

40 MW Sepopol Wind Farm

ENVIRONMENTAL AND SOCIAL ACTION PLAN

27 January 2021, revision 6

No.	Action	Requirement (Legislative, EBRD PRs, Best Practice)	Resources, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
0.1	Report to Lenders the results of Project environmental, social, health and safety monitoring and performance, including the implementation status of each of the ESAP elements below. Publish summary of Performance and KPIs.	EBRD Environmental and Social Policy (2019) EP IV	Responsibility: Energix Group	<ul style="list-style-type: none"> ■ bi-annually during construction, by end of Q2 and Q4 ■ annually during operation, by end of Q1 for previous year 	<ul style="list-style-type: none"> ■ Environmental and Social Reports on implementation status of each ESAP requirement below.
0.2	Develop capacities with respect to corporate ESG reporting policies and procedure for disclosure and disclosure information on ESG on the Project and all operations. Develop a Corporate-level overarching Environmental and Social Policy and cascade it to each development project. Incorporate environmental and social principles and commitments made in this Policy into contractual arrangements with contractors.	EU legislation EU Taxonomy	Own resources Responsibility: Energix Group	<ul style="list-style-type: none"> ■ ESG reporting policy and disclosure procedure – by Q2, 2021 ■ ESG reporting annually starting to 2021 for preparation and 2022 for disclosure 	<ul style="list-style-type: none"> ■ ESG reporting policy ■ ESG disclosure procedure ■ ESG Report
PR1	Performance Requirement 1: Assessment and Management of Environmental and Social Impacts and Issues				
1.1	Develop and implement a Corporate-level ESMS at Energix Polska level, with the objective to ensure a coordinated process of implementing environmental and social requirements for each development project, embedding the developer's main operational activities at the same time. Develop and implement a Corporate-level overarching Environmental and Social Policy. Incorporate environmental and social principles and commitments made in this Policy into contractual arrangements with contractors in Poland. As part of the ESMS to be developed, design and implement a procedure for assessing environmental and social risks associated with contracted works and services. Develop a procurement procedure to include clear selection criteria for contractors, including past performance with regard to labour and health & safety as well as key requirements which selected contractors will have to meet in terms of EHSS. Develop a Contractor Management Plan as part of the Corporate-level ESMS, which should include the established mechanisms, such as internal inspections and audits, to verify compliance and progress towards the desired project outcome	EBRD PR1, IFC PS1 Polish regulation, Best practice EP IV	Own resources Responsibility: Energix Group	<ul style="list-style-type: none"> ■ Environmental, social and H&S management procedures and Environmental and Social Policy in place by the end of 2021. ■ Management systems implementation throughout Project life cycle. 	<ul style="list-style-type: none"> ■ Environmental and Social Policy ■ Environmental, social and H&S management procedures ■ ISO 14001, OHSAS 18001/ ISO 45001) accreditation attained (recommended, however not mandatory) ■ Contractor Management Plan
1.2	Establish, maintain and strengthen, as necessary, an organisational structure that defines roles, responsibilities and authority to implement the ESMS to ensure ongoing compliance with relevant national regulatory requirements and the PRs. Designate specific personnel, including management representative(s), with clear lines of responsibility and authority to monitor, maintain and assure implementation of the defined ESMS. Required EHS personnel is estimated to include, as a minimum: <ul style="list-style-type: none"> ■ an Environmental (and Social) Manager ■ an OHS Manager (a dedicated Occupational Health and Safety Manager needs to be employed to manage OHS aspects in relation to the project implementation). Energix Polska could delegate these roles and responsibilities directly to its contractors in charge with construction and operation of the Project. Such delegation will be clearly establish through the contracts between Energix and the Contractors. Energix will assure regular (at minimum quarterly during construction and biannual during operation) monitoring of implementation of the EHS local regulations and international standards /good practices. If needed, as a results of the audits, Energix will impose to the contractors corrective measures.	EBRD PR1, IFC PS1 Best practice EP IV	Own resources Responsibility: Energix Group directly or by delegating the EHS responsibilities to its contractors	<ul style="list-style-type: none"> ■ In place within 1 month after the financial close ■ Implementation during construction, operation and decommissioning 	<ul style="list-style-type: none"> ■ Job decisions to appoint the people for the positions (Environmental H&S, PR, HR, CLO, etc.) – of Energix Polska OR its Contractors. ■ In case these roles are let with contractors, Contract between Energix and Contractors with clear and detailed clauses on taking over these roles by contractors, with Energix regular monitoring events to check the compliance. ■ Job descriptions or Energix / Energix contractors ■ Company's organigram with responsibilities for all Energix Polska's Project / Energix's contractors company's organogram showing EHS roles and responsibilities ■ Quarterly audit reports by Energix on EHS performances of contractors during construction and biannual audit reports during operation.

No.	Action	Requirement (Legislative, EBRD PRs, Best Practice)	Resources, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Once defined, the key environmental and social responsibilities will be communicated to the relevant personnel. Energix will ensure that employees/ contractors employees with direct responsibility for activities relevant to the Project's environmental and social performance are suitably qualified and trained				
1.3	<p>Develop a set of topic-specific Management Plans / Framework Plans- MPs (either as standalone MPs or few MPs combining several topics) to document how Project-related impacts will be managed during construction and, subsequently, during operation:</p> <ul style="list-style-type: none"> ■ Environmental and Social Management and Monitoring Plan ■ Waste and hazardous materials Management Plan ■ Emergency Preparedness and Response MP ■ Community Health, Safety and Security MP ■ Occupational H&S FMP, Resource Efficiency and Pollution Prevention and Control ■ Hazardous Materials MP ■ Workforce MP (including Worker Code of Conduct, Worker Grievance Mechanism, Workers accommodation etc), ■ Alien Invasive Species screening / Vegetation memo and, if applicable, management plan ■ Cultural Heritage Chance Finds Procedure ■ Contractor Management MP ■ Traffic MP ■ Decommissioning MP <p>The Occupational Health and Safety Management Plan is to also address measure to ensure prevention and protection of both direct and contracted workers against COVID-19.</p> <p>Energix Polska could delegate preparation and implementation of these management plans directly to its contractors in charge with construction and operation of the Project. Such delegation will be clearly establish through the contracts between Energix and the Contractors. Energix will assure regular (at minimum quarterly during construction and biannual during operation) monitoring of implementation of the management plans. If needed, as a results of the audits, Energix will impose to the contractors corrective measures.</p> <p>In case of delegation of EHS responsibilities to the contractors, the checks under points 1.2 and 1.3 could be performed by Energix under the same audit events.</p>	EBRD PR1, IFC PS1 Best practice EP IV	Own resources Responsibility: Energix Group directly or by delegating the preparation and implementation of the Management plans to its contractors	<ul style="list-style-type: none"> ■ Preparation of the draft management plans within 1 month after the financial close ■ Implementation during construction, operation and decommissioning 	<ul style="list-style-type: none"> ■ Environmental and Social Management and Monitoring Plan ■ Topic specific management plans developed and under implementation ■ In case preparation and implementation is delegated to Contractors, Regular (quarterly during construction and biannual during operation) monitoring audits reports by Energix
PR2	Performance Requirement 2: Labour and Working Conditions				
2.1	Developed a grievance program for workers. Disclose and implement the grievance program to the own employees as well as to subcontractors employees in charge with construction and maintenance works during operation.	EBRD PR2, IFC PS2, EP IV	Own resources Responsibility: Energix Group	■ before financial close	<ul style="list-style-type: none"> ■ Grievance procedure in place for workers and subcontractors workers ■ Grievance log for employees and contractors workers ■ Amendment of the contracts with main contractors in charge with construction and maintenance to add the grievance program provisions
2.2	Define a Human Resources Policy which establishes the company's approach to managing its direct and indirect workforce, which is to include: working relationships, work organization, working hours, absence and late arrivals, vacation periods, business travel and use of company vehicles, employee development, health and safety responsibilities, remuneration terms and conditions, employee order responsibilities. Additionally, explicit language around prohibition of child and forced labour, non-discrimination, equal opportunity and fair treatment. A procedure documenting how the company ensures its approach to managing workforce is cascaded to its contractors should complement the Policy	EBRD PR2, IFC PS2, EP IV	Own resources Responsibility: Energix Group	■ before financial close	■ Energix Polska HR Policy
PR3	Performance Requirement 3: Resource Efficiency and Pollution Prevention and Control				
3.1	<ul style="list-style-type: none"> ■ Conduct operation noise modelling based on international and local standards, while taking into account information on sound power level vs wind speed at 10 above the ground and at hub height. ■ Based on the assessments above (pre-construction measurements and operation modelling), if the results show risks for noise exceedances, establish proper mitigation measures to ensure compliance with local and IFC noise limits (e.g. installing noise reduction equipment for blades, double-glazing of affected houses, reduced wind function). The measures to be included in ESMMP. 	EBRD PR3, IFC PS3, Equator Principal IV Best practice Polish Law	Certified consultants or laboratories for sampling during operation External consultants for operation noise modelling	<ul style="list-style-type: none"> ■ Before financial close for operation noise modelling ■ If applicable, mitigation measures included in ESMMP prior starting the construction ■ Starting the year 1 of operation for noise measurements 	<ul style="list-style-type: none"> ■ Operation noise modelling report ■ Mitigation measures in ESMMP, if required ■ Noise monitoring program for operation and potentially Action Plan to ensure compliance with Polish and Lenders requirements (in case of exceedances during operation measurements, only)

No.	Action	Requirement (Legislative, EBRD PRs, Best Practice)	Resources, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<ul style="list-style-type: none"> Establish and implement a Noise monitoring programme during operation in line with Polish legislation and international standards. Based on the results develop an action plan if needed to ensure compliance with international standards and Polish legislation. 		Responsibility: Energix Group		
PR4	Performance Requirement 4: Health and Safety				
4.1	<p>Perform the shadow flicker assessment by mapping all the receptors within the area of influence (i.e. ten times the rotor diameter) to provide more robustness to the study and to the final assessment.</p> <p>Overlay the modelling results with receptors layers identified using updated satellite imagery in order to confirm no receptors are located within impacted areas. Receptor layer will also take into consideration the urban expansion occurred in the area, if any.</p> <p>As shadow flickering is something that can be confirmed only once in operation, monitor the Grievance Mechanism to follow up on potential grievances on shadow flicker. Develop an action plan to reduce the impact if necessary.</p>	EBRD PR4, IFC PS4, EP IV Best practice EBRD PR10	Own resources Responsibilities: Energix Polska	<ul style="list-style-type: none"> Within 1st year of operation 	<ul style="list-style-type: none"> Comprehensive analysis on each of the sensitive receptors. Action plan to reduce the impact if necessary. External Grievance mechanism in place
4.2	<p>The blade and ice throw are considered as a potential impact on humans, which can be generated by the operating wind farm. In order to mitigate the potential impacts:</p> <ul style="list-style-type: none"> Ensure that warning signs are located at the entrance to the WF's area, are all the time in place at the entrance to each WTG; Perform weekly checks of each WTG location with focus on safety and warning signs condition; Ensure appropriate public communication and ongoing engagement with local Authorities as well as local inhabitants in order to be able to respond to any issues related to ice and blade throw risk immediately. 	EBRD PR4, IFC PS4, EP IV Best practice	Own resources. Responsibilities: Energix Polska	<ul style="list-style-type: none"> Ongoing throughout the project 	<ul style="list-style-type: none"> Internal notes; photos; copies of communication with public and authorities.
PR5	Performance Requirement 5: Land Acquisition, Involuntary Resettlement and Economic Displacement				
5.1	<p>For the turbines, land has been acquired based on individual commercial contracts. Potential issues may arise during construction or future maintenance with the temporary use of land, which may result in crop or other damages etc. Therefore engage with the local communities and start identifying vulnerable groups who may be impacted by each project and determine if additional mitigation measures are required.</p>	EBRD PR5 Best practice IFC PS 5 EP IV	Own resources Responsibilities: Energix Polska	<ul style="list-style-type: none"> During construction and ongoing throughout the Project lifetime 	<ul style="list-style-type: none"> Minutes of engagement meetings External Grievance mechanism in place
5.2	<p>Develop and implement an Annual Community Investment Plan for Sepopol using a participatory approach (involving the local affected communities). This Plan will define the domains in which Energix Polska will invest to support the development of the affected communities, e.g. education, local infrastructure and the annual budget.</p>	EBRD PR5 Best practice	Own resources Responsibilities: Energix Polska	<ul style="list-style-type: none"> During Operations, with annual revision, prior end Q4 for the following year 	<ul style="list-style-type: none"> Community Investment Plan for Sepopol WF
5.3	<p>Develop a Compensation Procedure at corporate level to ensure transparent and consistent compensation through implementation of standards across all company projects.</p> <p>Since the land acquisition was performed, this procedure will refer to:</p> <ul style="list-style-type: none"> compensation in case accidental damages to private; temporary use of private land during major maintenance/repair works. <p>For these cases, compensation is to be paid in line with Polish regulations and PR5 requirements (ideally before using the land).</p>	EBRD PR5 Best practice IFC PS 5 EP IV	Own resources Responsibilities: Energix Polska	<ul style="list-style-type: none"> Prior to financial close 	<ul style="list-style-type: none"> Compensation Procedure
PR6	Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	<p>Undertake additional supplementary survey for birds and bats in line with best practice and internationally recognized guidelines and standards. Bird data should be gathered using quantifiable methods such as VP surveys and Collision Risk Modelling (CRM).</p> <p>Energix should appoint an independent ecological advisor (with expertise in both ornithology and bats) to provide support in delivering the requirements in relation to PR6. Before contracting, the independent ecological advisor's capabilities and expertise will be assessed for approval by the Lenders.</p>	EBRD PR6, IFC PS6, EP IV Best practice EU Taxonomy	Own resources External consultants Responsibilities: Energix Group	<ul style="list-style-type: none"> Bird monitoring Reports - end May 2021 and November 2021 Preliminary CRM- middle June 2021 	<ul style="list-style-type: none"> Contract in place with an independent ecological advisor approved by Lenders Bird monitoring reports Collision Risk Modelling Report

No.	Action	Requirement (Legislative, EBRD PRs, Best Practice)	Resources, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>Further information on VP survey methods are provided in the supporting documentation provided but the key points are;</p> <ul style="list-style-type: none"> Although primarily designated for migratory breeders, most notably white stork and a range of raptors the site has year round interest and includes qualifying species present throughout the year or that congregate in winter; VP's must be established that provide complete coverage of the wind farm, including turbines outside the SPA, as there will be connectivity between the populations for which the SPA is designated and supporting habitats outside the SPA itself; The guidance found in "Scottish Natural Heritage (March 2017). Recommended bird survey methods to inform impact assessment of onshore wind farms" provides minimum requirements for survey hours required per VP. These are 12 hours a month per VP during migration season, and 6 hours a month per VP required in January, February, June, July, November and December. This would equate to an annual requirement of 108 hours per VP per year. Given the location of the wind farm in relation to the SPA and the many qualifying species the site supports the companies independent ecological advisor should provide a survey plan that identifies the additional survey hours in relation to the SNH minimum; As per the Scottish Natural Heritage (SNH) guidance surveys at VP's should cover all times of day and should avoid always occurring at the same fixed time period; <p>The most significant risk period is associated with migration and the arrival of migratory breeders, and autumn passage and dispersal, most notably white stork <i>Ciconia ciconia</i> and therefore CRM's will be produced after each of the main migratory periods.</p> <p>The results of the VP surveys will be a collision risk for the qualifying species, focusing primarily on those most at collision risk by virtue of their ecology and flight characteristics. These will include raptors, the stork, herons and egrets group, wildfowl and waders.</p> <p>Understanding of collision risk will help inform the focus and extent of adaptive management plans.</p>			<ul style="list-style-type: none"> Final migration CRM – end November 2021 Whole year CRM April 2022 	
6.2	<p>A survey of the area to be temporarily and permanently lost through construction of the wind farm and associated roads and cable/ overhead line connections is required. The survey will focus on the extent to which Priority Biodiversity Features (PBF) are supported, and identify the presence of modified and natural habitat and the extent to which it may support critical habitat features. The survey should be undertaken during April-July, when usage of the area by qualifying SPA species, and other PBF are likely to be present. Where construction has already taken place reference to previous studies, desktop analysis, expert opinion should be drawn up to identify the likely modified/natural/critical status of the site.</p> <p>The survey would inform a Critical Habitat Assessment and identify if there is a requirement to achieve no net loss and/or net gain.</p> <p>In accordance with the requirements of Paragraph 17 of PR6 and associated Guidance Notes, there may be a requirement to provide a Biodiversity Management Plan (BMP) or Biodiversity Action Plan (BAP) to deliver no net loss/ net gain.</p>	EBRD PR6, IFC PS6, EP IV, EU Best practice	Own resources External consultants for CHA Responsibilities: Energix Group	<ul style="list-style-type: none"> Middle June 2021 for CHA BMP/BAP - if required- January 2022 	<ul style="list-style-type: none"> Critical habitat assessment (CHA) report BMP/BAP if required
6.3	<p>Applicable in case of significant bird impact:</p> <p>Specific survey work using VP studies and CRM mentioned above, together with further desk study and consultation, will assist with identifying whether automated approaches such as DTbird would be suitable, and if so how best to configure them. Such studies will also assist in refining and understanding peak risk periods, when shut down procedures may be most effective.</p> <p>Based on the results, develop a shut down on demand procedure to be used by the IOCE to shut down individual turbines if needed due to risk of collision with qualifying features of the SPA or other priority biodiversity features.</p> <p>Once in place, all shut down incidents will be reported annually to Lenders.</p> <p>Test the shutdown protocol with the IOCE each year.</p>	EBRD PR6, IFC PS6, EP IV Best practice, Polish legislation	Own resources External consultants Independent Ornithological and Chiropterologist	<ul style="list-style-type: none"> Shut down on demand procedure prepared before commissioning and further implemented continuously during operation Annual Report by end Q1 for previous year of operation 	<ul style="list-style-type: none"> Shut down on demand procedure Shut down report
6.4	<p>During construction retain a professional ecologist to undertake an assessment of flora and fauna of the area to limit the impact on any protected species, particularly PBF species including Annex IV species.</p> <p>As a minimum, all areas of new land take, including road widening and temporary laydown areas, will be surveyed prior to construction starting. If PBF/Annex IV species are present alternative translocation sites will be identified within the project footprint. Immediately prior to any construction starting in that area the</p>	National and EU EBRD PR6, IFC PS6, EP IV Best practice	Own resources with internal / external ecologists	<ul style="list-style-type: none"> Contracted for the construction period – prior starting the construction 	<ul style="list-style-type: none"> Contract of the professional ecologist in place Biodiversity Management Plan (to include details on measures to protect PBF during construction and operation).

No.	Action	Requirement (Legislative, EBRD PRs, Best Practice)	Resources, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	ecologist will collect as many individuals as practicable and remove to the translocation site. In temporary land take ponds will be reinstated. These measures and the role of the supervising ecologist should be set out in a BMP. All Polish legal requirements in relation to strictly protected Annex IV species must be complied with and the BMP should detail those requirements and how they have been addressed.				
6.5	<p>Appoint an Independent Ornithological and Chiropterologist (birds and bats) expert (IOCE) to undertake monitoring of the Project during commissioning then subsequently during operation of the wind farm. The IOCE will be appointed on 3 year contract and this will continue through the operation of the wind farm.</p> <p>Such monitoring to include a post-construction bird and bat monitoring programme in line with best international practices, Polish guidelines and the requirements of the Environmental Decision.</p> <p>The post-construction programme needs to include carcass surveys to identify bird and bat casualties and carcass persistence/ surveyor efficiency surveys to confirm removal rates by scavengers, or removal by any other reasons (e.g. ploughed into the soil during seasonal agricultural activities). Use best practice for instance being developed by the UN CMS Energy Task Force.</p> <p>The IOCE will produce annual reports to be submitted to the Lenders on the impacts.</p> <p>The IOCE will assist in developing an adaptive management plan that defines the actions that will be taken and the trigger levels required to initiate such action in relation to birds and bats. The likely focus of adaptive management and extent of management actions required will be informed by the CRM based on data from the VP surveys. Triggering of adaptive management will be based on the results of post construction carcass searching. The adaptive management plan will form part of the BMP.</p> <p>After 3 years the scope of the IOCE will be refined to concentrate on areas that are seen as high risk. This will include any further expansion of the wind farm.</p>	EBRD PR6, IFC PS6, EP IV Best practice	Own resources External consultants Independent Ornithological and Chiropterologist	<ul style="list-style-type: none"> Appointed prior financial close, with initial contract for 3 years and further prologue as needed 	<ul style="list-style-type: none"> Contract with IOCE in place Annual biodiversity reports prepared by IOCE Incorporation of adaptive management plan including activation triggers into BMP. Production of carcass monitoring plan Post-construction biodiversity monitoring reports
6.6	<p>Linked to the adaptive management plan identified at 6.5 develop a bat mitigation procedure that includes triggers for change based on the number of bats per turbine killed assessed against European averages for operational turbines and population levels. Protocols for curtailment procedures aimed at shutdown of turbines at night when wind speeds fall below 6 m/s to be developed. Use EuroBat guidance to develop this procedure with the IOCE within the first 2 years of operation of the wind farm.</p> <p>Results from the carcass monitoring in relation to time of year and location of casualties will be used to optimise any curtailment regime.</p>	EBRD PR6, IFC PS6, EP IV Best practice, Polish legislation	Own resources External consultants Independent Ornithological and Chiropterologist	<ul style="list-style-type: none"> Within the first 2 years of operation of the wind farm 	<ul style="list-style-type: none"> Bat mitigation procedure Incorporation into BMP and adaptive management plan.
PR8	Performance Requirement 8: Cultural Heritage				
8.1	<p>Prepare a detailed Chance Find Procedure, to include the following:</p> <ul style="list-style-type: none"> a general overview of the Project, including a description of the components and activities that may result in Chance Finds; description of the national regulatory context for Chance Finds; description of the heritage context of the site with an overview of previous heritage studies and assessments of the area; description of the type of heritage that may be encountered as a Chance Find; an organisational chart with clear roles and responsibilities; identification of the key personnel and regulators, including contact details, who will be required to take action in the event of a Chance Find; a process diagram showing clear step by step actions in the event of a Chance Find; step-by-step detailed actions in the event of a Chance Find, including different scenarios; details of a find recovery strategy, to include find stabilisation, temporary storage and transfer to regulator; a programme of on-site training for employees so they can recognise Chance Finds and are aware of their responsibilities under the Chance Finds Procedure. <p>Amend the contract with the main construction contractor to ensure the Procedure's full acknowledgement and implementation.</p>	EBRD PR8, IFC PS8, EP IV Polish regulations Best practice	Own resources Responsibilities: Energix Polska	<ul style="list-style-type: none"> before start of intrusive construction works 	<ul style="list-style-type: none"> Chance find procedure in place at starting the intrusive construction works

No.	Action	Requirement (Legislative, EBRD PRs, Best Practice)	Resources, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
PR10	Performance Requirement 10: Information Disclosure and Stakeholder Engagement				
10.1	<p>Implement the Stakeholder Engagement Plan (SEP) as “living document”, updated regularly to reflect engagement conducted to date, potential new stakeholders identified and any changes required to adapt it to the project conditions and stakeholder expectations. In order to achieve this:</p> <ul style="list-style-type: none"> ■ resume the process of sharing information about the Project with the interested stakeholders, as early as possible, by all the accessible means of communication. ■ conduct meetings with the local communities to understand their opinion about the Project, Project status, future engagement strategy and start building the relation with these stakeholders. ■ consultation meetings will be planned and held with due consideration of the needs of any disadvantaged or vulnerable groups identified and will be free of external manipulation, interference, coercion or intimidation. ■ document the results of future consultation activities as annexes to the Project SEP ■ disclose the SEP in local language to the local communities. 	EBRD PR10, IFC PS1, EP IV Best practice	Own resources	<ul style="list-style-type: none"> ■ Prior to financial close with regular engagement thereafter ■ Outreach to local community within a 5 km distance of the wind farm. 	<ul style="list-style-type: none"> ■ updated SEP on yearly basis ■ Provide evidence to lender by end of Q2 2021 on stakeholder engagement meeting and compunctions.
10.2	<p>Implement the grievance mechanism / procedure for external stakeholders as defined in the SEP:</p> <ul style="list-style-type: none"> ■ the grievance mechanism will be disseminated in the affected communities starting as early as possible, prior to construction; ■ ensure Grievance Forms are constantly made available to the local communities and that people know where they can access these and how to use/submit them to the company; ■ ensure grievances received are managed in line with the management procedure presented in the Project SEP. ■ assess the efficiency of the grievance process periodically and adjust it as appropriate. 	EBRD PR10, IFC PS1, EP IV Best practice	Own resources	<ul style="list-style-type: none"> ■ Prior to financial close with regular engagement thereafter 	<ul style="list-style-type: none"> ■ Project-specific grievance mechanism / procedure for external stakeholders
10.3	<p>Appoint an employee responsible for relations with the local communities (to be called Community Liaison Officer - CLO) and ensure she/he conducts regular engagement with the local communities during construction and operation, as needed.</p> <p>Ensure that contact details of the CLO are made available to all stakeholders (contractors, local communities and residents of the area) in order to ensure that any grievances including related to environmental, social and H&S aspects of the Project can be easily communicated to the Company. The CLO will need to be acquainted with the stakeholders and stakeholder process as outlined in the SEP, and have a clear understanding of the project schedule and engagement milestones in order to inform stakeholders appropriately about the project progress.</p>	EBRD PR10, IFC PS1, EP IV Best practice	Own resources	<ul style="list-style-type: none"> ■ Prior to financial close 	<ul style="list-style-type: none"> ■ Appointment of an employee responsible for relations with the local communities (to be called Community Liaison Officer - CLO)
10.4	<p>Develop an Annual Environmental and Social Report on the environmental, social and health and safety performance of the Project and share it with the relevant stakeholders.</p> <p>This will also include reporting on a regular basis to the impacted communities about project progress status, and progress in the implementation of the ESAP. Reporting frequency could be bi-annual during construction and annual during operation. However, this could be refined depending to feedback received from the relevant stakeholders and, in this case, it should be reflected in the Project SEP.</p>	EBRD PR10, IFC PS1, EP IV Best practice	Own resources	<ul style="list-style-type: none"> ■ bi-annual during construction and annual during operation 	<ul style="list-style-type: none"> ■ Project presentation; amended SEP.