

Omega PV Plants Portfolio

Stakeholder Engagement Plan

Final



Prepared In cooperation with:

Multiconsult
POLSKA

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List of abbreviations

DUŚ	Decision on Environmental Conditions
EBRD	European Bank for Reconstruction and Development
NGO, NGOs	Non-governmental organisations
EIA	Environmental impact assessment
PV	Photovoltaics
SEP	Stakeholder engagement plan

1. Introduction

This document is a Stakeholder Engagement Plan (SEP) for Optima Wind sp. z o.o. project involving the construction of 3 photovoltaic farms (so called SKD Cluster):

- Sidłowo with a capacity of 290 MWp,
- Kikowo with a capacity of 235 MWp,
- Doborowo with a capacity of 197 MWp.

The project has been classified as 'Category B' (in accordance with the EBRD's Environmental and Social Policy for 2024) because the farms have a capacity of less than 400 MW and are located in areas of low sensitivity. In addition, the project was reviewed by an independent company (Multiconsult Polska Sp. z o.o.), which assessed the project for compliance with national and EU environmental law and the EBRD's environmental and social requirements.

The SEP has been produced following the international standards required by European Bank for Reconstruction and Development (the "EBRD" or the "Bank") and the requirements of Polish regulations.

The SEP is subject to publication in accordance with international best practice. The SEP is a living document and will be reviewed and updated as further permits are obtained and as new information about project stakeholders becomes available. Project stakeholders are all individuals or groups who are in some way connected to the project. They may influence its course, be involved in its implementation, or be interested in its results. They may include, for example, employees, customers, managers, suppliers, local residents, or officials. The SEP will be updated at least prior to the commencement of construction and operational activities to reflect changes among stakeholders and planned engagement at each stage.

1.1. Benefits of stakeholders engagement

Knowing the stakeholders and their impact on planned project is critical to its successful implementation and operation. Effective stakeholders engagement has the following benefits:

- Risk management

Identifying potential social risks before they threaten the project prevents these threats and saves time and money.

- Effective decision-making

Reviewing the stakeholder's feedback allow for a comprehensive analysis of the situation and helps make a more informed decision.

- Trust and image improvement

Considering the stakeholder's opinions helps build trust and goodwill towards the business, thus creating the image of an environmentally and socially responsible company.

1.2. Direct advantages of the Project

The implementation of the Project will improve reliability of energy supply to the population, industrial consumers, and the national power grid. Furthermore, it will generate increased revenue for local and national budgets, thereby supporting the development of public, social, and economic programs. The main objective of building photovoltaic farms is to support the decarbonisation of the economy by replacing high-emission energy sources, such as coal and gas, with clean energy from the sun. Investments in photovoltaics are a key element of the energy transition, which aims to achieve climate neutrality and increase the share of renewable energy

sources in the national energy mix. PV farms enable energy production without greenhouse gas emissions, which directly translates into a reduction in the negative impact of the energy sector on the climate.

In addition, the development of photovoltaics supports the fight against climate change by reducing CO₂ emissions, improving air quality and increasing the country's energy security. Thanks to the local nature of energy production, photovoltaic farms contribute to independence from fossil fuel imports and support the development of rural areas and local communities. In the context of climate policy and international commitments, the construction of PV farms is in line with the objectives of the European Green Deal and national sustainable development strategies.

Optima plants operations will result in significant increase of local communes budgets. Current budget of Sławoborze commune, where Sidłowo Plant is located is at the level of 33,5 mln PLN. Operation of the plant will add ca. 2,5 mln PLN per year.

For Tychowo commune (Kikowo and Dobrowo) current annual budget is at the level of 45,7 mln PLN. Operations of the plants will bring another 4 mln PLN to the local budget.

2. Project overview

Optima Wind is the sole owner of Green Bear Corporation sp. z o.o. – a developer of wind and photovoltaic power plants operating on the Polish market since 2007. Optima own the rights to a portfolio of planned renewable energy projects in Poland with a total capacity of approximately 3.1 GW. It is mainly financed by Virya Energy, and for some projects it has entered into a joint venture agreement with Eiffel Transition Infrastructure S.L.P. The project will be co-financed by the European Bank for Reconstruction and Development (EBRD) as co-lender.

In the first stage, Optima plans to develop three photovoltaic farms: Sidłowo – 290 MWp, Kikowo – 235 MWp and Dobrowo – 197 MWp

There are also other photovoltaic and wind projects considered by Optima Wind in the area of SKD Project, but they are at the early stage of development, thus these were screened only for potential environmental or social issues, as the locations and final configuration has to be confirmed. These will be assessed in line with EBRD guidelines in due course following implementation of Environmental and Social Management System.

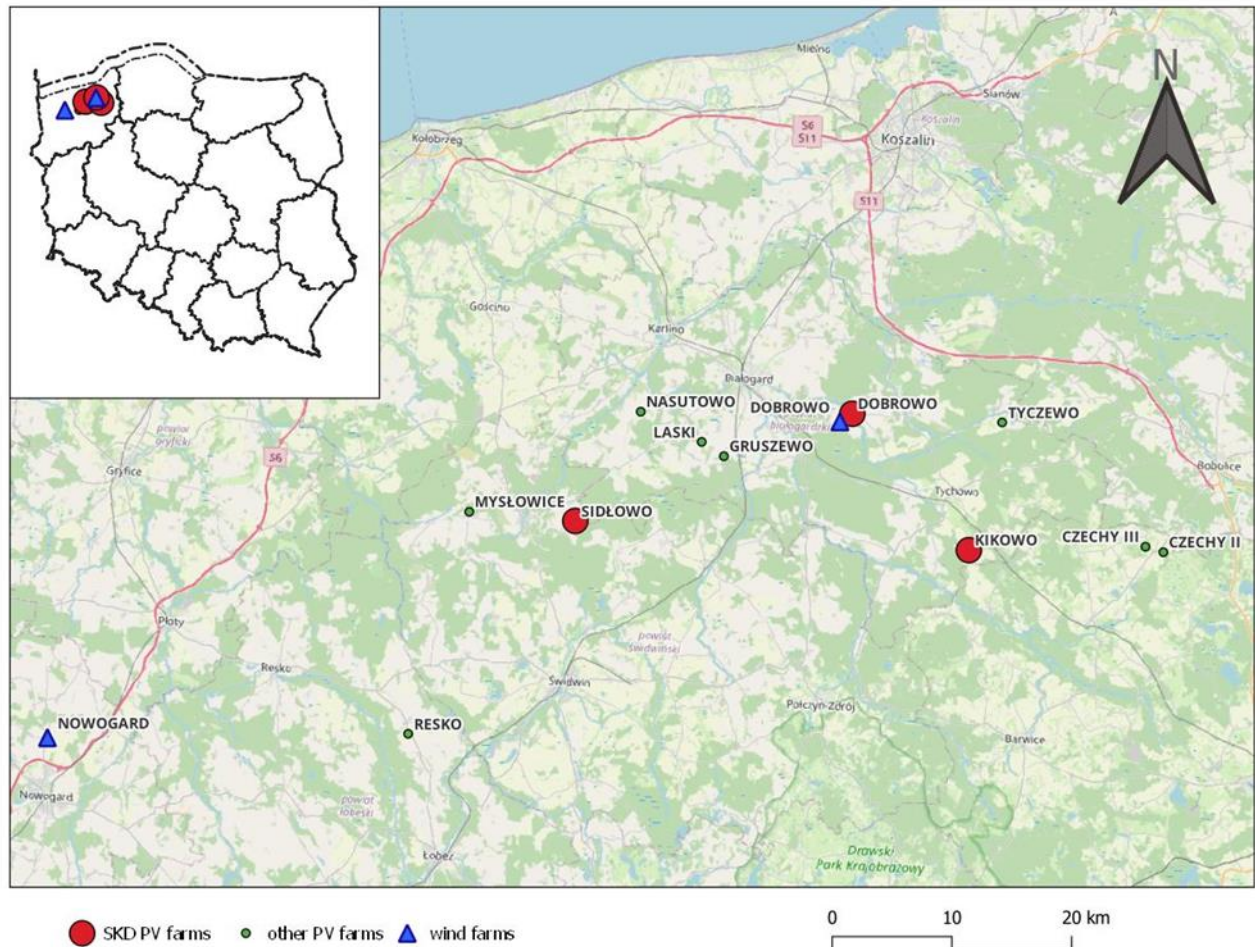


Figure 1 Location of Optima Wind projects

The farms of Sidłowo – Kikowo – Dobrowo cluster will be one of the biggest plants in Poland. Their planned capacity and areas covered by the panels are as follows:

Sidłowo – 290 MWp, covering 265,6 ha. Number of PV modules: 414 284 panels.

Kikowo – 235 MWp, fenced area of 231 ha. 335 686 panels will be installed.

Dobrowo – 197 MWp, 192,3 ha in total, 281 398 panels all together.

3. Demographic structure in the area of the Project

The demographic structure of the municipalities affected by the Project is presented below. The data comes from data compiled by the *Polska w liczbach* (Poland in numbers) portal based on reports from the Central Statistical Office¹ and the Statistical Bulletin of the West Pomeranian Province².

¹ <https://www.polskawliczbach.pl/>

² Statistical Office in Szczecin / Current studies / Announcements and bulletins / Other studies / Statistical bulletin of the West Pomeranian Province - 3rd quarter of 2024

3.1. Sidłowo village

Demographic data

Population: the village of Sidłowo had 208 inhabitants in 2021.

Population structure: 53.8% are women and 46.2% are men. Between 1998 and 2021, the number of inhabitants decreased by 0.5%. The feminisation rate in the village is 117, which is significantly higher than the feminisation rate for the West Pomeranian Province and higher than the rate for Poland as a whole.

60.6% of the inhabitants of Sidłowo are of working age, 23.1% are of pre-working age, and 16.3% are of post-working age. For every 100 people of working age in Sidłowo, there are 65.1 people of non-working age. This demographic burden index is therefore lower than the index for the West Pomeranian Province and lower than the demographic burden index for Poland as a whole.

Education: among women living in the Sławoborze municipality, the largest percentage have completed primary education (18.9%) and basic vocational education (18.9%). Men most often have basic vocational education (30.8%) and secondary vocational education (22.5%).

Socio-economic analysis

Unemployment: In the municipality of Sławoborze, to which the village of Sidłowo belongs, there are 119 people employed per 1,000 inhabitants. Women account for 56.3% of the total workforce, while men account for 43.7%. Registered unemployment in the municipality of Sławoborze was 13.4% in 2024 (13.4% among women and 13.4% among men).

Social exclusion: The groups most vulnerable to social exclusion are the elderly, young people leaving school without the possibility of continuing their higher education, as well as people employed on contracts or commission basis and in unstable forms of employment.

3.2. Tychowo Municipality

Demographic data

Population: the municipality of Tychowo has 6,187 inhabitants, of whom 49.5% are women and 50.5% are men.

Population structure: 57.6% of the inhabitants of the Tychowo municipality are of working age, 19.9% are of pre-working age, and 22.6% are of post-working age. Between 2002 and 2024, the number of inhabitants decreased by approximately 11.5%. The average age of inhabitants is 41.6 years, which is slightly lower than the average age of inhabitants of the West Pomeranian Province and comparable to the average age of inhabitants of Poland as a whole.

Education: among women living in the Tychowo municipality, the largest percentage have completed primary education (19.0%) and basic vocational education (18.5%). Men most often have basic vocational education (31.6%) and secondary vocational education (21.1%).

Socio-economic analysis

Unemployment: In the municipality of Tychowo, 143 people per 1,000 inhabitants are employed. Women account for 51.4% of the total workforce, while men account for 48.6%. Registered unemployment in the municipality of Tychowo was 16.6% in 2024 (16.6% among women and 16.6% among men).

Employment: In 2023, the average gross monthly salary in the municipality of Tychowo was PLN 6,472.12, which corresponds to 85.20% of the average gross monthly salary in Poland.

12.7% of the economically active population of the Tychowo municipality works in the agricultural sector (agriculture, forestry, hunting and fishing), 40.1% in industry and construction, 13.1% in the service sector (trade, vehicle repair, transport, accommodation and catering, information and communication) and 3.1% in the financial sector (financial and insurance activities, real estate services).

Social exclusion: The main groups at risk of social exclusion in the region are the elderly, the long-term unemployed and rural residents who do not have access to the Internet and are unable to use new technologies.

3.3. Dobrowo village

Demographic data

Population: the village of Dobrowo has 714 inhabitants.

Population structure: 48.0% are women and 52.0% are men. Between 1998 and 2021, the number of inhabitants decreased by 5.3%. The feminisation rate in the village is 92, which is significantly lower than the feminisation rate for the West Pomeranian Province and significantly lower than the rate for Poland as a whole.

61.6% of the inhabitants of Dobrowo are of working age, 19.3% are of pre-working age, and 19.0% are of post-working age. For every 100 people of working age in Dobrowo, there are 62.3 people of non-working age.

Education: Compared to the entire West Pomeranian Province, the inhabitants of the Tychowo commune have a lower level of education. Among women living in the Tychowo commune, the largest percentage have completed primary education (19.0%) and basic vocational education (18.5%). Men most often have basic vocational education (31.6%) and secondary vocational education (21.1%).

Socio-economic analysis

Unemployment: In the municipality of Tychowo, 143 people per 1,000 inhabitants are employed. Women account for 51.4% of the total workforce, while men account for 48.6%. Registered unemployment in the municipality of Tychowo was 16.6% in 2024 (16.6% among women and 16.6% among men).

Employment: in 2023, the average gross monthly salary in the municipality of Tychowo was PLN 6,472.12, which corresponds to 85.20% of the average gross monthly salary in Poland.

12.7% of the economically active population of the Tychowo municipality works in the agricultural sector (agriculture, forestry, hunting and fishing), 40.1% in industry and construction, 13.1% in the service sector (trade, vehicle repair, transport, accommodation and catering, information and communication) and 3.1% work in the financial and insurance activities, real estate services).

Social exclusion: The main groups at risk of social exclusion in the region are the elderly, the long-term unemployed and rural residents who do not have access to the Internet and are unable to use new technologies.

Social exclusion: The groups most at risk of social exclusion are the elderly, young people leaving school without the possibility of continuing their education, and people employed on a contract or commission basis and in unstable forms of employment.

3.4. Grzmiąca Municipality

Demographic data

Population: the municipality of Grzmiąca has 4,270 inhabitants.

Structure: 49.9% are women and 50.1% are men. Between 2002 and 2024, the number of inhabitants decreased by 17.3%. The average age of residents is 42.5 years, which is comparable to the average age of residents of the West Pomeranian Province and comparable to the average age of residents of Poland as a whole.

59.0% of the inhabitants of the Grzmiąca municipality are of working age, 17.5% are of pre-working age, and 23.5% are of post-working age.

Education: Compared to the entire West Pomeranian Province, the inhabitants of the Grzmiąca municipality have a slightly lower level of education. Among women living in the municipality of Grzmiąca, the highest percentage has higher education (20.9%) and secondary vocational education (20.3%). Men most often have basic vocational education (28.4%) and secondary vocational education (23.0%).

Socio-economic analysis

Unemployment: In the municipality of Grzmiąca, 75 people per 1,000 inhabitants are employed, with women accounting for 50.9% of the total workforce and men for 49.1%. Registered unemployment in the municipality of Grzmiąca was 13.5% in 2024 (13.5% among women and 13.5% among men).

Wealth and form of employment: In 2023, the average gross monthly salary in the municipality of Grzmiąca was PLN 6,474.24, which corresponds to 85.20% of the average gross monthly salary in Poland.

12.0% of the economically active population of the municipality of Grzmiąca works in the agricultural sector (agriculture, forestry, hunting and fishing), 33.9% in industry and construction, 19.9% in the service sector (trade, vehicle repair, transport, accommodation and catering, information and communication) and 2.1% work in the financial sector (financial and insurance activities, real estate services).

Social exclusion: The main groups at risk of social exclusion in the region are the elderly, the long-term unemployed and residents of rural areas attached to the town of Mysłowice.

3.5. Mysłowice

Demographic data

Population: The village of Mysłowice has 510 inhabitants.

Population structure: 46.1% are women and 53.9% are men. Between 1998 and 2021, the number of inhabitants decreased by 12.5%. Between 1998 and 2021, the number of inhabitants decreased by 12.5%. 59.0% of the inhabitants of the village of Mysłowice are of working age, 20.2% are of pre-working age, and 20.8% are of post-working age. For every 100 people of working age in the village of Mysłowice, there are 69.4 people of non-working age.

Socio-economic analysis

Unemployment: In the municipality of Sławoborze, 119 persons per 1,000 inhabitants are employed. 56.3% of all employed persons are women, and 43.7% are men. Registered unemployment in the municipality of Sławoborze was 13.4% in 2024 (13.4% among women and 13.4% among men).

Wealth and form of employment: In 2023, the average gross monthly salary in the municipality of Sławoborze was PLN 6,050.51, which corresponds to 79.70% of the average gross monthly salary in Poland.

19.2% of the economically active population of the municipality of Sławoborze works in the agricultural sector (agriculture, forestry, hunting and fishing), 30.4% in industry and construction, 12.6% in the service sector (trade, vehicle repair, transport, accommodation and catering, information and communication), and 2.1% in the financial sector (financial and insurance activities, real estate services).

Social exclusion: The groups most at risk of social exclusion are older people, young people leaving school without the possibility of continuing their higher education, as well as people employed on a contract or commission basis and in unstable forms of employment.

4. National and international legal requirements

This chapter identifies key international and national requirements relevant to the preparation of the Stakeholder Engagement Plan (SEP). These include, among others, the obligation to inform and involve the public and to engage statutory stakeholders in the project preparation and implementation process.

4.1. International conventions and European directives

International requirements for public consultation are set out in the following documents:

- Directive 2003/35/EC of 26 May 2003 providing for public participation in the preparation of certain plans and programmes relating to the environment and amending, with regard to public participation and access to justice, Council Directives 85/337/EEC and 96/61/EC on public participation in respect of individual decisions and programmes, ensures public participation at an early stage, provides for the possibility of submitting comments and proposals, and lays down rules for the participation of environmental non-governmental organisations (NGOs).
- Aarhus Convention - Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Official Journal 2003, No. 78, item 706); The Convention facilitates the participation of non-governmental organisations in the decision-making process; ensures compliance with assessment procedures; provides for the need for consultation and access to information; ensures public participation in the preparation of plans, programmes and guidelines relating to the environment, as well as in the preparation of legal acts.
- Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment – imposing an obligation to exchange information, provide access to documentation and justify the chosen solution in the light of the alternatives considered

4.2. Legal framework in Poland

Under Polish law, the public has the opportunity to participate in the process of drafting strategic documents and in obtaining an environmental decision for a given project, in the case of an environmental impact assessment. The above projects were not subject to a strategic assessment. The most important national provisions regulating public participation in the decision-making process for elements of the Project are:

- The Constitution of the Republic of Poland of 2 April 1997 (Journal of Laws No. 78, item 483, as amended), which stipulates that citizens have the right to obtain information about the activities of public authorities; furthermore, Article 74 states that "everyone has the right to information about the state and protection of the environment".
- Act of 3 October 2008 on access to information on the environment and its protection, public participation in environmental protection and environmental impact assessments (consolidated text: Journal of Laws 2024, item 1112, as amended). The Act implements, inter alia, Directive 2001/42/EC, Directive 2011/92/EU and the Aarhus Convention. On its basis, an environmental impact assessment process is carried out, including public participation and information at the stage of proceedings for individual projects requiring an EIA.
- Act on Spatial Planning and Development of 2003 (Journal of Laws 2024, item 1130, consolidated text), which establishes standards for the disclosure of information related to the creation of planning documents, primarily provincial spatial development plans, general municipal plans, studies of conditions and directions of spatial development of municipalities, and local spatial development plans.

The above-mentioned legal acts set out the requirements for public authorities, but do not specify detailed obligations for investors. The main requirement for investors is to comply with the law and the requirements set

by the administrative authorities, in particular the preparation and submission of relevant documentation. Under Polish law, public consultations are an integral part of the investment process. First and foremost, local strategic documents at the municipal level require public consultation. Furthermore, if the planned project is classified as one that may have a negative impact on the environment, public participation is required when the authority conducts an environmental impact assessment as part of issuing a decision on the environmental conditions for the project. As part of this participation, any interested party may review the documentation and submit comments and motions.

4.3. Standards applied by financial institutions

The requirements for public consultation by financial institutions (FIs) are broader than those provided for in Polish law. The main differences can be summarised as follows:

- Consultations with stakeholders are seen as a continuous process throughout the project life cycle. It is mandatory to provide stakeholders with access to the analysis of the project's impact on society and the environment, as well as the opportunity to receive feedback on their comments or remarks.
- Systematic identification of stakeholders and ongoing anticipation of their expectations and concerns. Particular emphasis is placed on informing those social groups that will be directly affected by the project or are vulnerable/disadvantaged.
- It is necessary to introduce a mechanism for handling complaints.

The EBRD has adopted a comprehensive set of detailed performance requirements (PR) that projects must meet. EBRD ESR 10: Disclosure and stakeholder engagement includes stakeholder identification and analysis, stakeholder engagement planning, disclosure, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

Key requirements of EBRD ESR 10

Stakeholder identification and analysis	Stakeholders (individuals or groups) that are affected or likely to be affected by the project, or may have an interest in the project will be identified and documented. An adequate level of detail will be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate to the project.
Stakeholder Engagement Plan	A Stakeholder Engagement Plan (SEP) will be developed and implemented. It will describe how the engagement with identified stakeholders will be carried out and the information to be disclosed. It will be tailored to take into account the main characteristics and interests of all parties affected by the project or other interested parties and outline the resources available to stakeholder engagement. The SEP will be updated during the project life cycle.
Disclosure of project relevant information	Information related to environmental and social impacts will be disclosed to help stakeholders understand the risks, impacts and opportunities associated with the project, including: i) the purpose, nature, scale and duration of the project; ii) risks, potential impacts and proposed mitigation plans; iii) the envisaged stakeholder engagement process and opportunities and ways in which stakeholders can participate; iv) time and venue of any envisaged public consultation meetings and the process of notification about meetings and reporting; v) the process by which any grievances will be managed.
Meaningful consultation	Meaningful consultation will be undertaken based on the nature and scale of the project's impact and the level of stakeholder interest. The consultation will begin early in the project planning process, and encourage stakeholder feedback. It will be based on the prior disclosure and dissemination of relevant, transparent, objective and easily accessible

	information in a proper timeframe and will be undertaken in a culturally appropriate format. The consultation shall support active and inclusive engagement with project-affected parties, including disadvantaged and vulnerable groups and will be free from external manipulation, interference, coercion, discrimination, intimidation and retaliation. The consultation process shall be documented.
Participatory disclosure and consultation	A formalised, participatory disclosure and consultation process shall involve organised and interactive consultation leading to the client's incorporating into the decision-making process. At an early stage, it is required to be engaged in a scoping process to ensure identification of key risks and impacts and for the stakeholders to provide comments and recommendations. In addition to the Environmental and social impact assessment (ESIA) and SEP, the project's environmental and social action plan (ESAP) and a non-technical summary (NTS) will be disclosed. The process shall meet any applicable national regulations. Regular reports (at least annual) on environmental and social performance shall be provided to stakeholders and shall be accessible as a separate publication, posted online or as detailed in the SEP.
Engagement during project implementation and external reporting	Information appropriate to the nature of the project and its adverse impacts shall be provided to identified stakeholders on an ongoing basis throughout the life of the project. In case any specific issues of concern to the stakeholders are identified during the disclosure and consultation process or by grievance mechanism, additional information shall be disclosed or consultations carried out at key stages of the project cycle. The client will seek feedback from the affected parties on the effectiveness of the impact mitigation measures.
Grievance mechanism	An effective grievance mechanism shall be established as early as possible in the project development process to be aware of and respond to stakeholders' concerns in a timely manner. The grievance mechanism shall be proportionate to the risks and potential adverse impacts of the project.
Changes to project environmental and social risks and impacts	The SEP shall include provisions for stakeholder engagement if there are changes at any stage of the project life cycle, which result in significant changes to the environmental or social risks and impacts. Information how these are being mitigated shall be disclosed to stakeholders. Additional consultation shall be carried out if there are significant adverse risks and impacts on affected parties.

4.4. Current status of permits and consultations under the EIA procedure

In accordance with the provisions on access to environmental information, public participation in environmental protection and environmental impact assessment, the environmental impact assessment (EIA) procedure is mandatory in the case of:

- projects that may always have a significant impact on the environment (Group I projects),
- projects that may potentially have a significant impact on the environment (Group II projects) – in this case, the authority competent to issue a decision on environmental conditions decides on the EIA,
- projects that may affect a Natura 2000 site.

In cases a) and b), the environmental impact assessment is carried out as part of the procedure for obtaining a decision on environmental conditions for the project.

According to Polish regulations, photovoltaic power plants are investments that may potentially affect the environment (mainly due to the change of land use to industrial).

Due to the scale of the project, the following sub-projects were subject to a full environmental impact assessment procedure:

- Sidłowo – final environmental decision issued on 24 May 2021.
- Kikowo – final environmental decision issued on 9 April 2021.
- Dobrowo I – final environmental decision issued on 10 May 2021.
- Dobrowo II – final environmental decision issued on 18 May 2023.
- Dobrowo III – final environmental decision issued on 24 January 2022.

After conducting environmental impact assessment procedure, including public participation, the competent authorities issued decisions on environmental conditions for all these projects.

5. Project stakeholders

5.1. Method of identifying stakeholders

Stakeholder identification is one of the key stages of project management, aimed at identifying individuals, groups and organisations that influence or are interested in the project. Proper stakeholder identification allows for effective management of their expectations, minimisation of risks, building of positive relationships and ensuring support for the achievement of project objectives.

Community representatives act as operational points of contact between the project team and the target communities. Their role includes both providing information about local socio-cultural conditions and distributing project communications within existing social structures. They also serve as a feedback channel for gathering opinions, risk signals and feedback from end stakeholders. The legitimacy of representatives may be formal – resulting from elections, appointments or institutional functions – or informal, based on social recognition, local authority and community trust. In both cases, their position enables effective communication mediation and supports consultation and decision-making processes within the project.

From a stakeholder management perspective, community representatives should be included in the stakeholder register as entities with a high level of influence and significant communication potential. This requires the planning of dedicated communication mechanisms, taking into account both formal channels (e.g. meetings, reports) and informal forms of interaction (e.g. community discussions, local initiatives).

The group of stakeholder representatives may include a variety of individuals and groups who have formal or informal authority to speak on behalf of local communities. These include, among others:

- persons holding positions in local government units and representatives of organisations working for the benefit of local communities;
- leaders of traditional or informal social structures, e.g. village leaders;
- persons who are not elected but enjoy authority and public trust, such as coordinators of local initiatives, members of citizens' committees or representatives of cooperatives;
- persons managing non-governmental organisations, social associations and groups working for equality, including women's groups;
- representatives of local elders and persons recognised as authorities due to their long-standing involvement in community life;
- leaders of religious communities, including representatives of local faiths;
- persons performing educational or upbringing functions, such as teachers, who are perceived as trustworthy and influential in the local community.

5.2. Methodology for identifying stakeholders

Stakeholder identification is a process of systematically identifying all individuals, groups and organisations that may influence, be influenced by or show an interest in the project.

Project context analysis, which aims to understand the project environment, its objectives, scope and potential areas of impact. The analysis should include:

- Analyse the project documentation (project card, needs analysis, schedule).
- Identify the areas of impact of the project (social, economic, environmental, technological).
- Identify potential groups that may be affected by or influence the project.

Based on the context analysis, a list of potential stakeholders should be drawn up. To this end, the following can be used:

- Workshops with the project team,
- Consultations with industry experts,
- Analysis of stakeholders from similar projects,
- Review of local social structures, institutions and organisations.

Typical stakeholder categories:

- Public and local government institutions,
- Project partners, contractors, suppliers,
- Local communities and their representatives,
- Non-governmental organisations and civic groups,
- Opinion leaders, media, professional groups,
- End users and project beneficiaries.

Identified stakeholders should be classified according to:

- Level of influence – ability to influence decisions, resources, schedule,
- Level of interest – degree of involvement and expectations towards the project,
- Type of relationship – formal (e.g. resulting from legal provisions) or informal (e.g. social, cultural).

All data should be organised in a stakeholder register, which should include:

- Name of entity/personal details,
- Role in the project,
- Level of influence and interest,
- Expectations and potential risks,
- Preferred communication channels.
- Engagement strategy (e.g. informing, consulting, co-deciding).

The stakeholder identification process is dynamic and requires regular review. New stakeholders may emerge during the project, or the status of existing stakeholders may change. Therefore, it is necessary to:

- Regularly update the stakeholder register,
- Monitor changes in the project environment,
- Adjust communication and engagement strategies.

5.3. Identification of stakeholders

The table below lists the most important stakeholders identified for the project and their categorisation.

Stakeholders	Type	Type of Influence
Mayor / City Office	Public institution	Positive
Local communities	Local community	Positive
Particularly vulnerable groups	Local community	Neutral
Village leader / Village council	Local representatives	Neutral
Land-owning farmers	Landowners	Positive
Landless farmers	Tenants	Neutral
Investor / Project developer	Private entity	Positive
Environmental organizations	Non-governmental / social organization	Neutral
Regional organizations	Non-governmental organization	Neutral
Local organizations	Non-governmental / social organization	Neutral
Power grid operator	Technical partner	Positive
School / Local educational institutions	Local institutions	Neutral
Local media	Informational	Neutral
Representatives of local religious denominations	Religious / cultural	Neutral

The implementation of the project does not involve the resettlement of individuals or businesses. At no stage have there been any physical or economic displacements, nor are any expected in the future. All the land necessary for the implementation of the individual components of the project has been secured through long-term voluntary/commercial lease agreements with the landowners.

One of the potential social impacts of the project is a reduction in the area of land used for agricultural activities. However, this impact is mitigated by a financial compensation mechanism in the form of lease payments to landowners. It should be noted that only land with a low soil quality rating (RV, RVI) has been allocated for the investment, which minimises the impact on agricultural production. The area occupied by photovoltaic installations and technical infrastructure is limited, and the spatial layout of the farm allows for the continuation of agricultural activities in the adjacent areas. The project takes into account the possibility of coexistence of energy and agricultural functions within the framework of sustainable spatial development. During the implementation phase (construction), there may be temporary social impacts, in particular related to increased traffic of heavy goods vehicles and construction machinery. This may cause nuisance to the local community, such as noise, increased traffic and restrictions on the availability of local infrastructure. In order to minimise these effects, appropriate organisational and communication measures are planned.

All lease agreements concluded by Optima Wind were concluded voluntarily, with the full consent and awareness of both parties. In the vast majority of cases, the landowners are large agricultural producers who ran their own agricultural businesses. In cases where the land was sublet to other farmers, they were also large, professional farmers running agricultural holdings. In fact, no 'informal' land users have been identified, as the land is continuously used for crop production.

Optima maintains regular communication with the owners of leased land, keeping them informed of the progress of development projects and providing them with the planned investment schedule in advance. Information about the expected start of construction work is provided well in advance to allow for proper planning of harvests or refraining from new plantings.

In cases where construction must begin before the harvest is complete, Optima pays appropriate compensation for lost crops. All lease agreements contain specific provisions regarding compensation for damage to crops, as specified in §5 'Right to use the property'. To date, no claims have been made by third parties.

We therefore conclude that the land designated for the construction of photovoltaic farms has been acquired voluntarily. Its acquisition will not affect the livelihoods of land users and will therefore not affect their general living conditions, nor will they lose their source of income. No claims have been made by third parties in relation to difficulties in using the plots, harvesting crops, access or deterioration of living conditions or loss of livelihood. The reduction in the area of land used for agricultural purposes will not affect land users or contribute to a deterioration in their living conditions or loss of livelihood. There is no need for public consultation, particularly in the context of access to alternative resources and the restoration of livelihoods for informal land users. Any individual impacts and claims will be addressed via project-level grievance mechanism.

5.4. Stakeholder engagement programme

The stakeholder engagement programme is a key element of the social impact management strategy for the photovoltaic farm construction project. Its aim is to ensure transparent, systematic and two-way communication between the investor and all stakeholder groups that may be affected by or have an impact on the project. The aim of the programme is to build trust and public acceptance for the project. Ensuring access to reliable and timely information. The programme enables stakeholders to express their opinions, concerns and suggestions. It allows local social, environmental and economic conditions to be taken into account in the project and minimises the risk of social conflicts. The programme will include various forms of communication and consultation, tailored to the specific characteristics of individual social groups.

Table1 . Stakeholder engagement programme

Stakeholder group	Purpose of engagement	Planned actions	Schedule	Responsibility	Communication channels	Monitoring methods
Local communities	Information and consultation	Information meetings, leaflets, surveys	Preparation and construction phase	Public communication team	meetings with the community group, printed materials, website	Opinion analysis, attendance, consultation reports
Vulnerable groups	Information and consultations	Information meetings, surveys, questionnaires, leaflets	Preparation and construction phase	Public communication team	meetings with the community group, printed materials, website	Opinion analysis, attendance, consultation reports
Mayor/Municipal Office	Compliance with local regulations	Formal consultations, planning agreements	Entire project cycle	Project team, legal department	Official letters, working meetings	Formal documentation, meeting minutes
Farmers – landowners	Negotiations and conclusion of lease agreements	Individual meetings, negotiations	Preparatory stage	Land acquisition team	Direct conversations, e-mail	Number of agreements signed, analysis of terms and conditions
Environmental organisations	Consideration of environmental aspects	Submission of environmental reports, consultations	Preparatory stage	Environmental team	E-mail, thematic meetings, meetings with the general public	Comments on reports, recommendations
Energy network operator	Securing connection and technical compliance	Technical meetings, exchange of documentation	Design and construction stage	Technical team	Meetings, e-mail, data exchange platform	Documentation compliance, connection schedule

6. Complaint handling mechanism

As part of the stakeholder engagement programme for the photovoltaic farm construction project, a formal complaint handling mechanism will be implemented by Optima Wind as part of Environmental and Social Management system. The roles and responsibilities will be allocated to dedicated personnel to ensure transparency, accessibility and effectiveness in responding to reports from individuals, groups and institutions that may be affected by the project. It will enable stakeholders to submit complaints, comments and concerns in a safe and orderly manner. It will ensure that reports are dealt with quickly and fairly. It will help to minimise social risks and build community trust in the project. In addition, the complaint handling system will be based on principles consistent with international standards, such as ESR10 of the European Bank for Reconstruction and Development (EBRD) and recognised international practices. The system will be easily accessible and simple to use, and its use will remain completely free of charge. Data confidentiality and full compliance with applicable personal data protection regulations, including the General Data Protection Regulation (GDPR), will be ensured. The complaint management process will be transparent and based on the principles of accountability. The GMS system will cover all types of complaints, including those relating to environmental and safety issues, both during the construction and operation of the photovoltaic farm.

Currently Optima Wind delegated Mr. Krzysztof Jermak to be the primary contact person for any grievances received. His contact details are as follows:

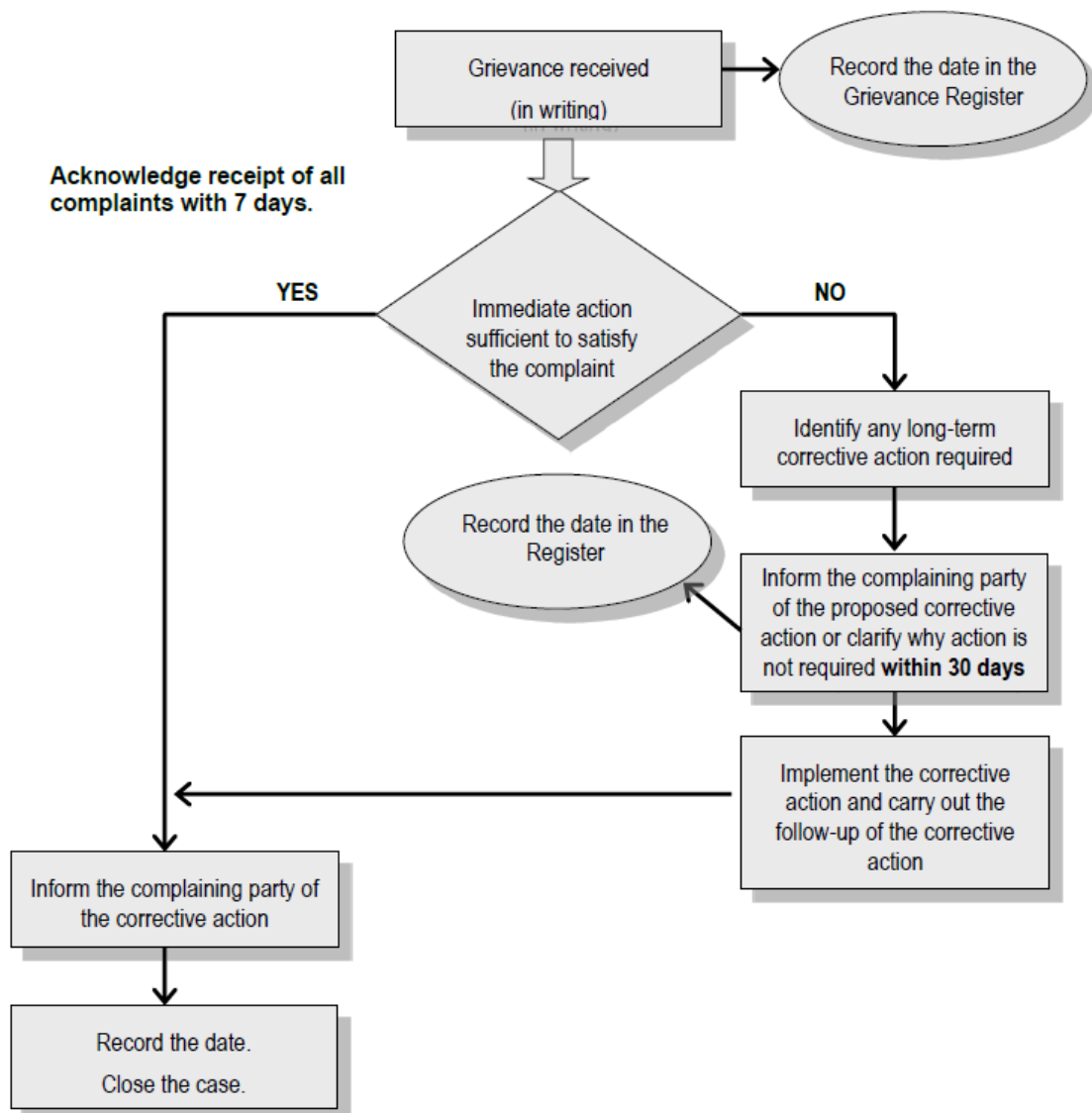
Krzysztof Jermak

Tel. +48 606 297 350

e-mail: kjermak@greenbearcorp.com

The complaint handling process diagram below illustrates the steps taken in response to reports from the community. The aim of the process is to ensure a prompt, adequate and effective response to every complaint. The time required to complete each stage will be adjusted to the level of risk assigned to a particular case, allowing for a flexible and proportionate approach to problem solving.

Flowchart for Processing Grievances



1 . Complaint management process flow chart

7. SEP monitoring and reporting

Monitoring and reporting on stakeholder engagement activities is an important component of managing the social aspect of a photovoltaic farm construction project. The aim of this process is to ensure the effectiveness of communication activities, identify areas requiring correction, and document interactions with stakeholders in a transparent and systematic manner.

Monitoring includes ongoing evaluation of information and consultation activities, such as meetings, educational campaigns, individual conversations and the publication of information materials. Among other things, the number and type of activities carried out, the level of stakeholder participation, the content of comments and opinions submitted, the response time to enquiries and the level of public acceptance of the project are analysed. In addition, a register of complaints and enquiries is kept, which allows for the identification of recurring problems and the assessment of the effectiveness of the mechanism for dealing with them.

In order to ensure an objective assessment of the activities implemented, tools such as activity logs, participant evaluation forms, satisfaction surveys and key performance indicators (KPIs), e.g. number of submissions, response time, attendance at meetings or number of recommendations taken into account, are used.

Reporting is carried out on a regular basis – for example, quarterly or after the completion of key project stages – and includes a summary of the actions taken, an analysis of the comments received, an assessment of the effectiveness of communication, and recommendations for further action. Reports can be made available to stakeholders, local authorities and other entities involved in the project, which helps to build trust and transparency in the investment process.

Systematic monitoring and reporting allow for the ongoing adaptation of stakeholder engagement strategies to change social and project conditions, thereby supporting the achievement of project objectives in a responsible and sustainable manner.