	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION

Grievance Mechanism

Table of contents

1. OBJECTIVE..... 2

2. SUBJECT MATTER AND SCOPE 2


3. RESPONSIBILITY 3

4. PROCEDURE AND MANAGEMENT OF COMMUNICATION WITH STAKEHOLDERS..... 3

5. MANAGEMENT OF CONTRACTORS' COMPLAINTS AND REQUESTS 5

6. TRAININGS..... 5

7. MONITORING AND REPORTING 6

	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION

1. Objective

The purpose of implementing the Grievance Mechanism is to establish a transparent and formalised communication process with Polenergia Group's External Stakeholders, in particular with the local communities. Each Stakeholder may submit a complaint or an oral or written request for Projects of the Polenergia Group. Reports shall be processed, managed and resolved in a structured and, above all, transparent manner, without any risk of discrimination or ill treatment.

Principles underlying the grievance mechanism:


- Ensuring a standard of high-quality communication with Stakeholders, based on transparency and mutual respect when receiving, examining and responding to complaints and requests from individuals and Stakeholders, ensuring that they are solved in a timely and reliable manner.
- Demonstrating and subsequently maintaining sensitivity to the local, cultural, linguistic and geographical context, without restrictions and discrimination against all parties.
- Ensuring availability and openness in receiving and handling complaints and requests.
- Ensuring confidentiality and privacy in the personal data management process, in accordance with applicable laws.
- Not hindering access to judicial or administrative remedies.
- No costs and fees for Stakeholders.
- Ensuring a source of knowledge for Polenergia project stakeholders in order to contribute to the improvement of environmental and social effects of the Project.

Information on the grievance procedure and the notification form can be found at www.esg.polenergia.pl. You can also submit your notification via the public website: <https://polenergia.zglaszam.to/>.

The grievance mechanism applies to all Polenergia Group projects, and to the activities of contractors and subcontractors of the Polenergia Group.

2. Subject matter and scope

The procedure concerns submitting complaints and requests by the local community during the planning, construction and operation of the facility by the Polenergia Group. Complaints and requests may relate to any aspects of the functioning of the Project, including but not limited to any damage caused by subcontractors of the Group, as well as by employees during the construction or operation and maintenance works.

	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION

3. Responsibility

Within the Polenergia Group, the responsibility for handling the case, from the moment of its registration until completion, rests with the Head of the Department of Environment Protection

4. Procedure and management of communication with Stakeholders

Each Stakeholder may submit a complaint or request at any time and without any financial outlay, while being able to remain anonymous.

Complaints or requests may be submitted in Polish or English. The methods of lodging complaints or requests are set out below. They may be submitted:


- By e-mail – using a form downloaded from the following websites: [Łądowe farmy wiatrowe - Energia z przyszłości - Polenergia](#), [Farmy fotowoltaiczne - Energia z przyszłości - Polenergia](#), in Project tabs.
- By traditional mail – using a form downloaded from the websites listed above. The form should then be sent to the following address: ul. Krucza 24/26, 00-526 Warszawa.
- In person – by leaving the form in the complaint and request box available at the office of Polenergia S.A. or the office of the project to which the complaint or request pertains at Project construction stage.
- At the Municipal Office during the development and operational stages of the Project.
- By telephone. An employee of Polenergia Group, who receives the notification, fills in the complaints and requests form. It is then forwarded to the Head of the Environment Protection and Sustainable Development Department or the Investment Manager to whom this complaint or request refers.
- Via the website [Whistleblower App \(zglaszam.to\)](#).

The responsibility to install a box for complaints and requests lies with:

- Development Project Manager – at the stage of the environmental procedure.
- Project Site Manager – at the stage of construction of a given Polenergia Group investment.
- Operational Project Manager – at the stage of operation of the Polenergia Group Project.

Boxes for complaints and requests are emptied by Project Managers:

- At the development stage – every 14 business days
- At the project construction stage – every 2 business days
- At the operational stage – once a month.

	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION

Complaints and requests shall be submitted to the Head of the Environment Protection and Sustainable Development Department.

Stages of handling a submitted complaint and request

Step 1 Registration of complaints and requests

Complaints and requests shall be registered in the Register of Complaints and Requests within one working day of their receipt, specifying the date and time of receipt of the complaint and/or request, as well as information on the complaint and/or request and the investment to which the complaint and/or request relates and the manner of their receipt.

At this stage, the admissibility of the complaint or request will also be determined. Complaints and requests shall not be admissible where:

- they have no direct connection with the Polenergia Group's operations,
- the scope of the complaint or request refers to situations occurring prior to the commencement of construction and unrelated to the Group's activities on the site.

If the complaint or request is not admissible, the Polenergia Group representative shall clearly inform the Complainant of the reasons why the complaint or request cannot be handled and, where possible, provide information helpful for redirecting the complaint or request to the relevant institution or person. In such a case, the complaint or request shall be registered in the Register of Complaints and Requests as inadmissible.

Step 2 Acknowledgement of receipt


The Head of Environment Protection and Sustainable Development Department of the Polenergia Group shall be responsible for confirming (verbally or in writing) the receipt of the complaint or request and for informing the person submitting the complaint or request about the course of further investigation, as well as the timetable for further stages of the process.

Step 3 Deadline for consideration of a complaint or request

The complaint or request shall be examined, and the risk assessment shall be carried out immediately. Complaints and requests will be dealt with within 30 working days. Complaints or requests related to the threat to life or health of the Applicant or other persons shall be handled immediately.

Step 4 Examining process

All cases are examined by two employees appointed for this purpose by the Head of the Environment Protection and Sustainable Development Department. Meetings and inspections of the location specified in the form may be organised to clarify the matter. In order to carry out a thorough analysis of the reported case, Polenergia Group employee can take photographs and collect other data and evidence. A Group employee may also call a meeting with the persons submitting complaint or request and the persons designated by them, or with employees of the Group involved in the process.

	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION

Minutes of the meeting shall be drawn up by a Group employee. The Polenergia Group is obliged

to consider all evidence as well as to meet with all interested parties and make every effort to ensure that the persons submitting complaints or requests have the opportunity to present their arguments. After considering the case, a report shall be drawn up.

Such a solution may include mitigating or remedial measures in the form of financial or in-kind compensation.

Step 5 Response

After the completion of the verification of the complaint or request, a communication will be prepared

for the Complainant, containing information on the findings and outcomes of the investigation. If the complaint or request is anonymous, the decision shall be entered in the Register of Complaints and Requests, together with a description of the procedure. Personal data contained in the register of complaints

and requests will be stored in accordance with the principles of personal data protection applicable in the Polenergia Group.

Step 6 Appeals

If the person submitting a complaint or request does not accept the solution or outcome of the agreed remedial actions, negotiations may take place. In the event of ineffective negotiations, the Complainant may refer the case to bodies independent of the Polenergia Group. The Complainant has the right to apply for reconsideration of the case. It is then considered by the Head of the Environment Protection and Sustainable Development Department and the Compliance Officer.


5. Management of contractors' complaints and requests

The Polenergia Group takes responsibility for any shortcomings on the part of contractors carrying out investments executed by the Polenergia Group, and resolves them in accordance with the provisions of the relevant agreements. In addition, a person responsible for receiving complaints and requests directly on the premises of the Polenergia Group project shall be appointed on the Contractor's side.

6. Trainings

Polenergia Group shall provide training to all persons who may receive a complaint or request, and provide Employees with guidance on their role in responding to and receiving complaints and requests.

Responsibility for conducting training on handling claims and requests lies with the Head of the Environment Protection and Sustainable Development Department.

	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION


7. Monitoring and reporting

The Head of the Environment Protection and Sustainable Development Department shall keep a Register of complaints and requests, including any data relating to the subject matter of the complaint or request. He/She will also be responsible for monitoring the implementation of tasks resulting from the arrangements regarding the manner of handling the case described in the complaint.

The Head of the Environment Protection and Sustainable Development Department shall present the Register of Complaints to the elected Member of the Management Board on an ongoing basis. Once a year, the register of claims and requests shall be submitted to the Management Board of Polenergia Group.

Appendices:

Appendix No 1: Template notification form

	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION

Appendix No 1

Dear Sirs/Madams,

This form will allow for more efficient submission of comments, complaints, questions to the Project Investor:

Project name (*details will be provided on a case-by-case basis*)

and thus, it will allow more effective communication and transfer of information, and the response to events/incidents that occur as a result of our activities.

After completing the form, please leave the form in:

Municipality Office, address of the Municipality Office (*details will be provided on a case-by-case basis*)

or sent to:

Marta Porzuczek, Head of Environment Protection and Sustainable Development
Department

at Polenergia S.A.

ul. Krucza 24/26, 00-526 Warsaw

Phone: +48 22 522 38 42; mobile: + 48 609 909 702

e-mail: Marta.Porzuczek@polenergia.pl

or

Project Manager


Project name

Mobile:

E-mail:

or

Submission of a notification via the [Whistleblower App portal \(zglaszam.to\)](https://zglaszam.to)

	Procedure introducing procedure	No P-P064
Date: 12.03.2024	Grievance Mechanism	INFORMATION I COMMUNICATION

Sincerely,
Marta Porzuczek

REFERENCE NO:	
Name and surname:	
Please indicate the preferred method of communication	<ul style="list-style-type: none"> ▪ By post. Please enter the contact address: ▪ By phone: ▪ By e-mail:
Preferred language of communication:	<ul style="list-style-type: none"> ▪ Polish ▪ English
Description of the event or complaint:	What happened? When? To whom? Effect of the event
Date of event/complaint:	
Event category:	<ul style="list-style-type: none"> ▪ One-off event – date ▪ More than once – how many times ▪ Continuous (existing problem)
Proposed solutions:	