



Sage Solutions

BREBEX SOLAR POWER PLANT, SERBIA

Stakeholder Engagement Plan

SAGE SOLUTIONS Ltd.

May 2025

Contents

1	INTRODUCTION	3
2	AIM OF ENGAGEMENT AND OBJECTIVES OF THE SEP	4
3	PROJECT OVERVIEW	4
4	APPLICABLE STANDARDS	6
5	STAKEHOLDER ENGAGEMENT PRIOR TO AND DURING THE ESIA STAGE	7
6	STAKEHOLDER IDENTIFICATION AND ENGAGEMENT METHODS	7
7	STAKEHOLDER ENGAGEMENT PROGRAMME	9
8	GRIEVANCE MANAGEMENT	9
9	MONITORING AND REPORTING	10
	APPENDIX A – COMMUNITY GRIEVANCE FORM	11
	APPENDIX B – STAKEHOLDER ENGAGEMENT PROGRAMME	12
	APPENDIX C – GRIEVANCE LOG	17
	APPENDIX D – STAKEHOLDER ENGAGEMENT REPORTS	18

Brebex Solar Power Plant, Serbia

Stakeholder Engagement Plan

1 Introduction

The Brebex Solar Power Plant (SPP) is a project being developed in the municipality Dimitrovgrad in Serbia, close to the border with Bulgaria, with a planned maximum generation capacity of 300 MW ('the Project'). There are two small villages on each side of the future development – Bačevo (650m) and Brebevnica (2km). The Project location and the generally proposed layout of Project components is provided in Figure 1 of this document.

Sage Solutions Ltd. ('Sage' or 'the Developer') has been contracted by Brebex Ltd. to develop the Brebex SPP, after which Brebex Ltd. will construct and operate it.

The Project is expected to be financed by an international finance institution or a major commercial bank and as such is expected to meet the highest environmental and social standards, which include requirements already present in national legislation, but also go beyond them. Sage Solutions hired a team of external consultants¹ to identify the environmental and social risks associated with the Project. The consultants prepared an Environmental and Social Impact Assessment (ESIA) of the Project, in line with the requirements of the Equator Principles and the International Finance Corporation (IFC) Performance Standards.

Initially, an ESIA Scoping Study was prepared, along with a preliminary Stakeholder Engagement Plan (SEP). The main purpose of this SEP was to guide the information disclosure and consultation process during the development of the Project ESIA, as well as management of any questions, comments or grievances from Project stakeholders. While working on the ESIA, further engagement with stakeholders took place, and a new, updated version of the SEP has been prepared (this document).

In preparing the SEP, the Developer, with assistance from the consultants, identified that the key stakeholders are the residents of the municipality Dimitrovgrad, in particular the few people residing in villages surrounding the project site, Bačevo and Brebevnica, as well as in villages which are located along the road which will be used for a part of construction related transport (Radejna, Smilovci and Protopopinci). In addition, stakeholders include people that have been affected by land acquisition, an active hunting association from the area, representatives of relevant municipal departments and institutions, as well as other statutory stakeholders. Internal stakeholders include Project employees, as well as contractors, subcontractors and local suppliers.

The SEP will continue to be periodically revised and updated by Brebex Ltd., as the Project moves from the development stage, into construction and then the operation stage. All updated versions of the SEP, along with all other Project related documents, including a non technical summary (NTS) of the ESIA, are already, and will continue to be available, on the project website at www.brebex.rs.

¹ Pepper Advisory Limited (UK), LINK 011 (Serbia), Insitu (Serbia), Fauna C&M (Serbia), Turnstone Ecology Limited (UK) and Ion Acoustics Limited (UK).

2 Aim of Engagement and Objectives of the SEP

The Project aims to continue establishing and to maintain constructive relationships with all stakeholders, to ensure that environmental and social impacts and risks are addressed in the best possible manner. The SEP is intended to provide a roadmap for that.

The objectives of the SEP are to:

- Provide a brief description of the Project (updated with new developments), to set the context for identifying any new stakeholders and to serve as a non-technical tool for communication with stakeholders;
- Identify the stakeholders who have concerns about, or influence on the Project, particularly any vulnerable communities or groups;
- Identify and record key issues and concerns that stakeholders may have about the Project;
- Build open, positive relationships with stakeholders based on the timely provision of information and opportunities for stakeholders to voice their opinions and concerns;
- Ensure that stakeholders are informed regularly about the Project's activities, describing the construction and operation stages, and the overall Project duration;
- Provide tools for maintaining a record of all consultations;
- Describe the Grievance Mechanism, which has been established and will continue to be implemented throughout the Project construction and operation phase, along with maintaining a record of the grievances received, processed and closed.

3 Project Overview

The following section provides a brief project overview, while more detailed information is available in the Project NTS.

The main segments of the SPP will be built on approx. 305 ha of land owned by the Republic of Serbia and managed by the Serbian Ministry of Agriculture, Forestry and Water Management, which has been leased by the Project Developer. In line with national legislation, 40% of the income from lease of state-owned land for the SPP is transferred directly into the local budget of the municipality Dimitrovgrad.

The land is formally registered as agricultural land, however, in reality it comprises scrub and grassland which is not used by anyone. The site is uninhabited and there are no residential structures on or near it. The state border crossing with Bulgaria, Gradina, is approx. 2 km southwest of the site and the actual border is only 100m from the boundary line.

The ESIA identified several areas of valued natural habitats within the boundary of the Brebex SPP site, including marshland around Lipinsko Pond, that cover an area of about 20 ha. These habitats are protected under Serbian law and have been excluded from the development area. The creation of a biodiversity protection zone means that area of land available for the solar plant is about 273 ha (about 89% of the total area). Of this, about 150 ha will be covered with PV panels and electrical equipment. The remaining 123 ha includes the tracks that run between the panels, as well as land between the panels and the boundary fence.

The Brebex SPP includes photovoltaic ("PV") panels and an Energy Storage Facility which is a battery storage system that will be used to help manage the flow of electricity to the grid. In simple terms, the batteries will be charged during the day and discharged during the early evening when there is a peak demand on the grid (i.e., between 6pm and 7.30pm). The PV panels will be placed in lines or "strings" and will be mounted on steel frames. The distance between the strings of panels is likely to be between 3 to 4 metres.

The Project also requires the installation of an underground cable which will follow the route of an existing road and the construction of a substation and switchyard. These facilities, along with the Energy Storage Facility, will be located close to an existing 400kV OHL, where the SPP will connect to the existing national grid. The PV panels, inverters, and the PV array transformers are expected to be sourced from China, however no Chinese workers will be sent to site to install the equipment.

The construction and operation of the substation is the responsibility of Brebex Ltd., whilst Elektromreža Srbije or "EMS" will own and operate the switchyard. There will be a security fence around the whole SPP, both the area where the PV panels will be installed, as well as around all the other facilities, i.e. substation and switchyard and the Energy Storage Facility.

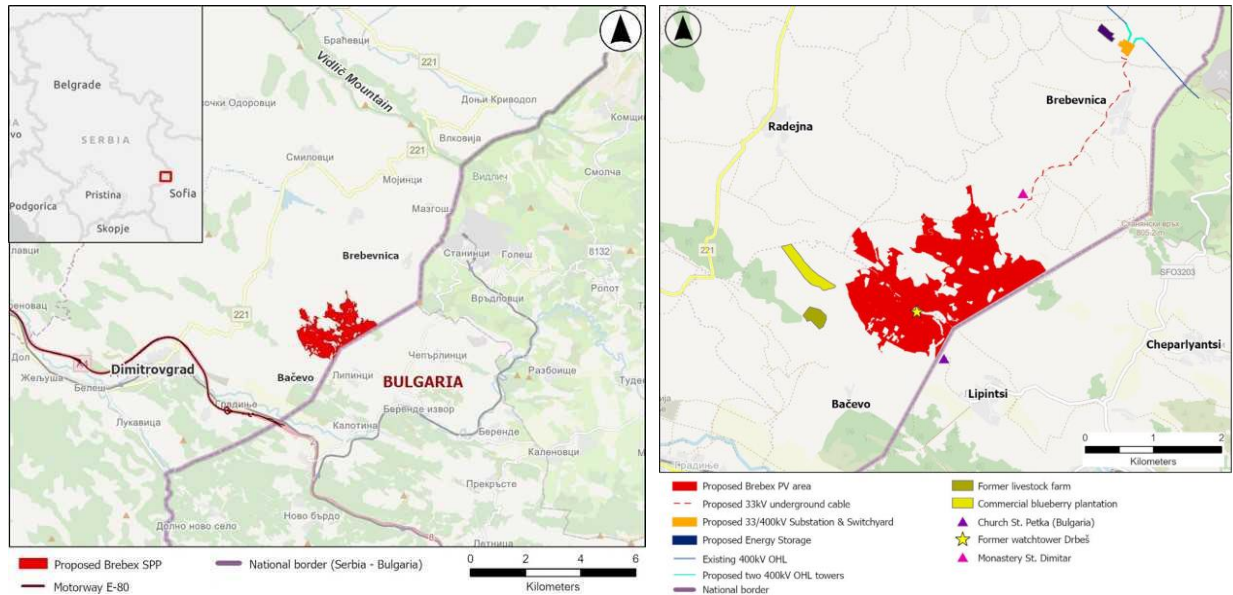


Figure 1 – Brebex SPP Site Location, General Layout and Surroundings

At the time of updating this SEP, Brebex Ltd. plans to appoint an Engineering, Procurement and Construction (EPC) contractor to construct the SPP on their behalf. It is likely that one or more separate contractors will also be employed to undertake the civil work including the construction of the access roads, the substation and a very short section of a 400 kV OHL, to connect to the existing one. The SPP will operate for 25 to 30 years, after which it may be decommissioned or the solar panels replaced, depending on the decision of the owner of the SPP.

At the time of updating this SEP, the timeline for key events is as follows:

- Plan of Detailed Regulation (PDR) adopted: January 2024 for the Solar Power Plant and October 2024 for the connection facilities.
- Location Conditions agreed: October 2024 (solar panel area) – December 2024 (connection facilities)
- Obtaining of building permit: planned for June 2025.
- Start of construction: planned for summer 2025.
- Access tracks for the substation: planned for summer 2025.
- Installation of Solar PV strings: planned for second half of 2025 to early 2026.
- OHL 400 kV and substation 33/110kV construction: planned for mid 2025 to early 2026.
- Start of commercial operation: planned for autumn 2026.

Project Area of Influence considered in the SEP

The SEP has identified stakeholders associated with the Project Area of Influence, which goes beyond the physical footprint of the facilities or infrastructure to be built and takes into account activities undertaken during the construction, operation and decommissioning of the Project.

The Project Area of Influence for the Brebex SPP is defined as:

- Potential impacts on sensitive habitats within the SPP site boundary, impacts of habitat loss on local and migratory bird and bat populations, including losses of stopover sites, and the possible creation of barrier, displacement or cumulative effects, as well as any potential impacts on other biodiversity;
- The transport route to site for heavy vehicles and, in particular, the delivery of the solar PV components;
- The impact on the landscape and visual impacts as defined by a Zone of Theoretical Visibility;
- The municipality where the SPP is located as well as the surrounding villages, where there is any potential for economic displacement and/or social disruption, as well as benefits directly from the Project (e.g.

employment opportunities, payment of land lease fees into the local budget) or due to the presence of the construction teams within the local communities;

4 Applicable Standards

The Serbian Regulatory Framework

Key legislation of the Republic of Serbia, addressing stakeholder engagement, that pertains to the Project includes:

- The Constitution of the RS, which provides a wide platform for public participation and access to information. It also provides the public with the right to be informed fully and timely about issues of public importance, submit requests, petitions and proposals.
- The Law on Free Access to Information of Public Importance of the RS, which requires representatives of the public sector to provide information and respond to any queries in relation to their activities, including planning documents, permits, audits, etc.
- The Law on the Protector of Citizens of the RS, which establishes an independent state authority which protects the human and minority rights and freedoms of citizens and controls the work of all administrative authorities.

Disclosure of information and organising public hearings in Serbia is regulated through the process of development and adoption of spatial and urban plans for cities, municipalities, settlements, projects, as well as through the environmental impact assessment process. Under national law, for SPP projects there is no requirement to complete an Environmental Impact Assessment (EIA) and therefore this process is not applicable to SPP Brebex.

The law which applies to spatial planning is the Law on Planning and Construction of the RS, which regulates the development and adoption of planning documents in Serbia such as the Plans of Detailed Regulation (also referred to as Zoning Plans), which are subject to a public disclosure and consultation process, as prescribed by the law. This process includes the publishing of draft plans, the organisation of public hearings to present these draft plans and the rights of interested persons and organisations to provide questions and comments on the draft plans and receive responses.

International Standards

Apart from national legal requirements described in the previous section, the Project will meet internationally recognised good practice. This includes stakeholder engagement requirements in relation to disclosure of information, consultations and grievance management, presented in the IFC Performance Standards on Environmental and Social Sustainability (2012) ².

According to these standards, stakeholder engagement is an ongoing process which involves the implementation of the following activities:

- Identification of project stakeholders and planning of engagement activities and events through the preparation of a Stakeholder Engagement Plan,
- Timely public disclosure of appropriate project related information to enable meaningful consultation with stakeholders,
- Meaningful consultations with potentially affected parties and communities on matters that directly affect them, and
- Implementation of a procedure or policy by which people can make comments or complaints in relation to the project and receive a response (Grievance Mechanism).

This SEP builds on engagement activities which are required under national legislation of the Republic of Serbia and includes additional activities that have been or will be undertaken by the Developer/Brebex Ltd. to fully comply with IFC requirements.

² Stakeholder engagement and grievance management are presented in IFC Performance Standard 1, see full policy at: https://www.ifc.org/wps/wcm/connect/24e6bfc3-5de3-444d-be9b-226188c95454/PS_English_2012_Full-Documents.pdf?MOD=AJPERES&CVID=jkV-X6h

5 Stakeholder Engagement Prior to and During the ESIA Stage

Prior to and during the ESIA stage, the Developer engaged with the Government of Serbia, via the Ministry for Agriculture, Forestry and Water Management, as well as the Municipality of Dimitrovgrad, regarding the lease of public land needed for the SPP. In parallel, contacts with individual owners of needed land were ongoing, to acquire what is needed for the Project, all on a voluntary basis, without the use of expropriation.

As the ESIA work progressed and concrete impacts were identified, contacts with owners of needed land continued, compensation agreements were made and payments executed. The process of acquiring land and compensating owners for potential impacts has been completed.

Following the completion of the Brebex SPP Scoping Study and the draft SEP, in August 2023, the Developer appointed a Project Community Liaison Manager (contact details available in section 8 of this document) and provided this individual with sufficient resources to meet the requirements of the SEP. The Community Liaison Manager is required to:

- Ensure this SEP is updated as and when appropriate;
- Plan, implement and conduct day-to-day management of Project related stakeholder engagement, including any grievances raised;
- Maintain records of formal and informal stakeholder engagement activities;
- Organise, arrange and attend stakeholder meetings;
- Prepare information for dissemination to stakeholders in accessible formats;
- Ensure that the Grievance Mechanism is implemented and that a log of raised grievances is regularly maintained.
- Monitor engagement activities and prepare reports.

In September 2024, the Developer, together with the ESIA team, held meetings with key stakeholders to gather their perspectives on the project and collect feedback on potential impacts and mitigation strategies. The ESIA social team produced a list of preferred meetings, and the Developer set them up and attended them together with the ESIA social team. These meetings are described in Appendix B of this SEP.

As part of the national engagement process, the Brebex SPP Zoning Plan and accompanying Strategic Environmental Assessment were publicly disclosed for comments on the website of the municipality Dimitrovgrad and hard copies were available in municipal building during November 2023. A public hearing to present the plan and respond to any comments and questions was also held in November, in the municipal building, and the documents were formally approved in January 2024. A separate process, comprising the same steps, occurred for the Zoning Plan for the connection facilities (substation, underground cable, Energy Storage Facility and short OHL), which was publicly available and presented to all interested stakeholders during April and May 2024, after which it was also formally adopted in October 2024.

6 Stakeholder Identification and Engagement Methods

The Developer together with the team of consultants, identified stakeholder groups that may be affected by and/or are interested in the Project, as presented in Table 1 below. During the ESIA scoping stage, this process was based on a desktop review of available Project documents and maps, while direct engagement in the field occurred later, during the ESIA preparation stage, as described in Appendix B of this SEP. The list below will be further revised if needed, as Project planning evolves.

Table 1 – External and Internal Project Stakeholders

Stakeholder Group	Type of Communication and Proposed Method	Issues of interest / concern
External stakeholders		
Owners and users of land which has already been acquired for all Project components.	Grievance mechanism	Resolution of any grievances in relation to land acquisition.

Stakeholder Group	Type of Communication and Proposed Method	Issues of interest / concern
	Individual meetings, as needed.	
People working and residing in areas potentially affected by project related transport and traffic impacts (parts of Dimitrovgrad town, Radejna, Smilovci and Protopopinci)	Meetings (group or individual) Project website (NTS, SEP and ESIA) Grievance mechanism	Expected transport and traffic impacts, mitigation measures
Hunting association Vidlič or other interested organisations	Individual meetings Public hearings and / or consultation meetings Project website (NTS, SEP and ESIA) Grievance mechanism	Biodiversity impacts, for example impacts on wildlife and habitats, vegetation Landscape and visual impacts Noise impacts Transport and traffic impacts Support for local initiatives and development, possible establishing of social investment fund Field work safety measures
General public, particularly residents of Bačevo and Brebevnica, but also residents of Dimitrovgrad town (and municipality).	Public hearings and / or consultation meetings Project website (NTS, SEP and ESIA) Media Grievance mechanism	Project benefits Environmental and social impacts Employment / procurement opportunities Transport and traffic impacts Support for local initiatives and development, possible establishing of social investment fund
Municipality (local self government) Dimitrovgrad	Meetings Official correspondence	Project timeline and progress Project benefits, including payments into the local budget for public land lease Environmental and social impacts Employment / procurement opportunities Transport and traffic impacts Support for local initiatives and development, possible establishing of social investment fund
Statutory stakeholders, for example, relevant Ministries, institutes, utility companies, directorates, etc.	Official correspondence and meetings when necessary	Planning documents and permits
Internal stakeholders		
Sage solutions ltd. / Brebex ltd. employees	Direct notifications, announcement boards Office meetings Internal grievance mechanism for employees	Labour contracts Human Resources Policy Health and Safety procedures
Contractors, subcontractors, local suppliers	Information in contracts Meetings and official correspondence Site inspections	Worker grievance mechanism Worker Code of Conduct Health and safety at work Security Interaction with the community and Project Grievance Mechanism Environmental protection

7 Stakeholder Engagement Programme

The implementation and updating of this SEP in the Project development phase is the responsibility of Sage Solutions, after which this responsibility will be handed over to Brebex Ltd. prior to and during construction and operation.

This section of the SEP focuses on presenting the main engagement activities which have been identified as needed and will be implemented in the preconstruction phase. This includes disclosing documents associated with the Project environmental and social impact assessment and consulting stakeholders on specific issues, before moving into the construction phase of the Project.

The activities which are presented here all need to be implemented before construction begins. Engagement which needs to continue during construction cannot be precisely defined at this time and will be presented in more detail in future SEPs.

Disclosure of the ESIA, NTS and SEP

A project website has been created by Sage Solutions: www.brebex.rs

The NTS and SEP, in Serbian and the full ESIA in English, have been disclosed on this website. These documents will remain in the public domain throughout the life of the Project, together with contact details for the submission of questions, comments or grievances in relation to the Project, as in section 8 below. Hard copies of the NTS and SEP, in Serbian, are available in the municipal building in Dimitrovgrad (office of the Councilor for Economy and Agriculture, address: Balkanska 2, Dimitrovgrad) for any interested stakeholders to review.

Other engagement in the pre-construction phase

It is expected that with the disclosure and dissemination of the NTS and SEP, the key stakeholders will be well informed about expected environmental and social impacts and planned mitigation measures.

Additionally, in the pre-construction phase, it may be necessary to discuss transport and traffic related impacts directly with residents of affected smaller villages: Radejna, Smilovci and Protopopinci. This can be done by contacting municipal and village/settlement representatives and organising small, focused meetings to present Project plans and hear any feedback in relation to times (months, days in the week, times of day) when using roads should be avoided, any additional safety concerns that need to be highlighted to Project drivers (e.g. the presence of school children in the villages), any Project related transport schedules that need to be disclosed to villagers and in what way (information on community boards, through the local web portals or social network groups), etc.

From experience, local communities will also be interested in any upcoming employment and procurement opportunities and it is also recommended to make this information publicly available, in these communities, as it becomes known. Engagement regarding social investment opportunities and donations, if the company decides to implement such activities, should also be presented to local stakeholders.

8 Grievance Management

The Project Grievance Mechanism is managed by the Community Liaison Manager (CLM). The main features of the Grievance Mechanism are:

- Any person or organisation may submit comments or complaints in person, by phone, by post or email. A template for the Grievance Form is provided at the end of this document (Appendix A of the SEP), however the use of this form is not obligatory. Contact information for Brebex Ltd. is provided at the end of the Grievance Form.
- Individuals who submit a grievance have the right to request that their name is kept confidential. Grievances may also be submitted anonymously, however this could limit Brebex Ltd.'s options for investigating and responding to the grievance.
- All grievances will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant.
- Brebex Ltd. will keep a central record of all the grievances received, the Grievance Log (see Appendix C of the SEP). The Grievance Log is maintained by the CLM. Worker/ employee grievances will be addressed through a separate, internal grievance mechanism (the Workers Grievance Mechanism) and should not be submitted through the contact details provided in this SEP.

- All grievances will be registered in the Grievance Log and acknowledged within 5 working days. A formal response to the grievances raised must be provided within 20 working days.
- In cases when the complainant is not satisfied with the way their grievance has been responded to, Brebex Ltd. will invite representatives of the relevant local community or other mutually agreed third party, to participate in the process so that a solution, acceptable to both sides, can be found.
- The Grievance Log will be used to track the resolution of all grievances raised and to prepare management reports.

The submission of grievances to Brebex Ltd. does not prevent anyone from exercising their legal rights and / or seeking remedies in accordance with the laws and regulations of the Republic of Serbia.

Questions and / or grievances can be submitted to Brebex Ltd. by post, email, fax or by telephone through the following contact details:

Contact person: Milovan Mirković, Community Liaison Manager

Brebex Ltd.

Address: Ikarbus 3 Nova 19, Beograd

Phone: +381 66 858 4570

e-mail: office@brebex.rs

Hard copies of project documents (NTS and SEP) are available at:

The municipal building in Dimitrovgrad

Office of the Councilor for Economy and Agriculture

address: Balkanska 2, Dimitrovgrad

9 Monitoring and Reporting

Monitoring Stakeholder Engagement

Brebex Ltd. will actively monitor the implementation of the SEP and will make periodic amendments to the document, particularly to plan and present upcoming disclosure and consultation events.

The key indicators that will be used to assess Project related efforts for stakeholder engagement and whether outcomes consistent with the SEP are being achieved will be:

- Number and type of grievances and how they are being addressed;
- Documents disclosed, where, how and received comments, questions and provided relevant answers;
- Details of consultations organised with affected people and local communities in relation to key topics, i.e. traffic and transport management, employment and procurement opportunities, potential donation opportunities, etc. Feedback from local communities and how it was incorporated in further Project planning and/or implementation;
- Details of other engagement activities and their impact on the Project (outcomes of engagement).

Brebex Ltd. will also monitor any Project related engagement activities not directly organised by the company but by the local municipality or other statutory stakeholders. In line with international good practice, Brebex Ltd. will engage directly with interested stakeholders from these events and aim to address their views and concerns directly.

Reporting on Stakeholder Engagement

As presented earlier, the CLM will maintain the Grievance Log and based on that, as well as using the indicators listed in the previous section, will prepare SEP reports (Appendix D of the SEP), issued for Brebex Ltd. company management on a quarterly basis prior to and during construction. The CLM will document all meetings and consultations with minutes and photographs (when appropriate) and will attach these to the reports.

Information from the SEP reports will be summarised in the Project Annual Environmental, Health, Safety and Social Performance Reports.

APPENDIX A – Community Grievance Form

Reference No (to be filled in by responsible person in Brebex Ltd.):	
Full Name	
Contact Information and Preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide postal address: <input type="checkbox"/> By Telephone: Please provide telephone number: <input type="checkbox"/> By E-mail: Please provide E-mail address:
Preferred language (please tick)	<input type="checkbox"/> Serbian <input type="checkbox"/> Other (please specify):
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem?
Date of Incident/ Grievance	
	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____ Date: _____

Please return this form to:

Milovan Mirković, Community Liaison Manager

Brebex ltd.

Address: Ikarbus 3 Nova 19, Beograd

Phone: +381 66 858 4570

e-mail: office@brebex.rs

APPENDIX B – Stakeholder Engagement Programme

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Feedback from stakeholder	Next steps
ESIA Development Phase						
Three female and two male owners of affected land	Face to face meeting	Brebex local office, Dimitrovgrad, 11.09.2024.	To understand views on the land acquisition process, level of satisfaction of affected people with compensation and contacts with the Developer.	Contact details of the Developer already available to affected people. No new materials provided at the meeting.	The three women are members of an extended family, who own parts of 2 affected land plots. They inherited the land from mutual relatives and no one is using these plots. All of the owners have moved into urban areas, two of the women to Dimitrovgrad town and one of them lives abroad. The two women living in Dimitrovgrad work in Bulgaria and commute there daily (this is a common occurrence for many of the inhabitants of Dimitrovgrad). The one woman living abroad is retired, but she often visits her home town and relatives. They have a house in the Brebevnica village, also co-owned by all of them. No one lives there, however they use it as a weekend house and have family get togethers there. All owners were satisfied with the price offered by the Developer and agreed to accept it. All owners have used a part of the money to renovate the weekend house together. The owners all have other land which they own and no one is using this land either (no one engages in agriculture and they do not rent out the land). One man was a sole owner of two affected land plots. He is elderly and lives with his wife in Brebevnica village. He engages in small scale agriculture, mostly to keep himself occupied and to share the produce with his children and their families. He keeps some animals, has a vegetable garden, keeps bees, and has a small fish reservoir. He used a part of the affected land for seasonal crops, for animal feed, but he has other land which he can continue to use with the same purpose. He was also satisfied with the compensation offer and believes that he would not be able to receive that much if he sold the land on the market. He shared a part of the money with his children and grandchildren and made some minor investments in his farm. The second man owns 4 land plots which were originally needed for the construction of the Project OHL and which were acquired by the Developer through a permanent servitude. However, the project design changed in	Continued contacts with all affected owners on an as needed basis, to follow up on any issues in relation to land acquisition or address any grievances.

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Feedback from stakeholder	Next steps
					<p>the meantime and the Developer decided to install underground cables below a municipal road and not to construct the OHL. This middle aged man lives in the village and engages in all types of manual work and has some basic machines available (tractor with a trailer and some attachments), which is why he is sometimes engaged by the Project to help with some local tasks, such as cleaning of shrubbery, transporting certain materials, etc. He stated that he has a good cooperation with the Project and feels that he benefitted from the establishment of the permanent servitude because he does not use this land (which is still owned by him). The compensation for the permanent servitude, as well as the odd jobs he carries out sometimes for the Project, have been an unexpected and welcome income for him.</p>	
Member of the local hunting association (Vidlič)	Face to face meeting	Brebex local office, Dimitrovgrad, 11.09.2024.	To heard views regarding the Project from the perspective of the hunting association, with a focus on loss of land available for hunting in the future and construction relayed impacts on animals.	Contact details of the Developer already available to the organisation. No new materials provided at the meeting.	The hunting association operates on the territory of the municipality, and they have one elevated hunting stand in the vicinity of the project site. The area of land which will be occupied by the project is not significant compared to the total area used by the hunting association, so there is no worry that there will be any significant impacts. The most important topic for the hunters is that there will be a fence around the solar panel areas. They consider that this will stop wild animals from becoming hurt if they are close to the equipment (and also that they might cause any damage. The hunters believe that the animals will adapt to the new conditions, because this is what happens when any new changes are introduced in the environment and they do not fear any long term consequences, apart from some initial impacts during construction (if animals are chased away from the area by noise and other construction nuisances). The hunters have protocols for sharing information to ensure safety during hunting activities, including with the border police and they share all their activities on the association's facebook profile. They are in contact with the Developer's local community liaison based in the Brebex office in Dimitrovgrad.	Deliver information about NTS and SEP disclosure on website and in hard copy at the municipal building in Dimitrovgrad.
Head of Cadastre	Face to face meeting	Brebex local office, Dimitrovgrad, 11.09.2024.	To learn about the cooperation with the Developer on identifying owners	Contact details of the Developer already available to the Cadastre.	The head of the local Cadastre stated that this office cooperated with the Developer to identify owners of affected land to the extent possible and to process all other administrative tasks in relation to land acquisition, important to	

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Feedback from stakeholder	Next steps
			of affected land and their contact details, as this was one of the most challenging aspect of acquiring privately owned land.	No new materials provided at the meeting.	enable the development of the project. The cooperation with the whole municipality, including with this department has been very good. The head of the Cadastre was born in Brebevnica village but now lives in Dimitrovgrad town. He stated that there are hardly any people living in the villages next to the future SPP and most people only visit the villages in the summer.	
Municipality Dimitrovgrad	Face to face meeting	Local municipal building, Dimitrovgrad, 12.09.2024.	To understand the views and concerns of the municipality in relation to the Project, as well as any feedback they have from interested individuals and organisations.	The municipality continually receives information regarding the development of the Project.	Representatives of various municipal departments participated in the meeting (local development, urban planning, construction, environmental protection) with the Developer and ESIA consultants. The municipality has been trying to attract investors in the past 10 years for the development of solar power plants, because the area has favourable conditions. More than 150 companies expressed an interest over the years, but the Developer will be the first that has engaged in all relevant procedures and will finally implement an SPP project. The cooperation between the Developer and the municipality has been very good. The municipal budget will be significantly strengthened with the income from the renting of public land (40% of the amount is transferred by the RS into the municipal budget) and payments will be made annually for the next 30 years. The municipality expects there will be a willingness to provide some additional support for local development when the SPP becomes operational. Another important aspect is that the construction of the new substation will provide greater security for the local electricity grid, in case of any accidents. There were no comments or questions regarding the project when the PDR was adopted. The local population is sensitive towards nature. For example, in response to local views, the municipality banned all mini hydro projects because of their significant negative environmental impacts. The SPP is welcomed by everyone as there are no major side effects on the environment and at the same time no one was using the land where it will be built. The municipality is ready to assist the Developer with providing information about the Project and the Developer's local office is conveniently located in the centre of town where anyone can get any information they need (note: the office has since been closed, however	Deliver information about NTS and SEP disclosure on website and in hard copy at the municipal office in Dimitrovgrad, as well as contact details for comments, questions.

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Feedback from stakeholder	Next steps
					information is available in the municipality as presented in the SEP).	
One female owner of affected land	Phone call	13.09.2024.	To understand views on the land acquisition process, level of satisfaction of affected people with compensation and contacts with the Developer.	Contact details of the Developer already available to affected people. No new materials provided at the meeting.	The woman co-owns the land plot with her sister. Both of them no longer live in Dimitrovgrad and the land they own (including the affected land plot) is unused. They were both very satisfied with the cooperation with the Developer, including the offered compensation price. The sisters own a house in one of the villages near Dimitrovgrad which was built by their father and is now used as a weekend house, which they often visit because they enjoy the nature in these parts.	Continued contacts with all affected owners on an as needed basis, to follow up on any issues in relation to land acquisition or address any grievances.
One male owner of affected land	Phone call	13.09.2024.	To understand views on the land acquisition process, level of satisfaction of affected people with compensation and contacts with the Developer.	Contact details of the Developer already available to affected people. No new materials provided at the meeting.	The owner of the affected land plot lives in Belgrade and he also accepted the offered compensation, which he believes was fair. The affected land is not being used by anyone. His family has a house in one of the villages near Dimitrovgrad town, however it is in poor condition and they no longer visit. The family has more land in the area and none of it is used.	As above
ESIA Disclosure and Pre-construction Phase						
Construction Phase						
Operation Phase						

BREBEX SPP, SERBIA
STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Group	Engagement Method	Location and Time	Purpose	Consultation/ Disclosure Materials	Feedback from stakeholder	Next steps

APPENDIX C – Grievance Log

No.	Date when the grievance was received	Name of person who submitted the grievance	Contact details of the person who submitted the grievance	Brief description of the problem / grievance	Planned actions to address the grievance	Actions carried out to address the grievance	Results of the actions carried out to address the grievance	Date when grievance was closed

APPENDIX D – Stakeholder Engagement Reports

The reports will tentatively have the following main headings:

- **Summary of Grievances Raised under the Grievance Mechanism**
- **Stakeholder Meetings**
- **Social Events**
- **Community Investment**
- **Press Releases and Comment**