



| | | |
|--|--|-----------------------------------|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan Public | INFORMATION I COMMUNICATION |

Polenergia Group Public Communication Plan

Table of contents

| | |
|---|----|
| 1. Introduction | 2 |
| 1.1. Preliminary information..... | 2 |
| 1.2. Objectives of the Public Communication Plan..... | 2 |
| 1.3. Subject matter of the Public Communication Plan..... | 3 |
| 2. Stakeholder identification | 3 |
| 3. Analysis of social doubts by type of investment | 5 |
| 3.1. Onshore wind farms..... | 5 |
| 3.2. Photovoltaic farms | 6 |
| 4. Communication rules and actions programme | 7 |
| 4.1 Objectives of communication with stakeholders | 7 |
| 4.2. Communication fields | 8 |
| 4.3. Stakeholder Communication Schedule..... | 8 |
| 4.3.1. Process of arrangements with the public administration and land owners..... | 8 |
| 4.3.2. Public consultation process carried out in the administrative procedure..... | 9 |
| 4.3.3. Construction of the Project..... | 9 |
| 4.3.4. Operation of the Project | 9 |
| 4.4. Methods of communication | 11 |
| 4.4.1. Communication tools..... | 12 |
| 5. Stakeholder Relationship Management Plan: | 12 |
| 5.1. Analysis of potential social conflicts | 12 |
| 5.2. Structure of the Stakeholder Relationship Management Plan | 13 |
| 6. Consulting for Project Managers | 14 |
| 7. Appendices | 14 |
| 7.1. Appendix No 1: Polenergia Group Social Engagement Policy..... | 14 |
| 7.2. Appendix No 2: Grievance Procedure..... | 15 |

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|---|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

1. Introduction

1.1. Preliminary information

This document is a Public Communication Plan, prepared for all investments and projects being developed, in particular wind farms, photovoltaic farms, hydrogen projects or energy storage facilities, hereinafter referred to as the “Project” or “Projects”, which are or will be assets of Polenergia Group (hereinafter referred to as the “Company” or the “Group”).

The purpose of the document is to properly manage the process of information sharing and the engagement of the Project Stakeholders in a fair and transparent manner, in such a way as to build a platform of understanding, trust and support for the Project. The aim is also to maintain the best possible relationships with the Stakeholders relevant for a given Project. This should be done in accordance with relevant Polish and international legislation, applicable international lender standards and own corporate requirements.

Before the launch of each Project, i.e. at the moment of obtaining a building permit, but before the commencement of construction and assembly works, detailed Stakeholder Relationship Management Plans will be prepared separately for each Project. These plans will be drawn up on the basis of this Public Communication Plan and other related documents.

The Public Communication Plan is an internal document relating to all Projects, and the Stakeholder Relationship Management Plan will be tailored to each Project individually. Stakeholder Relationship Management Plan will consist of: ESAP (Environmental and Social Action Plan) and SEP (Stakeholders Engagement Plan). Stakeholder Relationship Management Plans will be made public.


1.2. Objectives of the Public Communication Plan

The aim of the Public Communication Plan is to provide a framework for a coherent, comprehensive, transparent and understandable approach to communication with the Group's Stakeholders, in accordance with the requirements of Polish and international regulations, the Company's policy, the Group's ESG strategy and good practices.

Main objectives of the Public Communication Plan

- active identification and analysis of Stakeholders (I) affected or likely to be affected by the Project (directly or indirectly) at all stages of its development (planning, construction, operation), (II) affected by other activities undertaken by the Group, or (III) who may express interest in the Project or other activities of the Group and incorporate them into the communication process,
- identification of potential risks and relationships to the Project for Stakeholders in order to consider appropriate management measures,

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta POrzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|-----------------------------------|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Public Communication Plan | INFORMATION I COMMUNICATION |

- definition of the objectives of communication with Stakeholders and presentation of the main benefits of such communication,
- definition of communication management methods and identification of tools for managing the flow of information between the Group and Stakeholders,
- establishment of the processes to provide interested parties with relevant and appropriate information on the Project throughout its implementation and operation,
- establishment of the processes for communication and engagement of the key stakeholders in a given Project as part of the implementation of the Social Engagement Policy and the Biodiversity Strategy,
- description of the process within which stakeholders can comment, provide feedback, ask questions, express concerns and raise complaints.

1.3. Subject matter of the Public Communication Plan

Public Communication Plan:

- contains guidelines for managing the engagement of the Project Stakeholders; focuses on managing communication with international, national, regional and local Stakeholders of the Project;
- contains a presentation of the Grievance Mechanism (GM) that will be operated by the Company to enable external Stakeholders to submit comments or concerns related to the Project and their management by the Company;
- presents the features of the management system that will constitute the basis for the implementation of activities specified in the Public Communication Plan, including information on roles and responsibilities in the Company.

2. Stakeholder identification


The Stakeholder is any person, group of persons or organisation for whom the Project (or activity)

has a real or potential, direct or indirect, positive or negative impact, or which has a real or potential, direct or indirect, positive impact or a negative impact on the Project (or action).

Details of the Stakeholders will be presented in the Stakeholder Relationship Management Plan, which will be developed and adapted to a specific Project.

Communication of the Polenergia Group takes place mainly in locations where Group Projects are located or in locations where their construction is planned. Organisations operating

| | | | | | |
|---------------|-------------------------------------|------|------------|-----------|--|
| Developed by: | Marta POrcuczek | Date | 12.03.2024 | Signature | |
| Approved by: | Management Board of Polenergia S.A. | | | | |

| | | |
|--|--|--|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

nationwide may also become Stakeholders of Polenergia (e.g. Wielka Orkiestra Świątecznej Pomocy [Great Orchestra of Christmas Charity], Szlachetna Paczka [Noble Gift]).

Polenergia Group companies should inform the ESG Team about establishing cooperation with organisations in the field of social engagement. That cooperation should be consistent with the assumptions of the Group's Social Engagement Policy.


Stakeholder relations with the Project are presented in the table in Chapter 4.3.4. On the other hand, the division of stakeholders into categories based on their needs, interests and potential impact on the Project is presented in the table below.

Please note that categorisation was based on available information and current knowledge. It was not confirmed by the entities listed in the table. The full Project Stakeholder Register will be developed separately for each Project.

Table 1. Connecting Stakeholders to the Project

| Stakeholder categories and groups | Connection to the Project | Stakeholders |
|--|---|---|
| National, local and regional authorities; Public administration | Regional and local authorities are relevant to the Project as they are responsible for decisions on environmental conditions and permits, and for implementing legislation and development plans and policies at the regional level. Regional and local authorities have an influence on the process of obtaining permits related to the Environmental Impact Assessment and construction, and on the implementation of the project, and their attitude towards investments and companies involved will have an impact on its schedule. In addition, local authorities should be involved to maintain a direct line of communication, identify important issues that may affect the project and provide social support. | Voivodes, Starostes, Mayors and Municipality Heads, Town and Municipal Offices, Village Administrators, Rural Development Agency, Regional Directorate for Environmental Protection, Provincial Inspectorate of Environmental Protection, Polish Waters, National Support Centre for Agriculture, State Forests |
| Local institutions (public services) | Local public services, including those related to education and law enforcement, which may be potentially affected (directly or indirectly) by the Project's activities or related environmental and social impacts. | Municipal Services Department Primary schools, kindergartens and other educational establishments, Community centres, Social welfare centres |
| Society (local NGOs) | Organisations directly interested in the Project and its social and environmental | Social organisations, Volunteer Fire Department |

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|---|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

| | | |
|--|--|--|
| | aspects which are capable of affecting the Project directly or through the public opinion. | |
| Undertakings, companies operating on the Project site | Companies directly or indirectly interested in the Project and its business, social and environmental aspects which are capable of affecting the Project and which may be affected by the Project. | Project preparation stage: service providers, in particular with respect to surveying and planning services. Implementation stage: construction contractors, etc., securing the project site. Operation stage: service providers for the maintenance of investments, servicing, protection. |
| Local communities | Communities may be directly or indirectly affected by the Project. The public should be informed about the Project schedule and the actions planned, as well as about the potential economic benefits, including opportunities to increase employment. | Inhabitants of the municipalities where the Projects are located and inhabitants of municipalities neighbouring the project. Owners of plots where investments are located and adjacent plots. |

The Stakeholder Register will be updated throughout the entire Project cycle, based on the results of the meetings held. It will be attached to the Stakeholder Engagement Plan, drawn up individually for each Project. Once a year, the Stakeholder Register will be reviewed and updated by the ESG Team in consultation with the new projects implementation and operation departments.


3. Analysis of social doubts by type of investment

Key issues or potential conflicts related to the construction and operation of the Polenergia Group investments were identified which may raise stakeholder concerns. Section 4.3.4. identifies stakeholder groups with whom cooperation can be established in order to better understand their concerns, try to address them on the basis of an environmental impact assessment and find a solution.

3.1. Onshore wind farms

In Poland, the protests related to wind power mainly concern onshore wind farms and relate in particular to the distance between the projects and residential buildings. The ongoing discussions at political and media levels were particularly intensive in 2016, when the law setting the minimum distance between wind turbines and buildings was adopted. Another

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|---|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

discussion took place between 2022 and 2023, when the amendment to the so-called “Distance” Act was adopted.

The controversies raised by wind turbines relate to the following aspects:

1. **Noise and vibration:** Wind turbines generate a certain level of noise. There are therefore concerns in the public domain that this noise will be burdensome and that wind turbine rotors will cause vibrations of the ground. Some residents fear that the noise generated by wind turbines will affect their quality of life.
2. **Health and safety:** There are concerns that exposure to noise and vibrations generated by wind farms may negatively affect the health of local residents.


There are concerns in the public domain that mechanical vibrations caused by turbines may cause damage to tissues and blood vessels, while noise may lead to vibroacoustic disease, and light flashing may cause epileptic conditions. Others, in turn, are concerned about the risk of wind turbine breakdowns and the resulting possible self-ignition, detachment of part of the blades or rotors.

3. **Impact on nature:** The impact on ornithofauna and chiropteroфаuna is constantly monitored on each investment of the Polenergia Group. There are indications that wind farms may have a negative impact on local ecosystems, particularly birds and bats. The issue of bird collisions with wind turbine blades is often raised as a cause for concern and evidence of the harmful effect of wind farms.
4. **Landscape aesthetics :** High wind turbine towers interfere with and permanently change the traditional rural or forest landscape. Part of the society fears that wind farms will disturb the beauty of the surroundings.
5. **Impact on the value of the real property:** Due to the controversies mentioned above, there are claims that the presence of wind farms in the area may reduce the value of real estate, which may be unfavourable for the residents and land owners near the farms.

It is worth noting that opinions on onshore wind farms in Poland vary. Therefore, it should be stressed that not all residents of real estates located in the vicinity of the investments are concerned about wind farms. Some perceive them as an important source of renewable energy and an added value for the environment. Wind farms have many benefits and, although negative opinions on them are still present, public acceptance and understanding of the need to develop this sector of the energy industry is constantly growing.

3.2. Photovoltaic farms

| | | | | | |
|---------------|-------------------------------------|------|------------|-----------|--|
| Developed by: | Marta POzruczek | Date | 12.03.2024 | Signature | |
| Approved by: | Management Board of Polenergia S.A. | | | | |

| | | |
|--|--|--|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

Photovoltaic farms are much less controversial. Generating energy from the sun has been gaining social acceptance in Poland for many years. Solar energy is used by households and public facilities.

Opinions on photovoltaic farms are usually less controversial than on wind farms. The negative views on photovoltaic farms most often relate to the following aspects:

1. **Landscape aesthetics:** Some believe that photovoltaic panels adversely change the appearance of the landscape, especially when placed on large areas of land.
2. **Land use:** Photovoltaic farms occupy large areas of land which may raise concerns about the loss of agricultural land or natural green areas.
3. **Panel recycling:** There are concerns about the disposal of photovoltaic panels at the end of their life cycle. The storage or recycling of panels may be challenging and affect the environment.
4. **Impact on the microclimate:** Some report that photovoltaic farms may have an impact on the microclimate of local areas, including temperature and airflow.

However, it is worth noting that the negative opinions on PV farms are less pronounced than on wind farms. Solar energy is widely perceived as a clean and sustainable source of renewable energy. Photovoltaic farms tend to attain greater public acceptance due to their lower impact on the surroundings and less controversy than in the case of wind farms.

4. Communication rules and actions programme


4.1 Objectives of communication with stakeholders

RES are an acceptable source of energy in Poland, but in the opinion of the public there are myths and false data regarding different renewable energy sources.

Following discussions on the construction of onshore wind farms, there is a need to raise awareness and education on the characteristics and opportunities of such projects. Over recent years, the number of prosumers and the power of prosumer installations has been steadily increasing. At the end of December 2015, there were approximately 4 thousand prosumers in Poland, whereas at the end of September 2023 their number exceeded 1.3 million. It follows from the above that solar energy is a popular and accepted source of renewable energy among Poles. Other investments related to renewable energy, such as hydrogen production or energy storage remain poorly known. Further awareness-raising activities on RES are therefore needed.

Polenergia Group pursues its strategic objectives with utmost care. It cares for the interests of local communities, taking into account their views when carrying out investments. Polenergia Group conducts and communicates its Projects in a transparent manner.

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|--|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

Aligning communication with the needs of stakeholders and implementing appropriate tools for correct and transparent communication with residents is the goal of the Polenergia Group ESG Strategy published in 2023. Communication with all new Projects and periodically with Projects already commissioned is a priority task.

4.2. Communication fields

Communication with stakeholders is based on the following pillars:

- Investment information: Stakeholders should be able to easily obtain detailed and clear knowledge about the planned or existing investment.
- Information about the positive environmental, climatic or natural aspects regarding the implementation of the investment and the need to develop RES in connection with the need to reduce CO2 emissions.
- Education and raising public awareness of the need to increase power generated from renewable energy sources.
- Socio-economic development of the region where the investment is carried out, including the possibility of creating new jobs in the areas where the Group Projects are located.
- Presentation of the scope of social engagement resulting from the Polenergia Group Social Engagement Policy.

4.3. Stakeholder Communication Schedule

The schedule of communication with stakeholders should be described in detail in the Stakeholder Engagement Plan (including in ESAP and SEP documents) for each investment and agreed in cooperation between the Environment and Sustainability Department and the various departments responsible for project the development.

Communication activities addressed to Stakeholders and involving the public should correspond to the development stages and target selected groups. Each such target group should be described using available tools for communication with Stakeholders.


Monitoring of communication activities shall be carried out by the ESG Team at each stage of the Project.

Implementation of the Project can be divided into the following stages:

4.3.1. Process of arrangements with the public administration and land owners

At this stage, the communication should be addressed to the representatives of the Stakeholder groups who have a direct relation with the Project, i.e. state and local government administration, institutions which may affect the construction process. It should

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta POrzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|-----------------------------------|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Public Communication Plan | INFORMATION I COMMUNICATION |

also be addressed to the directly involved residents, such as owners of land intended for the investment.

4.3.2. Public consultation process carried out in the administrative procedure

The communication should cover representatives of the main Stakeholder groups who have a direct link with the Project, i.e. the local government administration, institutions which may affect the construction process and directly involved inhabitants, such as owners of land intended for the investment. Public consultations carried out in the context of an administrative procedure relating to changes in land development plans or environmental impact decisions are an important stage during which stakeholders should be kept informed of the progress of the Project or significant changes to the Project.

4.3.3. Construction of the Project

During the construction of the investment, extensive communication must be performed with the inhabitants of the municipality where the investment is located and the municipalities neighbouring the investment. The communication should cover representatives of the main Stakeholder groups who have an indirect and direct link with the project, i.e. national and local administration, social and local government organisations, and directly and indirectly involved residents.

Already at the project construction stage, with the consent and decision of the Project Manager, communication regarding the areas of the Group's social activities should start. Presentation of the Group, as well as the benefits of its presence in a given area should be done in consultation and in cooperation with the ESG Team which operates within the Environment and Sustainability Department.


During meetings on the social engagement of Polenergia, it is important to explain why the Group plans to cooperate with local authorities and active organisations, and to what extent local communities can count on the support from Polenergia Group.

4.3.4. Operation of the Project

After obtaining the use permit for the Project, the target group covers both residents and public administration in connection with the period of submitting post-investment reports. In subsequent years, communication should cover all Stakeholders included in the Stakeholder Engagement Plan for the Project, which will be updated after the completion of the construction phase.

It is extremely important at this stage to involve Project Managers in the dialogue with the local community. The presence and activity of Polenergia should not end with the preparation of the Project and construction. Engagement is also important when the investment is put into operation. For this purpose, it is required to conduct activities based on the Social Engagement Policy, which describes the areas of social activities for all

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|--|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

companies. The ESG Team is responsible for the implementation of the above-mentioned Policy, however the engagement of individual Project Managers is necessary to implement the assumptions of the Polenergia Group Social Engagement Policy.


The engagement of Project Managers means creating, together with the ESG Team, a schedule of meetings with the local communities and participation in major local events.

In addition, it is important that the ESG Team develops a support plan for a given municipality, which will be consulted with the Project Manager. The plan will be created at the beginning of each calendar year and will contain the areas of engagement of a given company.

Table 2 shows the connection between the investment stages and stakeholders, communication tools and persons responsible for communication.

| Investment implementation stage | Stakeholder | Communication tool | Responsibility |
|---|---|--|---|
| Commencement of investment preparation (planning, environmental, building permit procedure) | <ul style="list-style-type: none"> • Owners of the land on which the project is implemented • Local government administration • Distribution System Operator • RDOŚ (Regional Directorate for Environmental Protection) | <ul style="list-style-type: none"> • Individual meetings • Formal correspondence • Exchange of documentation and correspondence related to the Project | Project Manager together with Communication Department and ESG Team |
| Administrative procedure of investment preparation (planning procedure, environmental procedure, building permit) | <ul style="list-style-type: none"> • Inhabitants of the municipality where the projects are carried out and of the neighbouring municipalities. • Local government administration • Local NGOs • Distribution System Operator • RDOŚ | <ul style="list-style-type: none"> • Individual meetings • Formal correspondence • Exchange of documentation and correspondence related to the Project • Participation in consultation meetings • Conduct of the Grievance Mechanism • Other tools as decided by the Project Manager | Project Manager together with Communication Department and ESG Team |
| Commencement of construction works – construction of | <ul style="list-style-type: none"> • Residents of the municipality where the project is carried out • Residents and administration of the municipalities | <ul style="list-style-type: none"> • Formal correspondence • Publication of information in the media • Publication of notices in public spaces • Open events | Project Manager together with Communication Department and ESG Team |

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|---|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |


| | | | |
|--|---|---|---|
| the investment project | neighbouring the investment <ul style="list-style-type: none"> Local NGOs Local government administration | <ul style="list-style-type: none"> Company website Conduct of the Grievance Mechanism Other tools as decided by the Project Manager | |
| Completion of the investment project and obtaining an occupancy permit | <ul style="list-style-type: none"> Residents of the municipality where the project is carried out Local NGOs Local government administration | <ul style="list-style-type: none"> Formal correspondence Publication of information in the media Publication of notices in public spaces Company website Conduct of the Grievance Mechanism Other tools as decided by the Project Manager | Construction Site Project Manager, Operational Project Manager and ESG Team |
| Further maintenance and operation of the investment | <ul style="list-style-type: none"> Residents of the municipality where the project is carried out Local NGOs Local government administration | <ul style="list-style-type: none"> Publication of notices in public spaces Company website Conduct of the Grievance Mechanism Other tools as decided by the Project Manager | Operational Project Manager and ESG Team |

4.4. Methods of communication

As part of the Public Communication Plan, there are 4 levels of information provided corresponding to the target groups:

- Information provided directly at individual meetings, personalised written or electronic correspondence, closed and individual meetings. The Public Communication Plan should contain a general list of entities covered by individual meetings and a schedule for organising individual meetings.
- Open meetings, conferences, printed materials. The Stakeholder Engagement Plan for a given Project will set out the schedule for the organisation of local meetings at the stage of preparation of the investment project and its construction, and the dates of cyclical meetings with stakeholders.
- Local media, posters (in selected cases, after a decision made together with the Project Development and Operation Departments, as well as the Communication Department).
- The suppliers constitute both a group of stakeholders and entities conducting their own communication activities. Therefore, cooperation with suppliers in the field of communication

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|--|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

with stakeholders should be taken into account and constant internal communication should be conducted as part of the investment.

4.4.1. Communication tools

The manner of providing information will be adapted to the nature and type of the investment. The catalogue of tools that can be used under the Stakeholder Engagement Plan includes:

- individual meetings organised with selected stakeholders,
- consultation meetings and open events, such as conferences, open days, participation in public events organised by the local government,
- publishing a press release about the investment completion and providing information electronically to the local and regional media,
- distribution of leaflets, posters and information folders,
- information boards at the Municipality Office, the construction office and in the vicinity of the investment project,
- individual electronic or letter correspondence,
- permanent information point at the Municipality Office,
- Polenergia Group's ESG website ([ESG website \(polenergia.pl\)](https://www.polenergia.pl)),
- non-financial report of Polenergia Group.

5. Stakeholder Relationship Management Plan:


For each investment carried out or put into operation, the Environment and Sustainability Department will develop a Stakeholder Relationship Management Plan comprising the ESAP (Environmental and Social Action Plan) and the SEP (Stakeholders Engagement Plan). The aim of the Stakeholder Relationship Management Plan is to create a detailed stakeholder communication plan for each investment carried out within the Polenergia Group.

Stakeholder Relationship Management Plan should contain provisions reflecting the framework described in the Public Communication Plan. The Stakeholder Relationship Management Plan should indicate, for the purposes of the selected Project, the terms and conditions of communication with the Project stakeholders, in accordance with the requirements of Polish and international regulations, the Company's policy, the Group's ESG strategy and good practices.

5.1. Analysis of potential social conflicts

Carrying out an analysis of potential social conflicts is a key step in drawing up a plan for communicating with the residents at the investment preparation stage. The analysis of

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta POrczuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|--|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

potential social conflicts should be an integral part of the Stakeholder Relationship Management Plan, prepared for each Project.


The analysis of potential social conflicts contained in the Stakeholder Engagement Plan, prepared separately for each investment, should contain the following elements:

- A strategic context addressing the arguments of supporters and opponents of renewable energy sources for the selected investment. The analysis should include an assessment of similar investments in the region.
- A social analysis including an analysis of the administrative structure and the list of public and local government units that will be affected by the investment and whose representatives represent the Project stakeholders. The social analysis should include conclusions on demographic data (population structure, education data) and a socio-economic analysis of the region containing data on wealth, unemployment rate, forms of employment and the identification of socially excluded groups.
- Characteristics of the road infrastructure, space and landscape, planning and environmental conditions influenced by the construction or further maintenance of the investment.
- A detailed description of the social issues that may affect the implementation of the investment or its further operation.

5.2. Structure of the Stakeholder Relationship Management Plan

- I. Introduction to the Stakeholder Relationship Management Plan, containing the purpose of preparing the document and a detailed description of the investment project. The characteristics of the investment should include technical data, a description of the location of the investment project, actions taken so far and administrative and environmental procedures.
- II. A summary of the existing stakeholder engagement activities, including a description of the communication activities carried out in cooperation with specific target groups. List the institutions, offices, organisations and private bodies to which the communication activities were directed.
- III. Identification and list of target groups and the analysis of stakeholders taking into account the detailed characteristics of each stakeholder.
- IV. Social and economic analysis of the investment region, taking into account the specific characteristics of local communities, as well as social, age and wealth structures. The analysis should include a description of professional activity, employment and unemployment among the inhabitants of the municipality, a verification of the needs of social assistance centres and educational points.
- V. Analysis of social risks for investments, describing possible conflicts and methods of resolving them.

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta POrzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|--|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Communication Plan | Public INFORMATION I COMMUNICATION |

- VI. A social communication plan divided into target groups and stages of investment implementation.
- VII. A detailed schedule of implemented activities in accordance with the matrix of communication tools for selected target groups.
- VIII. Defining areas of cooperation as part of the implementation of the Polenergia Group's Social Engagement Policy.

Preparing the Stakeholder Relationship Management Plan is an integral stage of preparing the investment project. The Stakeholder Relationship Management Plan should be developed and implemented immediately after obtaining administrative approvals to start the construction of the Project.

The following documents are an integral part of the Stakeholder relationship Management Plan: ESAP and SEP developed by the Environment and Sustainability Department.

The rules for implementing the Stakeholder Relationship Management Plan will be agreed upon and adapted to a given Project in cooperation with Project Managers.

6. Consulting for Project Managers

The Project Manager should receive training on communication with stakeholders. The training shall aim at:

- sensitivity to communication,
- presentation of the significance of the dialogue with stakeholders,
- drawing attention to the most important aspects of communication,
- presentation of communication tools and their practical application.

Each Project Manager is obliged to read the Public Communication Plan.

Once a year, workshops on communication with Stakeholders will be organised, during which Project Managers will be able to acquire practical knowledge and discuss specific cases that occur in a given calendar year.


The ESG Team is responsible for the implementation of training regarding the Social Communication Plan, including the implementation of the Polenergia Group's Social Engagement Policy.

7. Appendices

The Social Engagement Policy of the Polenergia Group and the Grievance Procedure are attached to this Social Communication Plan.

7.1. Appendix No 1: Polenergia Group Social Engagement Policy.

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |

| | | |
|--|--|-----------------------------------|
|  | Procedure introducing procedure | No P-P063 |
| Date: 12.03.2024 | Polenergia Group Public Communication Plan | INFORMATION I COMMUNICATION |

7.2. Appendix No 2: Grievance Procedure

| | | | | | |
|---------------|--|------|------------|-----------|--|
| Developed by: | Marta PORzuczek | Date | 12.03.2024 | Signature | |
| Approved by: | <i>Management Board of Polenergia S.A.</i> | | | | |