



Project Solis

Stakeholder involvement plan and mechanism for submitting complaints

ENCRO d.o.o

Zagreb, July 2023

Table of Contents

1. INTRODUCTION	3
2. PROJECT SUMMARY	5
2.1. SPP Pelegrin Phase I.....	6
2.2. SPP Gornji Humac.....	7
2.3. SPP Gradić.....	8
3. STAKEHOLDER INVOLVEMENT REQUIREMENTS.....	9
3.1. Requirements for information and public participation in Croatian regulations 9	
3.2. Requirements of the European Bank for reconstruction and development....	10
4. STAKEHOLDER ENGAGEMENT PLAN	11
4.1. Key objectives and strategies	11
4.2. Stakeholders of the Solis project.....	11
4.3. Key activities and communication	14
4.3.1. Preparatory activities.....	16
4.4. Implementation phase	17
5. RESOURCES AND RESPONSIBILITIES	20
6. COMPLAINTS MECHANISM	21
6.1. Introduction to the mechanism.....	21
6.2. Complaint Submission	22

I. INTRODUCTION

Solar power plants represent facilities for the production of electricity with minimal impact on the environment. There is no combustion process, emission of harmful substances, impact on air or water quality, soil degradation, noise pollution, and after the end of life and dismantling of the plant, there is no waste that needs to be stored permanently and that has a long-term negative impact on the environment.

In order to achieve the goals of the European Green Plan, on March 4, 2020, the European Commission proposed the **European Climate Regulation**. By adopting the regulations, the political obligation would become a legal obligation and an incentive for investments. As a member of the EU, the Republic of Croatia participates in the adoption and implementation of common EU policies and undertakes the obligations of achieving EU goals.

Also, the development of solar power plants is supported by EU Directive 2018/2001 and EU Regulation 2018/1999. The parliament also agreed that for solar power plants, the time for obtaining documentation for the purpose of revitalization should be simplified and further shortened.

As a member, Croatia supports the common goals of the European Union, and according to the EU Regulation, the **Integrated National Energy and Climate Plan for the Republic of Croatia for the period from 2021 to 2030** (hereinafter: the Plan) was drawn up. The plan was confirmed by the European Commission and adopted in December 2019. Also, on February 28, 2020, the Croatian Parliament adopted the **Energy Development Strategy of the Republic of Croatia until 2030 with a view to 2050** (hereinafter: the Strategy). Previously, a **Strategic Environmental Impact Assessment Study was prepared for the energy development strategy of the Republic of Croatia until 2030 with a view to 2050**.

The Stakeholder Engagement Plan (SEP) and the Grievance Mechanism are important documents for the planned Solis project, which includes the construction of a solar power plant SPP Pelegrin Phase I in the Pučišća municipality, SPP Gornji Humac in the Selca municipality and the construction of SPP Gradić in the area of the town of Benkovac in Zadar County.

The stakeholder involvement plan was developed in accordance with good international practice regarding public consultation and information disclosure. This good practice provides guidelines for creating stakeholder engagement plans with a list of issues that can be included but leaves it to the professional judgment of experts which issues to include, depending on their relevance to the project.

The goal of the stakeholder involvement plan is to provide clear and practical instructions for stakeholder involvement and ways to submit complaints. Although the formalized stakeholder involvement procedure is prescribed by national or EU legislation and international standards, it should not be seen as "another legal or administrative burden".

On the contrary, the development of energy projects, and even in the field of renewable energy sources, which are considered key to achieving the EU's climate neutrality goals, may for various reasons be subjected to critical scrutiny by the public. Therefore, the meaningful involvement of the public is an indispensable part of the business strategy for ensuring long-term and sustainable business, that is, the "social license to operate".

Important definitions

Stakeholders are individuals, organizations and groups that are directly or indirectly affected by a project, as well as all those who have an interest in the project and those who can positively or negatively influence the outcome of the project. Stakeholders can be: 1. Locally affected communities or individuals and their official or unofficial representatives; 2. State and local authorities, politicians, non-governmental associations and business associations, church representatives; 3. National and local media; 4. Academic community; 5. Other business entities.

Stakeholder engagement is not synonymous with stakeholder management and does not mean "managing stakeholders by making them do or think what we want". On the contrary, it requires the sincere commitment of the project holder (i.e. developer, those who develop projects) and other stakeholders and the willingness to involve stakeholders as an opportunity to improve activities in all phases, and not as a process for confirming already taken positions and decisions, which reflects in the "decide-publish-defend" approach (using legally prescribed public participation exclusively as an administrative formality). One of the most important benefits of meaningful public involvement is gaining "society's permission to operate". The term defined in this way overlaps with the term "meaningful involvement of the public", as defined in the Aarhus Convention.

A social license to operate is usually tied to a location and is granted by a group (network) of stakeholders. A company may have a work permit for one business activity, but not for others. Additionally, the wider the social, economic and environmental impact of the project, the more difficult it is to obtain "society's permission to operate". The consultation process is a key element of stakeholder involvement. It involves two-way communication between the project holder (developer) or its representatives and the communities on environmental impact assessments (EIAs), it allows the local community to express their views on the risks of the project, its impacts and mitigation measures, and for the project holder (or its representatives) to consider and respond to them on them. The consultation process must continue and be maintained throughout the life of the project.

The grievance mechanism is also an integral element of stakeholder involvement. It is a key procedure or process for identifying the viewpoints, concerns and objections (complaints) of stakeholders regarding the possible negative environmental and social impacts of the project. If properly established and managed, it significantly reduces project risks and the risk of litigation and associated costs.

A grievance is defined as "a complaint or a strong feeling that someone has been treated unfairly". This feeling can be based on a sense of real or perceived injustice and is the cause of the trouble. It applies to "all cases involving injustice towards others or violation of their rights".

2. PROJECT SUMMARY

Project Solis is comprised of three solar power plants: SPP Pelegrin Phase I, SPP Gornji Humac and SPP Gradić. All three solar power plants are developed by parent company ENCRO Ltd. under dedicated Special Purpose Vehicles (SPVs): 4 ENCRO Ltd, HUMAC Ltd, LUMEN SOLIS Ltd, respectively.

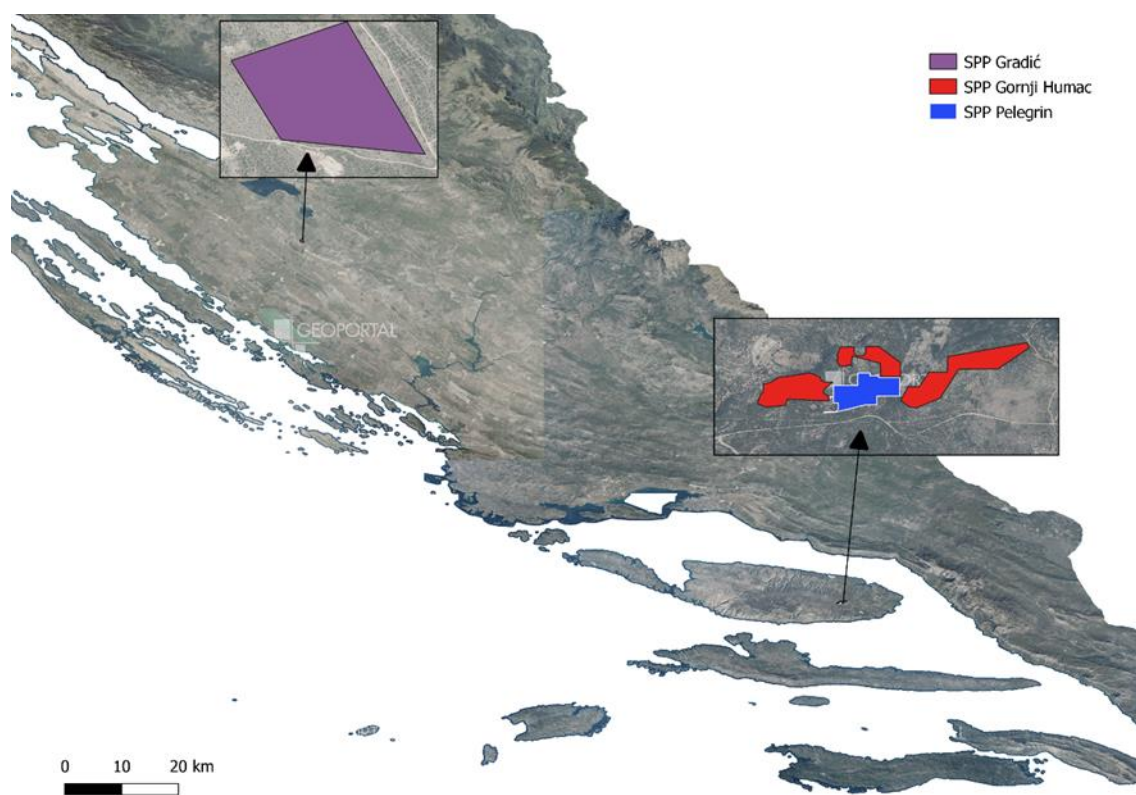


Figure 1 Project Solis location

All the necessary construction permits have been obtained for all three projects.

SPP Gradić: Construction permit, Class: UP/I-361-03/17-01/38, Regulation number (URBROJ): 2198/1-11-1/1-17-6, issued on 19 October 2017 by the Administrative Department for Spatial landscaping, environmental protection and communal affairs of Zadar County, Benkovac Branch and valid until 13 November 2023 (according to the Decision on the extension of the validity of the construction permit Class: UP/I-361-03/20-01/000032, Regulation number (URBROJ): 2198/1-07-01/1-20-0004 issued by the before mentioned authority on 13 October 2020).

SPP Gornji Humac: Construction permit, Class: UP/I-361-03/19-01/000028, Regulation number (URBROJ): 2181/1-11-00-07/03-19-0008, issued on 30 July 2019 by the Administrative Department for Construction and Spatial Planning of the Split-Dalmatia County, Supetar Branch and valid until 06 September 2025 (according to the Decision on the extension of the validity of the construction permit, Class: UP/I-361-03/22-01/000168, Regulation number (URBROJ): 2181/1-11-00-07/03-22-0003, issued by the before mentioned authority on 01 December 2022).

SPP Pelegrin: Construction permit, Class: UP/I-361-03/22-01/000185, Regulation number (URBROJ): 2181/1-11-00-07/02-23-0028, issued on 11 April 2023 by the Administrative Department for Construction and Spatial Planning of the Split-Dalmatia County, Supetar Branch and valid until 09 May 2026.

2.1. SPP Pelegrin Phase I

Solar power plant SPP PELEGRIN Phase I with an export capacity power of 9.9 MW and installed power of approx. 10 MWp is located within the area of 9.9 ha in the territory of the municipality of Pučišća, on part of the cadastral parcels c. 3929/2 k.o. Gornji Humac.

Estimated energy production of solar power plants is 15.51 GWh per year.

Selection of equipment was based on the principle of good engineering practice (GEP) and the best available technology (BAT).

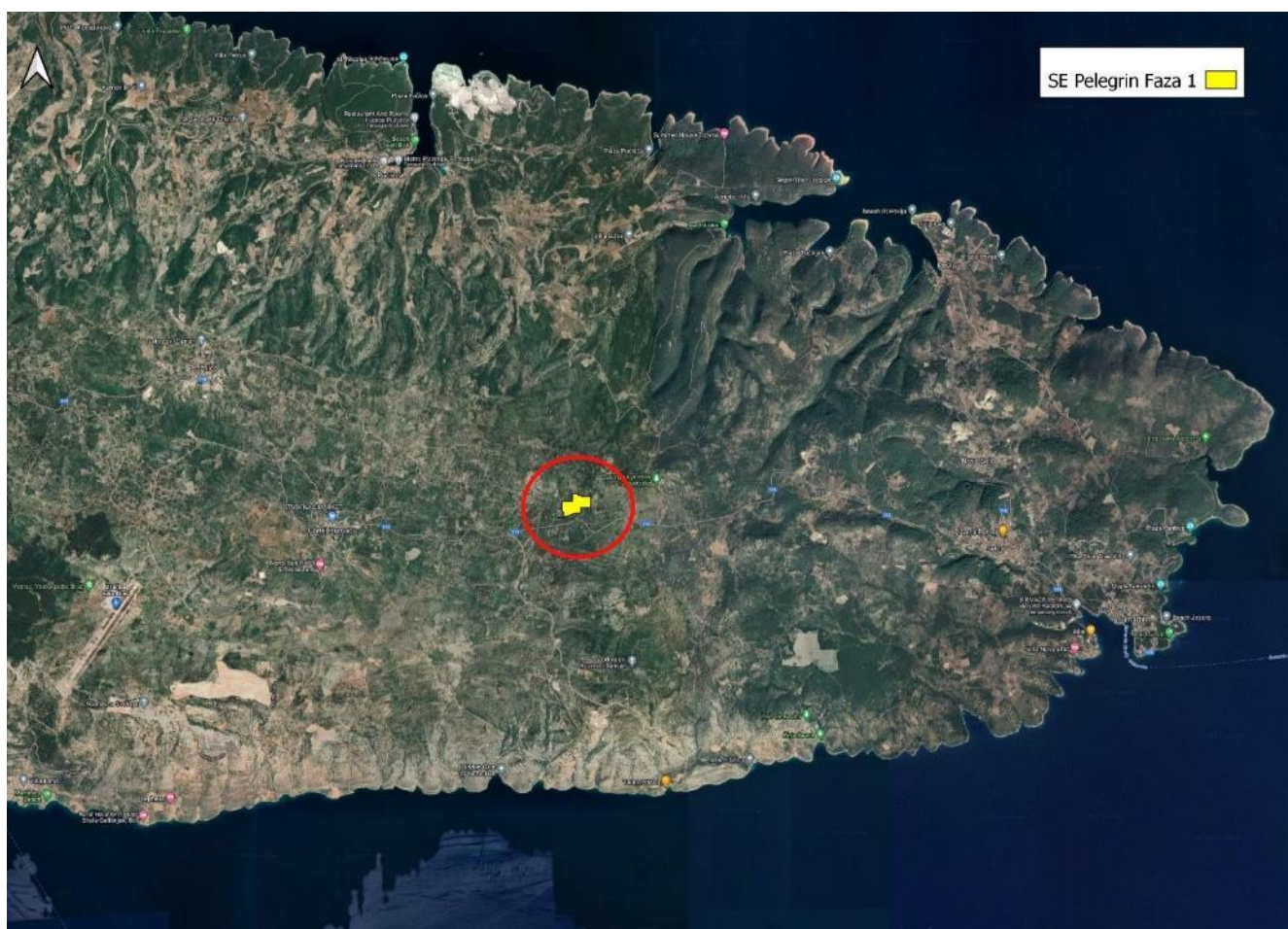


Figure 2 Location of SPP Pelegrin Phase I, Island Brač

2.2. SPP Gornji Humac

Solar power plant SPP Gornji Humac with an export capacity power of 9.9 MW and installed power of approx. 13 MWp is located within the area of 31 ha on part of the cadastral parcels c.no. 1810/1, 1813/2, 6572 hp. Pučišća, c.č. 3076/8 k.o. Selca, and k.č. 3929/2 k.o. Gornji Humac.

Estimated energy production of solar power plants is 19.7 GWh per year.

Selection of equipment was based on the principle of good engineering practice (GEP) and the best available technology (BAT).

It should be noted that the island of Brač has been selected as one of the 26 EU islands by the Secretariat of the Clean Energy Initiative for EU islands to transition to clean energy. The Gornji Humac solar power plant is part of the approved plan for the island's transition to clean energy.

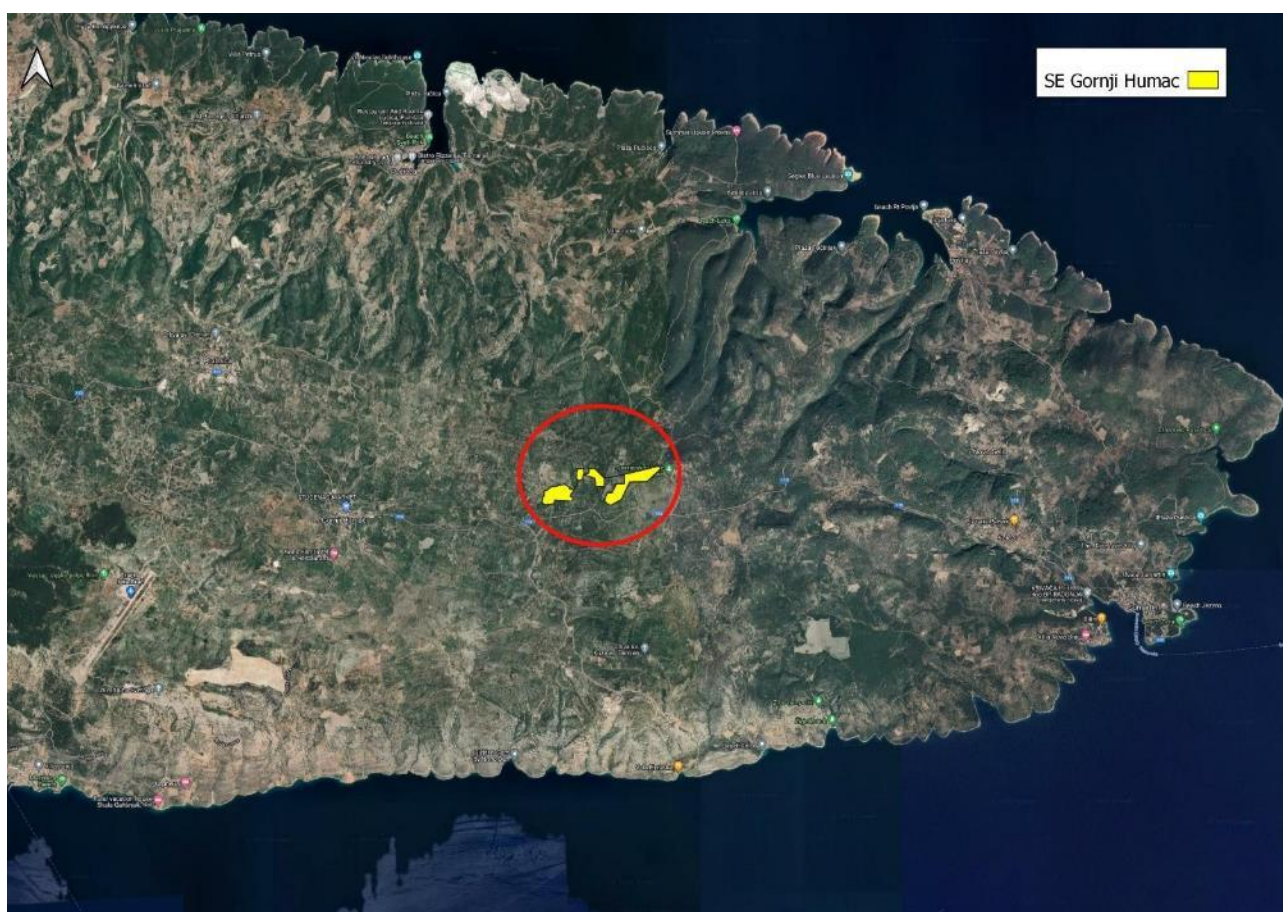


Figure 3 Location of SPP Gornji Humac, Island Brač

2.3. SPP Gradić

Solar power plant SPP Gradić with an export capacity power of 9.9 MW and installed power of approx. 13 MWp is located within the area of 36 ha on a part of the cadastral parcels c.no. 1868/1 k.o. Atlagić Tower, City of Benkovac.

Estimated energy production of solar power plants is 18.7 GWh per year.

Selection of equipment was based on the principle of good engineering practice (GEP) and the best available technology (BAT).

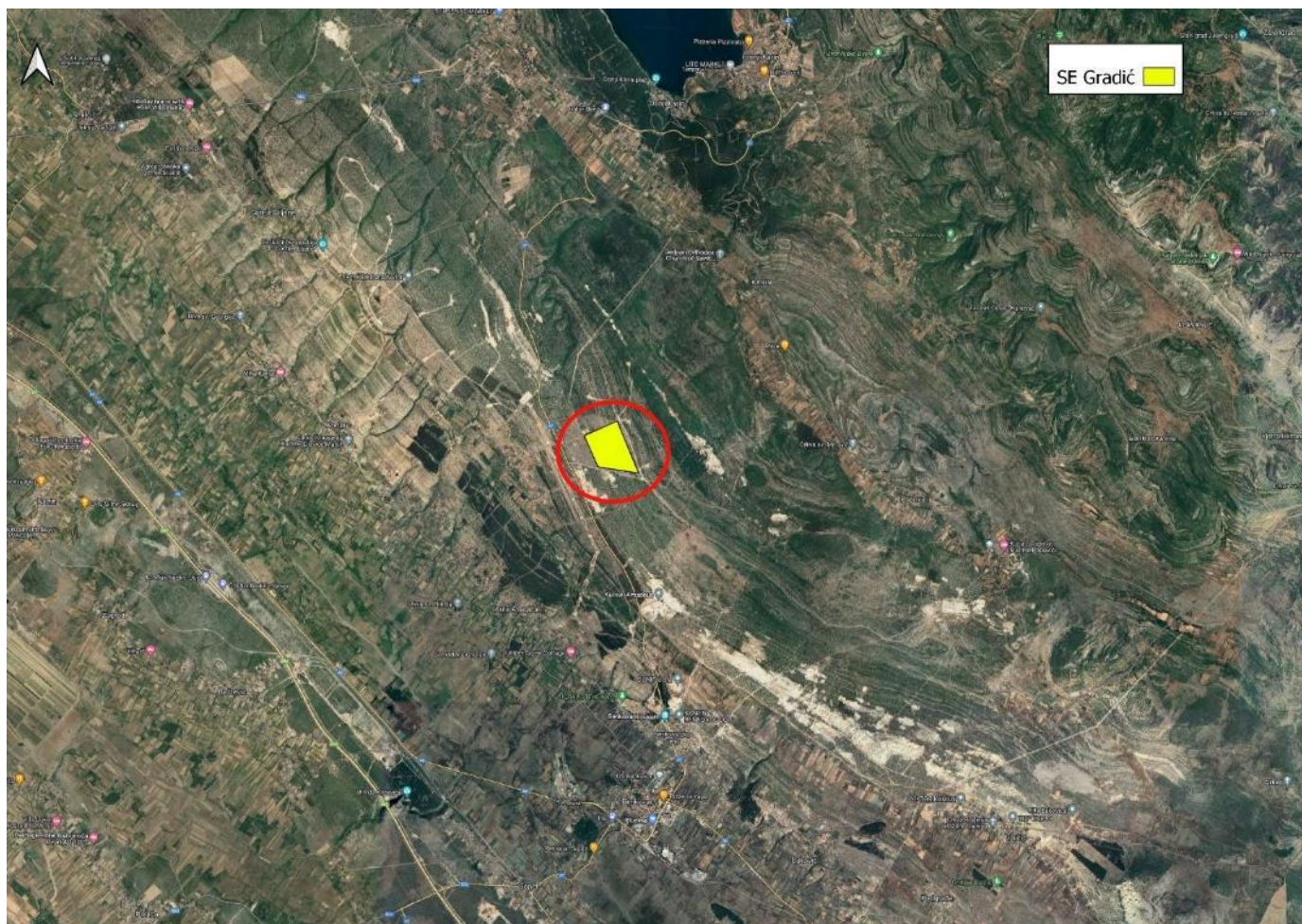


Figure 4 Location of SPP Gradić, Benkovac

3. STAKEHOLDER INVOLVEMENT REQUIREMENTS

3.1. Requirements for information and public participation in Croatian regulations

Requirements related to the public, public participation and access to information maintained by state bodies and organizations, as well as the right to submit petitions to state bodies and the right to a healthy environment in Croatia are prescribed by the Constitution of the Republic of Croatia (Official Gazette no. 56/90, 135/97, 08 /98, 113/00, 124/00, 28/01, 41/01, 55/01, 76/10, 85/10, 05/14).

By passing the Decree on Confirmation of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Protection Matters (Official Gazette No. 1/07), Croatia ratified the Aarhus Convention in 2006. The basic principles contained in the Convention are also supported by other Croatian laws and by-laws. acts, especially the Environmental Protection Act (Official Gazette No. 80/13, 153/13, 78/15, 12/18, 118/18). In accordance with the principles of the Convention, the public has the right to access information about the environment, to participate in decision-making in environmental matters, and the right to access justice in environmental matters.

According to the Environmental Protection Act, the public authority is obliged to provide access to environmental information that it owns and/or supervises. Also, the bodies responsible for carrying out environmental impact assessments are obliged to inform the public about these procedures. The method of informing and participating the public and the interested public in the process of assessing the impact of interventions on the environment, as well as the method of conducting a public hearing, that is, public inspection and public presentation, are prescribed by the Decree on informing and participating the public and interested public in matters of environmental protection (Official Gazette No. 64/08).

Croatia also has the Law on the Right to Access to Information (Official Gazette No. 25/13, 85/15) which stipulates that every citizen (in any capacity) as well as every legal entity (company, civil society association, media, institution, and etc.) has the right to access information of a public nature. Information of a public nature is information in the possession of a public authority, created during or related to the work of a public authority, contained in a document, and refers to everything that the public has a legitimate interest in knowing, except in cases where the information or its parts are protected by law in order to preserve other important interests (eg privacy or national security).

Public participation as part of the environmental impact assessment procedure is carried out by the Ministry of Economy and Sustainable Development in accordance with the Environmental Protection Act. However, practice shows that public participation is mainly focused on "administrative compliance" and "reduced to formality" as explained in chapter 3.3, which is important for better understanding of the project environment and better management of project risks and benefits.

In summary, public information and consultation procedures include the following steps:

- The public is informed via the media and the website of the Ministry about the details of the publication of the draft plan/document (where the printed version is available for inspection, the date and time when it can be obtained for inspection). The duration of public inspection is 30 days.
- Citizens/organizations are invited to send comments and/or participate in the public discussion.

3.2. Requirements of the European Bank for reconstruction and development

For the European Bank for Reconstruction and Environment (EBRD), stakeholder involvement is a key element of good business practice and corporate citizenship and a way to improve project quality, in accordance with Performance Requirement 10: Information Disclosure and Stakeholder Engagement. Stakeholder involvement must be tailored to each client and project, "depending on the risks and negative impacts on affected communities, the specifics of the sector and environment, and the degree of public interest."

PR10 states that stakeholder involvement includes:

1. Identification of stakeholders (individuals and groups) and their analysis.
2. Stakeholder Inclusion Plan.
3. Publication of timely, relevant, understandable, accessible, and appropriate information (without manipulation, intervention, coercion, and intimidation).
4. Meaningful consultation and public participation.
5. Grievance mechanism – an effective procedure for making comments and complaints.
6. Continuous communication ("responsibility for submitting reports - information" which implies taking responsibility for impacts).

Stakeholder involvement must be organized gradually and is expected to start at the earliest stage of project planning, when all options are still open, and to continue throughout the entire life of the project, in combination with Performance Requirement 1 and Performance Requirement 2.

The project manager must clearly define roles, responsibilities, and competences, and designate responsible personnel for the implementation and monitoring of the Stakeholder Involvement Plan. Although it is not explicitly written, stakeholder analysis implies the identification of key environmental and social issues that have been defined and promoted by individuals and/or groups because they reflect public concerns and allow the investor and authorities to approach solving these problems in an appropriate manner.

4. STAKEHOLDER ENGAGEMENT PLAN

The involvement of stakeholders is a dynamic, non-linear process and implies that individuals and groups must be adequately informed and meaningfully involved in the development of the project "in proportion to its possible impacts and the degree of interest of the stakeholders in the project". Due to the dynamic character of stakeholder involvement, the Plan must be regularly updated, especially project stakeholders (their importance for the project and possible impacts are not equal in all phases of the project), key issues of interest and reputational risks, and communication channels and tools.

4.1. Key objectives and strategies

The plan aims to achieve the following key goals:

- Designing a platform for continuous communication with stakeholders (information, two-way communication, and involvement)
- Establishing internal communication channels that will enable a stable flow of information and timely and effective coordination.
- Establishing simple and practical procedures for the timely identification and resolution of objections, concerns, and comments from different groups of the public
- Consistency and credibility in communication
- Building and maintaining a good reputation for the project and its holders

In order to achieve these goals, the following strategies will be used:

- Focus on the project implementation plan, while maintaining openness and flexibility when it comes to the expectations and concerns of individual groups
- Application of transparent and up-to-date communication with the required level of protection of business interests (adequate balance between requirements for transparency and protection of business interests)
- Openness to concerns and fears of key stakeholders, involvement in decision-making (as a risk mitigation measure)
- Focus on meeting stakeholders' expectations in a fair way, while giving credible explanations if it is realistically not possible to meet them
- If as per request individual consultations explaining the Project plans.

4.2. Stakeholders of the Solis project

In the development of solar power plant construction projects of the Solis project, the following groups, presented in the table, are distinguished in terms of their role, interest, or influence (power of influence).

The list of internal and external stakeholders must be updated regularly. Stakeholders need to be prioritized, which helps assess how much attention and time should be given to individuals, groups, organizations, and institutions at a given stage of the project based on two factors: their level of interest in the project and their power to influence the project and its outcomes.

Vulnerable Groups

The stakeholder identification process examined if there are any groups of affected people who might be more vulnerable to current and potential Project impacts. During the assessments and the preparation of this SEP, it was assessed whether there will be any groups who might be affected by the projects differently due to their gender, age, ethnicity, religion, physical or

mental disability or other attributes. The assessment identified that there are no vulnerable groups being differently affected by the project.

However, there are three groups of people, which might require different channels of communication: i) elderly residents, ii) residents with special medical needs (visual or hearing impairment), iii) residents with no or partial access to the Internet.

Those, and potentially other later identified groups, will benefit from appropriate communication methods, which will be used, as presented in the table.

Stakeholders directly and indirectly affected by the development of projects	Stakeholders who are directly or indirectly involved in the project	Stakeholders who can influence the implementation of the project
<p>Residents of nearby settlements and hamlets (near Selca and Pučišće) for SE Gornji Humac and SE Pelegrin</p> <p>Residents of Benkovac for SE Gradić</p> <p>Elderly people</p> <p>Elementary and high school children inhabiting the vicinity of road construction sites or passing the construction sites on daily basis.</p>	<p>4 Encro ltd. (company – project holder)</p> <p>Lumen solis ltd.</p> <p>Humac ltd.</p>	<p>Competent ministries, agencies and regulators at national and EU level: Ministry of Spatial Planning, Construction and State Property Ministry of Economy and Sustainable Development Ministry of Agriculture Croatian Energy Regulatory Agency State Inspectorate of Croatia Croatian Civil aviation Agency Croatian Forests European Commission</p>
<p>Residents of settlements and hamlets on possible transport routes from ferry ports to locations</p> <p>Elementary and high school children inhabiting the vicinity of road construction sites or passing the construction sites on daily basis</p>	<p>4 Encro ltd. (company – project holder)</p> <p>Lumen solis ltd.</p> <p>Humac ltd.</p>	<p>HEP-ODS (transmission system operator)</p>
<p>Residents of two municipalities on the island of Brač (better quality of life due to benefits to the local administration, employment opportunities)</p> <p>Residents of the city of Benkovac</p>	<p>Employees and construction contractors-</p> <p>Inero ltd. – EPC for SE Pelegrin</p> <p>HELB ltd. – EPC for SE Gornji Humac</p> <p>Siemens Energy ltd. – EPC for SE Gradić</p> <p>Oberhauser Bau - Systeme GmbH-supplier of supporting structures for projects SE Gornji Humac and SE Pelegrin</p> <p>Suppliers of photovoltaic modules and equipment</p> <p>Anhui Sanctus Renewable Energy Sales Co., Ltd. ("Seraphim")- supplier of solar modules</p> <p>Huawei Technologies Co. Ltd – supplier of inverters;</p>	<p>BIOM and other non-governmental organizations on the national level (Green Istria, Green Action, etc.) and at the local level (EkoZadar, Mountaineering Society Belveder, etc.)</p>
<p>Vulnerable groups: Elderly people, residents with special medial needs and people with partial or no access to the Internet and other modern ways of communication – vulnerable groups</p>	<p>4 Encro ltd.</p> <p>Lumen solis ltd.</p> <p>Humac ltd.</p>	<p>Local community branches, local media and portals</p>
<p>Chiefs and municipal officials of the municipality of Selca and the municipality of Pučišća on the island Brač</p>	<p>Police and firefighters DVD society</p>	<p>Zadar county head, county assembly, administrative departments Prefect of Split-Dalmatia County, county assembly, administrative departments</p>
<p>Mayor of the city of Benkovac, city council, administrative bodies</p>	<p>International financial institutions that could finance projects</p>	<p>Municipal heads, administrative bodies</p>

Prefect of Zadar County, county assembly, administrative departments		National media (specialized and general-informative) local media and portals
Prefect of Split-Dalmatia County, county assembly, administrative departments		

The list of internal and external stakeholders must be updated regularly. Stakeholders need to be prioritized, which helps assess how much attention and time should be given to individuals, groups, organizations, and institutions at a given stage of the project based on two factors: their level of interest in the project and their power to influence the project and its outcomes.

Newspapers, TV stations, local and regional blogs will get press releases with all necessary details about the project, contact person and media gallery materials.

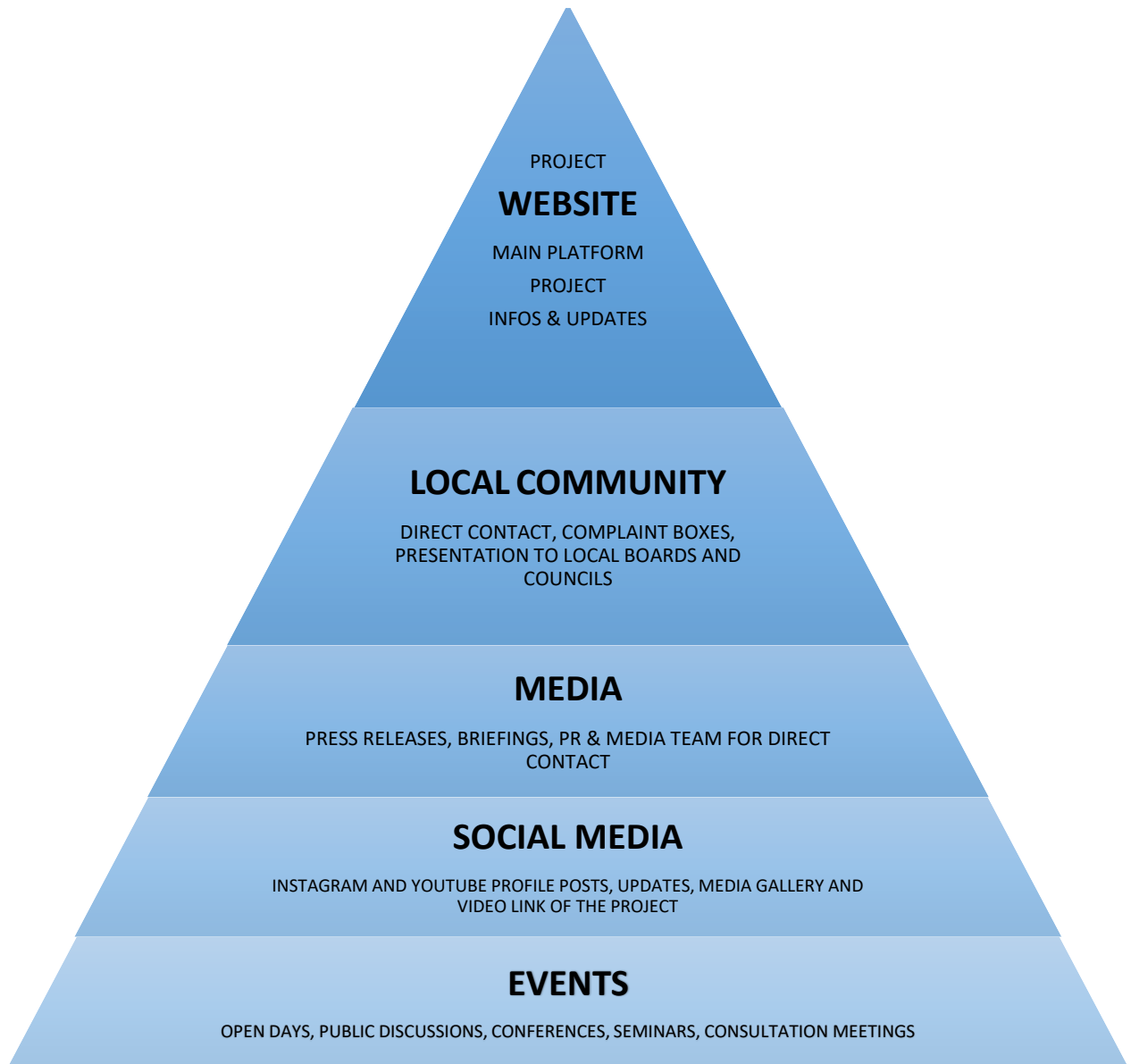
4.3. Key activities and communication

The activities are divided into two phases: the preparation phase and the implementation phase. The preparatory phase includes all activities aimed at ensuring that the project has all communication elements (primarily the website as a central communication platform), as a basis for the implementation of activities in the construction phase, trial work and regular work. Activities are divided by stakeholder groups for all projects.

Throughout the life of the Project this Stakeholder Engagement Plan will be updated to reflect Project progress. The SEP will be reviewed, and if necessary updated prior to construction commencing to capture any issues raised during the pre-construction consultations. Issues raised during the construction process will be documented and a response provided through the mechanisms described in this SEP.

Information Boards will be installed at the entrance of the Project area and will serve as a media tool/channel for communications with the residents. Information in relation to the Grievance Mechanism will also be included with contact details.

The Contractor will secure sites prior to any construction activities taking place and will ensure appropriate construction and warning signs are in place.



Structure of communication channels

4.3.1. Preparatory activities

Preparatory phase (April – May / June 2023)		
Key Activities	Resources	Activities
Project website	External	Selection of executors The appearance and content of the website, key functionalities (Content Management System for independent editing and updating of content, forms for giving opinions, remarks and comments) Choice of domain Publication of the website
Brochure - project ID card and infographic (Croatian and English version)	External	Choice of executor Concept and content of the brochure Breakdown of the brochure (adaptation for publication on the website)
Presentation of the project	Internal and external	Presentation template (visual presentation elements) Concept and content of the presentation
Questions and answers about the project "Key messages"	Internal and external	List of all questions about the project with answers (the list must regularly be updated) Key messages with the aim of ensuring consistent communication
Complaints Policy (4 Encro ltd., Lumen solis d.o.o, Humac ltd.) Complaints form Complaints form via the website 'Complaint Box' in the local community and at the location of the solar power plants	Internal and external	Policy with the aim of informing all stakeholders (internal and external) about the approach of the project holder regarding the quick and efficient resolution of complaints Development of internal capacities for handling complaints Designing a template for entering complaints Publication of the complaint form on the website

4.4. Implementation phase

The local public (residents on possible transport routes, residents of surrounding settlements and hamlets) will be informed in a timely manner about the progress of the works in the local media. If necessary, other activities, such as consultation events, will be organized. Communication with residents during construction will include the collection and analysis of complaints that may arise due to increased traffic or construction disruptions. The complaint form and short instructions will be available on the project website, in the local community and at the solar power plant locations. During construction and during subsequent work, communication with the competent authorities will be focused on fulfilling legal obligations related to reporting, providing additional explanations, and solving open questions, and participating in official meetings.

In accordance with the obligations from the Energy Approval, the project holder will regularly report to the competent authorities (Ministry of Economy and Sustainable Development). Also, they will regularly prepare information on the status of the project and the environmental and social aspects of the activity and publish it as a minimum on the project's website. In addition, information about the start of trial work will be published in the local (and, if necessary, national media), which will also inform the Ministry of Spatial Planning, Construction and State Property and HEP-ODS. If necessary, additional information will be published in the media (local and national) and the local community. In order to mark the official start of the operation of the solar power plant, it is possible to organize a special event.

During regular work, the project manager will monitor their impact on local residents, collect and analyze residents' complaints and deal with them appropriately visiting sites at least every 2 weeks for a continuous engagement with local community and officials.

The project holder will inform the local community and other stakeholders about all phases of project development (primarily through information on the website and through articles and other media formats in local or national media). It will also organize the monitoring of media content, so that, in case of need, it can react in a timely manner and deny incorrect or incomplete information. In the event that an issue of interest is raised, the administration will respond as soon as possible.

Stakeholder engagement manager plan to visit local schools and arrange an educational hosting event with lecturer in schools about renewable energy for students in elementary and local high school.

Educational info board about flora and fauna on location will be installed on site for visitors supporting local tourist roads nearby and in cooperation with tourist board Ravni Kotari and tourist board of Island Brač.

Local farmers will be included in company events or fair including local people who might help in organising and support of events during all the time of project following recent good cooperation with local producers.

Interested NGO's at local and national level will be provided timely with information, communication and consultation. Others might include cultural associations, athletic clubs' associations, and agricultural cooperatives.

Overview of activities by stakeholder groups:

	Communication ways	Dynamics	Responsibility
Stakeholders directly and indirectly affected by development			
Residents of settlements and hamlets on possible transport routes from ferry ports to locations	Website Local media & portals Roadside assistance - HAK (www.hak.hr)	Before starting the works (announcements of works) and during works (transportation) – information on cargo transportation	Project Coordinator (management) Zvonimir Meštrović Stakeholder involvement expert: Rujana Lukač
Vulnerable groups			
Elderly residents, residents with special medical needs, residents with no or partial access to the Internet, restraining them getting full information and passing their feedback	Local media (newspaper and radio) Local community branches Public events	Before and during construction and during regular work	Project Coordinator (management) Project manager
Organizational stakeholders			
Employees	E-mail Meetings Events Reports	Continuously, in all phases	Project Coordinator (management) Project manager
Construction companies, suppliers of solar panels and equipment	In accordance with contractual obligations	Before the start of work, during work and during regular work	Project manager
Transmission system operator			
HEP-ODS	Email Meetings Exchange of documents and official correspondence about the project	When necessary, but certainly before the trial run and during the entire duration of the project	Project Coordinator (management) Project manager
Administrative stakeholders			
Administrative Department for Construction and Spatial Planning, Supetar Branch, Split-Dalmatia County	Official correspondence, notifications, meetings as needed	In accordance with the requirements of administrative procedures, before trial work and use permit	Project Coordinator (management) Project manager
Administrative department for spatial planning, environmental protection and communal affairs, Benkovac branch, Island Brač	Delivery of environmental monitoring reports - exchange of information, documents and official correspondence about the project	After completion of the construction works and throughout the duration of the project	Project manager, project management Environmental Protection Expert 'Stakeholder Involvement Expert'

Ministry of Agriculture	Exchange of documents and official correspondence about the project Delivery of the land lease contract	Before and after the construction works	Project holder, project management
State inspectorate	Consultative meetings Exchange of information and documents and prescribed measurements	During the entire duration of the project, in accordance with legal requirements, as necessary	Project holder, project management
Local authorities – City of Benkovac Municipality of Selce Municipality of Pučišća Tourist Board- Ravni Kotari	Consultative meetings Exchange of information and documents Official correspondence about the project	Constant communication, within and outside of the prescribed requirements (obtaining and maintaining the company's 'permit to operate' in accordance with the EBRD's requirement for meaningful stakeholder involvement)	Project manager or 'Stakeholder Involvement Expert'
Croatian Forest	Exchange of documents and E-mails, Formal letters, correspondence regarding the project	Prior and during the construction works.	Project Manager
Zadar County Road Authority	Exchange of documents and E-mails, Formal letters, correspondence regarding the project	During preparation phase for transportation and during transportation works - delivery of solar panels	Project Manager
Police	Consultative meetings – exchange of information and documents	During the construction and transportation process on site.	Project Manager
Fire brigade	Consultative meetings – exchange of information and documents	Continuously communication with local brigades during all the period on site	Project manager or 'Stakeholder Involvement Expert'

5. RESOURCES AND RESPONSIBILITIES

The project leader is the bearer of the overall responsibility for the involvement of stakeholders. To tackle these important topics in more detail, a dedicated person was appointed as a Stakeholder Engagement specialist.

Stakeholder Engagement specialist is responsible for implementing and updating the existing Stakeholder Involvement Plan, communication with stakeholders and the project team (related to schedules, technical and administrative issues) and the procedure for submitting complaints.

The responsibilities of the stakeholder engagement specialist more specifically are listed below:

- Creation of policies for stakeholder involvement and submission of complaints, as well as templates for submitting complaints
- Managing and regularly updating the database of complaints
- Creating mini-plans for the involvement of stakeholders for each phase of the project and updating information about stakeholders, channels and methods of communication, activities and deadlines for their implementation
- Monitoring and identification of the needs and expectations of the local community, evaluation of needs and expectations and giving suggestions on how to meet reasonable expectations and needs
- Creation of an investment plan in the community for successful management of individual needs of the community, apart from direct contributions (payments to city budgets in accordance with legal obligations)
- Continuous reporting to the management on the results of evaluation of complaints and making proposals for further necessary activities
- Regular update of the Stakeholder Involvement Plan
- Preparation of annual environmental and social reports on environmental, social, health and safety effects and the status of complaints and actions taken to mitigate them

Other responsibilities may include:

- Creation of the concept and content of the website and its regular updating with activities, media gallery and upcoming events around Benkovac and on Island Brač
- Management of social networks including Instagram Profile of Youtube video link
- Preparation of the concept and contents of the brochure
- Preparation of the video material for website and public viewing online and use on social media & media gallery
- Preparation of project presentations and their updating
- Preparing a list of questions and answers and updating
- Continuous relations with the media and monitoring of media content

6. COMPLAINTS MECHANISM

6.1. Introduction to the mechanism

According to the EBRD Complaints Management Guidelines, “the client must become aware of stakeholder concerns and respond to them in a timely manner. To this end, the client shall establish a grievance mechanism, process or procedures to receive and resolve stakeholder complaints and concerns regarding its environmental and social impacts.

A grievance can be a complaint, concern, question, suggestion, or other comment about the project and how it is implemented. Receiving and processing grievances is a valuable tool in order to know any concerns and to meet them, thus preventing problems and conflicts.

The grievance mechanism is dedicated to receiving, recording, investigating requests, complaints, and questions about the project and submitting answers to them. It is designed to enable any interested stakeholder to submit their grievances about the project.

A complaint may take the form of specific complaint about impacts, damages or harm caused by the project. Similarly, a grievance may refer to concerns about access to the stakeholder engagement process or about how comments have been addressed. Grievances can also be related to project activities, or perceived incidents or impacts.

The complaint mechanism must be adapted to the risks and potential negative impacts of the project.

If implemented effectively and continuously improved, a grievance mechanism is an alternative to dispute resolution.

However, if the stakeholder is not satisfied with the way his complaint was resolved, he can always complain to the competent authorities and/or initiate proceedings before the judiciary.

As noted in the Guidelines, experience shows that a significant number of complaints are based on misunderstandings, and that such complaints can be avoided or minimized by consistently involving employees and communities. Inclusion also helps keep individual community or employee concerns from escalating into a complaint.

Stakeholder Engagement Specialist will formally acknowledge receipt of the complaint within 24 hours, but no later than 36 hours. If the complaint is received by mail or in a council post box, acknowledgement of receipt will be sent by mail or post. If the complaint has been received verbally, by telephone or in conversation, contact details will be requested and acknowledgment of receipt will be sent by the preferred means of communication. If a complaint (concern) is not properly understood, additional information and/or clarification will be requested.

Stakeholder Engagement Specialist will evaluate and prioritize complaints (concerns) and bring serious complaints (concerns) to the attention of management immediately. All complaints must be adequately addressed, investigated and responded to within a period of no more than 30 days, preferably much sooner.

Stakeholder Engagement Specialist will regularly (quarterly or bi-annually) evaluate complaints received and follow-up actions (lessons learned), and annually propose points for improvement.

6.2. Complaint Submission

A complaint form should be used for submitting complaints. It should be available in hard copies in local administration (local communities, municipalities, and the regional offices) as well as in an electronic version on the project's website.

However, other written letters, emails, text messages and phone calls can also be used for submitting grievances, as described below. Stakeholders will be able to submit a grievance in relation to the project, at any time and at no cost, by using one or several of the following ways:

- Through the electronic grievance form on the project's website: www.encro.hr
- Submitting a written or verbal grievance during a public meeting
- Handing or mailing a written grievance to the Stakeholder Engagement Expert; Mrs. Rujana Lukač; rlukac@encro.hr
- Calling direct number: Zagreb office + 385 (0) 1 4693040

COMPLAINT FORM

Printed form

Name:
Last name:
E-mail address:
Phone number / mobile phone:
<ul style="list-style-type: none">• I agree that the personal data provided in this form are used for the purpose of submitting and processing my complaint
<ul style="list-style-type: none">• I want to remain anonymous
Description of the incident / complaint / problem
What happened?
When did it happen?
Where did it happen?

Who are the participants?

Was there immediate damage?

Could this lead to a serious impact on people and nature?

What are/can be the possible consequences?

What should be done to resolve the complaint / problem?

Date

Signature
