



# STAKEHOLDER ENGAGEMENT PLAN

## H2HUB Nowa Sarzyna

DEVELOPED BY



CUSTOMER

Polenergia S.A.

SUBJECT

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SEP for H2Hub Nowa Sarzyna

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**SUMMARY**

This SEP document provides an overview of the project communication and stakeholder engagement to date, as well as the planned activities and grievance mechanism for the construction of an electrolysis-based green hydrogen production facility with a refuelling station in the city and municipality of Nowa Sarzyna, Leżajsk County, Subcarpathian Voivodeship.

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## List of abbreviations

RED II Directive	Directive of the European Parliament and of the Council on the promotion of the use of energy from renewable sources
ENS	Nowa Sarzyna Combined Heat and Power Plant
PV farm	Photovoltaic farm Nowa Sarzyna IIa
FI	Financial institutions
GBVH	Gender-Based Violence and Harassment
GMS	Grievance Management System
HRS	Hydrogen Refueling Station
MPK Rzeszów	Miejskie Przedsiębiorstwo Komunikacyjne Rzeszów Sp. z o.o.
NGOs	NGOs
EIA	Environmental impact assessment
PGW WP	Państwowe Gospodarstwo Wodne Wody Polskie
PGL LP	State Forest Enterprise (Państwowe Gospodarstwo Leśne Lasy Państwowe)
PR	Performance Requirements
PS	Performance Standards
RDEP	Regional Director for Environmental Protection
SEP	Stakeholder engagement plan

## 1 Introduction

This document is the Stakeholder Engagement Plan (SEP) for the Project consisting of:

- construction of an installation for the production of green hydrogen based on the electrolysis process together with a refuelling station on the premises of the town of Nowa Sarzyna;
- Nowa Sarzyna IIa photovoltaic farm with a capacity of up to 7<sup>1</sup> MW;
- a publicly accessible hydrogen filling station in Rzeszów.

The hydrogen production installation and PV farm are located in the town and municipality of Nowa Sarzyna, Leżajsk County, Subcarpathian Voivodeship. The second hydrogen filling station will be located on the premises of the bus depot of City Public Transport Company (Miejskie Przedsiębiorstwo Komunikacyjne) Rzeszów Sp. z o.o. (MPK Rzeszów) in Rzeszów - area 216 Rzeszów - Staromieście at ul. Lubelska 54. The aim of the Project is to produce green hydrogen in accordance with the provisions of the RED II Directive<sup>2</sup>, which will allow the production of hydrogen with minimal environmental impact. The hydrogen production installation will be powered primarily by a local photovoltaic farm. There is also the possibility of purchasing green energy from external suppliers from the market. The hydrogen production installation will therefore in practice only be powered by green electricity sources. The product produced will be made available to contractors via distribution infrastructure, including publicly accessible hydrogen refuelling stations in Nowa Sarzyna and Rzeszów to support the local development of hydrogen technology. The station in Rzeszów will be used, among others, to refuel city buses owned by MPK Rzeszów, contributing to the reduction of emissions and decarbonisation of the city's public transport system.

In order to build understanding, trust and support for the Project, and in accordance with relevant Polish law, international lender standards and internal corporate requirements of the Shareholders, this Plan sets out the objectives and process for information sharing and stakeholder engagement for the Project.

At the stage of development of this Plan, all elements of the Project have final environmental decisions. The SEP will be published (in both English and Polish) in accordance with international good practice. The SEP will be reviewed and updated as further permitting processes progress and as new information on Project stakeholders becomes available. Going forward, the SEP will be updated at least prior to the commencement of construction and operational activities to reflect changes in stakeholders and planned engagement at each stage.

### 1.1 SEP preparation methodology

This SEP was prepared by the team of Sotis Advisors sp. z o.o. (Klaudia Drosio and Anita Kuliś, Polish environmental and social experts) in September/October 2024. The document includes a detailed desk review of the environmental decision-making (EIA) processes, stakeholder engagement to date, as well as planned activities. Knowledge and experience from other projects has also been used. The SEP is consistent with the EBRD Policy.

A site visit to: the Polenergia Elektrociepłownia Nowa Sarzyna plant (Nowa Sarzyna CHP plant), the location of the PV farm, the bus depot of MPK Rzeszów took place on 12-13 and 27 September 2024 and an interview with

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<sup>1</sup> Pursuant to the decision on environmental conditions of 31 January 2024, mark: RIG.6220.7.2023, entitled: 'Construction of a Nowa Sarzyna IIa photovoltaic farm with a capacity of up to 8 MW, located within Jelna, commune of Nowa Sarzyna, together with land development and infrastructure'- In accordance with the environmental decision, the maximum power output of the power plant may be up to 8 MW. At the current stage of design it is known that the construction project will assume a power plant capacity of up to 7 MW.

<sup>2</sup> Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources

the Mayor of the City and Municipality of Nowa Sarzyna on 27 September 2024. During the visit, local stakeholders affected by the Projects were interviewed. A brief summary of the results of the stakeholder surveys is presented in the table below:

Table 1 Stakeholder consultations for SEP preparation

Stakeholder	Date	Issues raised
MPK Rzeszów Sp. z o.o.	12.09.2024	<ul style="list-style-type: none"> <li>• Location of the development;</li> <li>• Attitudes towards the Project, including hydrogen technologies in general;</li> <li>• Potential benefits from the availability of new technology on site.</li> </ul>
Nowa Sarzyna Combined Heat and Power Plant	13.09.2024	<ul style="list-style-type: none"> <li>• Location of the development;</li> <li>• Attitudes towards the Project, including hydrogen technologies in general;</li> <li>• Potential benefits from the availability of new technology on site;</li> <li>• Technological adaptation of the ENS plant for the use of hydrogen technologies;</li> <li>• Polenergia Group's commitment to social issues;</li> <li>• Communication with the local community.</li> </ul>
Mayor of the City and Municipality of Nowa Sarzyna	27.09.2024	<ul style="list-style-type: none"> <li>• Proceedings of the information meeting with the inhabitants of Jelna on 17.04.2023;</li> <li>• Concerns of the local community about the construction of the PV farm;</li> <li>• Ways to improve the reception of investments by the local community.</li> </ul>

Source: Sotis Advisors, 2024

## 1.2 Project overview

The project consists of 3 component investments:

1. H2Hub Nowa Sarzyna - Construction of a green hydrogen production facility based on the electrolysis process, together with a hydrogen refuelling station;
2. Nowa Sarzyna IIa - Construction of a photovoltaic farm with a capacity of up to 7 MW located within Jelna, Nowa Sarzyna commune, together with land development and infrastructure, as well as a medium voltage cable line and fibre optic lines, located within Nowa Sarzyna, Wola Zarczycka, Jelna, Nowa Sarzyna commune;
3. Construction of a publicly accessible hydrogen refuelling station in Rzeszów.

Separate official proceedings are being conducted for each of the investments. These are separate projects together forming a system to support the development of hydrogen technology.

### H2Hub Nowa Sarzyna

The planned installation for the production of green hydrogen together with a refuelling station comprises a comprehensive production and distribution system located on the premises of Nowa Sarzyna CHP plant and the Qemetica company. The installation will produce hydrogen both for the needs of the Nowa Sarzyna CHP plant and for external customers. The project envisages the construction of an electrolyser, buffer and storage tanks, a compressor shed and an electricity container. In addition, process pipelines and technical infrastructure will be installed, including walkways, service roads and electrical and fire protection installations. The entire project will occupy an area of approximately 8,400 m<sup>2</sup>, of which approximately 4,150 m<sup>2</sup> will be converted into built-up and paved areas and the rest will be used for low-growing greenery. The project also requires the felling of trees.

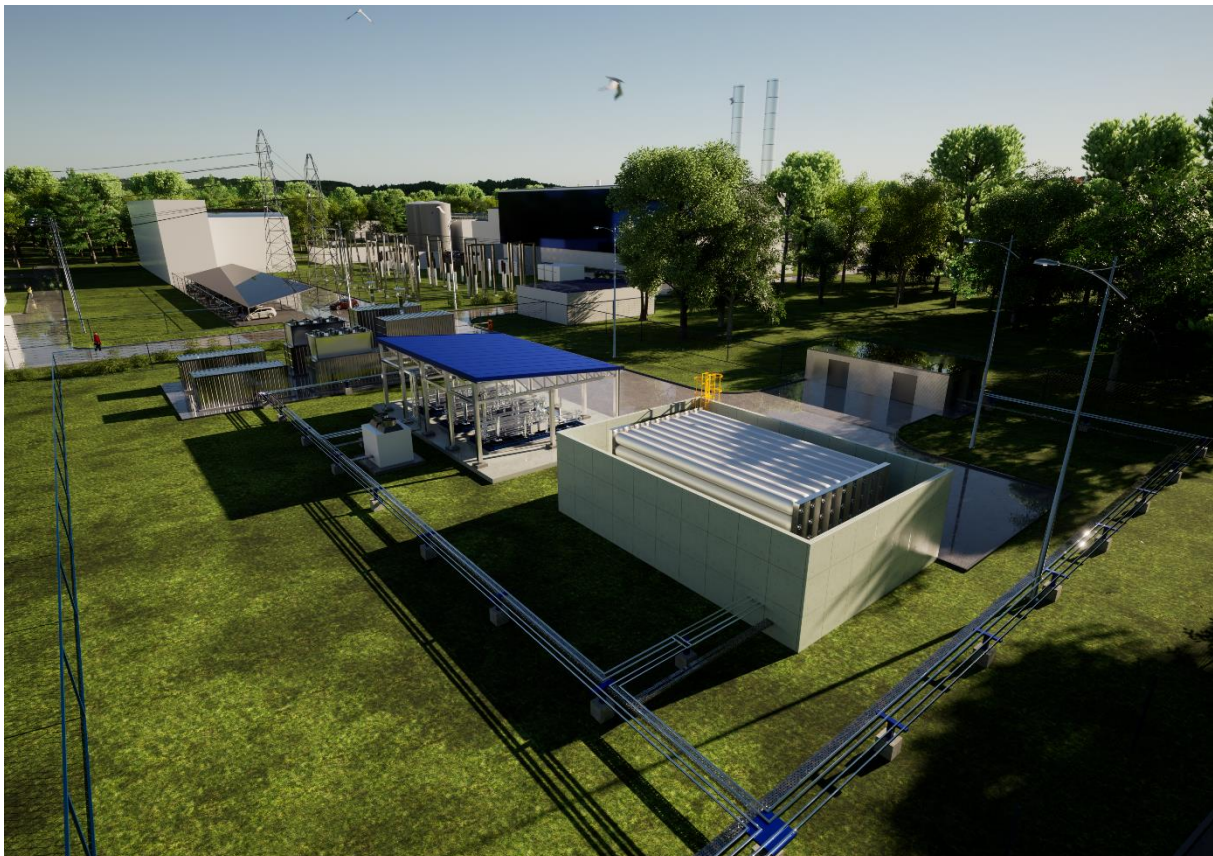
SEP for H2Hub Nowa Sarzyna

Table 2 Key technical information for the hydrogen plant

Element	Description
Surface	Approximately 8,400 m <sup>2</sup>
Building area	Approximately 4,150 m <sup>2</sup>
Green area	Approximately 4,250 m <sup>2</sup>
Main elements	Electrolyser, buffer/storage tank, power container, compressors
Associated infrastructure	Footpaths, service roads, technical installations, fencing
Features	Hydrogen production, storage, distribution, co-firing in a CHP plant
Location	Polenergia CHP Nowa Sarzyna plant

Source: Sotis Advisors, 2024

Figure 1 Visualisation of H2Hub , with visualisation of ENS buildings and installations in the background



Source: Polenergia, 2024



Figure 2 Visualisation of H2Hub with hydrogen refuelling station, in the background visualisation of ENS buildings and installations



Source: Polenergia, 2024

**PV farm Nowa Sarzyna IIa**

The planned photovoltaic farm in the municipality of Nowa Sarzyna will consist of several key components, including photovoltaic panels, prefabricated support structures, inverters and containerised transformer stations. The installation also includes technical infrastructure such as cabling, monitoring installation, as well as optional energy storage . The farm will cover an area of up to 5.71 ha and will be located on agricultural land. The project will have the option to be phased, allowing flexible management of the farm's construction and operations. The photovoltaic farm will be connected to a medium-voltage switchgear near the electrolyser. Safeguards will be installed to prevent the introduction of excess electricity into the grid. The investor allows for the possibility of implementing the investment in a division of 1 to 7 stages. Each stage will include the construction of photovoltaic farms with dedicated containerised transformer stations. They will be designed in such a way that each stage will have a complete technical infrastructure and will be able to function as a stand-alone, independent power plant.

Table 3 Key technical information for Nowa Sarzyna PV Farm IIa

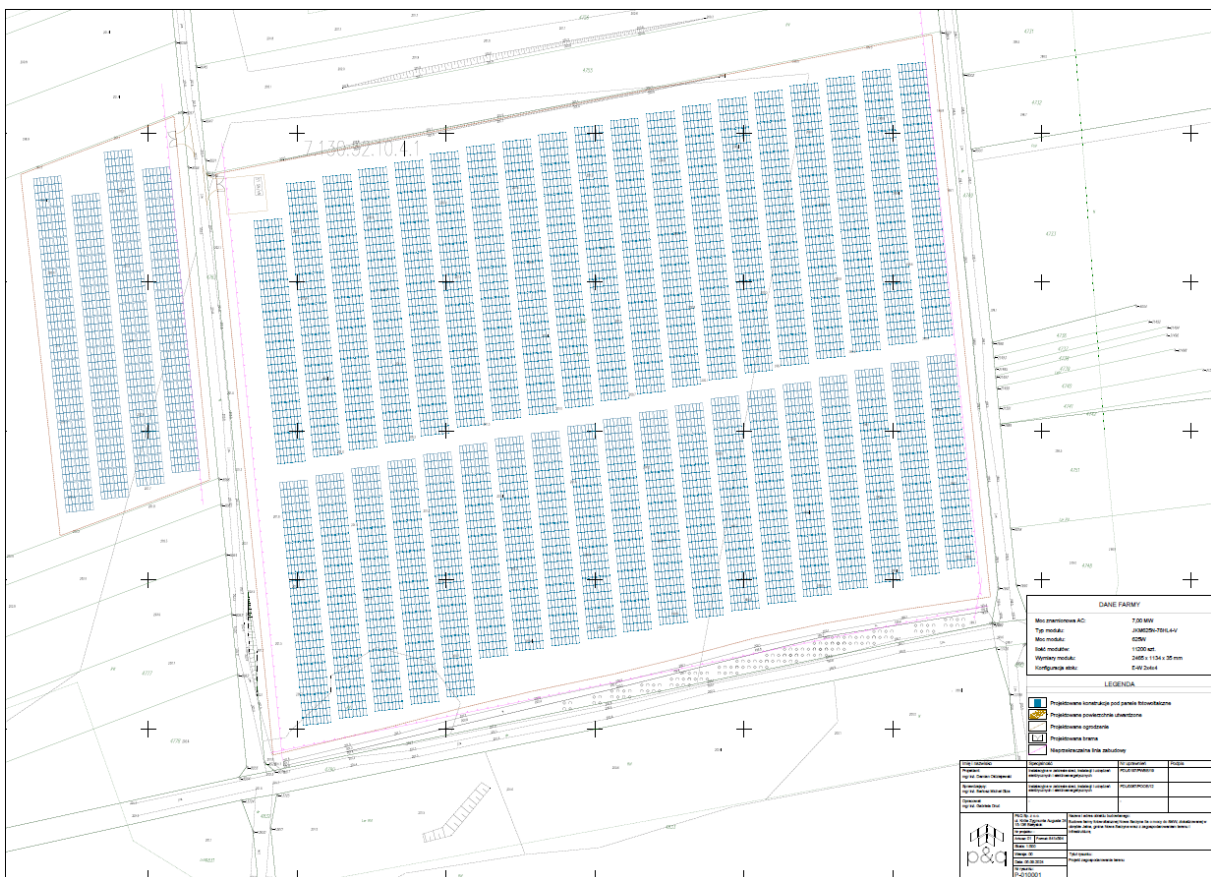
Element	Description
Power	Up to 7MW
Number of modules	Up to 32 000
Panel height	Up to 7 m
Number of inverters	Up to 160 pieces

SEP for H2Hub Nowa Sarzyna

Element	Description
Transformer stations	Up to 16 units
Farm area	Up to 5.71 ha
Location	Plots No. 4750, 4770 Jelna, Nowa Sarzyna municipality
Anticipated energy storage	Up to 100% of the total installed capacity of the farm, up to 10h of operation
Current land use	Agricultural land used to grow cereals and buckwheat

Source: Sotis Advisors, 2024

Figure 3 Development of the photovoltaic farm site



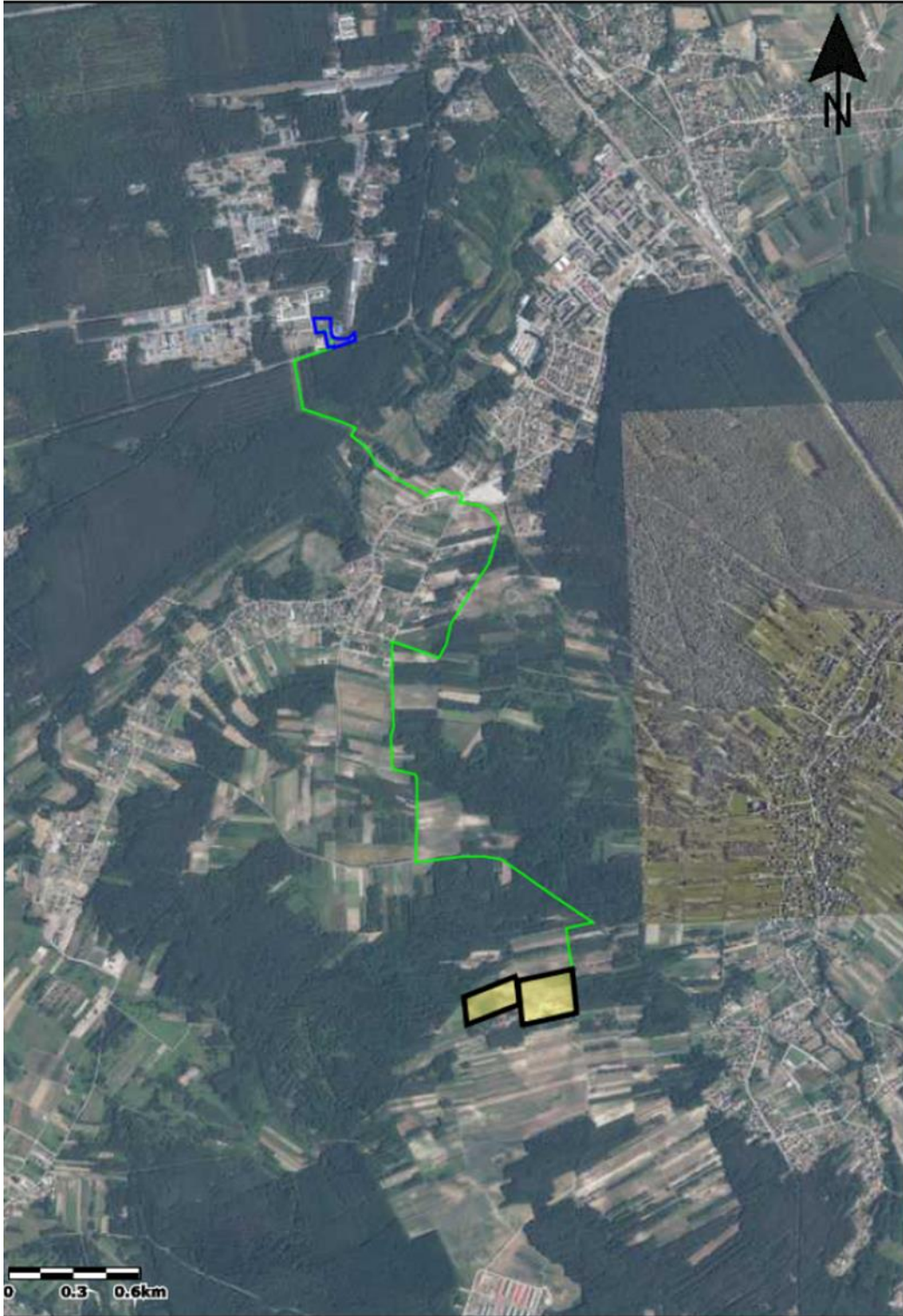
Source: Polenergia, 2024

SEP for H2Hub Nowa Sarzyna

Drawing 4 Cable route concept connecting PV farm and ENS

Blue color - H2HUB Nowa Sarzyna,  
green color - medium voltage cable line,  
yellow color - area designated for a  
photovoltaic farm.

739284,11 278908,23



735077,77 272955,10

Source: Polenergia, 2024

### Hydrogen refuelling station in Rzeszów

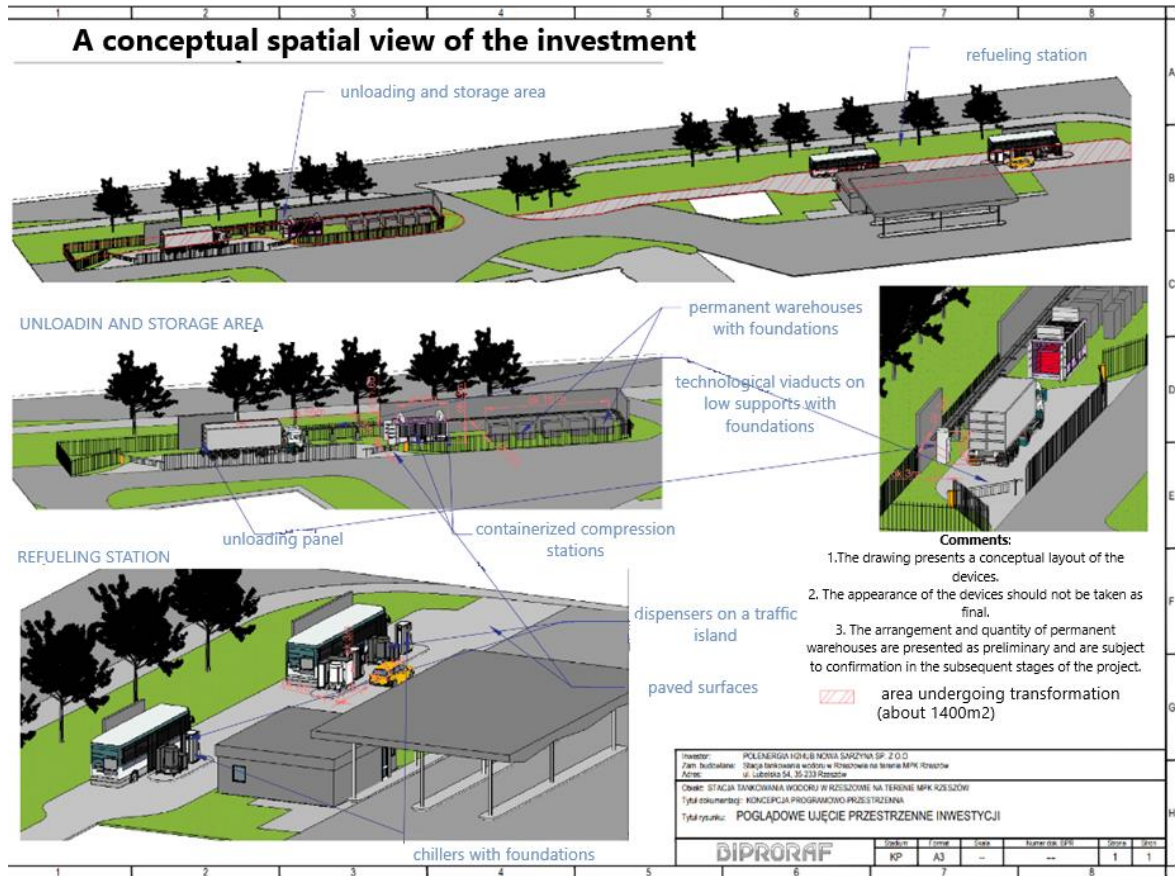
The planned project involves the construction of a hydrogen refueling station (HRS) on the site of the existing MPK Rzeszów bus depot. The station will supply hydrogen to city buses, passenger vehicles and eventually heavy goods vehicles. It will be a public station, planned to operate 24 hours a day, 7 days a week. The project includes the implementation of hydrogen storage infrastructure, a compression station, an unloading panel and vehicle refuelling dispensers. Hydrogen will be supplied to the station by mobile storage units (battery trucks), which will be filled at the H2Hub, located on the premises of the Nowa Sarzyna CHP plant. The entire development will occupy an area of up to 5100 m<sup>2</sup>, which currently includes green areas and paved parking areas.

Table 4 Key technical information for hydrogen refuelling station

Element	Description
Location	MPK Rzeszów bus depot, ul. Lubelska 54, Rzeszów
Surface	Up to 5100 m <sup>2</sup>
Possibility of refuelling	930 kg H <sub>2</sub> per day
Hydrogen capacity	400 kg of hydrogen in fixed tanks
Mobile hydrogen storage facilities	Battery trucks with 625 kg H <sub>2</sub> capacity, working pressure 300 bar
Compression station	900 bar compressors, 20 ft container body
Distributors	2 HDV dispensers (350 barg), 1 LDV dispenser (350 barg)
Associated infrastructure	Access roads, pavements, above- and underground utilities, fencing, lighting

Source: Sotis Advisors, 2024

Figure 5 View of a hydrogen refuelling station in Rzeszów



Source: Polenergia, 2024

### 1.3 Impact of the project on protected areas

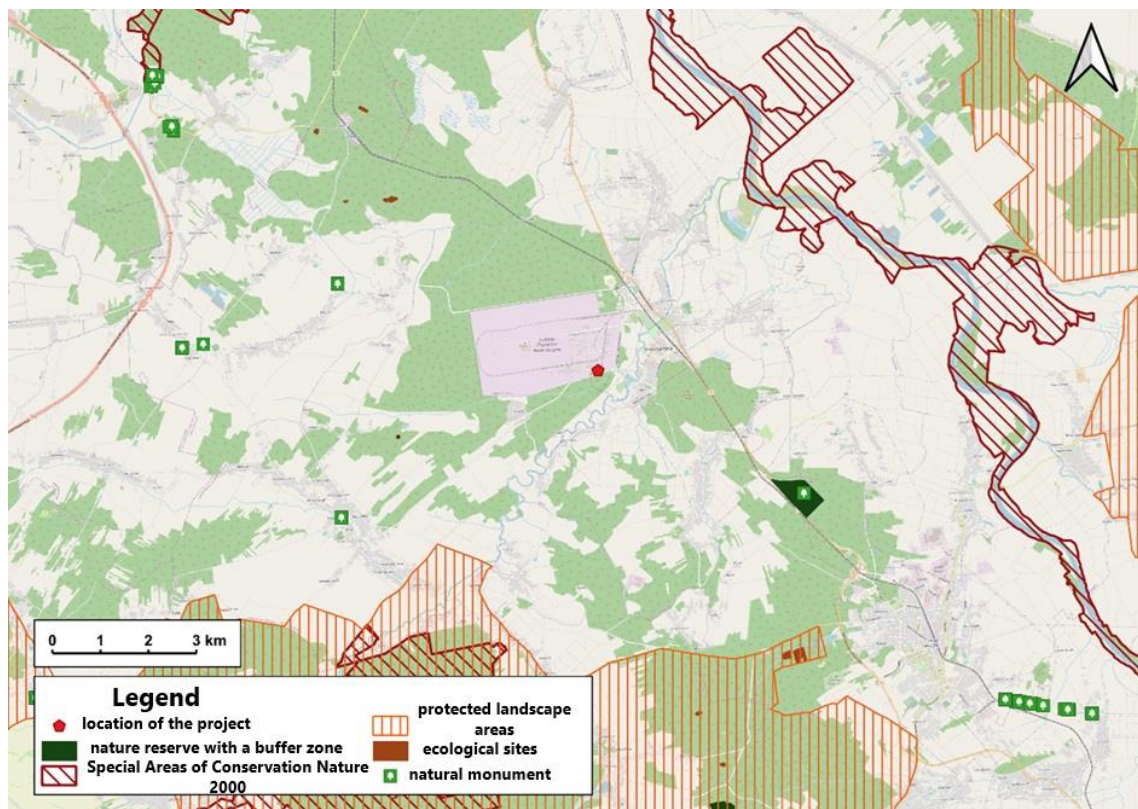
#### H2Hub Nowa Sarzyna

The planned project is located in an industrial area. It is not located within the boundaries of any protected areas<sup>3</sup>, including Natura 2000 sites. The closest form of nature conservation is the Las Klasztorny nature reserve at a distance of approximately 4.1 km to the south-east of the planned project.

Due to the location of the planned project outside the forms of nature conservation, the scale and nature of the planned project and the current development of the area where the planned project will be carried out, it will not affect the forms of nature conservation, including Natura 2000 areas, at any stage.

<sup>3</sup> Act of 16 April 2004 on nature protection, (Journal of Laws of 2023, item 1336, as amended).

Figure 6 H2Hub Nowa Sarzyna against the background of protected areas



Source: EIA report for H2Hub, 2022

**PV farm Nowa Sarzyna IIa**

The planned investment is located outside the range of areas protected under the provisions of the Nature Conservation Act of 16 April 2004. The project is located within the range of designated ecological corridors.

An analysis of the distance of the project site from the nearest protected areas has shown that the project is not likely to affect the nearest biologically valuable areas.

Figure 7 PV farm against a background of protected areas



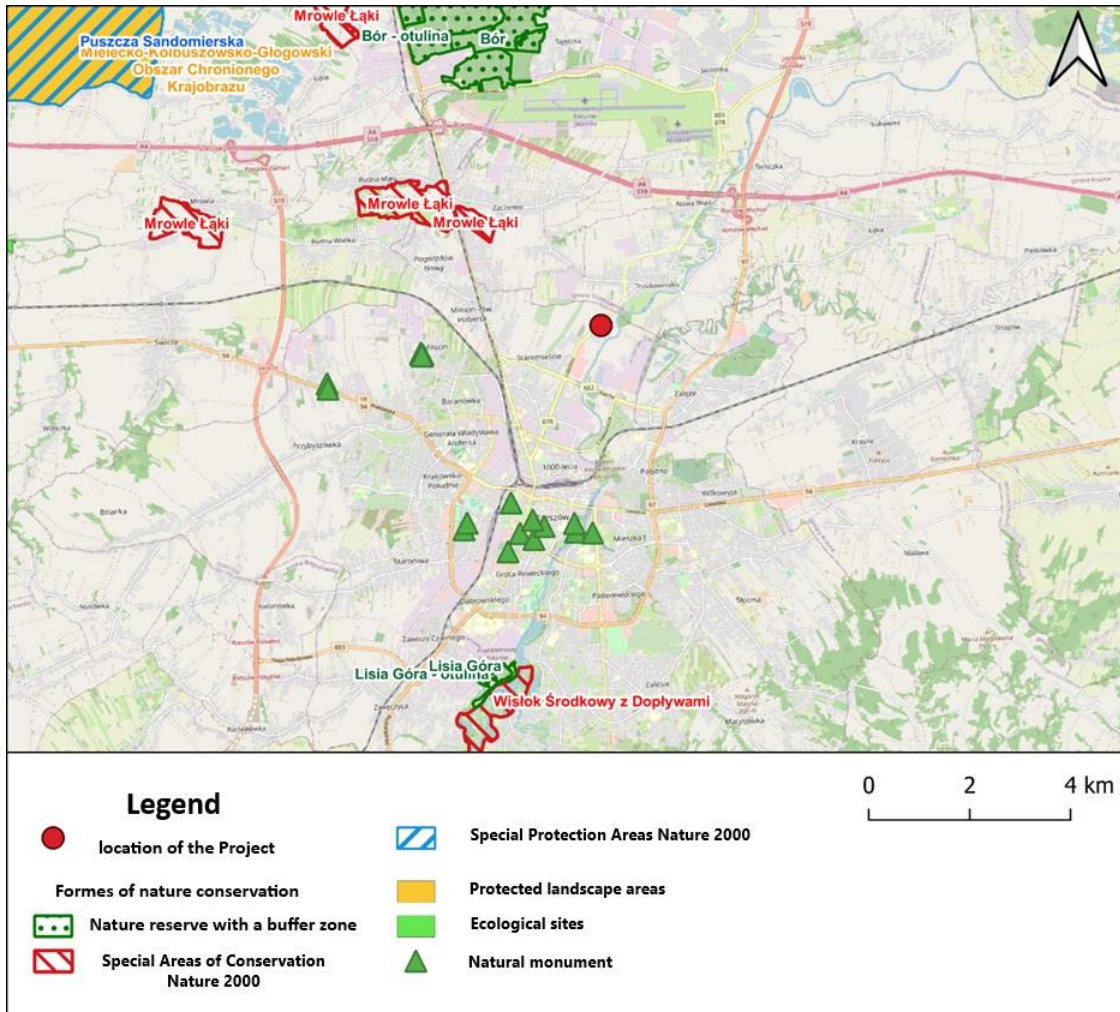
Source: KIP for Nowa Sarzyna PV Farm IIa, 2023

### Hydrogen refuelling station in Rzeszów

The planned project is located on the grounds of MPK Rzeszów, on a partly unpaved area. It is located outside the boundaries of areas subject to protection under the Act. on Nature Protection. The closest is the Mrowle Łąki PLH180043 Natura 2000 site at a distance of approximately 2.7 km to the north-west.

Due to the location of the planned project outside the forms of nature conservation, the scale and nature of the planned project and the current development of the area where the planned project will be carried out, it will not affect the forms of nature conservation, including Natura 2000 areas, at any stage.

Figure 8 Hydrogen refuelling station in Rzeszów in the background of protected areas



Source: KIP for Rzeszów Hydrogen Refuelling Station, 2023

### 1.4 Demographic structure in the Project area

The demographic structure of the municipalities affected by the Project is presented below. The data comes from data compiled by the portal Poland in numbers based on the reports of the Central Statistical Office<sup>4</sup> and the Statistical Bulletin of the Podkarpackie Voivodeship .<sup>5</sup>

#### City of Rzeszów<sup>6</sup>

##### 1. Demographics

**Population** 197,536 inhabitants

**Age structure:** 52.5% of Rzeszów's population is female and 47.5% male. Between 2002 and 2023, the number of inhabitants increased by 23.6%. The average age of residents is 40.4 years and is comparable to the average age of residents of the Podkarpackie Voivodeship and slightly lower than the average age of residents of Poland as a whole.

<sup>4</sup> [Central Statistical Office / Subject areas / Labour market](#)

<sup>5</sup> [Statistical Office in Rzeszów](#)

<sup>6</sup> <https://www.polskawliczbach.pl/Rzeszow>



59.7% of Rzeszów's population is of working age, 19.0% is of pre-working age and 21.4% is of post-working age. The city shows an ageing population trend, typical of urban areas in Poland.

**Education:** Rzeszów is one of the important academic centres, with around 11,000 students graduating from Rzeszów universities each year, which influences the demographic structure and the supply of skilled labour. Compared to the entire Podkarpackie Voivodeship, Rzeszów residents have a significantly higher level of education. Women living in Rzeszów have the highest percentage of tertiary education (46.2%) and secondary vocational education (15.4%). Men most often have tertiary education (40.4%) and secondary vocational education (21.4%).

## 2. Socio-economic analysis

**Unemployment:** There are 471 people working per 1,000 inhabitants in Rzeszów. 49.7% of the total employed are women and 50.3% are men. Registered unemployment in Rzeszów was 4.1% in 2023. This is significantly lower than the registered unemployment rate for the Podkarpackie Voivodeship and significantly lower than the registered unemployment rate for Poland as a whole.

**Employment:** In 2022, the average gross monthly salary in Rzeszów was 6508.96 PLN, which corresponds to 97.1% of the average gross monthly salary in Poland. Most Rzeszów residents are employed in the service sector (trade, vehicle repair, transport, accommodation and catering, information and communication) (26.1%) and in industry and construction (24.8%).

**Social exclusion:** The main groups at risk of social exclusion in the region are the elderly, the long-term unemployed and residents of rural areas connected to the city.

### Municipality and town of Nowa Sarzyna<sup>7</sup>

#### 1. Demographics at the end of 2023. :

**Population:** Nowa Sarzyna has a population of approximately 21,000.

**Population structure:** 50.4% of the inhabitants of the Nowa Sarzyna municipality are women and 49.6% are men. Between 2002 and 2023, the number of inhabitants decreased by 2.9%. The average age of the inhabitants is 40.4 years and is comparable to the average age of the inhabitants of the Podkarpackie Voivodeship and slightly lower than the average age of the inhabitants of Poland as a whole. 60.8% of the inhabitants of the Nowa Sarzyna municipality are of working age, 19.2% are of pre-working age and 19.9% are of post-working age.

#### 2. Socio-economic analysis

**Unemployment:** In the municipality of Nowa Sarzyna, 108 people per 1,000 inhabitants are working. 45.6% of the total employed are women and 54.4% are men. Registered unemployment in the municipality of Nowa Sarzyna was 14.5% in 2023.

**Wealth and forms of employment:** In 2022, the average gross monthly salary in the municipality of Nowa Sarzyna was 5374.02 PLN, which corresponds to 80.1% of the average gross monthly salary in Poland. The economy of the region is mainly based on the industrial sector (chemical and food) (26.4% of the economically active population) and agriculture (25.6% of the economically active population).

**Social exclusion:** the groups most at risk of social exclusion are the elderly, young people leaving school without the possibility of continuing their higher education, and people on work/job contracts and in precarious forms of employment.

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<sup>7</sup> [https://www.polskawliczbach.pl/gmina\\_Nowa\\_Sarzyna](https://www.polskawliczbach.pl/gmina_Nowa_Sarzyna)

## 1.5 Additional information about the Project

Project disclosure enables stakeholders to understand both the environmental and social risks and impacts of the project, as well as the opportunities it presents.

To ensure transparency and access to information at all stages of the Project's development - from planning to construction and operation - Polenergia has implemented the following measures:

- Maintain ongoing contact with stakeholders: local and regional authorities, landowners, educational institutions;
- Provide up-to-date information about the Project on the website: <https://www.polenergia.pl/nasze-aktywa/wytwarzanie/kogeneracja-gazowa-technologie-wodorowe/>;
- Provide updates related to the Project through various channels, including:
  - National, regional and local newspapers and web portals;
  - Information leaflets.

According to the requirements of potential lenders, an additional documentation package should be made public (at least: on the website of the lender and the Investor). The documents will be available in Polish and English:

- Stakeholder engagement plan - this document;
- Non-Technical Summary (NTS) - providing an overview of the Projects in non-technical language.

## 2 National and international requirements

The chapter identifies key international and national requirements relevant to the preparation of a Stakeholder Engagement Plan (SEP). These include, but are not limited to, obligations for public information and participation and involvement of statutory stakeholders in the project preparation and implementation process.

### 2.1 International Conventions and European Directives

International legal requirements for public participation

The international legal requirements for public participation that applied to the Project are set out in the following documents:

- Directive 2003/35/EC of 26 May 2003 providing for public participation in the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice Council Directives 85/337/EEC and 96/61/EC - provides for public participation in relation to individual decisions and programmes, provides for public participation at an early stage, gives the opportunity to submit comments and proposals, and sets out rules for the participation of environmental non-governmental organisations (NGOs).
- Aarhus Convention - Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Official Gazette 2003, No. 78, item 706); the Convention facilitates the participation of non-governmental organisations in the decision-making process; ensures that assessment procedures are followed; provides for the need for consultation and access to information; ensures public participation in the preparation of plans, programmes and guidelines relating to the environment, as well as in the preparation of legislation.
- Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (consolidated version), EIA Directive.

### 2.2 Legal framework in Poland

According to Polish law, the public has the opportunity to participate in the process of creating strategic documents and in the course of obtaining an environmental decision for a given project. The above projects have not been subjected to a strategic assessment.

The main national regulations governing public participation in the decision-making process for elements of the Project are:

- The Constitution of the Republic of Poland of 2 April 1997 (Journal of Laws No. 78, item 483, as amended), which states that a citizen has the right to obtain information on the activities of public authorities; furthermore, its Article 74 indicates that 'everyone has the right to information on the state and protection of the environment'.
- Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments (consolidated text: Journal of Laws 2023, item 1094, as amended). The Act implements, inter alia, Directive 2001/42/EC, Directive 2011/92/EU and the Aarhus Convention. On its basis, an environmental impact assessment process is carried out, including public participation and information at the stage of the proceedings for individual projects requiring an EIA.
- Environmental Protection Law of 2001 (OJ 2024, item 54, as amended) regulating the disclosure of information on the state of the environment and public involvement in environmental protection, until the entry into force of the Information Disclosure Act of 3 October 2008.
- The Spatial Planning and Development Act of 2003 (OJ 2024, item 1130, i.e.), which establishes standards for the disclosure of information related to the creation of spatial development plans.

The aforementioned legal acts indicate the requirements for public authorities, but do not specify the detailed obligations of investors. The main requirement for investors is to comply with the law and the requirements set out by the administrative authorities, in particular to prepare and submit appropriate documentation. According to Polish law, public consultations are an integral part of the investment process. If a planned investment may potentially have a negative impact on the environment, public consultations are part of the environmental impact assessment carried out for the project.

### 2.3 Policies and guidelines of international lenders

The requirements for public consultation for financial institutions (FIs) are broader than those under Polish law. The main differences can be summarised as follows:

- **Stakeholder consultation** is treated as an ongoing process throughout the project life cycle. It is mandatory to ensure that stakeholders have access to the social and environmental impact analysis of the project and that they are able to respond to comments or complaints.
- **Systematic identification of stakeholders** and ongoing anticipation of their expectations and concerns. Particular emphasis is placed on informing those groups in society that will be directly affected by the project or are vulnerable/unprivileged.
- **The need for a complaints mechanism.**

The European Bank for Reconstruction and Development (EBRD) has adopted a comprehensive set of specific performance requirements (PRs) that projects must meet. The EBRD's PR 10 requirement for disclosure and stakeholder engagement covers stakeholder identification and analysis, stakeholder engagement planning, disclosure, consultation and participation, grievance mechanism and ongoing stakeholder reporting.

### 2.4 Current status of permits and consultations under the EIA procedure

According to the provisions of the EIA Act, a full environmental impact assessment procedure must be carried out for projects that may always have a significant impact on the environment (Group I projects), or may be carried out at the discretion of the competent authorities for investments that may potentially affect the environment (Group II projects), or may only affect a Natura 2000 site (Group III). Investments with a potential impact on the environment can only result in an environmental decision after a screening procedure, which took place in the case of the analysed PV installation and hydrogen refuelling station in Rzeszów, or after a full environmental impact assessment, which took place in the case of the electrolyser installation.

Decisions on environmental conditions were issued on the basis of opinions and agreements of co-operating bodies: Regional Director for Environmental Protection (RDOŚ), the State District Sanitary Inspector and the State Water Management Company Wody Polskie (PGW WP).

A brief description of the administrative procedure for issuing the decisions for the individual elements of the Project is provided below. The issuance of three separate decisions on environmental conditions for this Project is justified in terms of content and administration due to the geographical location of the Project elements (different competences of the authorities). In this case we are not dealing with the so-called "salami slicing".

#### H2Hub Nowa Sarzyna

On 8 December 2022, proceedings were commenced with a view to issuing a decision on environmental conditions for the undertaking entitled: "H2Hub Nowa Sarzyna - construction of a green hydrogen production installation based on the electrolysis process together with a hydrogen filling station". The project is an investment which may always have a significant impact on the environment, for which an environmental impact assessment is obligatory. The application for issuing a decision on environmental conditions for the project in

question was placed on the publicly available data list<sup>8</sup> about documents (card no. 13/2022), information on the report on the environmental impact of the project for the project in question was placed on the publicly available data list about documents (card no. 14/2022).

On 12 May 2023r. The Mayor of the City and Municipality of Nowa Sarzyna made public information on the public participation procedure conducted. Consultations lasted 30 days. No comments and applications to the project were submitted. On 19.06.2023. The Mayor of the Town and Municipality of Nowa Sarzyna issued a notice-notice on completion of administrative proceedings in the case in question. The notices were made available through the website of the Town and Municipality of Nowa Sarzyna, the notice board at the Town and Municipality Office and the Applicant's notice board.

On 2 August 2023. The Mayor of the Town and Municipality of Nowa Sarzyna, having carried out an environmental impact assessment and having consulted the relevant authorities and obtained agreement on the conditions of implementation with the Regional Director of Environmental Protection` in Rzeszów, issued a decision on environmental conditions sign: RIG.6220.8.2022.

### **PV farm Nowa Sarzyna IIa**

On November 3, 2023, proceedings were commenced with regard to the issuance of a decision on the environmental conditions of consent for the execution of the undertaking entitled: "Construction of Nowa Sarzyna IIa photovoltaic farm with a capacity of up to 8 MW, located within Jelna, commune of Nowa Sarzyna, along with land development and infrastructure". The application for issuing a decision on environmental conditions for the said project has been placed on the publicly available register of documents<sup>9</sup> (card: 19/2023).

On 3.01.2024. a notice of completion of the administrative proceedings in the case was published. From the date of initiation of the proceedings to the date of issuing the decision on environmental conditions, the parties to the proceedings did not make any motions, comments and objections to the proceedings on issuing the environmental decision.

On 31 January 2024. On 31 January 2024 the Mayor of the Town and Municipality of Nowa Sarzyna, having consulted the relevant authorities, indicated that there was no need to carry out an environmental impact assessment and, in his letter ref: RIG.6220.7.2023. specified the essential conditions of use of the environment for the project entitled: "Construction of the photovoltaic farm Nowa Sarzyna IIa with a capacity of up to 8 MW, located within Jelna, commune of Nowa Sarzyna together with land development and infrastructure", mark: RIG.6220.7.2023.

### **Hydrogen refuelling station in Rzeszów**

On 15 September 2023, the procedure for issuing a decision on environmental conditions for the undertaking entitled: 'Construction of a public hydrogen filling station in Rzeszów' was initiated. Relevant information on the application in question was placed in the publicly available register of data on documents containing information on the environment and its protection - 557/2023. No comments or objections were filed during the period when the application was made available.

On 8 December 2023. The Mayor of the City of Rzeszów notified the parties to the proceedings on completion of the collection of evidence in the case in question and on the opportunity to comment on the collected evidence and materials. Within the statutory period of 7 days from the date of delivery of the aforementioned notice, no comments or motions were filed.

On 5 February 2024. The Mayor of the City of Rzeszów, having consulted the relevant authorities, indicated that there was no need to carry out an environmental impact assessment and, by letter no: KŚ-K-O.6220.43.2023

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<sup>8</sup> <http://www.bip.nowasarzyna.eu/> , tab Environmental protection, Environmental information

<sup>9</sup> <http://www.bip.nowasarzyna.eu/> , tab Environmental protection, Environmental information

determined the essential conditions of use of the environment for the project entitled "Construction of a public hydrogen refuelling station in Rzeszów".

### 3 Identification and categorisation of stakeholders

Methodology:

- Chamber work - analysis of similar projects, Project documentation received from Polenergia S.A.;
- Results of the stakeholder analysis prepared by Polenergia for the environmental impact assessment;
- Consultant's knowledge and experience from previous similar projects.

On this basis, external stakeholder groups were identified, as shown in the table below. It does not include other stakeholders such as client employees or contractors/subcontractors. It should be noted that some stakeholders may be listed in more than one category/group as they may have different links to the Projects. In Appendix A, you will find the full register of Project stakeholders that have been identified to date. The Stakeholder Register will be updated throughout the life cycle of the Projects, according to the results of the activities carried out.

#### 3.1 Identification and categorisation of stakeholders

The figure below shows the key external stakeholders identified for the Project and their categorisation.

Table 5 Overview of the identification and categorisation of key stakeholders

		Type		
		Negative	Neutral	Positive
Impact	High		<ul style="list-style-type: none"> <li>• Minister for Climate and Environment,</li> <li>• Development banks</li> <li>• Lenders</li> </ul>	
	Medium	<ul style="list-style-type: none"> <li>• People and groups affected by the project</li> </ul>	<ul style="list-style-type: none"> <li>• Political parties and their leaders and local representatives</li> <li>• National, regional and local media</li> </ul>	<ul style="list-style-type: none"> <li>• Mayor of the City and Municipality of Nowa Sarzyna</li> <li>• Mayor of Lezajsk ;</li> <li>• Polenergia Elektrociepłownia Nowa Sarzyna sp z o o;</li> <li>• MPK Rzeszów</li> </ul>
	Low	<ul style="list-style-type: none"> <li>• Landowners</li> </ul>	<ul style="list-style-type: none"> <li>• NGOs and associations working in the thematic or regional scope of the Project</li> <li>• Local business</li> <li>• Local community</li> </ul>	<ul style="list-style-type: none"> <li>• Subcarpathian Hydrogen Valley Association</li> <li>• I Secondary School in Nowa Sarzyna</li> </ul>

Source: Sotis Advisors based on Polenergia, expert analysis, 2024

The development of the Project does not require the resettlement of people or businesses - no physical or economic resettlement has taken place and will not be necessary in the future. The land required for all elements of the Project has been acquired through long-term lease agreements signed with landowners.

For the Project identified:

1. Direct socio-economic impacts on the development of municipalities and local residents. The following direct impacts were identified:
  - a. Increased revenue for the municipality through taxes paid by the operator for business activities in the area;
  - b. use of environmentally friendly hydrogen technology to refuel city buses in Rzeszów;

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- c. the possibility for private operators to use a public refuelling station in Rzeszów and Nowa Sarzyna.
2. An increase in annual income for the municipality (lease agreement) and one-off payments to landowners (transmission easement) along the route of underground installations and cables.
3. Direct socio-educational impact related to the involvement of the Company and Polenergia S.A. Group in the life of local communities
  - a. Implementation of activities related to the educational project "Play green with us!" („Graj z nami w zielone!") implemented in primary schools and kindergartens;
  - b. Cooperation with the Secondary School No. I in Nowa Sarzyna;
  - c. Participation in business conferences;
  - d. Supporting local communities through the implementation of Polenergia Group's Community Engagement Policy.
4. Direct impact on the increase of biodiversity in the region.

A potential negative social impact is the reduction of the area of land used for agricultural purposes, but this is compensated by the land rent paid to the owners. It should be noted that only low quality land (class RV, RVI) is used for photovoltaic farms. The area occupied by photovoltaic panels and infrastructure is limited and agricultural activities can continue around the installations. Other elements of the Project are located on land currently in industrial use. As a result of the Project, trees will need to be removed from the ENS site. For this reason, greenery planting is planned.

In addition, there may be some negative social impacts during the construction phase of the Project due to nuisance from increased traffic.

Due to long-term cooperation with the Nowa Sarzyna municipality, Polenergia supports activities related to the care of the Kołaczna Nature Reserve, where a unique stand of yellow azalea (*Rhododendron luteum*), the only one of its kind in the country, is located. Thanks to the commitment of Polenergia and cooperation with UNEP-GRID Warsaw, shrubs competing with the rhododendron have been completely removed, including American black cherry and acacia robinia bushes, as well as blackberry and wild hops regrowth. Successful eradication measures of invasive plants have covered 100% of the reserve area. There are plans to work with the municipality of Nowa Sarzyna to promote and further care for the rhododendron.

In summary, project stakeholders are mainly local communities and immediate neighbours, local businesses, as well as local authorities and regional institutions involved in the environmental decision-making process.



## 4 Stakeholder involvement

### 4.1 Stakeholder involvement to date

Polenergia S.A. is the sole shareholder of Polenergia H2Hub Nowa Sarzyna sp. z o.o., holding all shares. All frameworks on how stakeholders are involved and how the SPVs engage with the local community are set out in existing policies and procedures created for the Polenergia Group or for Polenergia S.A.. This ensures that all Companies are subject to the same internal regulations.

Thus, the way in which stakeholders are identified and involved, the way in which comments and complaints are raised, and the ways in which social and environmental activities are implemented for the Project in question are set out in:

- Polenergia Group's Social Communication Plan;
- The complaints and applications procedure;
- Procedure for anonymous reporting of violations of the law;
- Polenergia Group's biodiversity strategy;
- Environmental and social policy;
- Polenergia Group's Community Involvement Policy;
- Polenergia Group's Health and Safety Policy;
- Occupational risk assessment procedure;
- Procedure for health and safety requirements for projects under construction;
- Anti-corruption policy,
- Whistleblowing procedure.
- Whistleblower protection procedure (to take effect on 1.10.2024)

Socio-environmental activities are being carried out in the Nowa Sarzyna commune, which started with the commencement of construction of the Nowa Sarzyna Combined Heat and Power Plant in the area in 1998. Since the start of ENS, the company has been involved in many educational and social projects aimed at developing awareness of nature conservation and supporting biodiversity. The activities carried out to date will continue to be carried out in cooperation between ENS, H2Hub Nowa Sarzyna ora PV Nowa Sarzyna IIa in accordance with the Polenergia Group's Social Involvement Policy (see the section on planned activities for details).

Stakeholder engagement activities for the H2Hub Project have been ongoing since 2022, i.e. since the application for the environmental decision for H2Hub Nowa Sarzyna was submitted. The table below shows the ways in which stakeholders have been involved in the Project to date.

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Table 6 Overview of actions taken since 2022

Purpose of the engagement	Action	Method of engagement	Target groups	lead time
Project disclosure	Opinions and agreements resulting from the EIA procedure	Communication between authorities in the EIA procedure	authorities involved in issuing the environmental decision	During the course of the EIA procedure for the various elements of the Project: December 2022- February 2024
	Public consultation resulting from the EIA procedure	In accordance with the requirements of the EIA procedure, information on the stages of the pending proceedings in the customary manner: i.e. on the office's website, in the publicly available list of data on documents containing information on the environment and its protection.	all stakeholders	During the course of the EIA procedure for the various elements of the Project: December 2022- February 2024
	Raising public awareness and providing information about the Project	Press releases, website	all stakeholders	2022- still ongoing
	Negotiations with landowners	Letters, telephone contact, personal meetings	Elektrociepłownia Nowa Sarzyna, CIECH Sarzyna S.A., MZA Rzeszów, private landowners along the cable route from the PV farm	
	Keeping internal stakeholders informed of project progress	Internal newsletter, MAR announcements <sup>10</sup> , press releases, posts on our social media Polenergia	Internal stakeholders	

<sup>10</sup> MAR (Market Abuse Regulation) communications information that must be provided by listed companies in accordance with the MAR (Regulation (EU) No 596/2014 of the European Parliament and of the Council) on the prevention of market abuse. The purpose of this regulation is to ensure transparency and investor protection in the capital market, preventing manipulation and insider trading.

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Complaint mechanism	Possibility to submit comments and proposals during the environmental investigation phase	Public participation resulting from the EIA procedure announced	All stakeholders	During the course of the EIA procedure for the various elements of the Project: December 2022-February 2024
	Possibility to submit comments and proposals at any stage of the project	a complaint form on the website, printed forms and a box for printed forms displayed in the office of the town and commune of Nowa Sarzyna	All stakeholders	May 2023-ongoing (applications printed) September 2024 - electronic applications
	Enable the public to submit comments and proposals on all POLENERGIA S.A. projects	Complaint form on page <a href="#">Generating assets - ESG service (polenergia.pl)</a> and <a href="#">Onshore wind farms - Energy from the future - Polenergia</a> and <a href="#">Photovoltaic farms - Energy from the future - Polenergia</a>	All stakeholders	May 2023-continues
Education	Substantive and financial support for the training of young hydrogen specialists	holding classes for pupils on school premises as well as at the premises of the Nowa Sarzyna CHP Plant	Students of the Hydrogen Class of the 1st High School in Nowa Sarzyna	September 2023-continues
	Participation in H2 Poland Hydrogen Fair	Participation of 17 students of the Hydrogen Class of the Secondary School No. 1 in Nowa Sarzyna in fairs, panels and lectures as part of H2 Poland	Students of the Hydrogen Class of the 1st High School in Nowa Sarzyna	14-16 April 2024
	Raising young people's awareness of environmental issues, climate change and renewable energy sources	The educational programme Play Green with us!®; Implementation of eco-projects, eco-contests and the <i>climate reading</i> action	Primary and nursery school pupils	From 2022 - continues

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Employment	Promoting the Project among business and scientific circles	Participation at the H2 Poland Hydrogen Fair on the panel "How to finance the hydrogen transition successfully?"; organising a series of talks, organised by Polenergia, on careers in hydrogen with a focus on women's participation in industry, business and science.	schoolchildren, students, industry representatives	14-16 April 2024
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Source: Sotis Advisors on the basis of Polenergia data, 2024

## 4.2 Identified problems and concerns of stakeholders

The opportunity to submit comments and applications to the Project has existed since 2022. As of the date of this SEP, no comments or submissions have been received by the Developer through any of the available channels:

- Environmental decision proceedings underway - for the H2Hub green hydrogen plant, the environmental organisation Grand AGRO Environmental Foundation joined as a party to the proceedings, but no comments were submitted to the Project. No appeals have been filed against the environmental decisions;
- The comment box at UMIG Nowa Sarzyna- at the current design stage the box is checked once a month- no comments or applications have been received so far;
- Comment and application form- posted on www- as of September 2024, no comments have been submitted on the Project.

For the sake of completeness, the concerns of stakeholders associated with other similar Projects in the region were analysed (Appendix E). The analysis shows that the implementation of new investments may cause potential conflicts with the local community. Therefore, it is extremely important to build good relations and a positive corporate image in the region.

*Figure 9 Forms and complaint box at UMIG Nowa Sarzyna*



*Source: Sotis Advisors, September 2024*

## 4.3 H2Hub project in the media

Information about the Project is communicated via social media and the Investor's website.

Examples of publications are indicated below.

Figure 10 Examples of media coverage of the Project

Date of publication	Platform	Description	Link to publication
7/06/2023	Website	Polenergia has an agreement to supply an electrolyser for the H2HUB Nowa Sarzyna project	<a href="https://strefainwestorow.pl/wiadomosci/20230607/polenergia-ma-umowe-dostawy-elektrolizera-dla-projektu-h2hub-nowa-sarzyna">https://strefainwestorow.pl/wiadomosci/20230607/polenergia-ma-umowe-dostawy-elektrolizera-dla-projektu-h2hub-nowa-sarzyna</a>
7/06/2023	Website	Hystar signs contract for 5 MW electrolyser with Polenergia	<a href="https://hystar.com/hystar-signs-contract-for-5-mw-electrolyser-with-polenergia/">https://hystar.com/hystar-signs-contract-for-5-mw-electrolyser-with-polenergia/</a>
12/06/2023	Website	Polenergia has selected an electrolyser supplier for its project	<a href="https://www.gramwzielone.pl/wododor/20148597/polenergia-wybrala-dostawce-elektrolizera-do-swojego-projektu-wodorowego">https://www.gramwzielone.pl/wododor/20148597/polenergia-wybrala-dostawce-elektrolizera-do-swojego-projektu-wodorowego</a>
27/06/2023	Website	Polenergia ENS will receive a PLN 20 million grant from the National Fund for Environmental Protection and Water Management to build 2 hydrogen refuelling stations	<a href="https://www.bankier.pl/wiadomosc/Polenergia-ENS-otrzyma-20-mln-z-dotacji-z-NFOSiGW-na-budowe-2-stacji-tankowania-wodoru-8568178.html">https://www.bankier.pl/wiadomosc/Polenergia-ENS-otrzyma-20-mln-z-dotacji-z-NFOSiGW-na-budowe-2-stacji-tankowania-wodoru-8568178.html</a>
24/02/2024	Website	Polenergia's green hydrogen plant will receive EU subsidy	<a href="https://businessinsider.com.pl/biznes/fabryka-zielonego-wodoru-polenergii-otrzyma-unijna-dotacje/crjx7y5">https://businessinsider.com.pl/biznes/fabryka-zielonego-wodoru-polenergii-otrzyma-unijna-dotacje/crjx7y5</a>
03/2024	LinkedIn	Podkarpacka Dolina Wodorowa produced an educational film about Polenergia	<a href="https://www.linkedin.com/posts/dolina-wodorowa_h2hub-activity-7162724576811065344-y05h?utm_source=share&amp;utm_medium=member_desktop">https://www.linkedin.com/posts/dolina-wodorowa_h2hub-activity-7162724576811065344-y05h?utm_source=share&amp;utm_medium=member_desktop</a>
03/2024	LinkedIn	Polenergia has patronised a hydrogen technology class. Pupils learn about the principles and technology of green hydrogen production.	<a href="https://www.linkedin.com/posts/polenergia_h2hub-polenergia-ens-activity-7129752540736274432-mtNw?utm_source=share&amp;utm_medium=member_desktop">https://www.linkedin.com/posts/polenergia_h2hub-polenergia-ens-activity-7129752540736274432-mtNw?utm_source=share&amp;utm_medium=member_desktop</a>
05/2024	LinkedIn	The first day of the European Economic Congress is behind us. This year, a record number of 12 000 participants registered for <a href="#">the hashtag#EKG</a> .	<a href="https://www.linkedin.com/posts/polenergia_ekg-polenergia-eec-activity-7193909391094333440-xieK?utm_source=share&amp;utm_medium=member_desktop">https://www.linkedin.com/posts/polenergia_ekg-polenergia-eec-activity-7193909391094333440-xieK?utm_source=share&amp;utm_medium=member_desktop</a>

Source: Sotis Advisors, 2024

#### 4.4 Planned activities

It is recommended that all materials addressed to Stakeholders are developed by the Communications Department in collaboration with the ESG Team and the Project Manager (consistent with the Project stage).

The activities address key aspects related to the direct involvement of Stakeholders in the Project, i.e.:

1. Project disclosure,
2. Education,
3. Employment,
4. Complaint mechanism,

## 5. Engagement and communication with internal stakeholders

In addition, community engagement activities aimed at further building social trust and supporting excluded groups in the region have been identified. The Polenergia Group is already involved in the life of local communities due to the presence of the Nowa Sarzyna CHP Project in the Nowa Sarzyna municipality. Activities for local communities will also be supported by the activities of the H2Hub Nowa Sarzyna Company. The support provided relates to the four areas broadly described in Polenergia Group's Community Involvement Policy, and these are:

- Diversity and equal opportunities;
- Education and culture;
- Sport and health;
- Environment - Biodiversity Action.

Planned involvement of the Project in current campaigns in the municipality:

1. Play with us in green!® - the implementation of Polenergia's educational project Play with us in green!®, which consists in the realisation of eco lessons in schools and kindergartens located in the Nowa Sarzyna commune. The invited schools and kindergartens implement lessons that address issues related to waste segregation and closed-loop circulation, water management, renewable energy sources and, from September 2024, biodiversity. Every educational institution involved in the Play Green with Us® programme has the opportunity to carry out eco-projects, eco-contests and is also invited to take part in the *Climate Reading* campaign.
2. Involvement in the area of biodiversity - implementation of classes "Nature challenges! Biodiversity - know to preserve!" from September 2024,; activities in the Kołaczna nature reserve with associated care of the yellow rhododendron, as well as promotion of this flower;
3. Funding for children's and youth sports clubs, which is linked to the promotion of a healthy lifestyle, and funding for arts and culture groups (e.g. dance groups, community centre activities, which is linked to the activation of children and young people);
4. Supporting education by continuing the implementation of the patronage of the Hydrogen Technology Class through involvement in the implementation of educational school trips and thematic activities at the premises of the School Complex in Nowa Sarzyna;
5. Cooperation with local foundations and associations providing support to the local community (e.g. women's activation, funding of senior citizens' club activities).

Responsibilities for stakeholder communication are detailed in the table below. All stakeholder engagement activities should be reported in a short internal quarterly stakeholder engagement report. The report will be prepared by the Communications Department. Issues related to monitoring and reporting of SEP recommendations are described in Chapter 6.

Table 7 Planned stakeholder involvement

Purpose of the engagement	Action	Method of engagement	Target groups	lead time
Project disclosure	Raising public awareness and providing information about the Project	Press releases, website	all stakeholders	All phases of the Project 2022- still ongoing
	Negotiations with landowners	Letters, telephone contact, personal meetings	Elektrociepłownia Nowa Sarzyna, CIECH Sarzyna S.A., MZA Rzeszów, owners of land for PV and cable route	Pre-implementation phase
	Securing the contracts and permits necessary to implement the Project	Letters, telephone contact, personal meetings	Staroste Leżajski, PGW Wody Polskie, PGL Lasy Państwowe, gmina Nowa Sarzyna	Pre-implementation phase
	Keeping internal stakeholders informed of project progress	Internal newsletter, MAR announcements <sup>[1]</sup> , press releases, social media posts Polenergia	Internal stakeholders	All phases of the Project
Complaint mechanism	Possibility to submit comments and proposals at any stage of the Project	a complaint form on the web pages related to the Project, printed forms and a box for printed forms displayed in the office of the Town and Municipality of Nowa Sarzyna, in the building office	All stakeholders	All phases of the Project May 2023- continues
	Enable the public to submit comments and proposals on all POLENERGIA S.A. projects	Complaint form on the page <a href="#">Generating assets - ESG service (polenergia.pl)</a> and <a href="#">Lądowe farmy wiatrowe - Energia z przyszłości - Polenergia</a> and <a href="#">Photovoltaic farms - Energia z przyszłości - Polenergia; publicly available channel Whistleblower App (zgłaszam.to)</a>	All stakeholders	All phases of the Project May 2023- continues



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Purpose of the engagement	Action	Method of engagement	Target groups	lead time
Education	Substantive and financial support for the training of young hydrogen specialists	holding classes for pupils on school premises as well as at the premises of the Nowa Sarzyna CHP Plant	Students of the Hydrogen Class of the 1st High School in Nowa Sarzyna	All phases of the Project September 2023- continues
	Participation in education and business fairs	Participation in panels, discussions, organisation of lectures to raise public awareness of hydrogen use	Students of the Hydrogen Class of the 1st High School in Nowa Sarzyna	All phases of the Project 14-16 April 2024
	Environmental workshops and competitions in local schools	Cooperation with academia and primary/secondary schools on hydrogen technologies.	Regional community, researchers, schools, regional press	All phases of the Project
	Conducting educational activities and designing lesson plans on environmental issues, climate change and renewable energy sources	The educational programme Play Green with us! <sup>®</sup> Implementing eco classes, eco projects, eco competitions and also the <i>Climate Reading</i> action,	Pupils in primary schools, kindergartens	All phases of the Project From 2022 - continues
	Commitment to biodiversity	Implementation of eco-activities "Nature challenges! Biodiversity - know to preserve!"; Promotion and care of the yellow azalea.	Pupils in primary schools, kindergartens	All phases of the Project As of September 2024- continues

Purpose of the engagement	Action	Method of engagement	Target groups	lead time
Community involvement	Implementation of <i>the Social Communication Plan, including Polenergia Group's Social Involvement Policy</i>	Support for community activities in the areas: <ul style="list-style-type: none"> <li>Diversity and equal opportunities (activation of women, older people, support for people with disabilities).</li> <li>Education and culture (activities for schools, climate education, support for cultural centres).</li> <li>Sport and health (support for health activities and the promotion of sport among children and young people).</li> <li>Environment - Biodiversity Action (development of a project related to the care and promotion of the yellow rhododendron).</li> </ul>	Local community living in the municipality of Nowa Sarzyna	All phases of the Project From 1998 to now
Employment	Promoting the Project among business and scientific circles	Participation in knowledge fairs, job fairs, conferences, symposiums on RES, in order to bring employment opportunities in the growing branch of hydrogen technology closer.	schoolchildren, students, industry representatives	All phases of the Project 2024- continues
Engagement and communication with internal stakeholders	Keeping employees informed of plans for the Investors project in relation to staffing issues and development plans.	Communicate the actual impact on the local environment and communities. Includes reference to internal complaints mechanism and management system.	Company employees, contractor employees and subcontractors	On an ongoing basis, at least twice a year
	Inform, consult and involve in strategic decision-making processes.	Presenting at meetings, preparing reports/information on the status of Projects for shareholder board meetings.	Shareholders, Investors, Management Board	Constant reporting on the status of the project, annual reports and face-to-face meetings and shareholder board meetings

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Purpose of the engagement	Action	Method of engagement	Target groups	lead time
	Inform contractor and supplier employees about the Code of Conduct and Ethics, labour and safety issues through face-to-face meetings and briefing notes.	The training should include reference to the internal grievance mechanism and management system. Training on the impact of the Projects and their requirements will be organised as part of the induction training for all staff.	Contractors and subcontractors, suppliers and their employees	On an ongoing basis. During construction each time before new employees start work and at least once a year.
	Reporting in accordance with the environmental and social documents of the Projects.	LESA meetings and site visits, emails, data rooms.	Lenders	Reporting in accordance with ESAP and at least annually

Source: Sotis Advisors, 2024

## 5 Complaints mechanism

### 5.1 Grievance Management System (GMS)

The Grievance Management System (GMS) for the Project will comply with the Polenergia Group's Complaints and Requests Procedure. In addition, it will be based on the following principles as required by international standards such as the European Bank for Reconstruction and Development (EBRD) PR10 and international good practice:

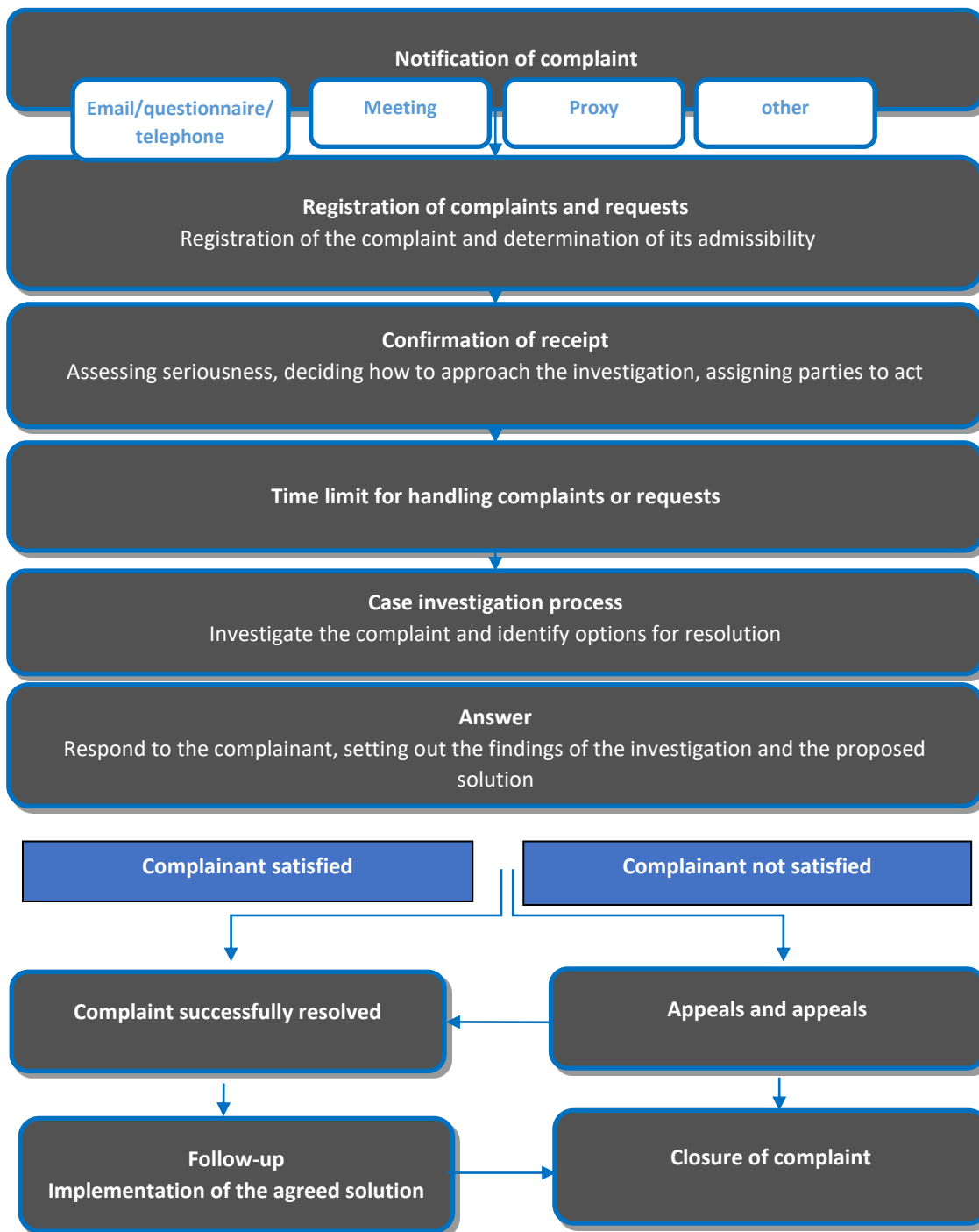
- The system will be easily accessible and simple to use;
- Use of the system will be free of charge;
- Confidentiality of data will be guaranteed;
- Compliance with data protection legislation, including the RODO;
- Transparency and accountability in the complaints management process.

The GMS will cover all types of complaints, including environmental and safety issues during construction and operation.

#### 5.1.1 Project Grievance Management

The grievance mechanism management process outlined in the figure below shows the steps that will be taken to ensure an effective and timely response to community complaints. The timeframe for each step of the process will depend on the categorisation of the risk associated with the complaints. Each stage of the process is described in the subsections below.

Figure 11 Flow diagram of the complaints management process



Source: Sotis Advisors on the basis of Polenergia Group's Complaints and Applications Procedure

### 5.1.2 Review timeframe and solutions

As stated in the Complaints and Requests Procedure, a review of the complaint or request and a risk assessment are to be carried out immediately. Complaints and applications are to be dealt with within 30 working days. Complaints or applications involving a risk to the life or health of the Applicant or others are to be dealt with promptly.

### 5.1.3 Notification of complaint

Complaints or applications may be submitted in Polish or English. The ways of submitting complaints or applications are set out below. They can be submitted:

- By e-mail - via a form downloaded from the websites (Annex B and Annex C): [Hydrogen Technologies - ESG Service \(polenergia.pl\)](#), [Gas Cogeneration and Hydrogen Technologies - Energy from the Future - Polenergia](#);
- To the Community Liaison Officer (CLO): H2Hub- [jakub.niestryjewski@polenergia.pl](mailto:jakub.niestryjewski@polenergia.pl); PV New Sarzyna IIa - [jakub.ostrowski@polenergia.pl](mailto:jakub.ostrowski@polenergia.pl); general - [marta.porzuczek@polenergia.pl](mailto:marta.porzuczek@polenergia.pl)
- By snail mail - via a form downloaded from the websites listed above. The form should then be sent to the following address: Polenergia S.A. ul. Krucza 24/26, 00-526 Warsaw.
- In person by leaving a form in the complaints and requests box, available at:
  - Polenergia S.A. headquarters;
  - the office of the project to which the complaint or application relates during the construction phase of the Project.
  - at the Municipal Office during the development and operation phases of the Project.
- By telephone. The person taking the call, who is employed by Polenergia Group, fills in a complaints and requests form. He/she then forwards it to the Director/Director of the Environment and Sustainability Department or the Investment Manager to whom the complaint or request relates.
- Via the publicly accessible [Whistleblower App \(zglaszam.to\)](#) - <https://polenergia.zglaszam.to/> (Appendix D).

Complaint and application boxes are emptied by Project Managers:

- During the development phase - every 14 working days;
- During the construction phase of the Project - every 2 working days;
- During the operational phase - 1 time per month.

Grievances, whether received in writing or verbally, will be recorded in the Grievance Register within a day of receipt, including the date of receipt, description of the concern/complaint, information about the complainant (confidential and if available) and how the grievance was received.

There will also be an opportunity to pass on the complaint in person to the preferred gender, for example if a woman prefers to explain the complaint to another woman. Staff working in the community relations team will be trained to recognise gender-based harassment (GBVH) complaints and flag them as such as they are received through various reporting channels.

### 5.1.4 Registration of complaints and requests

Complaints and requests shall be registered in the Complaints and Requests Register within one working day of receipt, stating the date and time of receipt of the complaint or request, as well as information about the complaint or request, the investment to which the complaint or request relates and how it was received.

The admissibility of the complaint or application will also be determined at this stage. Complaints and applications will not be admissible where:

- are not directly related to the activities of the Polenergia Group;

- the scope of the complaint or request refers to situations occurring prior to the start of construction and unrelated to the Group's activities on the site.

If the complaint or application is not admissible, a representative of Polenergia Group will clearly inform the Complainant of the reasons why the complaint or application cannot be processed and, where possible, provide information to help redirect the complaint or application to an appropriate institution or person. In such a case, the complaint or request will be registered in the Complaints and Requests Register as inadmissible.

### 5.1.5 Confirmation of receipt

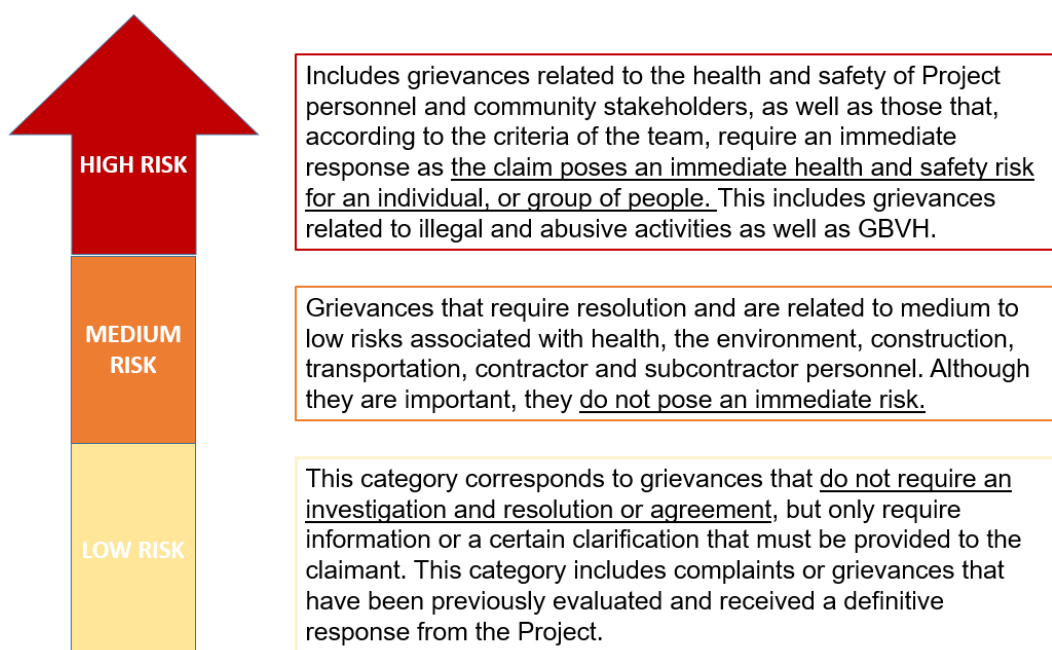
The Director of Environmental Protection and Sustainability of the Polenergia Group is responsible for confirming (orally or in writing) the receipt of the complaint or request and informing the complainant of the further investigation process and the timetable for further stages of the process.

### 5.1.6 Time limit for handling complaints or requests

A review of the complaint or request and a risk assessment will be carried out immediately.

Complaint management will involve determining the nature of the investigation based on the nature of the complaint and the potential risks associated with it. It is expected that the review and risk assessment phase will be carried out within the target timeframe of 24 hours of the complaint.

Figure 12 Complaint risk assessment



Source: Sotis Advisors, 2024

Once the level of risk has been determined, a timeframe will be set for the investigation, resolution and closure of the complaint. The CLO will assess the documents and information provided by the complainant and response times will be adhered to as follows:

- Low-risk complaints will be resolved and closed within a maximum of 30 days.
- Medium-risk complaints will be registered, assessed, resolved and closed within a maximum of 15 days.

- High-risk complaints should be investigated and closed within a maximum of 5 days. If a person's life or health is at risk, the complaint will be investigated and resolved immediately.

Complaints flagged as potential GBVH issues will be automatically assigned to high risk and will be assigned to a senior, trained, female (or gender appropriate) member of the community relations team for review and consideration.

### 5.1.7 Case investigation process

All cases are investigated by two staff members appointed for this purpose by the Director of the Environment and Sustainability Department.

Meetings may be organised to clarify the case, as well as inspections of the place stated in the form. A person from the Polenergia Group, in order to conduct a thorough analysis of the reported case, may take photographs as well as collect other data and evidence. A person from the Polenergia Group may also convene a meeting with the complainant and the persons indicated by him or her, or with the Group employees involved in the process. A Group employee will take minutes of the meeting. The Polenergia Group is obliged to consider all evidence as well as to meet with all parties concerned and endeavour to provide the complainants or claimants with an opportunity to present their arguments.

A report will be produced after the case has been reviewed.

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

### 5.1.8 Answer

Upon completion of the review of the complaint or request, a communication will be prepared for the complainant with information on the findings and outcome of the investigation. If the complaint or application is anonymous, the resolution will be entered in the Complaints and Applications Register together with a description of the procedure to be followed. Personal data contained in the Complaints and Requests Register will be stored in accordance with the Polenergia Group's personal data protection rules.

### 5.1.9 Appeals and revocations

If the complainant does not accept the solution or the outcome of the agreed corrective action, negotiations may be conducted. If negotiations are unsuccessful, the complainant has the option to refer the matter to bodies independent of the Polenergia Group. The complainant has the right to file a request for reconsideration. This will then be considered by the Director of the Environment and Sustainability Department and the Liaison Officer.

### 5.1.10 Closure of complaint

When the stakeholder is satisfied with the responses given to their complaint, the complaint will be closed and the register/database will be updated to indicate the resolution and date of closure

### 5.1.11 Management of contractor complaints

Contractors will be required to designate a person responsible for receiving complaints about Project activities or for directing complainants to the appropriate channels. This person will have to report the complaint to the Project CLO within a maximum of two days so that it can be dealt with in accordance with the internal complaint management mechanism (section 5.2). In the case of life or health-threatening situations, the relevant staff must take immediate action to prevent negative consequences. Complaints that reach the CLO will be dealt with according to the procedure described in section 5.2.

The developer will provide appropriate training for complaint takers and guidance on their role in the complaint reporting and handling process. In addition, specific training will be provided to staff dealing with GBVH-related



complaints. Investors will also ensure that contractors train their staff on the GMS and their responsibilities under it.

## 5.2 Internal complaint management

Informing employees about the grievance mechanism is included in internal training procedures by the Communications Department. Employees of contractors and subcontractors should be informed about the grievance mechanism during initial training, site reception. Complaint forms should be readily available at both company and site offices (e.g. by scanning a QR code redirecting to the form). Training materials / presentation should include key elements to ensure efficiency, transparency and fairness:

1. Objectives of the grievance mechanism - a description of why the grievance mechanism is necessary and how it fits into the wider context of stakeholder engagement and the promotion of a fair and sustainable working environment;
2. Scope of the grievance mechanism - who can complain (e.g. employees, contractors, suppliers) and what types of issues can be raised (e.g. discrimination, harassment, workplace safety issues, work environment, relationships with supervisors or colleagues);
3. Complaint procedures - outline the steps for making a complaint, including the channels available (email, online form, complaint box) and ensure confidentiality;
4. Roles and responsibilities - who is responsible for receiving complaints, investigating them and taking corrective action;
5. Response timeframe (as soon as possible: e.g. 5 days, no longer than a month);
6. Communication and employee awareness - how employees are informed of the existence of the grievance mechanism, the grievance procedures and the grievance resolution process;
7. Corrective and disciplinary action - what corrective or disciplinary action may be taken in response to legitimate complaints;
8. Monitoring and evaluation mechanism - how the effectiveness of the complaints mechanism is monitored and evaluated, including measures of success and ways to improve the process;
9. Protection from retaliation - reassurance to employees that they will not face retaliation for making a complaint;
10. Appeals and escalations - what options employees have if they disagree with the outcome of a complaint or feel it has been handled inappropriately.

The internal complaints mechanism will not be published/open to the public.

## 5.3 Roles and responsibilities

1. Contact details of the Community Liaison Officer:

**H2Hub Nowa Sarzyna and refuelling station in Rzeszów** - jakub.niestryjewski@polenergia.pl;

**PV Nowa Sarzyna IIa** - jakub.ostrowski@polenergia.pl;

**General** - marta.porzuczek@polenergia.pl

2. Contact details for the Director of Environment and Sustainability: marta.porzuczek@polenergia.pl

## 5.4 Monitoring and reporting

The Director of Environment and Sustainability will maintain a Complaints and Requests Register containing all details of the subject matter of the complaint or request. She will also be responsible for monitoring the progress of tasks arising from the arrangements for dealing with the matter described in the complaint.

The Director of Environment and Sustainability presents the Complaints Register on an ongoing basis to the elected Board Member. Once a year, the Complaints Register is presented to the Board of Directors of Polenergia Group.

## 6 SEP monitoring and reporting

### 6.1 Monitoring

In order to document the activities and evaluate the effectiveness of this SEP and associated stakeholder engagement activities, a data management and monitoring process will be implemented for the Project including the following elements:

- Implementation of planned SEP activities. Success will be measured for each action; where possible, this will be participatory (e.g. asking involved stakeholders about their satisfaction);
- Communication and consultation activities with all stakeholders;
- Monitor media coverage of shareholders, investors and the Project, recording the level and type of coverage (positive, negative, neutral);
- A key issues log will be kept, noting issues, key stakeholders and actions taken by Investors in response.
- Monitoring complaints, including:
  - Complaint methods to assess their accessibility and relevance for different stakeholder groups;
  - Number of GBVH reports submitted through the Community Complaints Mechanism (including the equivalent employee complaint mechanism).
  - The total number of complaints received and the time required to process them. Although the time required depends on the complexity of each complaint, an assessment of the average time can be helpful in determining whether the process complies with the specified timeframe.

### 6.2 Reporting

A short internal quarterly report on stakeholder engagement will be produced by the Director of Environment and Sustainability, as set out below:

- Key stakeholder engagement events that took place during the quarter;
- Main issues raised by stakeholders and their resolution;
- Statistics on complaints;
- Key findings and proposed improvements.

## 7 Annexes

### Annex A Complete Register of Project Stakeholders

Stakeholders	Link to projects
<b>Authorities - regional government</b>	
Regional Director for Environmental Protection in Rzeszów	Authority agreeing environmental decisions
Director of the Regional Water Management Authority in Rzeszów	Body giving an opinion on the Project
Starost of Lezajsk	Implementation of development projects, regional impact, planning permission
Voivodeship Inspector of Construction Supervision	Before undertaking any construction work Investor is obliged to submit a notification of intended commencement of construction works, as well as receive a permission to use before attempting to use a finished structure.
State County Sanitary Inspector in Leżajsk (Państwowy Powiatowy Inspektor Sanitarny)	Involved in the process of issuing the Environmental Decision
Regional Directorate of State Forests in Krosno	Opinion on the location of proposed developments (Transmission Transport Act); Involved in agreeing the signing of a contract for the felling of trees from forest land.
Mayor of the City and Municipality of Nowa Sarzyna	body issuing the environmental decision for H2Hub Nowa Sarzyna and the PV farm Nowa Sarzyna IIa, the municipality along the cable route
Mayor of the City of Rzeszów	authority issuing the environmental decision for the Hydrogen Refuelling Station in Rzeszów, building permit
Mayor of the Village of Jelna	Village along cable route from PV farm, PV farm site
Mayor of the village of Wola Zarczycka	Village along the cable route from the PV farm
<b>Institutions</b>	
Polska Grupa Energetyczna S.A (PGE Dystrybucja)	Proximity of the route of the 110 kV line with the route of the cable from the PV farm
National Fire Service	Securing the project site in the event of an accident
National Environmental Protection Fund	The Just Transition Programme: Innovation for the Environment
<b>Stakeholders affected by land impact</b>	
State Treasury/ (perpetual usufruct of Miejskie Przedsiębiorstwo Komunikacyjne w Rzeszowie Sp. z o. o.)	Owner of land affected by the Project
State Treasury (perpetual usufruct of Nowa Sarzyna CHP plant)	Owner of land affected by the Project
State Treasury/ (Perpetual usufruct of Ciech Sarzyna)	Owner of land affected by the Project

SEP for H2Hub Nowa Sarzyna

Stakeholders	Link to projects
Town and Commune of Nowa Sarzyna	Owner of land affected by the Project
Zakład Gospodarki Komunalnej Nowa Sarzyna Sp. z o.o.	Owner of land affected by the Project
Leżajski County	Owner of land affected by the Project
Zakłady Chemiczne "Organika- Sarzyna" S.A.	Owner of land affected by the Project
Państwowe Gospodarstwo Wodne Wody Polskie	Owner of land affected by the Project
State Treasury	Owner of land affected by the Project
State Treasury - State Forests Leżajsk Forest District	Owner of land affected by the Project
Private landowners	Owner of land affected by the Project
<b>Local NGOs (foundations, associations)</b>	
Our Little Homeland "Nasza Mała Ojczyzna"	Action for the development of local democracy
Circle of Rural Housewives in Sarzyna, Circle of Rural Housewives in Jelna, Circle of Rural Housewives in Ruda Łańcucka, Circle of Rural Housewives in Judaszówka	Defending the rights, representing the interests and working to improve the socio-professional situation of rural women and their families, activating women from rural communities, working to integrate the local community
Cultural Centre and Library Nowa Sarzyna	Activities to promote culture and integrate children and young people
Association for the Development of Jelna Village "Złoty Potok" in Jelna	Cultural development and community integration activities
Municipal Sports Club UNIA Nowa Sarzyna	Promotion of sport among children and young people.
Association "Nothing Divides Us" („Nie Dzieli Nas Nic")	Supporting activities for children from the Special School and Educational Centre in Leżajsk
Sports Club IGŁA in Jelna	Activities to promote sport among children and young people.
Primary schools in the municipality of Nowa Sarzyna	Implementation of the Play Green with Us project!
Secondary School in Nowa Sarzyna	Hydrogen technology class

SEP for H2Hub Nowa Sarzyna

Stakeholders	Link to projects
Grand AGRO Environmental Foundation	Foundation as a party in the environmental proceedings for H2Hub Nowa Sarzyna
Subcarpathian Hydrogen Valley	It aims to support the development of the hydrogen economy and strives to build a Podkarpackie hydrogen industry.
<b>Groups potentially affected by the Project</b>	
Inhabitants of the Town and Commune of Nowa Sarzyna	Potential benefits in terms of development and jobs
Residents of the city of Rzeszów	Potential benefits related to development and jobs, availability of hydrogen refuelling service, reduction of air pollution from hydrogen-fuelled vehicles
Residents of the Villages of Jelna and Wola Zarczycka	Potential benefits associated with land lease agreements
Schools in the region	Positive impact related to the Investor's involvement in social and educational activities
<b>Vulnerable groups</b>	
Vulnerable groups (women and female-headed households, elderly/retired people, children, young people (15-24), low-income households, people with disabilities)	Vulnerable groups may be affected by the Project because of their disability, social or economic status, limited education, lack of or access to Project employment or other Project benefits
<b>Media</b>	
Energy media: CIRE, wnp.pl, green-news.pl, biznesalert.pl, energetyka24.pl, energetyka.plus, wysokienapiecie.pl	Evaluation of the Project, impact on different stakeholder groups, in particular local communities and businesses, political issues
National and business media: Rzeczpospolita, Dziennik Gazeta Prawna, Puls Biznesu	Evaluation of the Project, impact on different stakeholder groups, in particular local communities and businesses, political issues
Local media	Evaluation of the Project, impact on different stakeholder groups, in particular local communities and businesses, political issues
<b>Internal stakeholders</b>	
Contractors, subcontractors and supply chain personnel	Project implementation, application of best practice. Services
Lenders	Project eligibility for funding; image aspects
Shareholders	Project feasibility

## Annex B Complaint form for PV Nowa Sarzyna IIa together with a leaflet

**Szanowni Państwo,**

Niniejszy formularz pozwoli na sprawniejsze przekazywanie uwag, skarg, pytań do Inwestora niniejszego przedsięwzięcia, pn.:

**Budowa farmy fotowoltaicznej Nowa Sarzyna IIa o mocy do 8 MW, zlokalizowanej w obrębie Jelna, gmina Nowa Sarzyna wraz z zagospodarowaniem terenu i infrastrukturą**

zlokalizowanego na: **dz. nr ew. 4750, 4770 obręb 0004 Jelna, m. Jelna, gmina Nowa Sarzyna**

a tym samym pozwoli na sprawniejszą komunikację i przekazywanie informacji oraz reagowanie na wydarzenia/zdarzenia zaistniałe na skutek naszej działalności.

Po wypełnieniu formularza, bardzo proszę o pozostawienie formularza w:

- Urzędzie Miasta i Gminy Nowa Sarzyna  
Ul. Kopernika 1, 37-310 Nowa Sarzyna

lub przesłanie go na adres:

Marta Porzuczek, Dyrektorka Działu Ochrony Środowiska i Zrównoważonego Rozwoju  
Polenergia S.A.  
ul. Krucza 24/26, 00-526 Warszawa  
Telefon: +48 22 522 38 42  
Mob.: + 48 609 909 702  
e-mail: Marta.Porzuczek@polenergia.pl

lub

Jakub Ostrowski - Department of Photovoltaics and Onshore Wind Farms  
e-mail: Jakub.Ostrowski@polenergia.pl  
Telefon: +48 504 178 059

Z poważaniem,

Marta Porzuczek

**Klauzula informacyjna dotycząca przetwarzania danych osobowych i zgoda na przetwarzanie danych osobowych**

Zgodnie z art. 13 ust. 1 i 2 Rozporządzenia Parlamentu Europejskiego i Rady (UE) 2016/679 z dnia 27 kwietnia 2016 r. w sprawie ochrony osób fizycznych w związku z przetwarzaniem danych osobowych i w sprawie swobodnego przepływu takich danych oraz uchylenia dyrektywy 95/46/WE (ogólne rozporządzenie o ochronie danych) („RODO”) informujemy, iż:

Administratorem Pani/Pana Danych Osobowych jest Polenergia S.A. z siedzibą: Krucza 24/26, 00-526 Warszawa (dalej „Administrator” lub „Spółki”).

W razie jakichkolwiek pytań należy skontaktować się z nami pod adresem naszej siedziby lub bezpośrednio drogą elektroniczną (rodo@polenergia.pl).

Pani/Pana dane osobowe przetwarzane będą na podstawie art. 6 ust. 1 RODO w celu rozpatrzenia Pani/Pana skargi bądź zażalenia.

Zgodnie z RODO, przysługuje Pani/Panu:

- prawo dostępu do swoich danych oraz otrzymania ich kopii;
- prawo do sprostowania (poprawiania) swoich danych;
- prawo do usunięcia danych, ograniczenia przetwarzania danych;
- prawo do wniesienia sprzeciwu wobec przetwarzania danych;
- prawo do przenoszenia danych;
- prawo do cofnięcia zgody na przetwarzanie danych w dowolnym momencie, bez wpływu na zgodność z prawem przetwarzania, którego dokonano na podstawie zgody przed jej cofnięciem, jeśli przetwarzanie danych odbywa się na podstawie zgody osoby, której dane dotyczą lub na podstawie art. 9 ust. 2 lit a RODO;
- prawo do wniesienia skargi do organu nadzorczego (Prezes Urzędu Ochrony Danych Osobowych).
- Podanie przez Panią/Pana danych osobowych oraz poniższa zgoda na ich przetwarzanie jest dobrowolne.

Wpisując swoje dane osobowe do formularza wyraża Pan/Pani zgodę na przetwarzanie swoich danych osobowych przez Polenergia S.A. z siedzibą: Krucza 24/26, 00-526 Warszawa w zakresie imienia, nazwiska, nr telefonu i adresu e-mail dla potrzeb Polenergia Farma Fotowoltaiczna 15 sp. z o.o w zakresie mechanizmu zgłaszania skarg i zażaleń.





NR REFERENCYJNY:	
Imię i Nazwisko	
Informacje kontaktowe Proszę o zaznaczenie preferowanego sposobu komunikacji	<input type="radio"/> Drogą pocztową. Proszę o wpisanie adresu kontaktowego:  <input type="radio"/> Telefonicznie:  <input type="radio"/> Poprzez e-mail:
Preferowany język komunikacji	<input type="radio"/> Polski <input type="radio"/> Angielski
Opis zdarzenia lub zażalenia	
Co się stało? Kiedy? Komu? Skutek zdarzenia	
Data zdarzenia/skargi	
	<input type="radio"/> Jednorazowe zdarzenie - data <input type="radio"/> Wydarzyło się więcej niż raz - ile razy <input type="radio"/> Ciągłe (problem istniejący)
Proponowane rozwiązania	

## Annex C Complaint form for H2Hub with flyer



Szanowni Państwo,

Niniejszy formularz pozwoli na sprawniejsze przekazywanie uwag, skarg, pytań do Inwestora niniejszego przedsięwzięcia **H2HUB Nowa Sarzyna** a tym samym pozwoli na sprawniejszą komunikację i przekazywanie informacji oraz reagowanie na wydarzenia/zdarzenia zaistniałe na skutek naszej działalności.

Po wypełnieniu formularza, bardzo proszę o pozostawienie formularza w skrzynce kontaktowej w Urzędzie Miasta Nowa Sarzyna lub przesłanie go na jeden z poniższych adresów:

Marta Porzuczek,  
Dyrektorka Działu Ochrony Środowiska i Zrównoważonego  
Rozwoju  
Polenergia SA  
ul. Krucza 24/26, 00-526 Warszawa  
Telefon: +48 609 909 702  
e-mail: [marta.porzuczek@polenergia.pl](mailto:marta.porzuczek@polenergia.pl)

Jakub Niestryjewski,  
kierownik projektów wodorowych  
Polenergia SA  
ul. Krucza 24/26, 00-526 Warszawa  
Telefon: +48 606 431 561  
e-mail: [jakub.niestryjewski@polenergia.pl](mailto:jakub.niestryjewski@polenergia.pl)

Z poważaniem,  
Jakub Niestryjewski

**Uwaga!** W celu zgłoszenia uwagi formalnej do Raportu Oddziaływania na Środowisko należy się skontaktować z Urzędem Miasta i Gminy Nowa Sarzyna, zgodnie z obwieszczeniem burmistrza z dnia 12.05.2023, nr sprawy RIG 6220.8.2022.

#### Klauzula informacyjna dotycząca przetwarzania danych osobowych i zgoda na przetwarzanie danych osobowych

Zgodnie z art. 13 ust. 1 i 2 Rozporządzenia Parlamentu Europejskiego i Rady (UE) 2016/679 z dnia 27 kwietnia 2016 r. w sprawie ochrony osób fizycznych w związku z przetwarzaniem danych osobowych i w sprawie swobodnego przepływu takich danych oraz uchylenia dyrektywy 95/46/WE (ogólne rozporządzenie o ochronie danych) („RODO”) informujemy, iż:

Administratorem Pani/Pana Danych Osobowych jest Polenergia S.A. z siedzibą: Krucza 24/26, 00-526 Warszawa (dalej „Administrator” lub „Spółka”).

W razie jakichkolwiek pytań należy skontaktować się z nami pod adresem naszej siedziby lub bezpośrednio drogą elektroniczną ([rodo@polenergia.pl](mailto:rodo@polenergia.pl)).

Pani/Pana dane osobowe przetwarzane będą na podstawie art. 6 ust. 1 RODO w celu rozpatrzenia Pani/Pana skargi bądź zażalenia.

Zgodnie z RODO, przysługuje Pani/Panu:

- prawo dostępu do swoich danych oraz otrzymania ich kopii;
- prawo do sprostowania (poprawiania) swoich danych;
- prawo do usunięcia danych, ograniczenia przetwarzania danych;
- prawo do wniesienia sprzeciwu wobec przetwarzania danych;
- prawo do przenoszenia danych;
- prawo do cofnięcia zgody na przetwarzanie danych w dowolnym momencie, bez wpływu na zgodność z prawem przetwarzania, którego dokonano na podstawie zgody przed jej cofnięciem, jeśli przetwarzanie danych odbywa się na podstawie zgody osoby, której dane dotyczą lub na podstawie art. 9 ust. 2 lit a RODO;
- prawo do wniesienia skargi do organu nadzorczego (Prezes Urzędu Ochrony Danych Osobowych).
- Podanie przez Panią/Pana danych osobowych oraz poniższa zgoda na ich przetwarzanie jest dobrowolne.

Wpisując swoje dane osobowe do formularza wyraża Pan/Pani zgodę na przetwarzanie swoich danych osobowych przez Polenergia S.A. z siedzibą: Krucza 24/26, 00-526 Warszawa w zakresie imienia, nazwiska, nr telefonu i adresu e-mail dla potrzeb Polenergia H2HUB Nowa Sarzyna sp. z o.o w zakresie mechanizmu zgłaszania skarg i zażaleń.



NR REFERENCYJNY:	
Imię i Nazwisko	
Informacje kontaktowe Proszę o zaznaczenie preferowanego sposobu komunikacji	Drogą pocztową. Proszę o wpisanie adresu kontaktowego:  Telefonicznie:  Poprzez e-mail:
Preferowany język komunikacji (proszę zaznaczyć)	Polski Angielski
Opis zdarzenia lub zażalenia	Co się stało? Kiedy? Komu? Skutek zdarzenia
Data zdarzenia/skargi	
	Jednorazowe zdarzenie - data Wydarzyło się więcej niż raz - ile razy Ciągłe (problem istniejący)
Proponowane rozwiązania	

**H2HUB** W Nowej Sarzynie to projekt pilotażowy dla produkcji zielonego wodoru całkowicie z energii pochodzącej ze źródeł odnawialnych.

Z uwagi na cele polityki środowiskowej Unii Europejskiej oraz drożące w wyniku wojny w Ukrainie ceny paliw kopalnych, wprowadzenie na rynek zielonego wodoru jest pożądane. Pozwoli on zastępować częściowo, a docelowo całościowo, gaz

**Polenergia**

ziemny w elektroenergetyce i energetyce ciepłej, magazynować energię uzyskaną z OZE, napędzać transport oraz wytwarzać zielone komponenty dla procesów chemicznych i przemysłowych (jak np. amoniak).

H2 Hub Nowa Sarzyna będzie poza jednostką wytwarzania i magazynowania wodoru wyposażony w stację nalewu dla bateriowozów oraz autobusów. Rozwiązanie to umożliwi rozwój zielonej mobilności w regionie poprzez promowanie zielonego transportu publicznego oraz możliwości transportu wodoru do mobilnych stacji tankowania. Uzyskany wodór zasilać będzie również pobliskie zakłady chemiczne, planowane jest wykorzystanie w procesie współspalania w ENS, celem zmniejszenia emisji i zapotrzebowania na gaz ziemny, oraz załączania do sieci gazowej Gaz-System aby umożliwić jego łatwy odbiór także innym odbiorcom.

Uruchomienie instalacji do produkcji wodoru planowane jest na **czwarty kwartał 2024r.** Instalacja będzie w stanie wytwarzać do **90kg H2/ godzinę.**



Annex D Application form from <https://polenergia.zglaszam.to/>

**Zgłaszam:**

Faktyczna nieprawidłowość
  Podejrzanie nieprawidłowości

**Kategoria zgłoszenia\***

Jakiego obszaru dotyczy zgłaszana przez Ciebie (prawdopodobna) nieprawidłowość:

Wybierz z listy ▼

**Dział**

Nieprawidłowość miała (najprawdopodobniej) miejsce w dziale/biurze:

Wpisz dział

**Sprawca**

Za nieprawidłowość (najprawdopodobniej) odpowiadają te osoby:

<b>Imię i nazwisko</b>	<b>Stanowisko i dział</b>
Wpisz imię i nazwisko sprawcy	Wpisz stanowisko i dział

Nie znam takich osób

**Wiedzę o nieprawidłowości mają/mogą mieć również:**

Za nieprawidłowość (najprawdopodobniej) odpowiadają te osoby:

<b>Imię i nazwisko</b>	<b>Stanowisko i dział</b>
Wpisz imię i nazwisko sprawcy	Wpisz stanowisko i dział

Charakter udziału tej osoby w sprawie:

Wybierz z listy ▼

Nie znam takich osób

**Treść zgłoszenia\***

Opisz na czym polega (prawdopodobna) nieprawidłowość:

Wpisz treść

0 / 5000

\*Pole obowiązkowe

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## Annex E Analysis of social conflicts occurring in similar investments

No other green hydrogen production projects are currently underway in the region. Similar investments have been launched in Rybnik and Warsaw.

There are currently 3 publicly accessible hydrogen refuelling stations in Poland:

1. **Warsaw**, Tango Street - the first publicly accessible hydrogen station in Poland.
2. **Rybnik**, ul. Budowlanych - the first station in Silesia to serve both passenger cars and hydrogen buses.
3. **Solec Kujawski on the premises of the Solbet company at 71 Toruńska Street.**- The station was set up for internal use by the company, which refuels its forklifts there, but cars, buses and commercial vehicles can also be refuelled there.-However, Solbet has not yet stated under what conditions a person from outside the company can refuel hydrogen at the station in Solec Kujawski

In addition, in 2024r. a project by the City of Rybnik and the Silesian University of Technology (ROW 2.0) will be launched, the aim of which is to transform the Rybnik Coal District into the Rybnik Hydrogen District - a centre for modern technologies based on sustainable, efficient sources of green energy.

In Poland, hydrogen technology faces different public reactions. Although hydrogen is promoted as a future solution for energy and industrial transformation, there is a lack of public awareness about it, which leads to fear and resistance. Surveys show that Poles have limited knowledge about hydrogen, which contributes to fear of its use. This, in turn, can lead to protests, especially in areas where hydrogen infrastructure development is planned, such as hydrogen valleys. Lack of confidence and fear of new technologies that are perceived as dangerous or too complicated can effectively hinder the development of the hydrogen transition .<sup>11</sup>

A photovoltaic farm will also be realised as part of the Project. Due to the fact that the farms are implemented on agricultural land, they cause its transformation. In the Investor's experience, negative opinions on photovoltaic farms mostly refer to the following aspects:

1. Landscape aesthetics;
2. Land use;
3. Panel recycling;
4. Impact on microclimate.

It is worth noting, however, that negative opinions on photovoltaic farms are less frequent than for wind farms, for example. Solar energy is widely perceived as a clean and sustainable source of renewable energy This does not, however, change the fact that there are protests from the local population regarding the implementation of photovoltaic farms. Residents raise concerns about the location of such investments, the potential impact on the environment and landscape, as well as health.

For example:

1. in the municipality of Nielisz, residents oppose the construction of a photovoltaic farm, fearing that its proximity to buildings will lower property values and discourage young people from settling in the area. For this reason, the investment has been re-examined by the municipality;

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<sup>11</sup> [Is hydrogen really the fuel of the future and the key to the global energy transition? \[ANALYSIS\] \(swiatoze.pl\)](#)

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SEP for H2Hub Nowa Sarzyna

2. in Kashubia, where residents oppose the construction of a farm in the village of Witolubie, pointing to concerns about location regulations and the impact of farms on the surrounding landscape ;<sup>12</sup>
3. in Jamielnik and Bagno, residents are concerned about the possible health effects of electromagnetic fields, as well as the loss of picturesque natural areas .<sup>13</sup>

A conversation with the mayor of the town and commune of Nowa Sarzyna confirms that among the inhabitants present at the information meeting in Jelna on 17.04.2023, some concerns arose in relation to the implementation of PV farms in the commune. These concerned safety and the negative impact of the investment on human health and the landscape. The mayor assured residents that measures would be put in place to reduce the impact on the above elements by: fencing and monitoring of the power plant site, a planned buffer of min. Fencing and monitoring of the site, planned buffer of min. 50 m from buildings, PV modules to be located min. 3 m from the fence of the farm, introduction of measures related to the development of biodiversity on the farm, connection directly to the electrolyser to prevent voltage drops in the grid, repair and reconstruction of roads, demolition of the farm and land reclamation after the end of operation. The concerns did not relate to the location of the PV farm selected for the Project, but they show that the implementation of similar projects is not indifferent to the residents.

Because of the tensions that can arise between the investment and the local community, it is extremely important to build good relations and a positive corporate image in the region.

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<sup>12</sup> [Protest against the construction of a photovoltaic farm in Kashubia | Głos Pomorza \(gp24.pl\)](#)

<sup>13</sup> [Residents oppose construction of photovoltaic farm - Gazeta Olsztyńska \(gazetaolsztynska.pl\)](#)