

Stakeholder Engagement Plan

BSP Battery Energy Storage System (BESS) Project, Hertz II,
Estonia

April 2025

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Public

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Appendix 1

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Acronyms and Abbreviations

BESS – Battery Energy Storage System

CEO – Chief Executive Officer

E&S – Environmental and Social

EBRD – European Bank for Reconstruction and Development

EHSS – Environmental, Health, Social and Safety

EPC Contractor – Engineering, Procurement and Construction Contractor

ESAP – Environmental and Social Action Plan

ESMP – Environmental and Social Management Plan

ESP – Environmental and Social Policy

NGO – Non-Governmental Organisation

PR – Performance Requirement

SEP – Stakeholder Engagement Plan

1. Project Overview

1.1. Introduction

This Stakeholder Engagement Plan (SEP) provides the requirements for the stakeholder engagement process, stakeholder identification and grievance mechanism planned for the Battery Energy Storage System (BESS) project, Evecon 435 OÜ (“Hertz II” or the “Project”).

The SEP provides an overview of the Estonia national legislation, the requirements for stakeholder engagement under the European Bank for Reconstruction and Development (EBRD) Environment and Social Policy (ESP) 2019, and international best practice related to information provision and disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The goal of this SEP is to set out how stakeholder engagement will be carried out for the Project and how long-term relationships between Project and the local communities will be maintained. This SEP also aims to inform, improve and facilitate decision-making that involves Project-affected people and other interested stakeholders in an inclusive and timely manner, and to ensure that these groups are provided with sufficient opportunity to voice their opinions about the Project.

The SEP is a live document, being reviewed periodically during project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

1.2. Project Background

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is providing a loan to BSP (‘Baltic Storage Platform’) (the “Company”) to finance the construction, commissioning and operation of the Hertz II BESS project in Estonia.

Figure 1-1 - Approximate Hertz II Site Boundary and Setting



The Project involves the construction of the following components:

- 54 BESS units
- 330kV substation (including 330kV equipment and a MV building) and one 330kV transformers
- 330kV busbar transmission line
- 27 x 33/0,73 kV and 4,5 MVA transformers
- Connection point to nearby Arukula substation.
- A mesh metal fence approximately 2m high around the battery bank.

2. CONSULTATION AND DISCLOSURE

2.1. National Legislative Requirements

Stakeholder engagement and the level of public disclosure and consultation activities within the context of the Project are regulated by the following laws:

Act on Environmental Impact Assessment and Environmental Management (2005): Establishes the procedures for conducting Environmental Impact Assessments (EIA) and integrates environmental considerations into decision-making processes.

- Public Involvement: Articles 21 and 22: Requires public notification about the initiation of an EIA and grants the public the right to access relevant

documents, submit proposals, objections, and questions, and receive responses during the EIA process.

- Consultation Periods: Article 35: Mandates public display and consultation periods for EIA programs and reports, allowing stakeholders to provide input that must be considered in the final decision.

Constitution of the Republic of Estonia (1992):

- Right to Access Information: Article 44: Guarantees everyone the right to freely access information disseminated for public use. It mandates that all government agencies, local authorities, and officials provide information about their activities to Estonian citizens upon request, in accordance with legal provisions.

Public Information Act (2000): Ensures that the public and every person has the opportunity to access information intended for public use, based on the principles of a democratic and social rule of law and an open society. Applies to all "holders of information," including state and local government bodies, legal persons in public law, and private entities performing public duties.

- Access Rights: Article 13: Individuals have the right to access public information without the need to demonstrate a specific interest.
- Obligations of Information Holders: Articles 10 and 11: Entities must maintain records of documents in their possession and ensure public access to information subject to disclosure.
- Assistance Duty: Article 15: Authorities are required to assist individuals in making information requests and provide guidance on the application process.

Administrative Procedure Act (2001): Establishes the general procedures for administrative actions, ensuring fairness and public participation.

- Right to Be Heard: Article 40: Guarantees individuals and organizations the opportunity to present their views before decisions affecting their rights or interests are made.
- Access to Information: Article 37: Ensures parties have access to information relevant to administrative proceedings.

Planning Act (2015): Regulates spatial planning to ensure sustainable development and public involvement in land-use decisions

- Public Participation: Articles 15–17: Mandates that the public be informed and consulted during the preparation of spatial plans, allowing stakeholders to submit opinions and objections that must be considered before adoption.

2.2. International Legislative Requirements

Aarhus Convention (ratified in 2001) on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters

The Convention establishes several rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional, or local level) will contribute to these rights becoming effective. The Convention provides for the following:

- The right of everyone to receive environmental information that is held by public authorities ("access to environmental information"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession.
- The right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organizations to comment on, for example, proposals for projects affecting the environment, or plans and programs relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("public participation in environmental decision-making").
- The right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").

EU Directive 2003/35/EC For Public Participation

The European Parliament and Council Directive 2003/35/EC provides for public participation regarding drawing up certain plans and programs relating to the environment. According to this Directive, Member States shall ensure that:

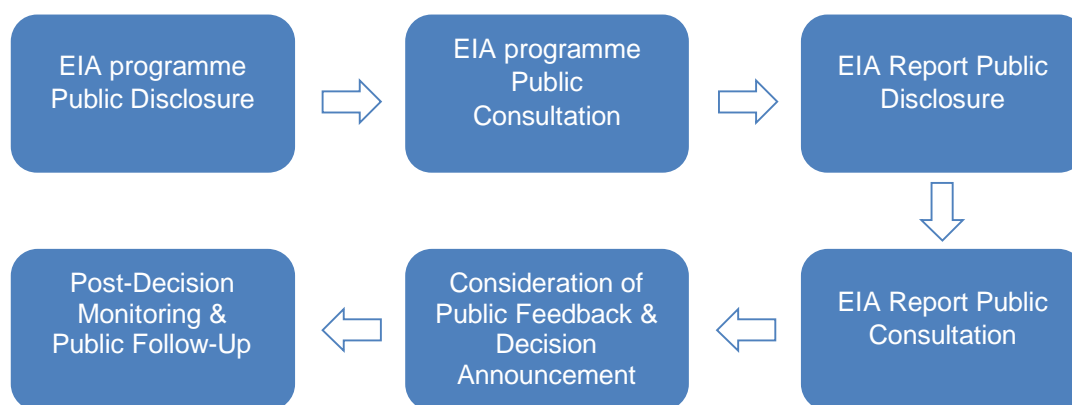
- "The public is informed, whether by public notices or other appropriate means such as electronic media where available, about any proposals for such plans or programs or for their modification or review and that relevant information about such proposals is made available to the public including inter alia information about the right to participate in decision-making and about the competent authority to which comments or questions may be submitted;
- The public is entitled to express comments and opinions when all options are open, before decisions on the plans and programs are made;
- In making those decisions, due account shall be taken of the results of the public participation.
- Having examined the comments and opinions expressed by the public, the competent authority makes reasonable efforts to inform the public about the decisions taken and the reasons and considerations upon which those decisions are based, including information about the public participation

process”.

2.3. Public disclosure and consultation flow

The graphic below gives a short description of the sequence of stages of the public disclosure and consultation laid out by national law:

Figure 2-1 - Public disclosure and consultation flowchart



- **Public Disclosure of the EIA Programme (14 Days Minimum)**
 - The EIA programme is published for at least 14 days for public review.
 - Stakeholders can submit opinions and objections.
 - Authorities must notify the public via official announcements.
- **Public Consultation on the EIA Programme (Public Hearing)**
 - A public hearing is held to gather feedback on the scope of the EIA.
 - Authorities may revise the EIA programme based on input.
- **Public Disclosure of the EIA Report (30 Days Minimum)**
 - The EIA report is made public for at least 30 days.
 - Stakeholders can submit written comments on findings and proposed mitigation measures.
- **Public Consultation on the EIA Report (Public Hearing Required)**
 - A mandatory hearing allows stakeholders to discuss concerns.
 - Authorities must respond to public input before a final decision.
- **Consideration of Public Feedback & Decision Announcement**
 - Authorities publish the decision with explanations on how public feedback was addressed.
- **Post-Decision Monitoring & Public Follow-Up**
 - The public can request monitoring reports and challenge non-compliance.

2.4. EBRD Requirements

The Project will adhere to EBRD Environmental and Social Policy (ESP) 2019 and the EBRD Performance Requirements (PRs). The EBRD PR 7 (Indigenous Peoples) and PR 9 (Financial Intermediaries) are not applicable for this Project.

The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key requirements of this PR are set out in Table 1 below.

Table 1: EBRD PR10 Requirements

<ul style="list-style-type: none">■ Identify the various individuals or groups who are affected or likely to be affected by the Project; or may have an interest in the Project.■ Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.■ Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.■ Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.■ Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.
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2.5. Existing Stakeholder Engagement and Community Awareness Programmes

Limited consultation or engagement has been carried out by BSP at this stage of the Project. In line with Estonian regulations, the municipality was responsible for public consultation during the planning process for Hertz 1, including informing residents, collecting feedback, and consulting relevant authorities. BSP has also held several meetings with the municipality. To support ongoing engagement, the Company will be establishing an online grievance mechanism for affected stakeholders to submit grievances available via the BSP website. This SEP has been created to ensure that BSP continues to engage with those affected by the Project and also complements the formal consultation process already undertaken under Estonian law..

3. STAKEHOLDER IDENTIFICATION

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the level of potential Project impacts.

As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:

- a) Primary stakeholders - individuals and groups who are affected directly by the Project; and
- b) Secondary stakeholders - those parties which have influence on, but are not necessarily directly impacted by, the Project, and those indirectly impacted by the Project

The key stakeholders identified are presented in Table 2.

Table 2: Key Identified Stakeholders and Methods of Engagement

Stakeholder Category	Type	Name	Interest in Project
Primary	Project Shareholders / Internal Stakeholders	BSP, BSP Shareholders (Evecon OÜ, Corsica Sole, and Mirova)	Decision-making process, Project implementation, and stakeholder engagement.
	Local Communities	Nearby communities and residents of Aruküla village, Raasiku Rural Municipality of Harju County	Benefitting from grid balancing, and energy supply stability. Nuisances due to noise and construction related disruption i.e., traffic, dust, and noise.
	Vulnerable Groups	Any specific vulnerable groups identified i.e., disabled persons, elderly persons etc. in close proximity to the site.	Vulnerable groups that may have limited mobility or access to main Project communication channels.
	Permitting bodies and governmental agencies	Tallinn Municipal Government; Raasiku Parish Government; Estonian Environmental Board; Estonian Health Board/ Ministry of Social Affairs; Ministry of Climate; Estonian Transport Administration; Estonian Rescue Board; Rescue Centres, Volunteer Fire Brigades Emergency Medical Services (EMS) (Kiirabi); Estonian Competition Authority	Issue of building permits, environmental permits, approval of designs, and Occupational Health and Safety (OHS) Authorisations.
Secondary	NGOs	Local, National NGOs etc.	Understanding the proposed measures and impacts the Project will bring (i.e., on conservation efforts and biodiversity).
	Contractors/Suppliers	EPC Contractor, battery supplier, transformer supplier, switchgear supplier.	Tenders and participation in the implementation of the Project.

Stakeholder Category	Type	Name	Interest in Project
	Construction workers	Construction workers employed by the EPC / Construction Contractor	Contractors are engaged to carry out the construction works.
	Business Environment	Neighbouring businesses to the project site.	Noise and traffic related nuisance during construction and operation. Businesses with interest in the Project's construction or operation providing services or supplies i.e., waste disposal.
	Utility Companies	Eesti Energia, local water and sewage authorities, and telecommunications operators	Ensuring grid stability (Eesti Energia & Elering), sustainable resource use (water and sewage authorities), and reliable connectivity (telecom operators)
Lender	Lending Organisation	EBRD	Provide the loan to finance the Project, alongside certain environmental, social and technical requirements.

4. STAKEHOLDER ENGAGEMENT PROGRAMME

4.1. Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 3 below. The objectives of external communications are to provide regular engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the Project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, EBRD PR 10 and Estonia national legislation.

4.2. Stakeholder Engagement Programme

The Stakeholder Engagement Programme envisages that consultation meetings will take place with relevant interested parties prior to the commencement of construction for the Project as well as during the project implementation, if necessary. Consultation and engagement activities are required to address current stakeholder suggestions, ideas or concerns. In order to receive their full engagement, stakeholders will be able to use several channels (phone, e-mail, and website) for

receiving more details about the project or state their comments, ideas throughout the project life cycle.

Stakeholders will be able to attend consultation meetings and be informed of project.

Non-Governmental Organisations (NGOs) are recognised as potentially relevant stakeholders, particularly where their areas of focus relate to the Project's environmental, social, or community aspects. It is considered good practice to include NGOs in the SEP to ensure that opportunities for engagement remain open throughout the project lifecycle. BSP will aim to understand the needs of any interested NGOs as they become known and may update this SEP to reflect any specific commitments or agreements to provide information. This approach allows for proportionate and interest-based engagement, while maintaining alignment with EBRD's Performance Requirement 10.

The Stakeholder Engagement Programme is detailed in Table 3 below:

Table 3: Future Stakeholder Engagement Programme

Stakeholders	Communication/Engagement Method	Information to be Disclosed	Timeframe
Internal Project Shareholders (Supervisory Board of BSP, BSP Shareholders (Evecon OÜ, Corsica Sole, and Mirova), and EHS Manager)	<ul style="list-style-type: none"> Internal meetings with the Project Manager, E&S Manager and owners of the SPVs on a weekly and as-needed basis. At least one E&S kick-off meeting with the Construction Contractor to outline E&S requirements. Monthly EHSS meetings attended by Project Manager, E&S Manager and Construction Contractor to discuss Project updates and E&S measures and processes during construction 	<ul style="list-style-type: none"> ESAP and SEP Quarterly reports on grievances, if any. Other E&S data (e.g., H&S statistics, training, workforce) may be reported upon request or during key project milestones Project progress updates Financial performance ESG compliance and sustainability measures Risk assessments and mitigation strategies 	<ul style="list-style-type: none"> Weekly internal meetings throughout construction period. Meeting with Contractor held before construction and upon contract signing. Monthly Project EHSS meetings throughout construction period.
Permitting bodies and governmental agencies	<ul style="list-style-type: none"> Ongoing communications with Municipality to discuss regulations, permitting and updates on Project development via emails, meetings, and official correspondence as needed 	<ul style="list-style-type: none"> Regulatory compliance status, if requested by the relevant authority or required under 	<ul style="list-style-type: none"> Project design and construction phases (as required).

Stakeholders	Communication/Engagement Method	Information to be Disclosed	Timeframe
	<p>throughout the Project timeline.</p> <ul style="list-style-type: none"> Submit official letters and emails to the relevant National Government Authorities as required Pre-scheduled formal engagement meetings with regulatory bodies Submission of compliance and environmental reports Site visits with regulators for verification (when requested) Participation in public hearings (where applicable) 	<p>national procedures Permitting and legal compliance updates, if any (i.e. Environmental Consents, Construction Permits and OHS Authorisations)</p>	
Local Communities	<ul style="list-style-type: none"> When there are sufficient requests from local resident, organized pre-operation town hall meetings with project representatives, to determine the need and frequency of future meetings with community representatives (e.g. head of the village) Project Non-Technical Summary (NTS) distributed through community centers Dedicated Community Liaison Officer (CLO) for ongoing engagement and grievance handling 	<ul style="list-style-type: none"> SEP and NTS Project timeline and potential community impacts Employment & business opportunities Environmental & safety measures Community investment and CSR initiatives 	<ul style="list-style-type: none"> Once during the early stage of construction Regular online & print updates throughout the construction phase. Immediate response to grievances
Vulnerable Groups	<ul style="list-style-type: none"> If and when vulnerable groups are identified in the future, social specialists will facilitate one-on-one consultations. These consultations will present: Project construction updates; Grievance mechanism; Temporary impacts (traffic, noise, vibration, dust etc.); 	<ul style="list-style-type: none"> SEP, NTS Project-related risks affecting vulnerable groups Opportunities for inclusion (employment, training) 	<ul style="list-style-type: none"> Prior to construction and throughout construction period (as required).

Stakeholders	Communication/Engagement Method	Information to be Disclosed	Timeframe
	<p>Restrictions or diversions caused by Project-related activities. All consultations and meeting minutes should be recorded.</p> <ul style="list-style-type: none"> Tailored assistance programs 		
NGOs	<ul style="list-style-type: none"> Provide relevant project documents (e.g. NTS, SEP, grievance mechanism) upon request via email or in coordination with local authorities or community channels. If NGOs express interest or raise concerns during project development, BSP is open to engaging in dialogue and sharing information as appropriate. The approach to engagement will be adapted based on the nature of the NGO's interest and the phase of the project 	<ul style="list-style-type: none"> SEP, NTS Environmental and social management measures, where relevant Project updates, if specifically requested 	<ul style="list-style-type: none"> If and when NGOs express interest, during the construction and operation phases as relevant. Engagement will be initiated as needed and in response to actual NGO contact
EPC Contractor and Suppliers	<ul style="list-style-type: none"> Monthly coordination meetings attended by the Project Manager, E&S Manager, and Construction Contractor to discuss project progress, ESAP and SEP compliance Dedicated E&S meetings with the E&S Manager during construction as needed Construction Contractor to consult and collaborate with local emergency services regarding emergency procedures and any potential road closures. Joint HSE briefings and compliance sessions coordinated by BSP's EHS 	<ul style="list-style-type: none"> Monthly updates on ESAP, SEP, and CESMP implementation Project schedule and milestone tracking E&S issues and data shared with E&S Manager to develop resolutions to issues found. Expectations regarding compliance with site-specific HSE procedures, the CESMP, 	<ul style="list-style-type: none"> Meetings with Project Manager, E&S Manager and Construction Contractor held prior to construction upon contract signing and as needed during construction. Weekly meetings with Construction Contractor and E&S Manager throughout construction Ongoing performance reviews

Stakeholders	Communication/Engagement Method	Information to be Disclosed	Timeframe
	<p>Manager or a designated representative, in collaboration with contractors and suppliers, to support understanding of Construction Environmental and Social Management Plan (CESMP), legal, and EBRD requirements</p> <p>Performance evaluations based on contractual obligations linked to the ESAP and SEP</p> <ul style="list-style-type: none"> Reporting dashboard for real-time updates 	<p>applicable national regulations, and alignment with EBRD E&S standards Procurement and sustainability requirements</p> <ul style="list-style-type: none"> Code of conduct adherence 	
Construction Workers	<ul style="list-style-type: none"> Daily safety briefings /Induction training and toolbox talks Regular assessments conducted by supervisors to ensure the well-being, safety, and working conditions of construction workers Provision of information on grievance mechanisms through internal communication channels such as induction briefings, noticeboards, or email updates Feedback through the project-wide grievance mechanism 	<ul style="list-style-type: none"> SEP Workplace safety procedures & HSE protocols Grievance mechanism and resolution process 	<ul style="list-style-type: none"> Weekly communication with workers. throughout construction period. Weekly safety briefings or when there are new types of work to be done.
Business Environment	<ul style="list-style-type: none"> Inform potential future identified affected businesses about the Project, construction schedule and the Project grievance mechanism. Industry conferences and networking events Collaboration with local businesses Corporate reports and press releases 	<ul style="list-style-type: none"> SEP and NTS Business partnership opportunities Corporate responsibility initiatives 	<ul style="list-style-type: none"> Throughout the construction period as required.
EBRD	<ul style="list-style-type: none"> Formal project progress report ESG performance assessments 	<ul style="list-style-type: none"> ESAP and SEP Project compliance 	<ul style="list-style-type: none"> Quarterly updates in the construction phase and biannual updates in the first

Stakeholders	Communication/Engagement Method	Information to be Disclosed	Timeframe
	<ul style="list-style-type: none"> ▪ Risk & financial disclosure reports submitted to EBRD ▪ Participation in EBRD-led sustainability forums 	<ul style="list-style-type: none"> ▪ with EBRD environmental and social policies ▪ Sustainability and governance updates ▪ Financial and operational status reports 	<ul style="list-style-type: none"> ▪ 2 years of operational phase ▪ As per EBRD reporting requirements

In addition to scheduled engagement activities at key project milestones, stakeholders may also request ad hoc meetings or information sessions at any time. The project team will seek to accommodate such requests, particularly during periods of disruption, changes in construction schedules, or emerging community concerns.

For more information and comments, stakeholders can use the contact information below:

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In summary of the table above, the key communication methods for this assignment are described below:

Company E&S Meetings

These meetings will provide time for BSP and the shareholders to organise the implementation of environmental and social (E&S) actions, as well as an opportunity for EPC contractor to provide updates on their implementation of the ESMP and E&S actions during construction. The interaction between the BSP EHS Manager and the EPC Contractor will be stipulated in their scope of works and included in their individual contracts. This will involve regular communication between the two parties.

Community Consultation Meeting (Public Engagement Sessions)

Community Consultation Meetings serve as a formal platform for engaging with affected communities, ensuring they remain informed about the project's progress, potential impacts, and mitigation measures. These sessions provide an opportunity for local stakeholders to voice their concerns, ask questions, and seek clarifications directly from project representatives. Even though construction has already commenced, maintaining open communication with the community is essential to uphold transparency and compliance with EBRD standards. Ongoing engagement helps to build trust, address grievances proactively, and demonstrate the project's commitment to responsible development.

To ensure effectiveness, these meetings should incorporate a structured approach, including mechanisms to record attendance, gather community feedback, and provide formal responses to concerns raised. This process ensures accountability while reinforcing the project's commitment to continuous stakeholder engagement. Formal minutes and attendance registers must be taken during this meeting and any future public consultation meetings.

Local Business Engagement Meetings

The EHS Manager will engage directly with businesses located in proximity to the project site through the most suitable communication channels available, including via written correspondence using the company email addresses and phone numbers. Following initial outreach, BSP will organise a face-to-face meeting as required to raise awareness and discuss Project components, the grievance mechanism, and opportunities for community queries. Formal meeting minutes and an attendance register will be maintained during these engagements and any future business meetings.

EBRD E&S Meetings

BSP will provide annual (and on-a-needs basis) environmental, social, health and safety updates to the EBRD during the construction phase and operation phase. These updates will demonstrate the implementation of E&S actions agreed before the loan ratification. This includes actions to be carried out by the EPC Contractor in the ESMP.

5. REPORTING AND GRIEVANCE MECHANISM

5.0. Introduction

A grievance is considered to be any complaint or comment (including questions or suggestions) about the way the Project is being implemented. Grievance management is an important component of the Project's implementation and is guided by a well-developed process that includes:

- clear communication to stakeholders, proper documentation and tracking of complaints, and well-defined responsibilities for resolution.

The grievance mechanism for the BSP BESS Project – Hertz I I is outlined in this SEP and will be developed and implemented with the following aims:

- To address concerns promptly and effectively, in a transparent manner that is free from manipulation, interference, coercion, intimidation, or retribution, and is readily accessible to all affected parties at no cost.
- To ensure handling of grievances in a culturally appropriate manner that is discreet, objective, sensitive and responsive to stakeholders' needs.
- To guarantee that there will be no retaliation or discrimination against those who raise grievances, and that all grievances will be treated with confidentiality.
- To allow for anonymous submissions, and to ensure regular updates to complainants about progress.

- To ensure that this mechanism does not prevent access to formal judicial or administrative remedies.

5.1. Monitoring, Reporting and Feedback Mechanisms

BSP will monitor the communication channels and will provide feedback as appropriate. A complaint box at the Hertz I project site will be available for stakeholders during the construction phase and complaints can also be submitted by emailing the BSP EHS Manager or visiting the Evecon Headquarters in Tallinn. Any complaints will be registered in a log (Appendix 2) for complaints by the EHS Manager who will also be the key contact person responsible for managing the grievance mechanism. The contact details of the EHS Manager will be shared to stakeholders during the engagement activities listed in Table 3.

In order to monitor the implementation of this SEP and the functioning of the grievance mechanism, the EHS Manager will confirm to EBRD that the arrangements are in place and operating during the early stages of construction. This will include the sharing of notes, minutes and/or documentation on engagement activities undertaken, including all information disclosure undertaken as part of the SEP. In line with BSP's submission of the Annual E&S Report, EBRD will also annually assess the SEP implementation.

5.2. Grievance Mechanism Submission Process

BSP will operate a Grievance Mechanism, established in-line with international best practice. Any comments or concerns can be brought to the attention of the company verbally (in person or over the phone) or in writing by email or filling in a grievance form (see Appendix 1). The grievance form can be submitted in person in the complaint's boxes at the Hertz II Project site or to Evecon Headquarters office in Tallinn.

The grievance form and information on the procedure (including contact persons) will be made available on the BSP website and during engagement activities. Information banners will also be placed on designated noticeboards around the site perimeter.

How to Submit a Complaint

Stakeholders can submit grievances through any of the following channels:

- **In person**, by speaking directly with project staff on-site or during scheduled community meetings.
- **By phone or email**, using contact information made available on public notices or at the project site.
- **Via the designated community liaison officer.**
- **By completing a grievance form available at the project site office or from BSP representatives Via partner institutions or trusted intermediaries**, such as local NGOs or community leaders, particularly in cases where direct submission may be difficult or sensitive.

These options are designed to make the grievance mechanism accessible, inclusive, and easy to use for all community members, including vulnerable groups.

Grievance Record-Keeping and Tracking

All grievances, including anonymous submissions, will be recorded in the grievance mechanism log. The Project Manager and EHS Manager will cooperate closely, sharing all information regarding any complaints or dissatisfaction.

The grievance log will store the following information on the complaints received:

- Complaint number
- Category (aka subject of the grievance)
- Name of complainant (if provided)
- Complainant address and contact details
- Date of complaint receipt
- How complaint was received
- Who received the complaint
- Description of the issues/complaints
- Date of response
- Date of final resolution
- Entities involved
- Status of the issue
- Notes on current status e.g. resolution activities planned and progress
- Number of days between complaint receipt and complaint acknowledgement
- Number of days between complaint receipt and complaint resolution

5.3. Guiding Principles of the Grievance Mechanism

The grievance mechanism for this project is designed to be accessible, transparent, and fair, following international best practices. It is governed by the following key principles:

- **Accessibility:** The mechanism is available to all stakeholders, including individuals and groups, without cost or discrimination.
- **Anonymity:** Complaints can be submitted anonymously, and no identifying information is required unless voluntarily provided.
- **Non-retaliation:** Complainants are protected against any form of retaliation. The project proponent is committed to ensuring a safe environment for raising concerns.
- **Confidentiality:** All grievances, especially those involving sensitive matters (e.g. GBVH), will be handled with strict confidentiality.
- **Timely resolution:** Grievances will be acknowledged, assessed, and resolved promptly within defined timeframes.

- **Responsiveness and fairness:** All concerns will be considered objectively, and responses will be communicated clearly and respectfully.

These principles aim to ensure trust in the grievance process and promote constructive dialogue with affected communities.

5.4. Gender-Based Violence and Harassment (GBVH) under the Grievance Mechanism

In line with international good practice, BSP's grievance mechanism adheres to the principles of accessibility, anonymity, non-retaliation, confidentiality, and sensitivity in handling Gender-Based Violence and Harassment (GBVH)-related cases.

The prevention of GBVH in the workplace is a priority for BSP and its senior management. The grievance mechanism described in Section 5.2 is designed to address all types of grievances, including those related to GBVH, and allows for the anonymous submission of complaints.

To ensure a safe and appropriate response to such sensitive issues, BSP will designate a trained female staff member to act as a Gender Focal Point. This individual will be responsible for engaging with GBVH complainants and ensuring that grievances are raised and managed in a safe, confidential, and survivor-centered environment.

All GBVH-related complaints will be handled with strict confidentiality. The identity of complainants will be protected at all times, and retaliation of any kind will not be tolerated. When necessary, GBVH cases will be referred to qualified personnel, including legal, psychosocial, and child-protection specialists. Only trained investigators will handle these cases, and serious incidents may be referred to relevant national authorities or external service providers for further action.

This approach reinforces BSP's commitment to a safe, inclusive, and respectful environment for all individuals involved in the Hertz II Project.

5.5. Grievance Resolution

If grievances are submitted on site, the Contractor will be responsible for logging complaints which will then be solved by the BSP EHS Manager according to Stage 1 of the Grievance Mechanism process. In case the EHS Manager cannot solve the complaint, further information is requested from the complainant and a grievance meeting with the Contractor and the EHS Manager will be established as described in Stage 2. Stakeholders can use one of the stages for submitting grievances. They can directly apply to Stage 2.

All verbal or written complaints or grievances will be logged immediately after they are received by the EHS Manager. Complaints will be acknowledged and responded to (first response) within 5 working days. Resolution will be proposed within 10 working days for Stage 1 and 30 working days for Stage 2 from acknowledgement of the grievance, however the EHS Manager will aim to respond to complainants and resolve the issues as quickly as possible from the date of receipt. Individuals can request the right to have their name kept confidential and this mechanism does not

preclude the right for stakeholders to process grievances through other judicial means.

Grievances submitted will be solved and followed-up in accordance with the procedures given below:

- Stage 1 – EHS Manager receives and solves complaints. If at Stage 1 the complainant's grievance is not solved, he/she will be informed about grievance resolution procedures of Stage 2. The complainant has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. The EHS Manager will be aware of all the grievances submitted at Stage 1 through the grievance log and will monitor their resolution remotely.
- Stage 2 – The EHS Manager receives and solves complaint. A Grievance Meeting attended by the EHS Manager and Project Manager will be set up to resolve complaints.

The Complainant has the right to apply to the Court in case his/her complaint was not resolved through either Stage 1 or Stage 2, or directly without use of the grievance mechanism.

5.6. Roles and Responsibilities

BSP has overall responsibility for project implementation and safeguard compliance. The contact below is responsible for ensuring all Project-related grievances are carried out in accordance with Estonian legislation as well as EBRD's Environmental & Social Policy:

Antoine STOKKING, EHS Manager, BSP

Telephone: +33 6 20 96 88 74

Email: antoine.stocking@corsicasole.com

Address: 59 rue Pernety 75014 Paris

Appendix 1

BSP GRIEVANCE FORM

BSP Grievance Form (Template)

Reference No.	
Full Name (optional):	
Contact Information Please mark how you wish to be contacted and add contact details	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> Other (please specify):
Description of Concern, Incident or Grievance	What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of concern, incident, or grievance	
<input type="checkbox"/> One-time incident/grievance (date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)	
What would you like to see happen to resolve the problem?	
Signature: Date:	
Please insert this form in one of the grievance boxes	

Appendix 2

BSP GRIEVANCE LOG

BSP Grievance Log Sheet (Template)

No.	Date of complaint receipt	Grievance Channel	Name and Contact Information	Grievance Category	Description of Grievance	Person Responsible for Resolution	Date of Communication of Solution	Status