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# STAKEHOLDERS ENGAGEMENT PLAN (SEP)

## Offshore Wind Farms MFW Bałtyk II and MFW Bałtyk III, Poland

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CLIENT

Equinor & Polenergia S.A.

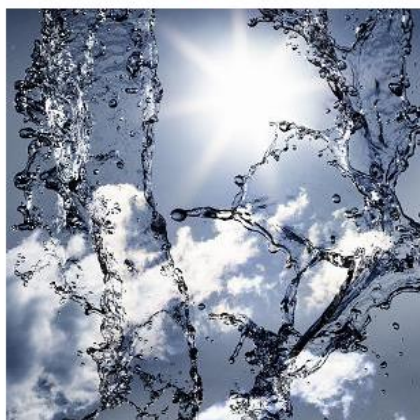
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## SEP

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## SUMMARY

This SEP provides an overview of project communication and stakeholders involvement, up to date, as well as planned activities and grievance mechanism regarding the offshore wind farm MFW Bałtyk II and MFW Bałtyk III located in Poland, on the Baltic Sea, and connection infrastructure on land (Poviat Stupsk).

This report has been prepared by Sotis Advisors in cooperation with Multiconsult Polska sp. z o.o. for its client. The client's rights to the report are provided for in the relevant assignment agreement.

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**ACRONYMS**

CGM	Community Grievance Mechanism
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIA decision	Environmental decision in meaning according to Polish EIA Act
EIB	European Investment Bank
EZZ	Polish Exclusive Economic Zone
FNEZ	Foundation for Sustainable Energy - Fundacja na rzecz Energetyki Zrównoważonej
GBVH	Gender based Violence Harassment
IFC	International Finance Corporation
Location permit, PSZW	Permit to erect or use artificial islands, structures and equipment in Polish maritime areas

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SEP for MFW Bałyk II and MFW Bałyk III

NGO, NGOs	Non-governmental environmental organisation (-s)
O&M, O&M Base	Operation and Maintenance, Operation and Maintenance Base
OWF	Offshore Wind Farms (MFW)
POWSD	Polish Offshore Wind Sector Deal
PR	Performance Requirement
PS	Performance Standard
PSE	Transmission system operator (Polskie Sieci Elektroenergetyczne S.A.)
RDOŚ	Regional Director of Environmental Protection (RDEP)
SEP	Stakeholder Engagement Plan

# 1 Introduction

This document is the Stakeholder Engagement Plan (SEP) for the Offshore Wind Farms MFW Bałytk II and MFW Bałytk III (hereafter referred to as 'the Projects'), located in the Polish Exclusive Economic Zone (EEZ). These Projects are developed through Joint Venture between Equinor and Polenergia (both referred to as 'Shareholders'), each holding 50% interest. The Shareholders have established separate legal entities for each OWF, respectively: MFW Bałytk II Sp. z o.o. and MFW Bałytk III Sp. z o.o. (referred to hereinafter as 'Investors'). The aim of the Projects is to generate electricity using wind power - a non-carbon, renewable source of energy. Energy transmission will be provided via the connection infrastructure between OWF and the power station in Wierzbiczin.

For the purposes of this SEP, each of the two OWFs is treated as an individual development project with its own legal entity. In order to build understanding, trust and support for the Projects and in accordance with the relevant provisions of Polish law, applicable international lender standards and internal corporate requirements of Shareholders, this Plan sets out the objectives and process for information exchange and engagement with Projects stakeholders.

At the stage of developing this Plan, both OWF Projects and their connection infrastructures have environmental decisions.

The SEP will be made public (in both English and Polish) in accordance with good international practice. This SEP is an update of the 2022 document. There have been changes to the EIA decisions obtained for the Projects, and an EIA decision has been secured for the connection infrastructure for both wind farms. The SEP will be subject to review and update as the processes for obtaining further permits and decisions for both Projects progress, and as more information becomes available about the Project's stakeholders. In the future, the SEP will be updated at least before the start of construction and operation activities to reflect changes among stakeholders and the planned engagement at each stage.

As the Projects progress, detailed action plans will be developed before each stakeholder engagement campaign. These plans will be updated and appended to this SEP after each campaign to report on the campaign outcomes and enable them to be considered in further SEP updates.

## 1.1 Methodology for SEP preparation

This SEP was prepared by Sotis Advisors sp. z o.o. Team (Klaudia Drosio, Anita Kuliś and Katarzyna Auffret-Twardowska, a Polish environmental and social experts) in April and May 2024. It entailed a detailed review of internal documentation gathered by the Projects team in regards of EIA processes, stakeholder engagement up to date as well as planned activities and interviews with Projects representatives, local authorities, landowners. Expert knowledge and experience from other OWF projects was also used, including, among other things, knowledge from interviews with commercial fishermen and tourism operators shipping/operating in this part of the Baltic coast.

Site visit to all on-shore facilities in the Projects area held between 8 and 10 April 2024 and during the site visit consultation with local stakeholders in potentially affected communities took place. Short summary of the results of the stakeholders surveys are reported in the below table:

SEP for MFW Bałytk II and MFW Bałytk III

**Table 1. Stakeholder Consultation for the Preparation of this SEP**

Stakeholder	Date	Issues discussed
Head of the commune of Ustka	08.04.2024	<ul style="list-style-type: none"> <li>• evaluation of the information campaign about the Projects;</li> <li>• matters related to fishermen in the commune: incl. e.g. fishermen's interest in changing their profession; changes from fishing to tourism activities before the Covid epidemic, aging society;</li> <li>• issues related to the cable route through the commune (investor's flexibility in agreeing to change its route);</li> <li>• energy security issues;</li> <li>• lack of "measurable" benefits for the commune in connection with the implementation of the Projects and need for educational activities.</li> </ul>
Mayor of Ustka municipality	09.04.2024	<ul style="list-style-type: none"> <li>• positive opinion about Investor's contacts with local community;</li> <li>• emphasized great interest in work related to offshore wind farms, expressed not only by fishermen, but also by young people (30-40 years old, working today in similar professions, e.g. in Norway and wanting to return home);</li> <li>• offshore wind farms seen as a job opportunity for local communities.</li> </ul>
Mayor of Leba municipality	10.04.2024	<ul style="list-style-type: none"> <li>• positive response to the plans of building a service base in Leba, especially in the context of opportunities for new jobs;</li> <li>• load-bearing capacity of the road near the O&amp;M base ("yacht road") - how will the investor solve this matter at the construction stage;</li> <li>• insufficient depth of the approach channel into the port;</li> <li>• inability to go fishing for larger boats for several winter months;</li> <li>• issues of financing necessary works in ports from various financial resources;</li> <li>• fishermen issues - limited catches and poor productivity of fishing grounds;</li> <li>• large number of requests to scrap boats this year;</li> <li>• proposal to install stands for fishermen selling fish from their boats;</li> <li>• reconversion of fishermen to other activities;</li> <li>• lack of possibility to conduct recreational fishing;</li> <li>• internal conflicts between fishing organisations;</li> <li>• compensation for fishermen;</li> <li>• educational activities – there is a need for regular trainings and certification, because trainings offered on the market are too expensive for fishermen.</li> </ul>
Landowner 1 – private company – Agrodan	09.04.2024	<ul style="list-style-type: none"> <li>• cooperation with the Projects in acquiring land from the Company – very positive assessment;</li> <li>• communication, price negotiations.</li> </ul>
Landowner 2	09.04.2024	<ul style="list-style-type: none"> <li>• cooperation with the Projects and communication when obtaining the rights to the land from the owner (negotiations, amicable agreement) – positive opinion.</li> </ul>
Landowner 3	09.04.2024	<ul style="list-style-type: none"> <li>• cooperation with the Projects and communication when obtaining the rights to the land from the owner (negotiations, amicable agreement) – positive opinion.</li> </ul>

Source: Sotis Advisors

Attempts were also made to speak with community representatives – softysami (village heads). Phone calls were made to 4 individuals, but they could not be contacted. They did not answer their phones.



SEP for MFW Bałyk II and MFW Bałyk III

The SEP was developed in connection with the Livelihood Restoration Plan, Livelihood Restoration Framework, and Social Baseline Assessment. In accordance with the information contained in these documents regarding groups and social areas susceptible to the Project's impact, the SEP includes the method and scope of engaging and informing these groups.

SEP is in line with Equator Principles, IFC, EBRD Policy and EIB Performance Standard. More information about all these requirements are presented in chapter 2.3.

## 1.2 Projects overview

In 2018, Equinor and Polenergia started cooperation on the construction of two wind farms in the Baltic Sea, located about 28 and 55,6 km from the port of Łeba in the Voivode of Pomerania off the Polish Baltic shore, in both the Polish EEZ and the Territorial Polish Sea.

Two Polish companies were established, MFW Bałyk II and MFW Bałyk III, in which Equinor and Polenergia each hold 50% of shares. The generation capacity from both farms is expected to be 1440 MW, which will allow more than two million households to be supplied with electricity.

The final investment decision for these Projects is subject to obtaining the necessary permits and is planned for 2024. According to the time schedule first construction works, including preparatory works are scheduled for August/September 2024 onshore, first offshore works, including seabed preparatory works (which according to the Polish Building Law is also treated as construction works) for 2025, and offshore installation works for 2026..

The land components of the Projects will be located in the administrative territories of the urban-rural communes of Ustka, Redzikowo (former gmina Słupsk) and the urban commune of Łeba in the Pomeranian Voivode.

Equinor and Polenergia are also considering the implementation of a similar project in the Baltic sea area, MFW Bałyk I, in a further development stage.

The Projects includes construction of:

- two offshore wind farms with installed capacity of 720 MW per each;
- offshore transmission infrastructures cover one offshore substation per each OWF and submarine cables;
- land transmission infrastructures cover one onshore substation per each OWF and underground cables;
- O&M Base in Łeba (associated facility).

The summary of key information for the Projects includes the following table and a figure.

**Table 2. Key technical information about the Projects**

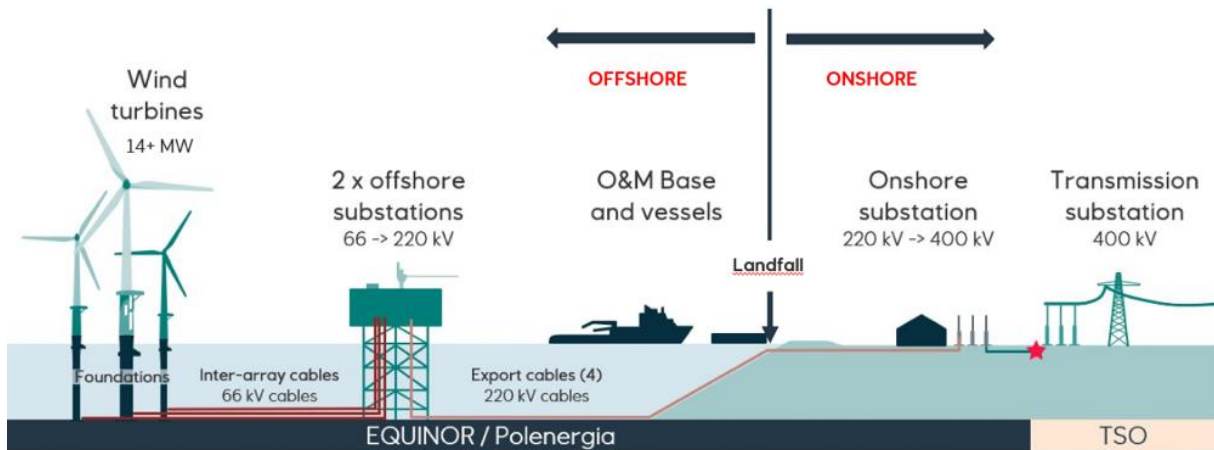
Parameter	MFW Bałyk II	MFW Bałyk III
Area off shore	122 km <sup>2</sup>	117 km <sup>2</sup>
Distance to shore	approx. 37 km	approx. 22 km
Distance to Łeba port	approx. 55,6 km	approx. 28 km
Depths	21-42 m	25-39 m
Average wind speed	9-10 m/s	
Installed capacity	720 MW	720 MW
Turbine type	14.4 MW Wind Turbine Generators	

SEP for MFW Bałyk II and MFW Bałyk III

Turbine number	50	50
Foundations	Primarily monopile foundations	
Transmission system	<ul style="list-style-type: none"> <li>• High voltage alternative current transmission system;</li> <li>• One offshore substation in each area with co-located onshore substations.</li> </ul>	
Landfall close to Ustka	<ul style="list-style-type: none"> <li>• One landfall common to both Projects;</li> <li>• Located approximately 3 km west of the port in Ustka;</li> <li>• Landfall land plot (8500 m<sup>2</sup>) belonging to the State Treasury (former military unit and forest area);</li> <li>• Landfall site area will not be cleared entirely.</li> </ul>	
Grid connection close to Słupsk	Wierzbiecin	
O&M Base in Łeba (associated facility)	Operation and Maintenance base with control room, remotely controlling the offshore windfarms, will be located in the port of Łeba.	
Key Projects legal and financial parameters	<ul style="list-style-type: none"> <li>• Joint Venture (JV) ownership structure - Equinor (50%) and Polenergia (50%);</li> <li>• BII &amp; III are separate legal entities;</li> <li>• Projects financed required;</li> <li>• State aid Contract for Difference (CfD) scheme in place;</li> <li>• Expected commercial operation date: Q2 2028;</li> <li>• Design lifetime: 30 years.</li> </ul>	

Source: Bałyk II/III, March 2024

**Figure 1. Schematic diagram of the Projects**

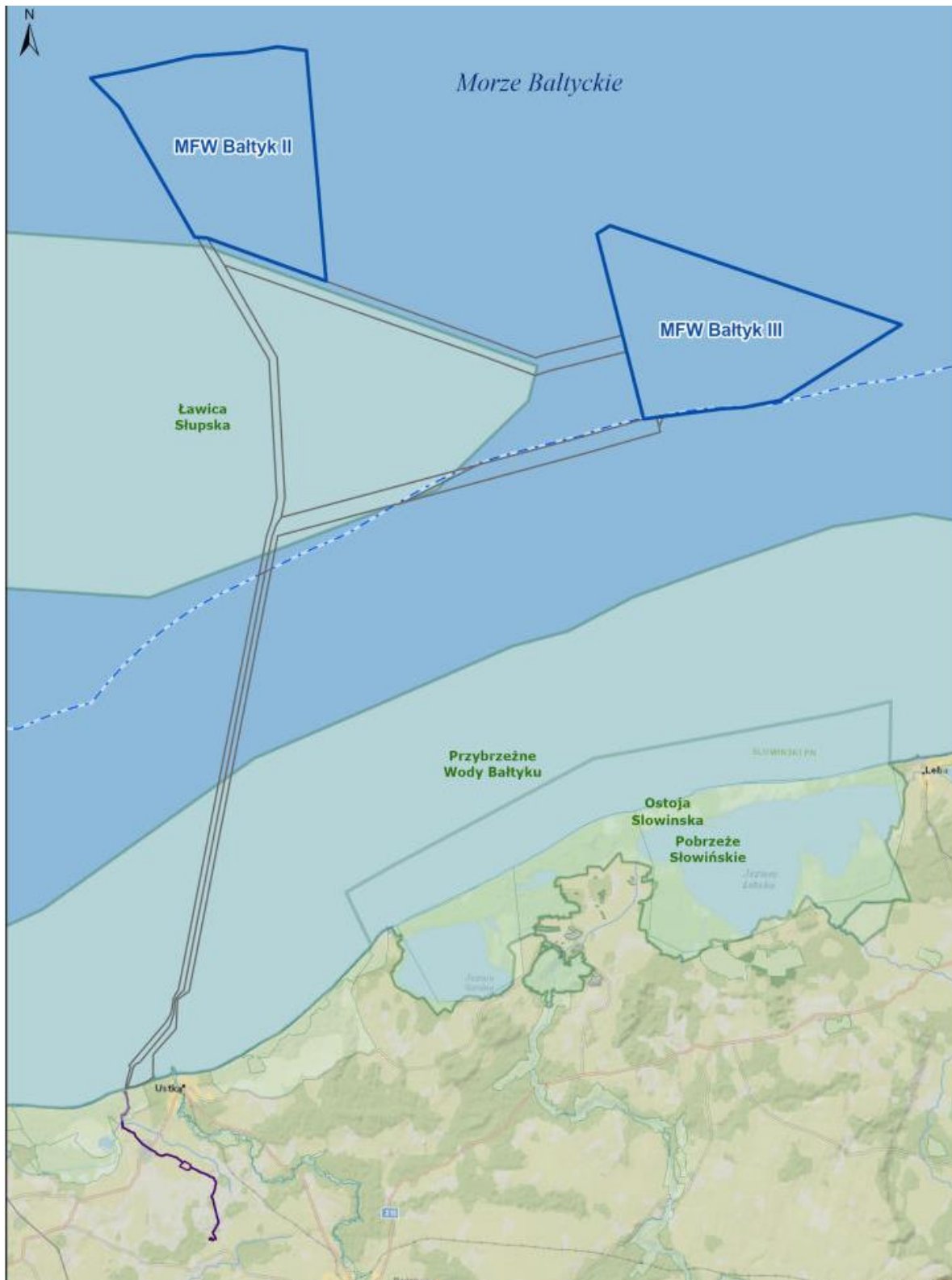


Source: Preliminary SEP, 2022

The Project is in line with Maritime Spatial Plan for Polish Sea Areas (Ordinance of the Council of Ministers of April 14, 2021 on the adoption of a spatial development plan for internal sea waters, territorial sea and exclusive economic zone at a scale of 1:200,000, Journal of Laws item 935) and it will be implemented entirely in the area indicated in the permit for erection and use of artificial islands, structures and devices.

SEP for MFW Bałtyk II and MFW Bałtyk III

**Figure 2 Location of the off-shore wind farms MFW Bałtyk II and MFW Bałtyk III as well as external connection infrastructures.**



Source: Equinor&Polenergia, April 2024

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SEP for MFW Bałtyk II and MFW Bałtyk III

SEP for MFW Bałyk II and MFW Bałyk III

**Figure 3 Onshore connection infrastructure of the MFW Bałyk II and MFW Bałyk III**





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SEP for MFW Bałtyk II and MFW Bałtyk III

Source: Equinor&Polenergia, May 2024

## 1.3 Current permitting status and EIA disclosure

According to the information provided by Investor the permitting status<sup>1</sup> is presented below in the list and table format (up to date).

### MFW Bałtyk II

- In January 2013, the MFW Bałtyk II was granted a permit to erect or use artificial islands of structures and equipment in Polish maritime areas (location permit or PSZW);
- In January 2013, the MFW Bałtyk II obtained the Connection agreement from the transmission system operator (PSE, Polskie Sieci Elektroenergetyczne S.A.) (amended in 2019, 2020, 2021, 2023);
- In March 2014, a decision on the permit to lay cables on the seabed was issued;
- In March 2017, the MFW Bałtyk II was granted a decision on environmental conditions; the decision has been amended in 2023;
- In November 2023, a decision on environmental conditions has been granted for connection infrastructure;
- All applications for the Building Permits for offshore part and onshore connection infrastructure were submitted in March-April 2024.

### MFW Bałtyk III

- In March 2012, the MFW Bałtyk III obtained a decision on the permit to erect or use artificial islands, structures and equipment in Polish maritime areas (location permit or PSZW);
- In July 2013 and March 2014, a decision on the permit to lay cables on the seabed was issued;
- In August 2014, the MFW Bałtyk III obtained the Connection agreement from the transmission system operator (PSE, Polskie Sieci Elektroenergetyczne S.A.) (amended in 2015, 2018, 2021, 2023);
- In July 2016, the MFW Bałtyk III obtained a decision on environmental conditions, the decision has been amended in 2022;
- In November 2023, a decision on environmental conditions has been granted for connection infrastructure;
- All applications for the Building Permits for offshore part and onshore connection infrastructure were submitted in March-April 2024.

**Table 3 Permitting status for EIA decisions, up to date**

Project part	EIA decision	Comments
Offshore MFW Bałtyk II	<ul style="list-style-type: none"> <li>• Issued on 17 March 2017 by RDOŚ, No.: RDOŚ-Gd-WOO.4211.26.2015.KSZ.20</li> <li>• EIA decision change: issued on 26 October 2021 by RDOŚ, No.: RDOŚ-Gd-WOO.420.3.2021.KSZ.14</li> </ul>	All EIA decions issued after a appropriate assessments, involving the public and relevant authorities. The EIA covered all aspects of the environment including assessment of impacts on WFD goals and biodiversity taking into account critical habitats and species (marine and terrestrial) as well as climate change aspects. Changes of EIA desions issued by the same authority and after the same procedures involving the public.
Offshore MFW Bałtyk III	<ul style="list-style-type: none"> <li>• Issued on 7 July 2016 by RDOŚ, No.: RDOŚ-Gd-WOO.4211.12.2015.KP.22</li> <li>• EIA decision change: issued on 8 November 2022 by RDOŚ, No.: RDOŚ-Gd-WOO.420.41.2022.AM. 6</li> </ul>	
Onshore and offshore	Issued on 29 November 2023 by RDOŚ, No.: RDOŚ-Gd-WOO.420.40.2022.AM.32	In addition, the documentation for the onshore grid connection infrastructures took

<sup>1</sup> <https://www.baaltyk2.pl/proces-uzyskiwania-pozwoleń>

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Project part	EIA decision	Comments
Connection Infrastructures		into account the wider impact on the local community - the prepared Environmental Impact Report meets the requirements of the ESIA, as required by the EBRD Policy and IFC.
O&M Base	Application for environmental decision in progress	-

Source: Sotis Advisors based on information and data provided by Equinor&Polenergia

Formal public participation took place during the environmental impact assessment procedures culminating in the environmental decision. The public was informed about the investor's applications for OWF EIA decisions and the progress of the EIA procedure in the usual way (notice boards on RDOŚ and on all municipalities from Hel to Ustka as well as Maritime Office in Gdynia, the Mayors of Gdynia, Sopot and Gdańsk, RDOŚ portal<sup>2</sup>, etc.). As regards ECI, publications of notices, apart from RDOŚ, took place in the Head of Ustka Municipality and the Head of Redzikowo (former gmina Słupsk) Municipality. In the course of these procedures, everyone was able to familiarise themselves with all the documentation gathered. Also everyone could submit their conclusions and comments on the Projects within the 21-day (during first EIA procedures) and within 30-day (during update EIA) public participation periods.

## 1.4 Supplementary disclosure package

Disclosure of project information enables stakeholders to comprehend both the environmental and social risks and impacts of the project, as well as the opportunities it presents.

Investor aims to set an example of best practice with the construction design of the OWFs, illustrating how OWF projects should be executed, with robust stakeholder engagement and consistent communication throughout the project's lifecycle.

To align with this objective, the goals for information disclosure and public communication are:

- To inform the local community about the planned work schedule and scope, while also inviting feedback.
- To announce the company's commitment to adhering to best practices in environmental protection and ensuring occupational safety for employees and subcontractors.
- To establish a grievance mechanism for collecting feedback, complaints, and suggestions, facilitating the resolution of issues.

To ensure transparency and accessible information throughout all stages of the Project's development—from planning to construction and operation—Equinor&Polenergia has implemented several measures:

- Hosting ongoing regular quarterly meetings with stakeholders: from local and regional authorities, landowners, organisation and associations to universities and schools.
- Providing current Projects information on a dedicated websites: [baaltyk2.pl](http://baaltyk2.pl) and [baaltyk3.pl](http://baaltyk3.pl), and since April 2024 on [baaltyk123.pl](http://baaltyk123.pl) as well as Equinor and Polenergia websites.
- Sharing Projects-related updates through various channels, including:

<sup>2</sup> <http://www.wykaz.ekoportel.pl>, Bałtyk II under the number 384/2021 and Bałtyk III 402/2022, External Connection Infrastructure (ECI) under the number 258/2023

[Regionalna Dyrekcja Ochrony Środowiska w Gdańsku - Regionalna Dyrekcja Ochrony Środowiska w Gdańsku - Portal Gov.pl \(www.gov.pl\)](http://www.gov.pl)



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- National, regional and local newspapers and webportals;
- The stationary Local Information Point in Łeba;
- Public information boards.

In addition, stakeholders directly involved in the Projects will have access to further specific information, including:

- Details about various stages of the construction process
- Environmental Impact Reports and related analyses
- Environmental permits and building permits.

According to the potential Lenders requirements additional package of documentation should be disclosure to the public (at least: on Lenders website, [baltyk123.pl](http://baltyk123.pl)), for at least 60 days. Documents will be available in Polish and English:

- Stakeholders Engagement Plan – this document;
- Environmental and Social Action Plan (ESAP) – contains environmental and social action plan that must be taken;
- Non-technical summary (NTS) – giving Projects overview in non-technical language;
- Cumulative Summary (CNT) - containing general information about the Projects
- Supplementary Information Package (SIP) - contains additional assessment of impacts not included in the original EIA.
  - Livelihood Restoration Framework (LRF) - containing guidelines for assistance in finding new sources of livelihood or compensation to ensure that the living conditions of affected people are at least at the same level as before the project;
  - Livelihood Restoration Plan (LRP) - a detailed action plan aimed at improving or restoring the livelihoods of those negatively affected by the project;
  - Social Baseline Assessment (SBA) - identifying how the Projects might impact people and the community in relation to their lives, work, and relationships.

In order to maintain an appropriate level of communication with Projects Stakeholders, these documents will also be discussed during an informational meeting organized at the Local Information Point in Łeba in the fourth quarter of 2024. Printed versions of the documents will be available at the construction offices and the Local Information Point in Łeba.

Stakeholders will be informed about the time and place of the document release through:

- Informational posters displayed at the Local Information Point, municipal offices, and villages along the connection infrastructure route. The posters will be equipped with a QR code linking to the website where the documents will be available;
- Information on the website: [baltyk123.pl](http://baltyk123.pl) and by sending a message to industry portals.

## 2 International and national requirements framework

The chapter identifies key international and national requirements relevant to the preparation of the SEP. These include, inter alia, the obligation of public information and participation and the involvement of statutory stakeholders in the process of project preparation and implementation.

### 2.1 International conventions and EU Directives

The international legal requirements for public participation are set out in the following documents:

- Directive 2001/42/EC of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ L 197, 21.07.2001) - imposes an obligation to inform widely on the decisions adopted and to make available the documents in the form of plans and programmes, the opinions, the results of the consultations and the justification of the choice from the point of view of alternatives, (SEA Directive).
- Directive 2003/35/EC of 26 May 2003 providing for public participation in respect of 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 with regard to individual decisions and programmes, provides for public participation at an early stage, provides opportunities to submit comments and applications, lays down rules for the participation of non-governmental environmental organisations (NGOs).
- Aarhus Convention - Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. (OJ 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 legislation, public participation is carried out at the stage of preparing strategic documents such as the maritime spatial development plan and at the stage of obtaining an environmental decision for a project.

The most important acts of Polish legislation on public participation in the decision-making process are:

- The Constitution of the Republic of Poland of 2 April 1997 (Journal of Laws No. 78, item 483, as amended), which stipulates that a citizen has the right to obtain information on the activities of public authorities; in addition, its Article 74 indicates that "everyone has the right to information on the quality of the environment and its protection";
- 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, the Directive 2001/42/WE and Directive 2011/92/EU and Aarhus Convention. On its basis, the environmental impact assessment process is conducted, including public participation and information at the stage of:

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- strategic documents (plans, programmes, strategies, including for the energy sector);
- individual projects that require EIA (such as offshore wind farms and the construction of energy transmission system).
- Act of 27 March 2003 on spatial planning and development (consolidated text: Journal of Laws of 2023, item 2739), which regulates the method of public announcement of the preparation of the spatial development plan.
- Act of 8 March 1990 on municipal self-government (consolidated text: Journal of Laws of 2023, item 40 as amended), which sets out the rules for consultations with the inhabitants of the municipality.

## 2.3 International lender policies and guidance

Equator Principles, International Finance Corporation (IFC), European Bank for Reconstruction and Development (EBRD), and European Investment Bank (EIB) have specific requirements regarding stakeholder consultations and public information disclosure. Detailed overview of their requirements are presented below:

### Equator Principles (EPs)

- **Principle 5: Stakeholder Engagement:** Requires stakeholder engagement for Category A projects (OWF case) and, to a lesser extent, for Category B projects (O&M Base, associated facility). These projects must identify stakeholders and engage with them, with particular attention to engaging affected communities. Public disclosure of documents such as Environmental and Social Impact Assessments and Stakeholder Engagement Plans is required.

### International Finance Corporation (IFC)

- **Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts:** Mandates stakeholder consultations during the environmental and social impact assessment process. It requires appropriate disclosure and engagement with stakeholders at early stages of the project.
- **Performance Standard 7: Indigenous Peoples** – do not apply in this case .

### European Bank for Reconstruction and Development (EBRD)

- **Performance Requirement 10: Information Disclosure and Stakeholder Engagement:** Mandates engagement with affected communities and other stakeholders. It requires providing information in a manner understandable to the local community and conducting stakeholder consultations. If the project has significant environmental or social impacts, the consultations must be more detailed.
- **Performance Requirement 7: Indigenous Peoples:** – do not apply in this case.

### European Investment Bank (EIB)

- **Environmental and Social Standard 10: Stakeholder Engagement:** Defines requirements for stakeholder engagement, including public consultations and information disclosure. It requires identifying stakeholders, conducting consultations at appropriate project stages, and documenting the outcomes of these consultations.
- **Environmental and Social Standard 7: Rights and Interests of Vulnerable Groups:** Requires special attention to engaging with vulnerable groups and obtaining their consent when necessary.

Each of these principles and standards aims to ensure appropriate stakeholder engagement and transparency during project implementation, which helps prevent conflicts and promotes sustainable development.

SEP for MFW Bałtyk II and MFW Bałtyk III

For Category A projects, which largely encompasses the MFW Bałtyk II and MFW Bałtyk III projects due to their scale, the public participation requirements are more extensive than those set out in Polish law.

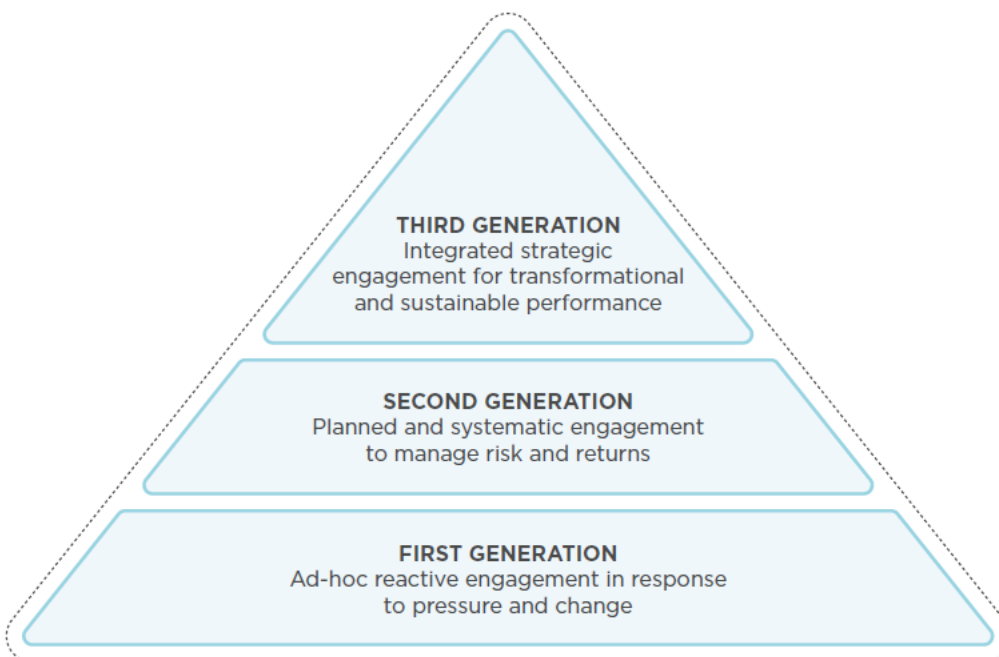
- Stakeholder consultations should be an ongoing process, continuing throughout the project’s life cycle. During this process, stakeholders must be given access to information about the environmental and social impacts of the project and the opportunity to provide feedback (gathering and reviewing comments);
- Systematic stakeholder identification is expected, along with identifying their expectations and concerns. Special attention is given to informing groups that are affected by and sensitive to the impacts of the project and engaging them in consultations;
- An essential requirement is the establishment of a mechanism for submitting comments and complaints, as well as addressing identified issues from affected people and other stakeholders (grievance mechanism).

The key principles guiding the Investor’s approach to stakeholder engagement on this Projects are:

- to be open and transparent with stakeholders, engaging in an open process and providing meaningful information on relevant aspects;
- to be accountable and willing to accept responsibility as a corporate citizen and to account for impacts associated with the Projects activities;
- to have a relationship with stakeholders that is based on trust and a mutual commitment to acting in good faith;
- to respect stakeholders’ interests, opinions and aspirations;
- to be responsive and to coherently respond in good time to stakeholders.

Taking above into consideration level of stakeholder engagement will be in line with third generation of stakeholder engagement as proposed in AA1000SES<sup>1</sup>.

**Figure 4 Level and approach to the stakeholder engagement**



Source: AA1000SES, 2015

### 3 Stakeholders identification and categorisation

Based on the:

- Desk research – analysis of the: similar projects, SEP 2022 prepared by ERM, Projects documentation received from the Equinor&Polenergia;
- Results of the initial stakeholder analysis prepared by the Equinor&Polenergia for the purpose of communication plan;
- Consultant’s knowledge and experience from the previous, similar projects.

The following external stakeholder groups were identified. In the table are presented external stakeholders that the Projects may impact. It does not contain other stakeholders like client’s employees or contractors/ subcontractors. Please note some stakeholders may be cited in several categories/groups, as they may have different connections to the Projects. See Appendix A for the complete register of Projects Stakeholders that have been identified to date. The Stakeholder Register will be updated throughout the Projects lifecycle, following the outcomes of engagements conducted.

#### 3.1 Stakeholders identification and categorisation

The graph depicts the most important external stakeholders identified for the Projects and their categorisation. The full list of identified Stakeholders is in the appendix A.

**Table 4 Overview of the key stakeholders identification and categorisation**

		<u>Position</u>		
		<u>Negative</u>	<u>Neutral</u>	<u>Positive</u>
<b>Influence</b>	<b>High</b>	<ul style="list-style-type: none"> <li>• <u>Owners and crew members of fishing and tourists boats / vessels</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Ministers: Climate and Environment, Foreign Affairs, Interior and Administration</u></li> <li>• <u>Members of Parliament</u></li> <li>• <u>National, Regional and local authorities issuing permits and decision.</u></li> <li>• <u>National, regional and local (SKO) Court of justice</u></li> <li>• <u>Development Banks: EIB, EBRD, World Bank, Santander, etc.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Ministry of Infrastructure, especially thru Sector Deal Agreement</u></li> </ul>
	<b>Medium</b>	<ul style="list-style-type: none"> <li>• <u>Fishers and tourist operator organisations: Zrzeszenie Rybaków Morskich, Północnokaszubska Lokalna Grupa Rybacka, Bałtyckie Stowarzyszenie Wędkarstwa Morskiego, etc.</u></li> <li>• <u>Impacted people and group of people (ECI construction phrase)</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Political parties, especially their regional and local representatives</u></li> <li>• <u>Mayors of the communes on the ECI route.</u></li> <li>• <u>National, regional and local media: Cire, WNP, Biznes Alert, Gazeta Wyborcza Gdańsk, Wiadomości Rybackie, etc.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Mayors of Ustka and the Ustka commune</u></li> <li>• <u>Mavor of Łeba</u></li> <li>• <u>Ports administration, public service providers</u></li> <li>• <u>NGOs and Associations: Foundation for Sustainable Energy, Polish Electricity Association (PKEE), Forum Energii, Rumia Invest Park</u></li> </ul> <p style="text-align: right;">General public</p>
	<b>Low</b>	<ul style="list-style-type: none"> <li>• <u>Owners of required land who have not agreed to amicable easement</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Organizations that operate within the territory of the State Treasury: Ustka Forest District, Polish Army</u></li> <li>• <u>Fish producers and organisations (processing organisation)</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Owners of secured land</u></li> <li>• <u>National Banks</u></li> <li>• <u>Academia: Maritime Fishing Institute, Maritime Institute in Gdańsk, etc. and secondary technical schools</u></li> <li>• <u>Local businssines: owners of hotels, bars, restaurants, etc.</u></li> </ul>

Source: Sotis Advisors based on data from Equinor&Polenergia, expert experiences

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**SEP for MFW Bałtyk II and MFW Bałtyk III****1. External Stakeholders****Institutional (government, professional and business organisations, unions)**

- National Government Authorities – Ministries are of primary political importance to the Projects in terms of establishing policy and monitoring and enforcing compliance with Polish Law throughout all stages of the Projects life-cycle.
- National, Regional and Local Government Authorities are of importance to the Projects as they are responsible for the decisions on environmental conditions and permits, as well as the implementation of legislation, and development plans and policies at a national, regional and local level. Regional and Local Governments have a say in the Projects EIA process and construction permitting process and execution, and its attitudes to the Projects and Investors involved will impact its schedule. Additionally, local Government needs to be engaged to maintain a direct line of communication, identify important issues which may impact the Projects, and ensure social support. Aspects of the permitting will also be performed by maritime authorities on the Polish coast.
- Political Parties - regional & local representatives. Political parties are important as they may exert influence on the municipality and gather political support towards the Projects. Local citizens identify with their representatives and count on them to provide them with relevant information about wind farm developments, especially the benefits generated for local communities.
- Court of justice on national, regional and local (SKO) level. Any potential appeal procedures against decisions issued for the Projects will be crucial until final administrative decisions are obtained. In particular, the environmental decision for O&M Base, building permits.
- Media - Local, regional and national level media may influence local stakeholders' perceptions of the Projects.
- National and regional NGOs and associations – will pay attention about the Projects, push ministries for law changes, may published important analysis and participate in the Projects promotion.

**Local civil society and businesses**

- Local Institutions (Port administrations / Public service providers, local governments) - Local public services including port administration and utility supply and local governments related stakeholders that potentially may be directly or indirectly affected by the Projects activities or the Project's associated environmental and social impacts.
- Regional and local NGOs and Associations (especially tourist operators and fisheries) - Organizations with direct interest in the Projects, and its social and environmental aspects, that are able to influence the Projects directly or through public opinion<sup>3</sup>.
- Land-affected stakeholders (includes public and private landowners)- Owners of plots within the area of the MFW Bałtyk II and MFW Bałtyk III cable route, landfall and the Łeba O&M Base area. These owners include public entities (such as the Starost of Słupsk, State Treasure- former: Forest District, Polish Army), and private owners (including companies and individuals).
- Potentially affected communities/groups and local societies directly or indirectly impacted by, or benefitting from, the Projects (eg.: people lives in neighborhood villages impacted by traffic on heavy building machinery, private owners of small bars, apartments) - Communities may be directly or indirectly affected by the proposed Projects and its activities, either positively or negatively.
- Vulnerable groups (e.g.: people with disabilities, young and old people, fishermen especially non-affiliated, tourist operators) - These communities need to be made aware of the Project's schedule and its planned

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<sup>3</sup> <https://wysokienapiecie.pl/70692-mala-fundacja-blokuje-morskie-wiatraki-orkenu/>

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**SEP for MFW Bałyk II and MFW Bałyk III**

activities as well as of the potential benefits that will come in the form of economic opportunities and employment. According to the consultant's knowledge resulting from conversations with representatives of sensitive groups, some groups expressed their negative opinions about Projects of a similar nature and about the entire offshore wind industry in Poland. For this reason, protests against the Projects cannot be ruled out. Improper communication and cooperation, particularly with fishermen and tourist operators, may result in protests and block the construction or departure of ships for construction/service from the port<sup>4</sup>.

- Academia and Education institutions - Education institutions and individuals with direct interest in the Projects, and its social and environmental aspects and that are able to influence the Projects directly or through public opinion. Such organizations may also have useful data and insight and may be able to become partners to the Projects in areas of common interest. Potential partners' interests may lie in the provision of services and supplies to the Projects or in addressing issues of common interest.
- Businesses (e.g.: local enterprises, local suppliers, owners of hotels, apartments, restaurants and bars) - Private sector industries and Investors that may be affected directly or indirectly affected by the proposed Projects and its activities. This may be positively as they may be able to secure contracts with the Projects, or negatively as they may have their business interests interrupted by the Projects.

## 2. Internal Stakeholders

The identification of internal stakeholders includes:

- Equinor & Polenergia Shareholders who may lose their funds in the event of Projects delays and inflation<sup>5</sup>, inappropriate communication about the Projects or in the event of protests in connection with the project.
- Employees of Equinor & Polenergia and their subsidiaries, established to implement the MFW Bałyk II and MFW Bałyk III projects, who are interested in the development of the Projects and thus their professional development, the possibility of improving qualifications, and achieving professional goals. An unclear employment and promotion policy may be the issue for them;
- Contractors and subcontractors who have the opportunity to earn on the Projects, develop their companies along with the development of the Projects. It is necessary to properly and transparently communicate purchasing procedures and compliance with the Code of Conducts and other Investor procedures in the chain of contractors and subcontractors;
- Suppliers - Cooperation on the Projects will enable suppliers to develop their companies and earn money. It might be crucial to conduct initial reputational risk audits, particularly in regards to child employment and poor working and pay conditions, product quality, and monitoring throughout the warranty period. Purchasing and supplier selection policies must be straightforward and transparent.
- Lenders (Development Banks, National Banks) - co-financing the Projects. Complying with requirements under their policies, including social and environmental policies, may determine the bank's participation in financing the Projects.
- Potential Lenders – co-financing Projects.

All internal stakeholders are positive about the Projects. They have the ability to develop and earn money thanks to Projects preparation, implementation, and operation. However, it is important to properly manage these stakeholders in order to minimize, in particular, reputational risks.

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<sup>4</sup> <https://www.cire.pl/artykuly/serwis-informacyjny-cire-24/184538-protest-rybakow-na-poczatku-instalacji-jednej-z-pierwszych-morskich-farm-wiatrowych-we-francji>

<sup>5</sup> <https://globenergia.pl/orsted-wycofuje-sie-z-projektow-offshore-na-wschodnim-wybrzezu/>



## 4 Stakeholder Engagement

The chapter includes information on Equinor&Polenergia's activities to date since 2014. Some of the activities already undertaken will be continued in the future.

### 4.1 Past Stakeholders engagement

Engagement for the Projects has been organised in the following work streams:

1. Engagement associated to education and social communication campaigns conducted for MFW Bałyk III in 2014-2015.

Initial engagement for MFW Bałyk II and MFW Bałyk III centred around a year-long education and social communication campaign taken forward by the Foundation for Sustainable Energy in cooperation with Polenergia between November 2014 and November 2015. During this time, consultations and meetings covered 15 stakeholder groups including fishing organisations, scientific institutes, port authorities and local authorities.

In addition, other activities undertaken over the course of the education and social communication campaign included the following:

- Engagement with the local government authorities of Ustka (rural and urban municipality), Smołdzino and Łeba municipalities to present the most important conditions for the implementation of the MFW Bałyk III, the potential role of local government authorities, the impact of the project on economic development of the coastal regions and to learn the concerns, expectations, and potential areas of cooperation with local authorities;
  - Disclosing Projects information to local communities through open day events in Ustka Municipal Office, Skwer Rybaka in Łeba and at Smołdzino Municipal Office;
  - Disseminating knowledge on the impacts and benefits resulting from the implementation of the Projects through media campaigns and cooperation with more than 20 local and regional information services. Three interviews were also held with the representative of Polenergia MFW Bałyk III, Foundation for Sustainable Energy (Fundacja na rzecz Energetyki Zrównoważonej - FNEZ), experts from the Maritime Fisheries Institute and participants of the consultation meetings which were broadcast in Radio Słupsk and Radio Koszalin;
  - Disclosure of project information on MFW Bałyk III through a virtual open house at: <https://wystawa.bałyk3.pl/en/> as well as the distribution and use of relevant information folders during consultations on EIA and all other following activities.
2. Engagement local communities neighboring the cable route corridor between 2018-2020.

Several initial meetings were held with the local communities neighbouring the cable route corridor during November and December 2018. These meetings were announced in the villages and municipalities via notice boards. They were attended by local communities, cable route neighbouring citizens, environmental consultancy representatives, company representatives and cable route plot owners. The objective was to present the cable route for the MFW Bałyk II and MFW Bałyk III onshore project infrastructure and respond to questions from stakeholders.

Between the years 2019 and 2020, due to Covid-19 restrictions, the social campaign was held online through virtual showroom sites for MFW Bałyk II and MFW Bałyk III. Projects information was also disseminated among all coastal offices, and grievance forms were also distributed in order to enable stakeholders to send their concerns.

Engagement associated to environmental permitting for the two Projects and external connection infrastructure, in 2021-2023 when the Investors applied for updated Environmental Decisions – see Chapter 1.3.

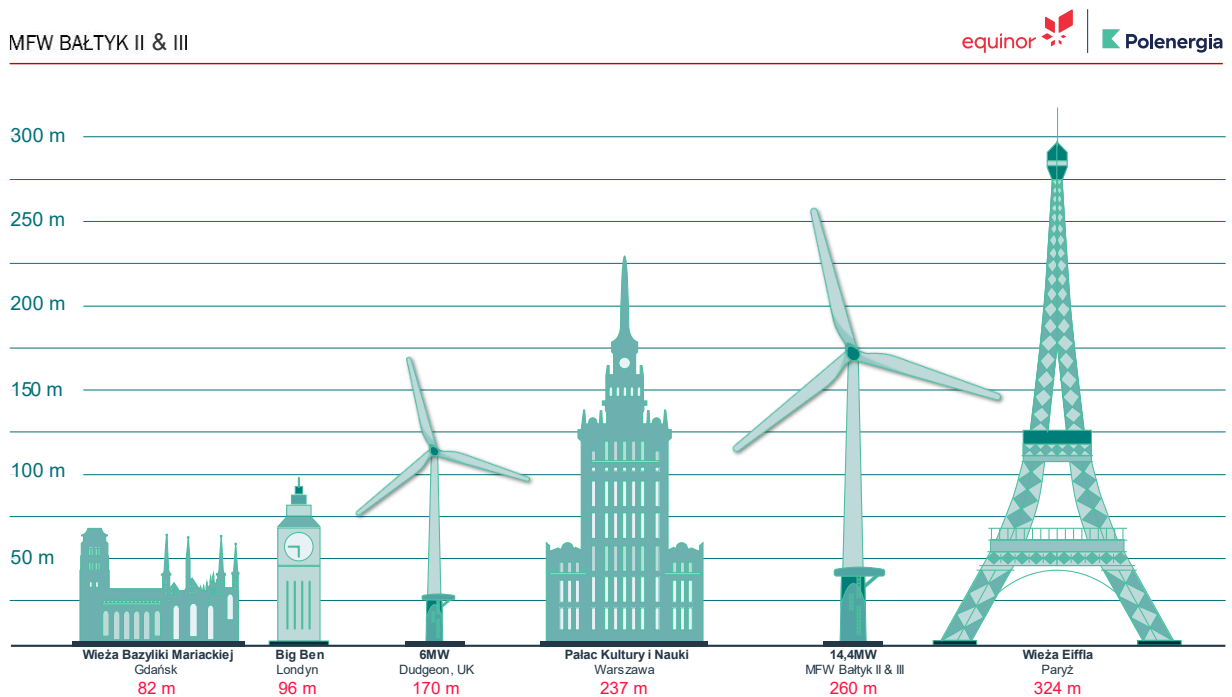


SEP for MFW Bałtyk II and MFW Bałtyk III

3. Other engagement activities conducted for the Projects since 2021.

Equinor&Polenergia have been very active since the early stages of the Projects informing very widely about the Projects and involving the local community in the green transition. Sotis Advisors had access to numerous Projects presentations and Projects announcements. Examples of the way in which the Project's stakeholders were presented and engaged, particularly from 2021 onwards, are indicated in the table below and in the figures.

**Figure 5 Example of graphical representation of the scale of the wind turbines for MFW Bałtyk II and MFW Bałtyk III from the Projects presentation.**



Source: Information meeting on the implementation of the MFW Bałtyk II and the MFW Bałtyk III, Łeba, 19.03.2024

**Figure 6 Local Information Point in Łeba: entrance, leaflets about project and grievance box, example of an artwork from a competition organised for schools.**



Source: Sotis Advisors, Łeba 10.04.2024

Since 2021, as part of public engagement, a series of activities have been undertaken to disseminate information about the Projects and familiarise the public with it. The activities can be categorised into the following thematic areas:

- Disclosure of general information about the Projects;

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- Presentation of the Projects and the potential benefits to the local communities;
- Presentation of the Projects’ progress to the authorities;
- Establishing initial contact and communication with identified stakeholders from whom land is to be leased for the Projects;
- Employment/local content;
- Education;
- Establishing contact and communication channels with authorities;
- Securing access to land.

The organized stakeholder meetings provided an opportunity for asking questions and submitting requests. So far, questions have been recorded regarding the Project's impact on people, the environment, the schedule, and employment-related issues. All these questions were considered and answered during the meetings. People interested in the Projects who visited the information point also had the opportunity to ask questions and submit comments and complaints. In cases where an immediate answer was not possible, alternative contact methods were suggested, such as filling out a complaint form, or contacting via email or phone. Comments regarding the Projects could be submitted both orally and in writing. It is important to note that by 2024, no complaints or questions had been reported through these additional contact methods.

A summary of all activities, that have taken place since 2021, involving the identified stakeholders is presented in Appendix B.

## 4.2 Identified Stakeholder Issues and Concerns

Stakeholders indicated that their main concerns were related to the Projects’ environmental impacts and recommended that engagement with stakeholders be continuous throughout the Projects’ lifecycle.

Table below, summarizes key issues raised and recommendations offered by stakeholders during the engagement activities.

**Table 5 Main External Stakeholder Issues and Concerns**

Topic	Issues and Concerns
<b>Environment and health</b>	<ul style="list-style-type: none"> <li>• Concerns relating to potential Projects impacts, including noise (onshore at construction stage), and noise and vibration impact on marine habitats;</li> <li>• Possible negative impact on fish (during construction) and on birds (during operation);</li> <li>• Navigation / safety issues during construction and operation (exclusive zone for OWF and submarine cables route).</li> </ul>
<b>Stakeholder engagement and information (especially related to the fishing and tourist operators)</b>	<ul style="list-style-type: none"> <li>• Needs for update about Projects stage;</li> <li>• Some stakeholders raised the need for further education about OWF for changes of professional qualifications to those needed by OWF;</li> <li>• Lack of data access and general information on previous OWF experience from abroad, the qualifications needed to work at OWF;</li> <li>• Concerns whether fishing or tourist boats will meet the required technical criteria for the OWF, the cost of their conversion;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Owners of fishing vessels and commercial yachts have requested financial support to adapt their vessels to meet the requirements of wind farm service ships.</li> <li>• Łeba port issues: deep of the water route, spaces for other ships than OWFs owned;</li> <li>• The group of tour operators considers that they are not properly informed. The port could be blocked in Leba if offshore wind farm developers fail to inform them about the Projects and the potential benefits of OWF construction projects;</li> <li>• An advisable channel of communication with fishermen and tourism operators is text messaging and "Wiadomości rybackie" - a monthly magazine published online and in hard copy by the Maritime Institute of Fisheries, as well as "Wiadomości żeglarskie" and by fishing and tourism associations, such as: the Sea Fishermen's Association, the North Kashubian Local Fishing Group, the Baltic Sea Angling Association, the Łeba Fishermen's Association, the National Chamber of Fish Producers;</li> <li>• Meetings are also advisable but with concrete information, e.g. on the issue of harmless work, professional requirements, compensation, courses and training, the protection zone around the OWF and the route of the submarine cable.</li> <li>• The investor's activities to date regarding, for example, support for local sports clubs, organization of workshops and a competition for schools have been very well evaluated. Continuation of these activities is expected.</li> </ul>
<p><b>Securing access to land</b></p>	<p>All Almost plots located on the land route of the grid connection infrastructure have already been secured.</p> <p>The key information's needed by the local community concern: the construction and its stages, duration, restrictions on access to areas on the other side of the cable route (construction stage), heavy vehicle traffic, and the protection zone (operation).</p>

Source: Sotis Advisors based on data gathered during site visit, data from Investor and experiences from other projects.

## 4.3 MFW Bałtyk II & MFW Bałtyk III in social media and websites

Projects information is also provided via social media and Projects websites: [bałtyk2.pl](http://bałtyk2.pl) and [bałtyk3.pl](http://bałtyk3.pl). Since April 2024 new, complex, website was open: [bałtyk123.pl](http://bałtyk123.pl). The Projects is widely known through press publications in the media with coverage nationwide. Press releases are sent regularly to the media, thanks to which there are many publications about the MFW Bałtyk II and MFW Bałtyk III projects. This provides access to current information about projects. Press releases are sent regularly to the media, thanks to which there are many publications about the MFW Bałtyk II and MFW Bałtyk III projects. This provides access to current information about Projects. Information about Projects is also available on LinkedIn of Equinor and Polenergia.

Examples of publications are indicated below.

**Table 6 Examples of publication in social media and websites**

Publication date	Platform	Description	Link to Publication
12/04/2021	Twitter	Polenergia signs agreement with Equinor to cooperate on offshore wind projects in Poland, including Bałtyk II and Bałtyk III	<a href="https://twitter.com/PolenergiaSA/status/1381594162468477445">https://twitter.com/PolenergiaSA/status/1381594162468477445</a>
05/06/2021	Facebook	Equinor announces plans to invest in the development of the Bałtyk III offshore wind farm in Poland	<a href="https://www.facebook.com/equinor/posts/3581563523647726">https://www.facebook.com/equinor/posts/3581563523647726</a>
27/05/2021	website	Łeba to become location for operations and maintenance base for Polish Baltic Sea offshore wind projects	<a href="https://www.equinor.com/en/news/archive/20210527-leba-location-operations-maintenance-base">https://www.equinor.com/en/news/archive/20210527-leba-location-operations-maintenance-base</a>
19/08/2021	Instagram	Polenergia provides update on progress of Bałtyk II and Bałtyk III projects	<a href="https://www.instagram.com/p/CSqy9p3lKhD/">https://www.instagram.com/p/CSqy9p3lKhD/</a>
07/09/2021	twitter	Press realise (WNP.pl): update about project schedule delay due to administrative procedures	<a href="https://twitter.com/wnppl/status/1435120910768431111">https://twitter.com/wnppl/status/1435120910768431111</a>
02/10/2021	website	Equinor releases detailed information on the Bałtyk III offshore wind farm including timeline and milestones	<a href="https://www.equinor.com/en/news/20211002-baltykiii-update.html">https://www.equinor.com/en/news/20211002-baltykiii-update.html</a>
20/04.2022	website	Press release (Gospodarka Morska) about "onshore+offshore = our future" – workshop dedicated to technical schools	<a href="https://www.gospodarkamorska.pl/onshore-offshore-our-future-warsztaty-dla-uczniow-szkol-srednich-juz-25-kwietnia-63818">https://www.gospodarkamorska.pl/onshore-offshore-our-future-warsztaty-dla-uczniow-szkol-srednich-juz-25-kwietnia-63818</a>
22/02/2022	website	Turbine supplier selected for Bałtyk II and III projects in Poland	<a href="https://www.equinor.com/en/news/archive/202202-baltyk-turbine-supplier">https://www.equinor.com/en/news/archive/202202-baltyk-turbine-supplier</a>
30/12/2022	website	Electrical systems infrastructure contract for Bałtyk offshore wind projects awarded	<a href="https://www.equinor.com/news/2022-12-30-electrical-systems-infrastructure-contract">https://www.equinor.com/news/2022-12-30-electrical-systems-infrastructure-contract</a>
07/04/2023	webiste	Workshop for emergency services	<a href="https://bałtyk123.pl/equinor-i-polenergia-szkola-sluzby-ratownicze/">https://bałtyk123.pl/equinor-i-polenergia-szkola-sluzby-ratownicze/</a>
07/2023	LinkedIn	We have launched the first information center about offshore wind farms in Poland	Grupa Polenergia LinkedIn, Equinor LinkedIn
19/03/2024	website	Equinor and Polenergia organised a meeting for the residents of Łeba and the surrounding area: Let's talk about OWF.	<a href="https://bałtyk123.pl/en/lets-talk-about-offshore-wind-farms-equinor-and-polenergia-organized-a-meeting-for-the-residents-of-leba-and-the-surrounding-area/">https://bałtyk123.pl/en/lets-talk-about-offshore-wind-farms-equinor-and-polenergia-organized-a-meeting-for-the-residents-of-leba-and-the-surrounding-area/</a>

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24/04/2024	website	Press release (Biznesalert.pl): about new comprehensive portal Bałtyk123.pl	<a href="https://biznesalert.pl/nowy-serwis-offshore-komunikacja-inwestycje-energetyka/">https://biznesalert.pl/nowy-serwis-offshore-komunikacja-inwestycje-energetyka/</a>
04/2024	LinkedIn	Equinor and Polenergia Group have launched a new visual identification of their projects, hashtag #Bałtyk. Offshore wind farms also have a new website common to all three projects: <a href="http://www.baltyk123.pl">www.baltyk123.pl</a>	Grupa Polenergia LinkedIn, Equinor LinkedIn
04/2024	LinkedIn	Equinor and Polenergia Group are talking to employers from Pomerania about offshore wind energy.	Grupa Polenergia LinkedIn, Equinor LinkedIn

Source: Sotis Advisors based on internet data

## 4.4 Activities Planned

Further disclosure of information will be based on the following three pillars:

- Engagement with directly affected stakeholders and their representatives to share updates about the Projects, including potential impacts of the Projects, community concerns and how they will be managed. This strand will need to dove-tail with the schedule for the building permits;
- Engagement with the broader public related to offshore wind energy, the Projects and the Investors to build awareness and support;
- Monitoring of media in order to provide proactive responses as required.

The targeted stakeholder group, objectives of engagement and activities for each pillar is described in the following subsections. The activities have been phased depending on the Projects’ pre-construction milestones as well as going forward during construction and operations, as follows:

Engagement prior to construction:

- Engagement to secure access to privately owned land (still 3 plots not fully secured - possible expropriation of the owners of these plots by the Voivode on the basis of a location decision);
- Engagement to support permitting of the Projects including:
  - Engagement to obtain an Environmental Decision for the O&M Base (Expansion, reconstruction of the warehouse building and change of use from storage to service function and construction of the warehouse building along with reconstruction of the existing quay at ul. Jachtowa, 84-360 Łeba);
  - Engagement to obtain building permits for the Projects;
  - Engagement with communities, fisheries and tourist operator sector;
  - Engagement related to delivering the five Flagship Programs described below.

Engagement during construction of ECI and OWF:

- Prior to commencing preparatory work and throughout the construction phase, it is essential to notify stakeholders about:
  - The schedule and sequence of work (covering the substation and cable route, divided into individual LOTS);
  - The accessibility for heavy construction equipment on local roads;
  - Potential changes to traffic organisation;
  - Construction activities near residential areas that may generate noise and air pollution.

Regular updates on construction progress should be provided during the entire build.

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**SEP for MFW Bałtyk II and MFW Bałtyk III**

- During the Offshore Wind Farm Construction it is advisable to inform relevant parties about:
  - The scheduled start date for offshore work;
  - The sequence of these activities (site, which part of the site, offshore cable route - LOTs);
  - Guidelines for approaching the construction area, including ships and construction equipment, along with any potential protective zones.

Continuous updates on the construction progress should be issued throughout the build.

**Communication Channels**

For both ECI and OWF Projects, the following communication channels should be utilised:

- **Community Meetings:** Engage with the local community through public meetings, presence at local events, or project-specific meetings with fishermen and tourism operators, as well as residents along the ECI route.
- **Official Notifications:** Send letters or emails to local authorities such as mayors, village heads, and local councils, including fishing and tourism organisations, local NGOs, and landowners.
- **Public Announcements:** Posters on local notice boards and in Local information point (LIP).
- **Press Releases:** Use local, regional, and industry-specific press, including publications like for example “Fishing News,” “Sailing News,” and “Voice of Pomorze 24.”
- **Online Updates:** Regularly update the Projects website ([www.baltyk123](http://www.baltyk123)) and social media channels.

**Frequency of Communication**

The frequency of communications and information dissemination should be tailored to the progress of the preparatory and construction work:

- **ECI Updates:** Information on progress should be provided at least once a three months (or more often if necessary), as well as after completing each stage and before commencing the next.
- **Offshore Work Updates:** Updates should be issued at least once every three months, as well as after completing each stage and before commencing the next.

By maintaining consistent and transparent communication through these channels and adhering to the specified update frequency, stakeholders will remain well-informed about the Project's developments and any potential impacts on the local community and environment. Engagement during operation.

- During the Offshore Wind Farm operation phase it is advisable to inform relevant parties about:
  - Informing about potential disruptions in the use of the sea or port.
  - informing about opportunities for business cooperation/employment.
  - Information and education activities in LIP.
  - Quarterly reporting communication

Engagement during decommissioning has not been included in this SEP and will need to be defined in further updates of this document, in advance of the Projects starting this phase. The engagement approach will need to consider relevant stakeholders and regulatory requirements for that phase as well as the relations developed with stakeholders up to that moment in time.

It is further noted that this list of activities will be updated as the Projects continue to respond to stakeholder interest and Projects requirements. Moreover, as the JV employees actively participate in all groups and most subgroups of the

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**SEP for MFW Bałtyk II and MFW Bałtyk III**

Polish Offshore Wind Sector Deal (POWSD)<sup>6</sup>, the following activities may be adjusted according to the achieved outcomes and results of these. The activities planned in the context of the POWSD include Stakeholder Cooperation and Regulatory Environment (Working Group 6), in which the JV will be coordinating Subgroup 2 covering Cumulative Impact Management. One of the most important and urgent actions in Sector Deal is the development of the Code of Good Practices for coexistence with fisheries. According to the assumptions, the Projects are to be presented and discussed with all relevant stakeholders to provide the fishing organisations with the opportunity to submit comments, influence the final shape of the document, and express the optimal compromise between the parties involved<sup>7</sup>.

**Five Flagship Programs**

The obligation to prepare a supply chain plan for materials and services, consistent with the state of development of the offshore wind farm project along with the connection infrastructure, results from Art. art. 4 and art. 15 of the Act of December 17, 2020 on the promotion of electricity generation in offshore wind farms (Journal of Laws of 2024, item 182). The analysis of the needs to support the competitiveness of the Polish industry in the process of developing the national supply chain for the OWF led to the development of a plan to implement five flagship programs of the "Supply Chain Plan" - open umbrella programs initiating and integrating activities for the development of the Polish industry and maritime services. wind energy, the so-called flagship programs. The plans are available on the website of the Energy Regulatory Office<sup>8</sup>.

During the life of the Projects there are number of activities planned – some of them are continuation of the activities already conducted or started, some of them will be new:

- preparation of communication materials, including press releases, presentations, media events;
- responses to media inquiries, interpellations, inquiries and applications in the access mode public information;
- organising public meeting and consultations and building relationships with local communities and representatives of the administration;
- education and local content meeting, workshops, capacity building;
- preparation of content: website: bałtyk123.pl, press release, social media profiles;
- media monitoring and review, including preparation of summaries in the scope.

It is noted that the activities in table below provide the framework of engagement necessary during the milestones indicated above. These will need to be further developed into specific Action Plans prior to each engagement campaign. It is also noted that whilst the engagement activities have a primary focus on the MFW Bałtyk II and MFW Bałtyk III, the Investors will seek to manage engagement holistically for all three Bałtyk projects, including MFW Bałtyk I.

The implementation of actions resulting from the SEP is the responsibility of the company boards and the communication and information departments. Other departments, such as environmental protection team and the team overseeing construction and ongoing maintenance/repairs, will also participate in the development of publications, workshops, materials for meetings, and press information.

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<sup>6</sup> [Tłumaczenie EN - final Polish Offshore Wind Sector Deal \(3\).pdf](#)

<sup>7</sup> <https://www.gov.pl/web/klimat/podpisano-porozumienie-sektorowe-na-rzecz-rozwoju-morskiej-energetyki-wiatrowej-w-polsce>, <https://www.gov.pl/web/morska-energetyka-wiatrowa/czym-jest-porozumienie-sektorowe>, <https://www.gov.pl/web/morska-energetyka-wiatrowa/strony-porozumienia-sektorowego>, <https://www.gov.pl/web/morska-energetyka-wiatrowa/grupy-robocze>

<sup>8</sup> [MFW Bałtyk II Sp. z o.o. - Plany łańcucha dostaw materiałów i usług - Urząd Regulacji Energetyki \(ure.gov.pl\)](#).

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SEP for MFW Bałtyk II and MFW Bałtyk III



SEP for MFW Bałyk II and MFW Bałyk III

**Table 7 Stakeholder engagement programme**

Engagement /communication objective	Engagement / communication activities	Content of Engagement/ communication	Target stakeholders	Timeline / schedule
<b>External Stakeholder</b>				
Disclosure information about the Projects	Common website for MFW Bałyk I, MFW Bałyk II, and MFW Bałyk III projects (bałyk123.pl)	The website will present information about the Projects including key facts and figures, maps, Projects calendar, Q&A section, press office. Key components, timeline, free telephone line, and Projects email address. It will also highlight the social environment and Projects benefits.	All stakeholders	April 2024 – ongoing during construction and operation
	Social Media updates	Short information, photos, drone footage, short videos about the Projects, construction schedule, and planned activities.	All stakeholders	At least once per quarter prior to and during construction and operation
	In-person (or virtual) meeting providing PPT presentation	Clear take away factsheets for the fishing / tourist operators and their organisations.	Local business, tourist operators, fishers	Prior to construction and at least twice per year during construction
	Local Information Point in Łeba Municipality	Projects information and career development opportunities.	All stakeholders	Started in June 2023 – ongoing during construction and operation
	Assess effectiveness of the engagement activities	<ul style="list-style-type: none"> <li>Satisfaction surveys among the local communities and fishermen</li> <li>Informant interviews with key stakeholders</li> </ul>	All stakeholders, focusing on local communities and fisheries	Annually during operation

SEP for MFW Bałyk II and MFW Bałyk III

Engagement /communication objective	Engagement / communication activities	Content of Engagement/ communication	Target stakeholders	Timeline / schedule
	Public events (e.g., Święto Łęby, harvest festival)	Bałyk Projects stand with information and activities.	Local communities, local/regional press	2022/2023/2024 and ongoing during construction
	Information meeting at the Local Information Point in Łeba	An informational meeting regarding the additional information package about the Projects mentioned in section 1.4 of the SEP	All stakeholders	Before the construction phase, November/December 2024
	A 60-day period for reviewing the additional information package about the Projects: ESAP, NTS, CNT, SEP, LRP, LRF, SBA	Printed documentation available at the Local Information Point in Łeba and at the construction offices	All stakeholders	Before the construction phase, October-December 2024
Disclosure information about the LRF and LRP	Common website for MFW Bałyk I, MFW Bałyk II, and MFW Bałyk III projects (bałyk123.pl)	The LRF and LRP will be translated to Polish and disclosed by Equinor/Polenergia on their Projects website. A feedback mechanism shall be put in place to allow stakeholder to provide on-line comments.	All stakeholders	prior construction phase/ Depending on the timeline for publication of the Code of Good Practices
	In-person (or virtual) meeting providing PPT presentation	Presentation of tentative recommendations in the LRF; Further consultation steps to arrive at the LRP; Information about the grievance mechanism	All stakeholders	Depending on the timeline for publication of the Code of Good Practices
	the Local Information Point in Łeba	Preparation of the draft LRP and of a short, non-technical summary thereof, which will be used to prepare a user-friendly brochure	All stakeholders	Depending on the timeline for publication of the Code of Good Practices

SEP for MFW Bałyk II and MFW Bałyk III

Engagement /communication objective	Engagement / communication activities	Content of Engagement/ communication	Target stakeholders	Timeline / schedule
Grievance Mechanism	Common website for MFW Bałyk I, MFW Bałyk II, and MFW Bałyk III projects (bałyk123.pl)	Presenting the possibility of filing complaints through the complaints mechanism, publishing responses to complaints. Provision of free telephone line and Projects email address to ask questions and file grievances.	All stakeholders	April 2024 – ongoing during construction and operation- updates as needed
	Local Information Point in Łeba Municipality, In each construction office for the respective stages of the investment	Grievance box: possibility of filling out the grievance form in Polish and English.	All stakeholders	Started in June 2023 (LIP) – ongoing during construction and operation
	Public meetings and targeted meetings	Refresh information about Grievance Mechanism.	Residents of urban municipalities, rural residents, local government, fishers, tourist operator organisations, producer and processor organisations	2024 and ongoing during construction
	Common website for MFW Bałyk I, MFW Bałyk II, and MFW Bałyk III projects (bałyk123.pl)	Information about the number and type of grievances and their resolution.	All stakeholders, focusing on local communities and fisheries / tourist operators	At least quarterly during construction and update as needed during operation
Education	Educational workshops and competitions	Cooperation with academic centers and primary/secondary schools on offshore wind energy.	Regional community, academics, schools, regional press	Ongoing as initiated
	Ecology workshops in local schools	Workshops for students on renewable energy, with a focus on wind energy.	Local communities	2023/2024 and ongoing during construction
	Offshore lesson scenarios for primary schools	Lesson scenarios on energy from offshore wind farms.	Primary schools	2024/2025
	Physical showroom, museum exhibition	General education on OWF construction and operation.	All stakeholders	Venue opening in June 2024

SEP for MFW Bałyk II and MFW Bałyk III

Engagement /communication objective	Engagement / communication activities	Content of Engagement/ communication	Target stakeholders	Timeline / schedule
Local Content	Explore areas of potential collaboration/delivery of shared value / supply chain	Industrial excellence and HSEQ-Training - Course for the Supply Chain	Suppliers	Q3 2024
	Local workforce and local supplier development	Start-up Accelerator Programme	R&D / Academia Community	Ongoing during the prior to construction and construction phase
	Transparent communication of the Projects to the selected municipalities	Regular quarterly meetings with residents and local government. Informing about Projects progress, planned investments, development opportunities, and collaboration possibilities.	Local Government, Heads of villages, Local community residents	Ongoing during the Projects construction phase
	Negotiate unified rules for possible compensation agreements with the fisheries / tourist operators	In person meetings/ workshops to inform about the compensation framework methodology agreed at sector level. Principles and process for defining Projects-specific compensations agreements	Local business, fishers	Prior to offshore construction
	Promoting offshore wind job opportunities	Workshops, in-person meetings, Local Information Point in Łeba	Pracodawcy Pomorza (Pomeranian Employers) based in Gdansk, Local businesses, Local high schools, Primary schools	Continued engagement and cooperation ongoing during the Projects construction and operation phases
	Equal Employment Promotion Campaign	<ul style="list-style-type: none"> <li>HR Agencies with trackrecord of successful, innovative media campaigns</li> <li>participation in job fairs</li> </ul>	<ul style="list-style-type: none"> <li>1st edition – Woman in Offshore; 2nd ed. Fishers, 3rd ed. Military, 4th ed. Local/Regional Unemployed; 5th Mining Community;</li> <li>Eduoffshore fair trade</li> </ul>	Continued engagement ongoing during the Projects construction and operation phases

SEP for MFW Bałyk II and MFW Bałyk III

Engagement /communication objective	Engagement / communication activities	Content of Engagement/ communication	Target stakeholders	Timeline / schedule
	Sectoral engagement through the Polish Wind Energy Association	Develop a common framework for engaging stakeholders in wind energy development	Polish Wind Energy Association, other offshore wind energy project developers, fishery organisations, tourist organisations, local government, government and military/navy stakeholders	Continued engagement ongoing during the Projects construction phase
	Sectoral events participation	Communicate Projects performance, explore collaboration (e.g., European Economic Congress, Polish Wind Energy Association Conference)	All stakeholders, other offshore wind energy project developers, renewable energy project developers, stakeholders involved in the supply chain, regional/national/local authorities	Once during construction and once during operation
	Sectoral-led engagement with fisheries / tourist operators	Workshops, targeted focus groups, and direct meetings to negotiate compensation agreements and explore collaboration	Fishery organisations, tourist operators	Following sector deal agreement
<b>Internal Stakeholder</b>				
Engagement and communication with internal stakeholders	Inform, consult, and involve in strategic decision-making processes.	Present on the meetings, prepare reports/information about Projects status for the shareholders board meetings.	Shareholders of the Investors, Management	Constant reporting on project implementation status, annual reports and direct meetings and shareholders board meetings
	Inform employees of the Investor Projects plans in relation to labor issues and development plans.	Inform about actual impacts on the local environment and communities. Include reference to the internal grievance mechanism and management system.	Company employees, Contractor and subcontractor employees	Ongoing, at least twice per year

SEP for MFW Bałtyk II and MFW Bałtyk III

Engagement /communication objective	Engagement / communication activities	Content of Engagement/ communication	Target stakeholders	Timeline / schedule
	Inform contractors and suppliers' employees about Code of Conduct and Ethics, labor, and safety issues via direct meetings and information notes.	Training to include reference to the internal grievance mechanism and management system. Training on Projects impacts and requirements to be organized as part of induction training for all employees.	Contractors and subcontractors, Suppliers and their employees	Ongoing. During construction every time before new employees start to work and at minimum once per month
	Reporting according to Projects Environmental and Social documents.	Meetings and LESA site visit, emails, data rooms.	Lenders	Reporting as defined in the ESAP and ESMMP at least once per year

Source: Sotis Advisors

## 5 Grievance redress mechanism

This Section presents the Grievance Mechanism to be implemented by MFW Bałtyk II Sp. z o.o. and MFW Bałtyk III Sp. z o.o. to manage external and internal grievances in relation to the proposed Projects, particularly from affected communities.

Grievances may take the form of specific complaints for damages/injury, concerns about routine Projects activities, or perceived incidents or impacts. Grievances may also be related to a commitment of the Investors' or their subcontractors that has not been honoured. The Investors recognize that unforeseen impacts may occur. Therefore, the maintenance of an open line of communication with the communities and/or those potentially affected by the Projects is important to maintain transparent relations and build trust

### 5.1 Community Grievance Management (CGM)

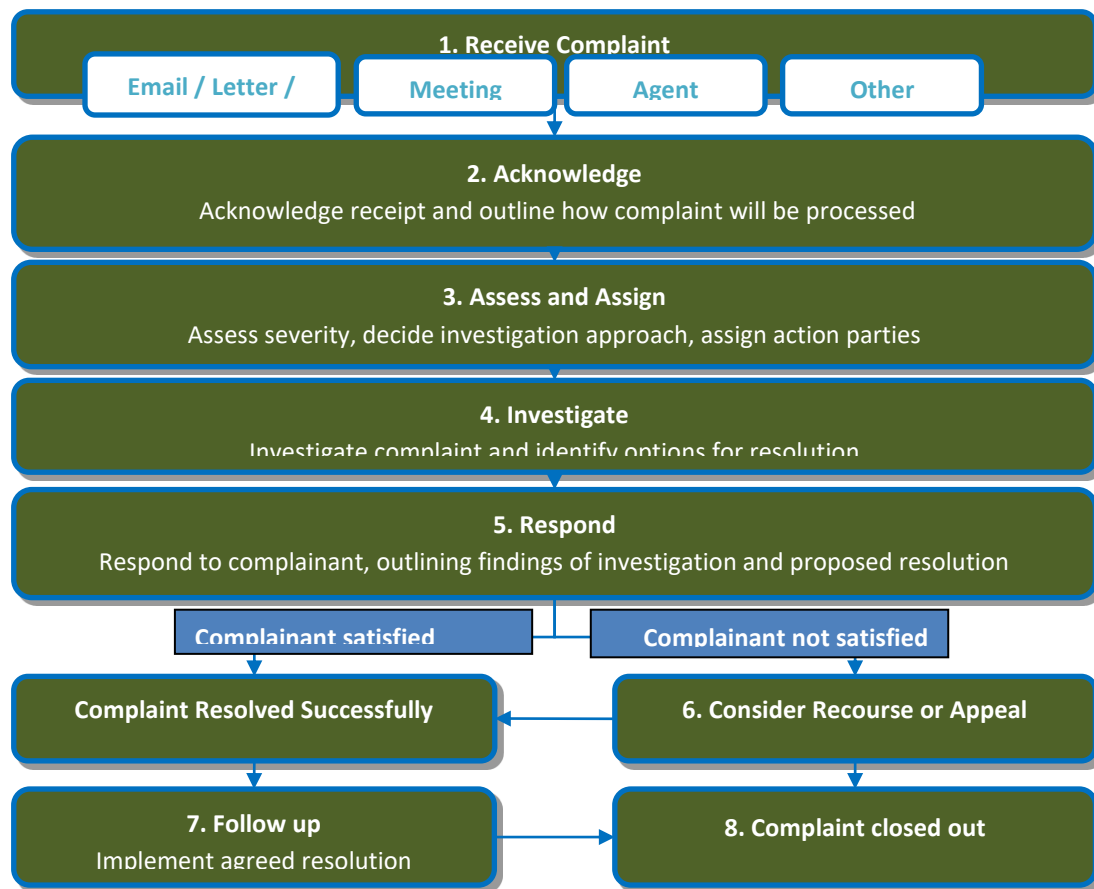
#### 5.1.1 The grievance procedure

The grievance mechanism management process outlined in figure below shows the steps that will be followed to ensure an effective and timely response to community grievances. The timeframe for each step in the process is shown in Within 1 day of submitting a grievance, feedback will be provided confirming the successful submission of the grievance. A successfully submitted grievance will be forwarded for review and categorisation. After determining the risk level of the grievance, the grievance processing procedure will be initiated. For grievances identified as high risk, the grievance will be reviewed, and a response will be provided within 4 days. For grievances categorized as "priority," which pose a threat to life or health, immediate actions will be taken to address the issue. Grievances classified as medium risk will be forwarded for examination, and the investigation will begin without undue delay, with a response provided no later than 12 days, and for low risk complains 20 days from the date of successful submission of the grievance. The closure of the grievance should occur no later than 30 days from the date of submission. Each case will be reviewed individually. In cases where the investigation reveals that additional studies or analyses are necessary for effective resolution of the grievance, the review period will be determined individually and communicated to the complainant. The final duration of individual processes will be determined in the company's internal procedures.

and will depend on the grievance risk categorisation (further detailed in Section 5.1.5 Step 3 Assess and Assign). Each step of the process is described in the sub-sections below.

**Figure 7 Grievance Management Process Flow Diagram**

SEP for MFW Bałtyk II and MFW Bałtyk III



Source: SEP, 2022

### 5.1.2 Timeframes for review and resolution

Within 1 day of submitting a grievance, feedback will be provided confirming the successful submission of the grievance. A successfully submitted grievance will be forwarded for review and categorisation. After determining the risk level of the grievance, the grievance processing procedure will be initiated. For grievances identified as high risk, the grievance will be reviewed, and a response will be provided within 4 days. For grievances categorized as "priority," which pose a threat to life or health, immediate actions will be taken to address the issue. Grievances classified as medium risk will be forwarded for examination, and the investigation will begin without undue delay, with a response provided no later than 12 days, and for low risk complains 20 days from the date of successful submission of the grievance. The closure of the grievance should occur no later than 30 days from the date of submission. Each case will be reviewed individually. In cases where the investigation reveals that additional studies or analyses are necessary for effective resolution of the grievance, the review period will be determined individually and communicated to the complainant. The final duration of individual processes will be determined in the company's internal procedures.

### 5.1.3 Receive complaint

Any stakeholder can submit a grievance at any time and free of any financial cost, having the option of remaining anonymous if they prefer. Grievances may be reported in Polish and English through the following reporting channels:

- Verbally or in writing to the Community Liaison Officer (CLO – to be defined); there will be one CLO for Projects;
- Using the main reception number available at +48 22 522 39 00, available for Projects;



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**SEP for MFW Bałtyk II and MFW Bałtyk III**

- In writing via email through a form sent to the designated email address: or through the contact section available on the Projects' website: [baltyk123.pl](mailto:baltyk123.pl);
- In person by leaving a Grievance Form at the grievance box to be available at the Local Information Point address: Tadeusza Kościuszki St. 88, 84-360 Łeba. At a later stage of the Projects it will be available in onshore O&M base located at the Port of Łeba, address: Jachtowa St. 8, 84-360 Łeba (The Grievance Form is presented in Appendix C);
- In person by leaving Grievance Form in each construction office for the respective stages of the investment (during ECI construction);
- In writing via regular mail at the following address: MFW Bałtyk II Sp. z o.o. and MFW Bałtyk III Sp. z o.o., Krucza 24/26 Street, 00-526 Warsaw, Poland;
- Questions concerning procurement under the Projects can be sent to the following e-mail address: [gm\\_baltykprocurement@equinor.com](mailto:gm_baltykprocurement@equinor.com);
- Questions and complains submitted by the employees (investor, contractors and subcontractors) can be also sent to via Equinor's Ethics Helpline [Equinor | Home \(integrityline.com\)](https://www.equinor.com/home/integrityline) .....

The Investors will inform stakeholders about the reporting channels available for filing grievances. When a complaint is received via the hotline, the hotline operator will either fill out a grievance form directly or arrange an Investor representative to meet with the complainant in person and complete a form at that time.

Once received, the grievance will be reviewed and registered.

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

The admissibility of the grievance will also be determined at this stage. Grievances need to be related to the Projects activities. If the claim is not admissible, the CLO will clearly communicate to the claimant the reasons why the claim cannot be considered. Submission of grievances through the CGM will not exclude the right of stakeholders to access other forms of legal redress.

There will also be a possibility for people to communicate the grievance in person to someone of their preferred gender, for example, if a woman prefers to explain the grievance to another woman. Staff working in the community relations team will be trained to recognise grievances related to Gender based Violence Harassment (GBVH) and flag them as such, as they are received through various reporting channels.

### **5.1.4 Step 2: Acknowledge**

The CLO shall acknowledge receipt of the complaint within the required time period and explain the process to the complainant, including timelines of the remaining steps in the management process.

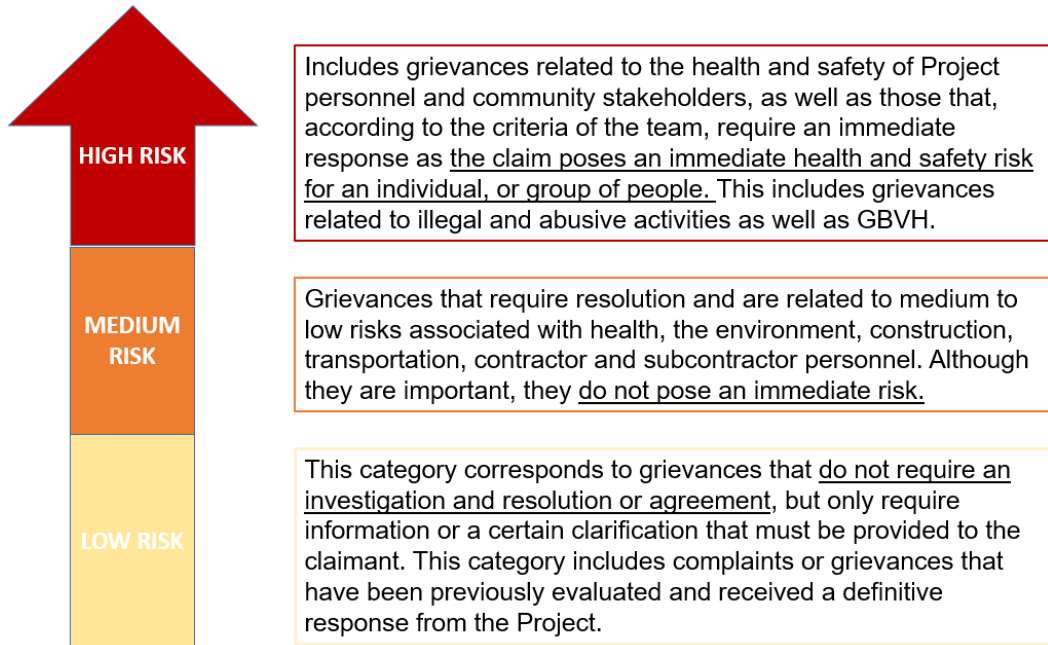
At this stage, the CLO could request the applicant to submit more information if, after the preliminary analysis, it has been concluded that the information provided by the interested party is not sufficient.

When the Investors receive a report of GBVH, the immediate priority will be to enable the reporter to access the professional support he/she wants. The Investors will work with the survivor, witnesses and whistle-blowers (where possible) to identify safety measures and prevent further harm.

### **5.1.5 Step 3: Assess and Assign**

Management of the grievance will entail determining the nature of the investigation based on the type of grievance and the potential risk attached to it. The screening and risk evaluation phase is expected to be carried out in a target timeframe of 24 hours from the submission of the grievance.

**Figure 8: Grievance Risk Evaluation**



in

Source: ERM, 2021

Once the risk level is determined, the timeframe to carry out the investigation, resolution and grievance close out will be established. The CLO will evaluate the documents and information provided by the complainant and response timelines will be observed as follows:

- Low risk grievances shall be solved and closed in a maximum of 30 days.
- Medium risk claims will be registered, evaluated, solved and closed in a maximum 15 days. High risk grievances will be evaluated immediately when received and should be investigated and solved in a maximum period of 5 days. If a persons' life or health is at risk, the complaint will be addressed and solved immediately.

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

### 5.1.6 Step 4: Investigate

The CLO will organise the review and investigation process of each grievance received. Resolution of a grievance may require additional information to clarify the situation and/or improve communication between the stakeholder and the Company.

For some grievances, a bilateral discussion or negotiation will be necessary. When it is possible for the issue to be resolved to the satisfaction of the complainant(s), the CLO will secure a written and signed record of the resolution and file it along with the case documentation. Such resolution may include mitigation or reparation measures of financial or in-kind compensation.

The Investors will follow-up all reports of GBVH; however, not all reports of GBVH will require an investigation. The decision on whether to investigate will be determined by various factors, including the severity of the reported behaviour, its impact and the wishes of the survivor. The decision will be made by a senior trained female member of

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the community relations team. Those reports of GBVH deemed to be investigated will be managed by staff members having been trained in conducting such investigations.

### **5.1.7 Step 5: Respond**

Once grievance investigations are completed, the CLO will draft a formal communication to the complainant, advising of findings and the outcome.

Personal data contained in the grievance register will be kept only as long as it is necessary to investigate the complaint, implement a resolution and monitor the situation at post closure stage.

### **5.1.8 Step 6: Consider Recourse or Appeal**

If the complainant is not satisfied with the resolution or the outcome of the agreed corrective actions, they should be free to take their grievances to a dispute resolution mechanism outside of the company's grievance mechanism, such as involving the Polish Ombudsman (Rzecznik Praw Obywatelskich, the Commissioner for Human Rights) or taking legal action.

The Investors will ensure that all grievances raised by all Projects stakeholders are treated impartially, respectfully and, if required, confidentially.

### **5.1.9 Step 7: Follow up**

The grievance will only be closed out when it is 100% resolved; if there is a process ongoing to resolve the issue (for example, repair works due to property damages), it will remain open until it is completed. Monitoring activities will be carried out by the CLO to make sure the resolution commitments are being implemented as agreed in terms of quality, schedule and safety.

### **5.1.10 Step 8: Complaint closed out**

When the stakeholder is satisfied with the responses provided to its grievance, the grievance will be closed out and the register/database will be updated to indicate the resolution and close-out date.

### **5.1.11 Contractor grievance management**

Contractors will be required to have a dedicated person who can receive grievances related to contractor operations associated with the Projects or refer stakeholders to the channels available for submitting a grievance to the Projects. The designated contractor representative receiving a grievance will be tasked to report it to the Projects CLO within a timeframe of maximum 2 days so it can be managed through an internal grievance management mechanism (section 5.2). In the case of reports concerning situations involving human life or health, actions to prevent negative consequences must be taken immediately by authorised personnel. The handling of the complaint after it is forwarded to the CLO will be consistent with the internal grievance mechanism (Section 5.2). The Investors will provide training for all those who may receive a grievance and equip employees with guidance relevant to their role in responding and reporting the grievance. There will be specific training for personnel who will support GBVH related grievances.

The Investors will provide training to their contractors and require all contractors to train their staff on the CGM and their responsibilities under the CGM.

## 5.2 Internal grievance management

Informing employees about the complaint mechanism should be incorporated into internal training procedures by the Compliance Team, HR team or other designated team or person. Employees of contractors and subcontractors about the mechanism for filing complaints should be informed during initial training, admittance to construction. Grievance forms should be readily available in both offices and construction offices (e.g., by scanning a QR code redirecting to the form). Training materials / presentation should cover key elements to ensure effectiveness, transparency, and fairness:

1. Objectives of the Complaint Mechanism - description why the complaint mechanism is essential and how it fits within the broader context of stakeholder engagement and fostering a fair and balanced work environment.
2. Scope of the Complaint Mechanism - who can lodge complaints (e.g., employees, contractors, suppliers) and what types of issues can be reported (e.g., discrimination, harassment, workplace safety concerns, workplace environment, relationships with supervisors or colleagues).
3. Complaint Submission Procedures - outline the steps for submitting a complaint, including available channels (email, online form, complaint box), and ensure confidentiality.
4. Roles and Responsibilities - who is responsible for receiving complaints, addressing them, and taking corrective actions.
5. Response Timeframe (as soon as possible: eg.: 5 days, not more than one month)
6. Communication and Employee Awareness - how employees are informed about the existence of the complaint mechanism, the complaint submission procedures, and the complaint resolution process.
7. Corrective and Disciplinary Actions - what corrective or disciplinary actions can be taken in response to legitimate complaints.
8. Monitoring and Evaluation Mechanism - how the effectiveness of the complaint mechanism is monitored and assessed, including measures of success and ways to improve the process.
9. Protection from Retaliation - assurances to employees that they will not face retaliation for filing a complaint.
10. Appeals and Escalations - what options employees have if they disagree with the complaint resolution outcome or believe it was mishandled.

An employee complaint mechanism will not be published / open for the public.

According to the received data from Investor employment grievance mechanism is under preparation. It will be developed, among others, on the basis of mechanisms existing in Polenergia and Equinor.

## 5.3 Roles and Responsibilities

Contact details of the Community Liaison Officer or in Local Information Point, address: Tadeusza Kościuszki 88, 84-360 Łeba.

Contact details to the HR/ SM Team Marta Porzuczek, Stakeholder Manager, e-mail: [Marta.Porzuczek@polenergia.pl](mailto:Marta.Porzuczek@polenergia.pl), mobile: 609 909 702

## 5.4 Monitoring and Reporting

General monitoring and evaluation tasks will be carried out by the Environmental and Social Manager to make sure that the different stages of the grievance mechanism are functioning, all the grievances are resolved in a timely manner, all the evidence information is documented and properly saved, and to identify whether certain patterns or recurrent grievances are arising.

A formal evaluation of the functioning of the Grievance Management mechanism, the nature of the grievances and required management action will be included in quarterly reporting. This will allow the Investors to review the grievances and revise, as appropriate, for accessibility and effectiveness.

# 6 Monitoring and reporting of SEP

## 6.1 Monitoring

In order to document activities and assess the effectiveness of this SEP and associated stakeholder engagement activities, the Investors will implement a data management and monitoring process including the following elements:

- Implementation of SEP planned activities. For each activity a measurement of success will be evaluated; wherever possible this will be participative in nature (e.g., asking involved stakeholders as to their satisfaction).
- Communication and consultation activities conducted with all stakeholders including government representatives, fisheries, local communities, NGOs etc. including meeting minutes.
- Monitor media coverage of the shareholders, Investors and the Projects, recording level and type of coverage (positive, negative, neutral).
- A log of key issues will be maintained noting the issue, key stakeholders, and actions taken by the Investors in response.
- Grievance monitoring including:
  - Means by which grievances are submitted to assess accessibility and appropriateness across stakeholder groups;
  - The number of reports of GBVH coming through the community grievance mechanism (including an equivalent worker grievance mechanism).
  - Total number of grievances received and time taken to address grievances. While the time required depends on the complexity of each complaint, an assessment of the average time can be helpful in determining whether the process conforms to the timelines defined.

the Key Performance Indicators (KPIs) for this SEP:

- Number and types of comments/feedback received by stakeholders
- Number and timing of responses to comments received
- Number of grievances by risk type
- Number and percentage (%) of grievances closed according to risk type and number of close out forms signed by the complainants
- Number and % of grievances closed according to type
- Timeframes for resolution (and closure) by grievance type
- Number of repeated grievances from the same stakeholder
- Trends in numbers of complaints
- Topics of complaints
- Level of compliance with the process

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## SEP for MFW Bałtyk II and MFW Bałtyk III

- Completeness of grievance register
- Number of grievances by level and type
- Number of satisfied responses from complainants by grievance type

As a result of monitoring (and evaluation below), the engagement strategies and actions in this SEP will be reviewed and updated. This will include updating the stakeholder registers and maps to reflect greater understanding of stakeholders and their concerns

The effectiveness of the engagement activities will be evaluated against the goals and objectives set out in this SEP. This evaluation will examine the extent to which activities were implemented in accordance with the plan and the extent to which they achieved the aims defined in Section 4.4.

The following follow-up and evaluation activities will take place:

- local level collection of information gathering related to issues and complaints;
- satisfaction surveys among the local communities and fishermen;
- informant interviews with key stakeholders;
- preparation and organization of external evaluation.

## 6.2 Reporting

Internal reports:

- **Monthly Reports:** The stakeholder engagement activities undertaken during the reported month. Developed by the representatives of constructor and investor.
- **Quarterly Progress Reports:**
  - Objectives set for the stakeholder engagement process during the reporting period and a status update with regard to their implementation;
  - Analyse of efficiency Grievance mechanism.

External reports:

- **Quarterly Progress Reports:** summary of grievances received across the company, presenting information about the number and type of grievances and their resolution
- **Annual reports:** the environmental and social performance of the Projects, stakeholder engagement activities and grievance management

Evidence of the external reporting will be presented by the Investors, including photographic evidence, examples of publications through the website.

## 7 Appendices

### Appendix A the complete register of Projects Stakeholders

Stakeholder – English name (Polish name in brackets)	Connection to the Projects and Interest Areas
<b>Authorities – Central government</b>	
Minister for Climate and Environment / Słowiński National Park	Environmental impact, fulfilment of EU obligations. Cooperation with SNP on biodiversity issues, especially dedicated to the sea environment
National Defence Ministry	Implementation of development projects in the context of Polish security and defence.
Polish Army / Navy	Military operations
Polish Navy Command	<ul style="list-style-type: none"> <li>Expert opinion on the possibility of mutual adverse impact of the planned project and newly designed wind farms in the immediate vicinity on the functioning of radiolocation systems, radio communication and other equipment of the Polish Navy and the Border Guard for BII, BIII;</li> <li>Agreement of BPD (Regional IT Centre in Gdynia)</li> </ul>
Polish Border Guard	State security
Ministry of Foreign Affairs	Responsible for Poland’s bilateral multilateral relations affairs
Ministry of Interior and Administration	National security
Civil Aviation Authority	State security
Military Aviation	State Security
Air Force Command	State Security
Military Economic Unit	State security
Minister of State Assets	Energy transition, energy transition
Minister of Infrastructure through its Department of Maritime Education and Department of Marine Economy and the Maritime Search and Rescue Service (SAR Service), Sector Deal Agreement	<p>Sector Deal Agreement.</p> <p>The Department of Maritime Education and Department of Marine Economy under the Ministry of Infrastructure are relevant as their roles are:</p> <ul style="list-style-type: none"> <li>Department of Maritime Education: contribute to policy on the use of scientific research and development work, promote the maritime, inland waterway and fisheries professions, participate in shaping vocational education in the maritime, inland waterway and fisheries professions.</li> <li>Department of Marine Economy: planning and spatial management of Polish maritime areas, develop maritime transport policy.</li> </ul>
Ministry of Agriculture and Rural Development (includes the Department of Fisheries and the Vessel Monitoring Centre of Gdynia)	Potential for development
Secretary of State, Government Plenipotentiary for Water Management and Investment in Maritime and Water Affairs	Implementation of development projects
General Directorate of Environmental Protection	Potential for development

## SEP for MFW Bałtyk II and MFW Bałtyk III

Stakeholder – English name (Polish name in brackets)	Connection to the Projects and Interest Areas
General Inspectorate of Building Control	Potential for development
National Electricity System Operator PSE	The National Electricity System Operator PSE SA is the state-owned Polish transmission system operator and is responsible to plan the expansion of the transmission network, taking into account the expected changes in the value and geographical distribution of domestic demand and location of new generating sources.
Minister for Development and Technology	Technological development, implementation of strategic initiatives
Ministry of Culture and Protection of National Heritage	Opinion for a location decision on the basis of the special transmission act will probably not be required – art. 12 c of the special transmission act – include SCLL.
Coordination Committee for Maritime Wind Power Issues	Coordinates the implementation of the "Sector agreement for the development of offshore wind energy in Poland". Established by the Minister of Climate and Environment
Urząd Regulacji Energetyki (URE)/Energy Regulatory Office	Conditions for the Project implementation
Polish Tourism Organisation (POT)	Influence and contact with tourism sector
Industrial Development Agency	Support for the development of future sectors, including wind. Rebuilding the Polish shipbuilding industry (Baltic Industrial Group)
<b>Authorities – regional government</b>	
Pomeranian Governor	Building permit
Marshal of Pomeranian Voivodeship	Key projects in the region
Provincial Conservator of Monuments	<ul style="list-style-type: none"> <li>Agreement with the Provincial Conservator of Monuments (including the National Maritime Museum) for MFW Bałtyk II, MFW Bałtyk III;</li> <li>Opinion concerning the location of the designed investment (Transmission Law Act);</li> <li>Obtaining a permit to carry out the construction works in archaeological are (in case of indicating archaeological sites in the above-mentioned opinion).</li> </ul>
Pomeranian Development Agency	Regional development, project support
Starost of Slupsk	Implementation of development projects, impact on the region, building permit for O&M Base.
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 Gdynia (Państwowy Powiatowy Inspektor Sanitarny)	Involved in the process of issuing the Environmental Decision for O&M Base
Maritime Office in Gdynia	Permitting, navigation channels, vessel traffic, maritime safety
National Maritime Museum in Gdańsk (responsible for the preservation of Underwater Monuments)	Responsible for the preservation of cultural and technical maritime heritage and dissemination of knowledge
Regional Inspectorate for Building Control in Gdansk	Competent within the scope of architectural building administration and building control
Pomeranian Regional Conservator of Monuments	Responsible for the preservation of Underwater Monuments



## SEP for MFW Bałtyk II and MFW Bałtyk III

Stakeholder – English name (Polish name in brackets)	Connection to the Projects and Interest Areas
Pomerania Regional Chamber of Commerce	Groups several companies operating in the AoI
Regional Directorate of State Forests in Szczecinek	<ul style="list-style-type: none"> <li>Opinion concerning the location of the designed investment (Transmission Law Act);</li> <li>Involved in agreement to sign a contract in order to cut trees from forest areas.</li> </ul>
Regional Directorate of Environmental Protection	Opinion for EIA process – O&M Base
District Board of Infrastructure in Gdynia	Management of the Military Unit where the landfall site is located.
<b>Authorities – local government</b>	
Mayor of Łeba	One of the fishing communities and ports which may be affected by the Projects
Mayor of Ustka	Ustka – location of the service port
Head of the Ustka municipality (wójt)	Rural municipality adjacent to urban municipality (town) of Ustka
Head of the Redzikowo municipality (former gmina Słupsk)	
Neighbouring municipalities	Potentially the passage of heavy construction equipment on the road, possible safety hazard for pedestrians, cyclists, vulnerable group
Commander of the Central Air Force Training Area in Ustka	National security, landfall area. During military training operations, access in the area of the training (sea and beach) is temporarily closed, which may affect the construction and servicing schedule.
<b>Political Parties</b>	Political support
<b>Businesses including suppliers, OWF developers</b>	
ENERGA-OPERATOR SA	Arrangement of the reserve supply/auxiliaries with the network administration
National Chamber of Fish Producers (Krajowa Izba Producentów Ryb), Ustka	For-profit fisher associations and organizations group Polish coastal and offshore fishing vessels, as well as owners and fishermen
Other planned offshore wind projects – incl. Equinor/Polenergia (Bałtyk I) PGE (Baltica 2/Ørsted, Baltica 3/Ørsted, Baltica 1); RWE (FEW Baltic-2); PKN Orlen (Baltic Power); EDPR (BC-Wind);	Other planned offshore wind projects who may have synergic and/or competing interests
Pomerania Regional Chamber of Commerce	Local development support
Ocean carriers	Impact on operations
<b>Land-affected stakeholders</b>	
Ustka Forest District (National Forests)	Owner of land within the landfall site
Starost of Słupsk	Owner of land affected by the Projects (in Ledowo)
Rejonowe Zarządy Infrastruktury (RZI) (falls under the Ministry of Defense – Regional Infrastructure Management Board	Owner of land affected by the Projects. Management of former military unit area where the landfall is located. G
Municipality of Ustka	Owner of land affected by the Projects
Municipality of Redzikowo (formerly: gmina Słupsk)	Owner of land affected by the Projects
State Treasury (including State Water Farm – Polish Waters Struga Lędowska	<ul style="list-style-type: none"> <li>Owner of the Military Unit where the landfall site is located.</li> <li>Owner of the forest land areas within the landfall site.</li> </ul>

SEP for MFW Bałtyk II and MFW Bałtyk III

<b>Stakeholder – English name (Polish name in brackets)</b>	<b>Connection to the Projects and Interest Areas</b>
District roads administration (Łędowo, Municipality of Ustka)	Owner of land affected by the Projects
National Support Centre for Agriculture	Owner of land affected by the Projects
Pomeranian Voivodeship	Owner of land affected by the Projects
PSE (TSO)	Owner of land affected by the Projects
Caritas	Owner of land affected by the Projects (eastern landfall)
Inwestycje Rolne	Owner of land affected by the Projects
Władysław Grzech MTM Spółka Jawna z siedzibą w Gdyni	Owner of land plot affected by the Projects
Gospodarstwo Rolne Boleszewo Spółka z o.o (Agrodan)	Owner of land affected by the Projects
Green Power Polska Spółka z o.o.	Owner of land affected by the Projects
Private citizens	Owners of land affected by the Projects
MOWI Poland SA (fish factory)	Situated along the Projects access road. Seafood Product Preparation and Packaging
<b>Civil Society Organisations</b>	
Local Action Group "Dorzecze Łęby"	Non-profit organisation; having objectives related to the development of the region, solution of common problems, fisheries resources, living conditions of the inhabitants, image of the area
"Łębscy Rybacy" Łęba Fishermen Association	Non-profit organisation acting as a Local Fisheries Group, with objectives related to the development of the region, solution of common problems, fisheries resources, living conditions of the inhabitants, image of the area
Darłowo Local Fisheries Group	Non-profit organisation acting as a Local Fisheries Group, with objectives related to the development of the region, solution of common problems, fisheries resources, living conditions of the inhabitants, image of the area
Association of Sea Fishermen (Zrzeszenie Rybaków Morskich), Władysławowo	Non-profit organisation acting as a Local Fisheries Group.
North Kashubian Local Fishery Group (Północnokaszubska Lokalna Grupa Rybacka)	Non-profit organisation acting as a Local Fisheries Group.
Association of Recreational Fisheries Shipowners (Stowarzyszenie Armatorów Rybołówstwa Rekreacyjnego) in Kołobrzeg, Władysławowo, Darłowo and Ustka	Non-profit organisation acting as a Local Fisheries Group, with objectives related to the development of the region, solution of common problems, fisheries resources, living conditions of the inhabitants, image of the area
Commercial and Sport Yacht Owners Association (Stowarzyszenie Armatorów Jachtów Komercyjno-Sportowych), Kołobrzeg, Ustka, Władysławowo	Non-profit organisation related to commercial and sport yachts with objectives related to the development of the region, solution of common problems, living conditions of the inhabitants, image of the area
Pomeranian Platform of Development of Offshore Wind Energy on the Baltic	Promoting wind farm development and cooperation between local businesses
Commercial and Sport Vessel Owners' Association, Kołobrzeg (Stowarzyszenie Armatorów Jachtów Komercyjno-Sportowych)	Non-profit organisation related to maritime vessels with objectives related to the development of the region, solution of common problems, living conditions of the inhabitants, image of the area

## SEP for MFW Bałtyk II and MFW Bałtyk III

Stakeholder – English name (Polish name in brackets)	Connection to the Projects and Interest Areas
Central Pomerania Fisheries Group in Ustka	Non-profit organisation acting as a Fisheries Group, with objectives related to the development of the region, solution of common problems, fisheries resources, living conditions of the inhabitants, image of the area
Polish Wind Energy Association	Economic, social and environmental impact of the Projects and the fulfilment of commitments and the transformation of the economy
Polish Offshore Wind Energy Society	Economic, social and environmental impact of the Projects and the fulfilment of commitments and the transformation of the economy
Institute for Renewable Energy	Economic think-tank, knowledge input from experts
Foundation for Renewable Energy	NGO promotes sustainable development in the energy sector
RE-Source Poland Hub Foundation	cooperation between consumers and producers of energy from RES
L. Paga Foundation – "Academy of Energy"	Education program, Polenergia as a strategic partner
MARE Foundation	Protection of marine ecosystems
Grand Agro Environmental Protection Foundation	Environmental protection, reducing human impact on marine ecosystem. They appealed the environmental decision made by Baltic Power.
Polish Coastal Fisheries Crisis Staff	Fishing
Baltic Sea Angling Association (Bałtyckie Stowarzyszenie Wędkarstwa Morskiego in Darłowo)	A non-profit organization whose goals are related to the development of the region, solving common problems, fish resources, living conditions of residents, image of the area, development of maritime tourism
The Crisis Staff of Polish Fisheries (Sztab Kryzysowy Polskiego Rybołówstwa)	Fishing organisation covers more than 500 fishing vessels operators.
Polish Fishermen Association, Władysławowo	Non-profit organisation acting as a Local Fisheries Group, with objectives related to the development of the region, solution of common problems, fisheries resources, living conditions of the inhabitants, image of the area
<b>International Institutions</b>	
United Nations Global Compact Network Poland	Sustainable business, environmental activities, presence of other stakeholders incl. Port of Gdynia
UNEP/GRID Warszawa	Works together with Polenergia in the Partnership for the Implementation of the Environmentally Sustainable Development Goals "Together for the Environment"
Environmental organisations – WWF, Greenpeace	Protection of aquatic species, sustainable fisheries, reducing human impacts on the marine ecosystem)
Coalition Clean Baltic	Protection of aquatic species, sustainable fisheries, reducing human impact on the marine ecosystem.
Council of the Baltic Sea	Regional cooperation
Baltic Sea States Subregional Cooperation	Regional cooperation
Vision and Strategies Around the Baltic Sea	Regional cooperation
Baltic 21	Sustainable development
The Baltic Marine Environment Protection Commission (HELCOM)	Protection of aquatic species, sustainable fisheries, reducing human impact on the marine ecosystem.
Baltic Sea Region Energy Co-operation	Regional cooperation for renewable energy

SEP for MFW Bałtyk II and MFW Bałtyk III

<b>Stakeholder – English name (Polish name in brackets)</b>	<b>Connection to the Projects and Interest Areas</b>
Baltic Sea Tourism	Regional cooperation for tourism, expertise in sustainable tourism
Baltic Sea Chambers of Commerce Association	Regional cooperation
Baltic Sea Trade Union Network	Influencing political decision making
Centrum Balticum Foundation	Regional cooperation and expertise in the Baltic Sea
Baltic Ports Organizations	Regional cooperation among ports
<b>Local Institutions (Port administrations / Public Service Providers)</b>	
Łeba & Ustka Port Authorities; public service providers in Łeba and located on ECI route	Implementation of individual development stages
<b>Potentially affected communities / groups</b>	
Fishermen connected to the following coastal communities: Darłowo, Jarosławiec, Ustka, Łeba, Rowy, possibly Władysławowo	Impact on ability to act, revenues, possible redress
Residents of Łeba	Potential benefits related to development and jobs, difficulties related to construction, impact on tourism, fisheries. Environmental issues
Residents of Redzikowo Municipality – former gmina Słupsk (with a special focus on the districts of Bruskowo Wielkie, Bruskowo Małe)	Potential benefits related to development and jobs, impacts associated to onshore construction works, including land lease agreements
Residents of Ustka (with a special focus on the districts of Łędowo, Pęplino and Duninowo)	Potential benefits related to development and jobs, impacts associated to onshore construction works, including land lease agreements
Local enterprises (including hotel, bar, restaurant, etc owners)	Participation in the implementation of the Projects
Maritime workers (other than fisherman and tourist vessels crew, operators and owners)	Difficulties in maritime traffic
Tourists	Attractiveness and access to the coastal area - especially during construction process
<b>Vulnerable groups</b>	
Vulnerable groups (women and women-headed households, elderly/retired, children, youth (15 – 24 years), low-income households, people with disability)	Vulnerable groups may be affected by the Projects by virtue of their disability, social or economic standing, limited education, lack of or access to employment with the Projects or other Projects benefits.
Fishermen and tour operators connected to the following coastal communities: Darłowo, Jarosławiec, Ustka, Łeba, Rowy, Władysławowo	Fishermen who, as a result of the project implementation, will have to give up their current source of income. A group that sees no opportunity for development or employment in offshore wind farms.
<b>Media</b>	
Energy media: CIRE, wnp.pl, green-news.pl, biznesalert.pl, energetyka24.pl, energetyka.plus, wysokienapiecie.pl	Project appraisal, impact on different stakeholder groups, in particular local communities and businesses, policy issues
National news and business media: Rzeczpospolita, Dziennik Gazeta Prawna, Puls Biznesu	Project appraisal, impact on different stakeholder groups, in particular local communities and businesses, policy issues

SEP for MFW Bałtyk II and MFW Bałtyk III

<b>Stakeholder – English name (Polish name in brackets)</b>	<b>Connection to the Projects and Interest Areas</b>
Local media: Polska The Times Dziennik Bałtycki, Głos Pomorza (GP24), TV Słupsk, Gazeta Wyborcza Trójmiasto, Radio Gdańsk, Radio Kaszebe, Nasze Miasto/Lębork Nasze Miasto, trójmiasto.pl, TVP Gdańsk, Wiadomości rybackie	Project appraisal, impact on different stakeholder groups, in particular local communities and businesses, policy issues
<b>Academia and scientific institutions</b>	
University of Gdańsk	Co-operation with Polenergia in the field of personnel training, eg. co-financing of postgraduate studies for women
Gdańsk University of Technology and its subordinated Maritime Technology Centre	Knowledge and competence transfer
National Maritime Fisheries Research Institute Gdynia	Knowledge and competence transfer
Naval Academy of Gdynia Akademia Marynarki Wojennej w Gdyni	Knowledge and competence transfer
Maritime University of Gdynia	Knowledge and competence transfer
Institute of Oceanology of Polish Academy of Sciences	Research and development
<b>Internal Stakeholders</b>	
Equinor & Polenergia and JTV employees	Project implementation, expertise, commitment to supporting local communities
Contractors, subcontractors and supply chain workers (local: Remontowa Group, etc and international: Vestas, Siemens, GE)	Implementation of Projects, use of best practices. Services,
Potential Lenders	Eligibility of the Projects for financing; reputational aspects.
Shareholders	Projects feasibility

## Appendix B Overview of activities taken since 2021

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
Disclosure of general information about the Projects	2021-Ongoing The one comprehensive portal about Bałyk projects called <a href="http://baltyk123.pl">baltyk123.pl</a> was launched April 24 <sup>th</sup> , 2024.	General public	<ul style="list-style-type: none"> <li>Virtual showroom available till the launch of the new portal on the Projects' websites (<a href="http://baltyk2.pl">Home (baltyk2.pl)</a>, <a href="http://baltyk3.pl">Home (baltyk3.pl)</a>)</li> <li>ongoing updating of the websites <a href="http://baltyk2.pl">baltyk2.pl</a> and <a href="http://baltyk3.pl">baltyk3.pl</a></li> <li>Dissemination of information about the Projects as a part of the environmental permitting processes</li> </ul>	<ul style="list-style-type: none"> <li>Wide dissemination of Projects information in graphics and non-technical language</li> <li>Providing contact details for e-mail communication and informing about the availability of a contact form directly on the Projects websites.</li> </ul> <p>Disseminate general information that is easy to understand by non-professionals, support the environmental permitting processes.</p>
Local Information Point in Teba Municipality	Opening the first stationary information point on offshore in Poland: June 2023	All stakeholders	<p>Projects information on the Projects</p> <p>Providing information about career development opportunities, possibility of submitting a CV.</p> <p>Grievance box: possibility of filling out the grievance form in Polish and English.</p>	Disclosure of information on the Projects Information Office, its purpose, location, open hours
Presentation to the authorities	16 December 2021, Headquarter of the Maritime Office in Gdynia (Urząd Morski w Gdyni).	Maritime Office in Gdynia (Urząd Morski W Gdyni). Less than 10 participants including those representing the Investors and their Advisor	In person meeting	Presented milestones of the Projects and further steps in the procedure. The map for design purposes, fire protection issues, cable laying depth, navigational expertise, general requirement for the marking, and safety were discussed.

## SEP for MFW Bałtyk II and MFW Bałtyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
Presentation of the Projects' progress to the authorities	January 2022 – 5 July 2022, Headquarter of the Pomeranian Voivodship Office in Gdańsk (Pomorski Urząd Wojewódzki w Gdańsku). Planned as ongoing engagement activity until the building permits are issued for the Projects	Pomeranian Voivodship Office in Gdańsk (Pomorski Urząd Wojewódzki w Gdańsku). Less than 10 participants including those representing the Investors and their Advisor	In person meeting	Presented the progress of the Projects to continue cooperation to secure building permits. A key topic discussed was the clarification of the required number of building permits for certain elements of the Projects.
Establish initial contact and communication with identified stakeholders from which land is to be leased for the Projects	January 2022 – up to early July 2022. 21 June 2022 Ustka Cultural Centre in Duninowo.	<ul style="list-style-type: none"> <li>Public institution landowners (state-owned institutions such as state forests and state defence facilities)</li> <li>Private companies owning land plots</li> <li>Private landowners owning plots needed for the onshore cable route</li> </ul>	<ul style="list-style-type: none"> <li>Phone calls</li> <li>Formal letters</li> </ul> In person meetings.	Established initial contact with new landowners, and continued engagement with land owners with whom the Investors already concluded easement agreements for the Projects. <ul style="list-style-type: none"> <li>The preferred option for the lease agreements was discussed: as a general rule, easement agreements for private plots, easement agreements or enforcement of the Transmission Law Act (Act of 24 July 2015 on the Preparation and Implementation of Strategic Investments in the Field of Transmission Networks, Journal of Laws of 2024, No. 555) provisions for the plots owned by public institutions, depending on the expectations of the owners.</li> </ul>
Presentation of the progress of the Projects to the authorities	27 October 2021, Hotel Mercure Gdańsk The Investors plan to continue educational activities (as a series of webinars and possible further meetings, if applicable) for the Projects.	More than 60 representatives of over 40 different governmental institutions involved in the building permitting process (and all relevant supporting permits)	In person meeting (one-day conference)	Informed on the progress of the Projects, sharing basic information on offshore wind farms development, construction, operation, and decommissioning processed. Introduced the Investors' new permitting Advisor (Projmors) for securing the building permits for the Projects. The institutions indicated they have very good knowledge of the procedures and legal framework but not enough information and experience on OWFs. The need for further education was expressed by the participants.

## SEP for MFW Bałtyk II and MFW Bałtyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
Presentation of the surveys undertaken (land surveys in the landfall and cable route corridor), Project and H&S risks.	Q1 2022 The geological survey (sounding and drilling) will be conducted by the contractor on the land plots needed for the cable corridor (both institutional and private) in Q4 2022 – Q1 2023.	General public including the local community in the areas where geotechnical and unexploded ordnance (UXO) surveys are performed for the landfall and cable route	A short information leaflet was provided to the survey contractor. The leaflets were made available in the vicinity of areas surveyed and were displayed in visible and representative places for the passers-by and tourists to get familiar with the aim and scope of works. This activity supported basic communication and H&S measures on the ground.  Phone calls, emails, formal letters and in person meetings.	Presented information on the nature, aim and purpose of the geotechnical study. The Investors and their contractor Geopartner prepared handouts of short leaflets for interested parties covering the scope of work of the contractors, basic information on the Project and H&S measures. Additionally, the JV provided the contractor recommendation letters as well as guidance on good practice and compliance to support its dialogue with landowners.
	25 April 2022, Pomeranian Employers (Pracodawcy Pomorza) main office in Gdańsk	Students of technical schools (Conradinum Shipbuilding and Technical School, Zespół Szkół Energetycznych and Zespół Szkół Morskich) 20 technical high school pupils	Workshop Partner participation in the workshop “Onshore+Offshore=Our Future”	Co-participation in the workshop on primarily technical aspects of the implementation of offshore wind farms in the Baltic Sea, as well as information on opportunities and directions of career paths for young people who want to seek employment in the offshore wind farm industry.
Employment/ local content	Oct. 2022, University of Technology in Gdańsk	students	Job fair	Promoting job opportunities for young people in the offshore wind industry as well as potential employment opportunities with the Projects as part of the Local Content development for the Projects.
	Gryfice Energy Cluster Meeting (2022), PTMEW Conference (panel participation) (2022), Seminar with RWE and TSO in Słupsk (2022), Maritime Safety Forum Conference (panel participation) by Special Economic Development	Local Supply Chain	Seminar, workshops	Presentation on Offshore Wind sector specifics. Engagement with local suppliers. In the seminar, organized with SRGE, participated around 150 people. With GE Hitachi- around 200 participants.



SEP for MFW Bałyk II and MFW Bałyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
	Zone of Pomorskie & PZU Lab (2023), Workshops for industry association PFTM (2022), Supplier Day - organized together with Siemens Gamesa Renewable Energy (2023) / Hitachi Energy (2023)			
	Participation in Eduoffshore (2023; 2024)	Potential employers, high schools, universities	job fair	Promoting job opportunities for young people in the offshore wind industry as well as potential employment opportunities with the Projects as part of the Local Content development for the Projects.
	1. I edition of workshops in cooperation with Sqadron (March 2023) „The response of MMC to events during the shift”  2. II edition in cooperation with Vissim "Coordination of traffic at offshore wind farm" (February 2024)	Public administration/military/security units 30 representatives	interactive workshops	1. Participants became acquainted with the components and rescue device assemblies which might be helpful to ensure the safety on OWF. Thanks to the meeting it was possible to develop the guidelines for cooperation between the farm and state rescue services. 2. exchange of experiences and competences of various units
Education	30 May – 2 June 2022  Potential replication of the activity in the Municipalities of Łeba, Słupsk and Ustka was discussed.	Rumia Invest Park, Mayor of Rumia Municipality, local organisations in cooperation in Rumia IP (CEE Energy), Local Board of Education, School Directors, Teachers, and approximately 600 8 <sup>th</sup> grade students of primary schools in the Municipality of Rumia	Workshop on offshore wind power projects and career counselling delivered by the Investors’ employees within 10 primary schools in the Municipality of Rumia	Shared basic information on offshore wind projects, promoting job opportunities for young people in this industry as well as potential employment opportunities with the Projects as part of Local Content development for the Projects.  The presentation was well received and widely commented by the participants.

SEP for MFW Bałyk II and MFW Bałyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
	<p>Education project in primary schools – two editions (2023/2024)</p>	<p>students from eleven primary schools in the Słupsk region</p> <p>I edition</p> <ol style="list-style-type: none"> <li>1. Primary School named after Wincenty Witos in Bierkowo</li> <li>2. Primary School named after Leopold Staff in Włynkówko</li> <li>3. Primary School named after Witold Dzięgielewski in Zaleskie</li> <li>4. Primary School named after the Land of Ustka in Charnowo</li> <li>5. Primary School nr 1 named after Leonid Teliga in Ustka</li> <li>6. Primary School named after Adam Mickiewicz in Ustka</li> </ol> <p>II edition</p> <ol style="list-style-type: none"> <li>1. Primary School named after Stefan Rowecki „Grot” in Wrześć</li> <li>2. Primary School named after Henryk</li> </ol>	<p>workshops and art competition</p> <p>*art competition was the part of first edition only</p>	<p>Two editions of educational project "One sea, many benefits. Offshore wind energy in my region", in which almost 3000 students from eleven primary schools in the Słupsk (Redzikowo) region took part. First edition ended up with 119 artworks delivered by students. Positive feedback and the willingness for further cooperation in educational activities expressed by schools’ principals.</p> <p>The workshops were conducted in all schools in the Ustka and Redzikowocommunes</p>

SEP for MFW Bałtyk II and MFW Bałtyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
		<p>Sucharski in Jezierzycze</p> <p>3. Complex School-Preschool named after Czesław Miłosz in Siemianice</p> <p>4. Complex School-Preschool in Redzikowo, Redzikowo 16a</p> <p>5. Complex School-Preschool in Objazd, Objazd 95</p>		
	Educational programme support (19-28 February 2024)	students from primary and secondary schools	workshops	educational project "Wind energy - energy of freedom" organized by the City Hall in Rumia, Rumia Invest Park and JV (approximately 900 students took part).
	Exhibition in National Maritime Museum in Gdańsk (preparation 2023/2024), execution 2024-2026 with the possibility of extension	All stakeholders; Tourists (local and incoming) School trips	Local events	Raising awareness about the OWF sector and positioning JV as an education and culture supporter. The first exhibition on offshore wind in Poland.
	Job Counselling Programme with Rumia Invest Park (2023)	pupils (primary school); Technical high-schools students		Lecture on Offshore Wind connected with job counselling programme delivered by RIP.

SEP for MFW Bałyk II and MFW Bałyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
Establish contact and dissemination of communication channels with authorities	March 2022 – June 2022	<ul style="list-style-type: none"> <li>Local authorities:</li> <li>Secretary of the Mayor Office in Ustka Urban Municipality</li> <li>Heads of Słupsk and Ustka Rural Municipalities</li> <li>Local heads of units of registration/villages: Duninowo, Lędowo, Pęplino (Ustka Rural Municipality), Bruskowo Wielkie, Bruskowo Małe i Wierzbęcino (Słupsk Rural Municipality).</li> </ul>	<ul style="list-style-type: none"> <li>Phone calls (&gt; 20)</li> <li>Formal letters (&gt; 9)</li> </ul> <p>In person meetings (5)</p>	<p>Establish contact, launch the series of educational and information sharing activities, establish preferred channels of communication and Projects information disclosure with stakeholders.</p> <p>Participants confirmed the need for further information sharing activities.</p> <p>16 participants in total.</p>

SEP for MFW Bałyk II and MFW Bałyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
Secure access to land	21 June 2022, Duninowo village Common Room (property of Ustka Rural Municipality) in Duninowo (Rural Municipality of Ustka). These meetings are intended to be held on a quarterly basis	<ul style="list-style-type: none"> <li>Private landowners of Ustka and Redzikowo municipalities with land plots within the Projects affected area and land cable route</li> <li>Head of Duninowo (sottys).</li> <li>Over 20 attendees owning a total of 44 land plots were invited, of which seven (incl. head of Duninowo) personally participated (plus four J.V. representatives)</li> </ul>	In person workshop (invitation sent via phone calls, formal letters, emails and announcements posted on local authorities' websites and village boards)	<p>Inform and discuss about the principles and the process for concluding easement agreements with private landowners for plots located on export cable route: transparency, same approach for all owners, sharing information upfront with owners about geological surveys planned within the onshore cable route.</p> <p>The approach for concluding formal easement agreements was discussed. Private owners informed about their preference to pursue the civil code to conclude the easement agreements (as a more society-focused form of cooperation than through the enforcement of the provisions of the Special Transmission Act). The stakeholders also asked questions about the planned geological surveys for the Projects.</p> <p>46 participants in meetings in 2022.</p>
Educational initiatives as a good practice	1 July 2022, University of Gdańsk and online	<ul style="list-style-type: none"> <li>University students</li> <li>Local NGOs</li> <li>Other OWF developers</li> </ul>	In person and online workshop	<p>Set an example of good practice on educating the public regarding OWFs; the activity was conducted mostly within the scope of the Flagship Programme 1 "Centre for Promotion and Dialogue" and Flagship Programme 2 "Offshore Wind Academy".</p> <p>40 participants in-person and 10 participants online</p>
Present the Projects and the potential for benefits to	<ul style="list-style-type: none"> <li>9 July 2022, Yacht Port in Łeba</li> <li>23 March 2023. City Hall in Ustka</li> <li>27 June 2023, Łeba</li> </ul>	Neighboring community to the planned O&M base in the Urban Municipality of Łeba and to the cable route in the	In person meeting	<p>Promote OWFs as a reliable source of green energy.</p> <p>Position the Investors as active participants in local community activities.</p> <p>Present the MFW Bałyk II and MFW Bałyk III Projects as locally based, sharing the expected local added value for the Łeba, Ustka and</p>

SEP for MFW Bałyk II and MFW Bałyk III

Engagement objective	Date / Venue	Target stakeholders	Engagement activities	Content of Engagement and feedback
	<ul style="list-style-type: none"> <li>19 September 2023, Bruskowo Wielkie</li> <li>6 December 2023, City Hall in Ustka</li> <li>19 March 2024, Łeba</li> </ul>	Redzikowo Commune, district of Słupsk		Słupsk community as a result of the presence of the O&M base and offshore wind farms infrastructure.
	2023-Ongoing	all stakeholders local organisations, local community, tourists	<ul style="list-style-type: none"> <li>Opening of Poland's first stationary local information point (LIP) in Łeba (June 2023)</li> </ul>	<ul style="list-style-type: none"> <li>Disseminate general information that easy to understand by non-professionals, showroom</li> <li>Contact form for grievance mechanism providing information about career development opportunities, possibility of submitting a CV.</li> </ul>
	<ul style="list-style-type: none"> <li>(Łeba, Swołowo) (2022/2023/2024) Harvest Festival in Słupsk Commune - Swołowo – September 2023</li> <li>Łeba Festival - celebration of the 666th anniversary of granting city rights - July 2023</li> <li>Redzikowo commune resident's day: June 2024</li> <li>Planned :Łeba Festival, 19<sup>th</sup>-21<sup>st</sup> July 2024, Harvest Festival in Słupsk Commune – Swołowo, 31<sup>st</sup> August 2024</li> </ul>	local community	local events	information about Projects, education

Source: Sotis Advisors, based on data from Equinor&Polenergia

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SEP for MFW Bałtyk II and MFW Bałtyk III

## Appendix C The Grievance Form

**Bałyk**

equinor | Polenergia

**Grievance Mechanism**

Offshore wind farm projects  
**Bałyk 1, 2 and 3**

**WHAT IS IT?**

The Grievance Mechanism is a process for assessing and resolving complaints from stakeholders if negative impacts of Projects' activities have occurred. It applies to all activities and stages of the investments.

**WHAT IS THE PURPOSE?**

Grievance mechanism provides the tools to address complaints and grievances in accessible and transparent manner.

**WHAT CAN BE THE SUBJECT OF A GRIEVANCE?**

Complaints and grievances may relate to damages, injuries or concerns related to Projects' activities, observed incidents or violations.

**WHO AND WHEN CAN USE IT?**

Any local stakeholder who deems to be negatively affected by the Projects. A complaint or grievance can be made at any time.

**IS MY DATA CONFIDENTIAL AND ANONYMOUS?**

The grievance may be submitted anonymously. If personal data is provided, it will not be shared with others without written consent.

**Step 1**  
Grievance

Send an electronic form available on [baltyk123.pl/en](http://baltyk123.pl/en)

or

Place the paper form in the box located:

- at the construction office in Peplino,
- at the construction office in Lędowo-Osiedle,
- at our Local Information Point in Łeba, 88/8 Kościuszki St.

**Step 3**  
Process of the grievance

The handling process varies depending on the type of complaint, the initial assessment and the complexity of the case.

**Step 5**  
Follow-up and monitoring

If a mitigation measure is identified, the investor shall implement it.

**Step 2**  
Registration

The investor will confirm receipt of the grievance.

**Step 4**  
Result

The investor will communicate the outcome in a response. The timing of the response will depend on the nature of the grievance.



SEP for MFW Bałtyk II and MFW Bałtyk III



**Date of grievance:**

\_\_\_\_\_

**Full name**

Please note: you can remain anonymous or request not to disclose your identity to a third party without your consent.

\_\_\_\_\_

I wish to raise my grievance anonymously.  
 I request my identity not to be disclosed without my consent.

**Contact information**

Please note: mark how you wish to be contacted.

By post:

\_\_\_\_\_

\_\_\_\_\_

By telephone:       By e-mail:

\_\_\_\_\_

**Preferred language for communication**

Polish  
 English

**Description of grievance**

What happened?  
 Where did it happen?  
 Who did it happen to?  
 What are the consequences?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Date of incident**

One time incident/grievance \_\_\_\_\_ date

Happened more than once \_\_\_\_\_  
how many times, over what period?

Ongoing (currently experienced problem)

**Anticipated solution to the problem**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_