level and are designed to ensure that community members and other affected stakeholders can raise concerns or complaints related to the company's activities.

8.1. What is Considered a Grievance

A grievance can be a complaint, concern, question, suggestion, or other comment about the Project and how it is implemented.

It is important to keep in mind that submitting a grievance is the first condition and also a necessary tool for Scatec, to know any concerns and to meet them. In this regard, the project companies undertake full responsibility and impartiality in managing all grievances received, the responses submitted and in conducting an open and trustworthy dialogue with all stakeholders.

The Project's grievance mechanism is designed to address a wide range of issues, including concerns related to land access, use restrictions, and compensation.

Affected landowners, tenants, and users may submit grievances if they believe that construction or operational activities have adversely impacted their land rights or if they have concerns regarding the terms or adequacy of compensation. These grievances will be treated with the same procedural rigor and impartiality as other types of complaints and will follow the standard steps of acknowledgment, investigation, resolution, and documentation.

For cases involving legal or contractual disputes over compensation, the project team will coordinate with relevant authorities and legal advisors to ensure appropriate referral and resolution, while maintaining transparency with the complainant throughout the process.

8.2. The Grievance Management Process

ENNA handles grievances—especially from community stakeholders—through a structured process aimed at timely, respectful, and transparent resolution, following the steps described in the table below. The company enforces a strict non-retaliation policy. Employees reporting concerns are protected from dismissal, demotion, or disciplinary actions, even if investigations do not substantiate the claims.

Table 1 Grievance Management

Step	Description
1. Submission	Grievances can be submitted through physical drop boxes, phone, email, or in-person discussions with the Community Liaison Officer.
2. Acknowledgment	Grievance is acknowledged within approximately 10 working days. The complainant is informed about the process and expected timelines.
3. Assessment & Investigation	The issue is logged and assessed by the responsible team. Investigations may include field visits or consultations to understand the grievance fully.

Step	Description
4. Response & Resolution	Simple grievances are resolved within ~30 working days. Complex ones may take longer. The company maintains communication throughout.
5. Feedback to Complainant	The resolution is communicated to the complainant. If unsatisfied, the issue can be escalated for further internal review.
6. Monitoring & Documentation	All grievances are registered, tracked, and analyzed for trends. The insights are used to improve future stakeholder engagement, operational practices and to address systemic issues.

To submit a grievance, community members and other stakeholders can use several channels:

1. **In person** – By speaking directly with Community Liaison Officer or Project representatives on site.
2. **Grievance boxes** – Located in accessible areas near project sites where written grievances can be deposited. Grievance boxes should be located outside of the scope of security cameras, so as to ensure the possibility of submitting anonymous grievances.
3. **Email** – Grievances can be submitted electronically to designated company addresses (these are usually provided during public consultations or on project-specific communication materials).
4. **Phone** – Through numbers communicated by ENNA, particularly by local site teams.
5. **Letter or mail** – Formal grievances can also be submitted in writing and sent to ENNA's headquarters or project office.

Grievance submission is open to any stakeholder, including individuals, groups, or institutions who may be affected by the company's operations or activities. Submissions can be **anonymous**, though providing contact details allows for feedback and resolution updates.

8.3. Gender-Based Violence and Harassment (GBVH) Grievances

Gender-Based Violence and Harassment (GBVH) refers to a range of harmful behaviours directed at individuals based on their sex or gender identity, including but not limited to sexual harassment, sexual assault, bullying, intimidation, physical or verbal abuse, and exploitation. GBVH can occur in the workplace, in project-affected communities, or in other contexts related to the implementation of the project.

For the purpose of this SEP, a GBVH complaint is defined as:

Any concern, allegation, or report made by a worker, contractor, community member, or other stakeholder regarding actual or perceived gender-based violence or harassment linked to the project's activities, personnel, or contractors.

GBVH complaints are handled with specialized care due to the sensitive nature and the need for survivor-centered care, confidentiality, and legal compliance.

Guiding principles:

- ❖ **Confidentiality** - Information is shared only on a need-to-know basis with the informed consent of the survivor.
- ❖ **Non-discrimination** - All individuals—regardless of gender, ethnicity, age, disability, or any other status—are treated with equal respect and dignity.
- ❖ **Non-retaliation** - No person who makes or supports a GBVH complaint shall face retaliation or discrimination.
- ❖ **Survivor-centred** – The rights of GBVH survivors will be prioritised, and survivors will be treated with dignity and respect.

All GBVH complaints will be:

- ❖ Logged securely in a confidential grievance register
- ❖ Monitored for resolution and systemic risk trends
- ❖ Reported in aggregate form (without identifying details) to E&S management and to the EBRD.

Lessons learned will inform continuous improvement of prevention and response measures, including further training, policy adjustment, and stakeholder engagement.

Survivors will be provided with, or referred to, appropriate support services, including medical care, psychosocial counselling, legal advice, and safe shelter if required. To ensure timely and effective assistance, referral contacts and agreements will be established in advance with qualified local service providers and relevant non-governmental organizations.

8.4. Contact Details

The current Grievance Mechanism is designed to enable Project Affected Persons to submit complaints, concerns, questions, suggestions or other comments about the Project and its implementation. This mechanism is in place for the whole life of the Project; PAPs are able to submit a grievance related to the Project at any time, free of charge.

PAPs can submit grievances, questions, requests, etc. either by phone, post or email, at the contact details below:

Community Liaison Officer (CLO)

Contact person: Ana Mitcov

Tel: +40733122350

E-mail: ana.mitcov@enevogroup.ro

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy (2024). In addition, EBRD’s Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by PAPs, and civil society organisations about EBRD financed projects among project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

9. Implementation, Monitoring and Evaluation

To ensure effective and responsive stakeholder engagement throughout the project lifecycle, this plan outlines a staged approach to communication, consultation, and monitoring, closely aligned with the construction schedule and the varying levels of impact on different stakeholder groups. Priority is given to those most likely to experience direct impacts.

Engagement activities will be tailored to the specific construction phase, with emphasis on anticipated impacts and required mitigation:

Table 2 Engagement Activities and Construction Stages

Construction Phase	Key Activities	Engagement Focus
Pre-Construction (Site Prep)	Site demarcation, mobilisation	Information disclosure, direct engagement with affected landowners, finalisation of access agreements, dissemination of GM
Early Construction	Ground works, access road upgrades, fencing	Intensive engagement with neighbouring land users and local businesses regarding access and mobility
Mid-Construction	Panel installation, cabling, substation works	Continued dialogue on work schedules, safety measures, grievance handling
Late Construction & Commissioning	Testing, landscaping, grid connection	Closeout communication, feedback collection, employment transition planning

Engagement frequency is developed based on stakeholder risk exposure:

Table 3 Engagement frequency

Stakeholder Group	Engagement Frequency	Type of engagement
Neighbouring landowners/users	Monthly	One-on-one meetings, site visits
Vulnerable persons project location	Monthly	Collaboration with local authorities, targeted briefings, door-to-door engagement by the CLO for elderly or immobile persons explaining impacts and obtaining feedback on accessibility issues
Local businesses and CBOs	Quarterly or as needed	Small group discussions, written updates
Local and regional authorities	Monthly / milestone-based	Formal meetings, joint inspections
General public / community members	Quarterly	Public notices, community briefings
Contractors and workers	Weekly	Progress update meeting, periodic internal audits
NGOs, media, and sector peers	Milestone-based	Targeted briefings, press kits

Another important aspect is the way the public is informed about the SEP. The Project companies will make publicly available the SEP on its website. Also, the SEP will be part of the annual environment and safety report of Scatec.

10. Reporting

External reporting will include timely updates to relevant stakeholders regarding Project advancement. The following activities (or some of them) shall be undertaken as part of the external reporting process:

- ❖ Public disclosure of the SEP
- ❖ Environmental reporting to national and local authorities
- ❖ Annual E&S report for IFIs
- ❖ Mass media reports including:

- Public announcements regarding the beginning of the construction, the implementation of certain activities, restrictions, and the ceasing of certain activities
- Press releases
- Social media updates

11. Roles and Responsibilities

ENNA through the CLO will be the main entity responsible for implementing this Stakeholder Engagement Plan. The responsibilities in relation to the SEP include:

- ❖ Overall SEP implementation: monitoring and reporting
- ❖ Stakeholder Engagement: Acts as the main point of contact between the project and local communities, ensuring inclusive, timely, and accessible communication.
- ❖ Grievance Management: Oversees the community grievance mechanism by receiving, tracking, and coordinating responses to concerns, ensuring transparency and timely resolution.
- ❖ Monitoring and Reporting: Gathers community feedback, monitors social risks, and maintains documentation to support compliance with EBRD's environmental and social performance requirements.
- ❖ Website: Provide access to relevant information about the project
- ❖ Mass media coverage/ Press releases/ Information disclosure: offer relevant information to the mass media and third parties
- ❖ Grievance mechanism:
 - Grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections)
 - Maintain central log of all grievances ensuring it is kept up to date
 - Issue all responses to grievance raisers and ensure the Management Team are informed.

12. Annex 1 – Grievance Form

PUBLIC GRIEVANCE FORM

Reference No (for internal purpose): _____

Full Name: 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

Romanian

Other, please specify

Description of Grievance:

If Grievance is related to a specific event/Incident;

Date of Incident

One time incident/grievance (date _____)

Happened more than once (how many times? _____)

On-going (currently experiencing problem)

Signature: _____ Date: _____

Please return this form to:

Tel:

E-mail:

