Stakeholder Engagement Plan

Talum 3 Battery Energy Storage System (BESS) Project, Slovenia

February 2026

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Public

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Acronyms and Abbreviations

BESS – Battery Energy Storage System

CEO – Chief Executive Officer

E&S – Environmental and Social

EBRD – European Bank for Reconstruction and Development

EHSS – Environmental, Health, Social and Safety

EPC Contractor – Engineering, Procurement and Construction Contractor

ESAP – Environmental and Social Action Plan

ESMP – Environmental and Social Management Plan

ESP – Environmental and Social Policy

NGO – Non-Governmental Organisation

PR – Performance Requirement

SEP – Stakeholder Engagement Plan

1. Project Overview

1.1. Introduction

This Stakeholder Engagement Plan (SEP) provides the requirements for the stakeholder engagement process, stakeholder identification and grievance mechanism planned for the Talum 3 Battery Energy Storage System (BESS) project, (the “Project”), in Kidričevo in Slovenia.

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

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

The SEP is a live public document which sets out NGEN’s commitments relating to stakeholder engagement, consultation and disclosure activities in connection with the Project. The SEP is reviewed periodically during Project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

1.2. Project Background

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is providing a corporate loan to NGEN (‘Next Generation Energy’) (the “Company”) to finance the construction of the Talum 3 BESS Project in Kidričevo, in Slovenia.

Figure 1 - Talum 3 location and wider the Talum Tovarna Aluminium production factory

The Project involves the construction of the following components:

- Batteries – used to store the electrical energy.
- Transformers – used to adjust the voltage level between the system and the grid.
- Battery and energy management system – used to control all the components in the system.
- Control systems – for energy management, security and fire suppression used to manage the operation of the BESS efficiently and safely.

The Project aims to enhance energy reliability in Kidričevo and the wider area and also supports the integration of renewable energy sources within the grid system. The objectives of the Project include:

- Enhance grid energy stability.
- Increase the reliability of renewable energy sources and help to integrate them into the energy system.
- Reduce greenhouse gas emissions and support the transition towards a more sustainable energy system.

1.3. NGEN Company Background

NGEN is an energy storage and software platform company headquartered in Žirovnica, Slovenia. Founded in 2018, NGEN specialises in innovative energy solutions, focusing on advanced technologies in the electricity sector. The company offers battery energy storage, energy supply, and energy management software solutions for residential, industrial, and grid levels, including for regional energy transmission and distribution network operators.

NGEN's BESS assets span Slovenia, Poland, Latvia, and Romania with installed power up to 115 MW. Total installed capacity is 306 MW/ 635 MWh, with an estimated investment of EUR 163 million. All facilities are standalone, and are not linked to power generation or industrial sites.

Two projects are making significant progress. In Slovenia, Talum 3 (70 MW/ 140 MWh; EUR 40 million) has moved into the construction phase, with batteries set to be delivered by mid-February and commissioning planned for June 30, 2026. Meanwhile, Vistula 1 in Poland (9 MW/ 18 MWh; EUR 6 million) has finished construction and is now waiting for balance group registration and operating licenses to be finalised.

The remaining projects are progressing through earlier development phases. Vistula 2 in Poland (8 MW/ 16 MWh; EUR 5 million) has begun pre-construction activities, with commissioning planned for 30 September 2026. Liepaja in Latvia (100 MW/ 215 MWh; EUR 50 million) and Lacu Sarat in Romania (115 MW/ 246 MWh; EUR 62 million) have both been acquired, and battery supply contracts have been executed; commissioning for both projects is expected by December 2026.

The projects are financed through a mix of sponsor equity and senior debt, including up to EUR 70 million provided by the EBRD.

2. CONSULTATION AND DISCLOSURE

2.1. National and International Legislative Requirements

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

- Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters (1988).
- EU Directive 2003/35/EC for Public Participation which governs requirements for public participation regarding drawing up certain plans and programs relating to the environment.
- Environmental Protection Act – ZVO-2 (Official Gazette 44/22) governing the framework for Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA), information, participation and transboundary procedures.
- Spatial Planning Act – ZureP-3 (Official Gazette 199/21) governing procedures and digital publication duties for national and municipal spatial acts.
- Access to Public Information Act – ZDIJZ (2025).
- Public engagement and consultations are governed by the SEA and EIA which are structured processes used to evaluate the potential environmental and social impacts of projects and to support transparency during project development:
    - SEA focuses on higher-level planning instruments (e.g., national policies, sector strategies, spatial plans), ensuring environmental and social factors are embedded early and proactively in the design of interventions.
    - EIA applies at the project level, assessing specific site-based environmental and social impacts and setting out mitigation, monitoring, and management measures.
    - Both processes require robust stakeholder engagement to ensure that the perspectives of affected communities, regulatory bodies, NGOs, experts, and other interested parties are formally captured and addressed. The key stages for stakeholder engagement in the SEA/EIA process include:
        a. Stakeholder identification and mapping – identifying all groups and individuals who may influence or be affected by the Project including regulators, local communities, vulnerable groups, landowners and technical experts.
        b. Early engagement and scoping consultations – at the beginning of the Project, stakeholders should be engaged on key environmental and social issues, project mitigation measures, and preferred approaches for ongoing consultation.
        c. Information disclosure – providing stakeholders with accessible, timely and relevant information.

d. Formal consultation during impact assessment phase (if applicable)

e. Integration of feedback and updates to assessment documents

f. Consultation on draft SEA/EIA reports

g. Ongoing engagement during implementation and monitoring.

2.2. EBRD Requirements

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

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

Table 1: EBRD PR10 Requirements

- Identify the various individuals or groups i) who are affected or likely to be affected by the Project; or may have an interest in the Project.
- Identify individuals and groups that may be differentially or disproportionally affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.
- Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.
- Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.

2.3. Existing Stakeholder Engagement and Community Awareness Programmes

Limited consultation or engagement has been carried out by NGEN at this stage of the Project. As part of its stakeholder engagement and community awareness efforts, the Company will be establishing an online grievance mechanism for affected stakeholders to submit grievances available via the NGEN website.

All grievances, whether submitted online, by email, in writing, verbally, or through on-site channels, are handled through NGEN's single internal grievance and whistleblowing process, which is referenced in the Stakeholder Engagement Plan as the primary grievance handling mechanism.

Grievances received on site, including those submitted in person or through physical forms, will be forwarded to the responsible NGEN representative and logged in the same central system. This ensures consistent registration, assessment, follow up, and resolution of all grievances under one unified process, regardless of the channel through which they are received.

This SEP has been created to ensure that NGEN's ongoing engagement with stakeholders affected by the Project and to complement the formal consultation processes required under Slovenian law.

3. STAKEHOLDER IDENTIFICATION

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

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

a) Primary stakeholders - individuals and groups who are affected directly by the Project; and

b) Secondary stakeholders - those parties which have influence on, but are not necessarily directly impacted by, the Project, and those indirectly impacted by the Project

The key stakeholders identified are presented in Table 2.

Table 2: Key Identified Stakeholders and Methods of Engagement

Stakeholder Category	Type	Name	Interest in Project
Primary	Project Shareholders / Internal Stakeholders	NGEN Group	Decision-making process, Project implementation, and stakeholder engagement.
	Local Communities	Nearby communities and residents of villages Kidričevo, Njiverce, Župečja Vas,and Lovrenc na Dravskem Polju, and also the Župnijska cerkev sv. Družine Church group.	Benefitting from grid balancing, and energy supply stability. Nuisances due to noise and construction related disruption i.e., traffic, dust, and noise.
	Vulnerable Groups	Any specific vulnerable groups identified currently or in the future i.e., disabled persons, elderly persons, etc. in close proximity to the site.	Vulnerable groups that may have limited mobility or access to main Project communication channels.
	Permitting bodies and governmental agencies	Občina Kidričevo (Municipality of Kidričevo), Ministry of the Environment, Climate and Energy, Ministry of Natural Resources and Spatial Planning.	Issue of building permits, environmental permits, approval of designs, and Occupational Health and Safety (OHS) Authorisations.

Stakeholder Category	Type	Name	Interest in Project
	Business Environment	Businesses within the wider Talum Tovarna Aluminium facility including Revital Kidričevo, SILKEM d.o.o., PKS Pro poslovne storitve in trgovina, Boxmark Leather proizvodnja in trgovina d.o.o.	Noise and traffic related nuisance during construction and operation. Businesses with interest in the Project's construction or operation providing services or supplies i.e., waste disposal.
Secondary	NGOs	Regional examples include Ecologists without Borders (Ekologib brez meja), and Umanotera (the Slovenian Foundation for Sustainable Development) but other locally based active NGOs may include community-oriented groups such as local cultural societies or volunteer groups.	Understanding the proposed measures and impacts the Project will bring (i.e., on conservation efforts and biodiversity).
	Contractors/Suppliers	EPC Contractor (Gradnje A & S, D.o.o), battery supplier (Tesla), transformer supplier, switchgear supplier.	Tenders and participation in the implementation of the Project.
	Construction workers	Construction workers employed by the EPC / Construction Contractor.	Contractors are engaged to carry out the construction works.
	Utility Companies	ELES d.o.o. (national TSO/DSO), regional DSO service providers e.g., Elektro Maribor d.d. (if applicable) VZDRŽEVANJE IN GRADNJE Kidričevo (local water and sewage authority).	Ensuring grid stability (TSO/ESO), sustainable resource use (water and sewage authorities), and reliable connectivity (telecom operators).
Lender	Lending Organisation	EBRD	Provide the loan to finance the Project, alongside certain environmental, social and technical requirements.

4. STAKEHOLDER ENGAGEMENT PROGRAMME

4.1. Disclosure of Information

The types of information disclosed and the specific methods of communication to be undertaken for this Project are summarised in the Stakeholder Engagement Programme in Table 2 below. The objectives of external communications are to provide regular engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the Project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, EBRD PR 10 and Slovenian national legislation.

The SEP is a live document that will be revisited and updated, if necessary, on at least an annual basis (or when changes are made) to reflect the changes in stakeholder engagement due to Project developments and new stakeholders. The information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence. The external and internal communication methods and information for disclosure identified in Table 3 are not exclusive and NGEN may choose to disclose more information upon request by stakeholders.

NGEN is responsible for internal and external communications regarding the existing and future projects and will be the main contact point for affected or concerned people. All related Project documents and communication related to the Project will be available and undertaken in English and/or Slovenian languages.

4.2. Stakeholder Engagement Programme

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

Stakeholders will be able to attend consultation meetings and be informed of Project activities, contact persons and the established Grievance Mechanism in detail, including channels for receiving information. Minutes will be taken at all stakeholder meetings and will include a signed attendance register.

Any concern or grievance raised prior or during the Project implementation will be collated and logged by the E&S Lead as well as by the EPC Contractor (Gradnje A & S, D.o.o). The EPC Contractor will assist in this process by escalating of any grievances received to E&S Lead. Stakeholders can use the grievance forms to be situated at the reception of the main construction site to submit their grievances. These grievances can be submitted anonymously.

All comments received will be reviewed in accordance with the commitments made under best international practise presented within the ‘EBRD Requirements’ section provided in Section 2. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

The Stakeholder Engagement Programme is detailed in Table 3 below

Table 3: Future Stakeholder Engagement Programme

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
▪ **Internal Project Shareholders (NGEN CEO, NGEN E&S Lead)**	▪ Internal meetings with the CEO and Country E&S Lead on an as-needed basis. ▪ At least one E&S kick-off meeting with the EPC contractor and Supervising Engineer to outline E&S requirements. ▪ Monthly EHSS meetings attended by Project Manager, E&S Manager and Construction Contractor to discuss Project updates and E&S measures and processes during construction.	▪ Updates on the ESAP, SEP, and ESMP implementation if necessary. ▪ Quarterly reports on grievances, if any. Other E&S data (e.g., H&S statistics, training, workforce) may be reported upon request or during key project milestones Project progress updates. ▪ Financial performance. ▪ ESG compliance and sustainability measures. ▪ Risk assessments and mitigation strategies.	▪ Weekly internal meetings throughout constriction period. ▪ Meeting with Contractor held before construction and upon contract signing. ▪ Monthly Project EHSS meetings throughout construction period.
▪ **Permitting bodies and governmental agencies**	▪ Ongoing communications with the Občina Kidričevo (Municipality of Kidričevo), the Ministry of the Environment, Climate and Energy, and the Ministry of Natural Resources and Spatial Planning via emails, virtual meetings, and official correspondence as required throughout the Project lifecycle. ▪ Submit official letters and emails to the relevant National Government Authorities as required. ▪ Pre-scheduled formal engagement meetings with regulatory bodies. ▪ Submission of compliance and environmental reports. ▪ Site visits with regulators for verification (when requested).	▪ Updates on Project design approvals including the status of Environmental Consents, Construction Permits and OHS Authorisations.	▪ As required during construction phase.

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
	▪ Participation in public hearings (if any request was made).		
▪ **Local Communities**	▪ When there are sufficient requests from local residents, organise a consultation meeting held in Kidričevo for residents in neighbouring areas. This should be advertised in the neighbouring areas via Municipal communication channels, posters and on the Company website. ▪ Ongoing updates on the Project website and through Municipal communication channels to the local community(s). ▪ Project Non-Technical Summary (NTS) distributed through community centres. ▪ Dedicated Community Liaison Officer (CLO) for ongoing engagement and grievance handling.	▪ SEP and NTS. ▪ Project timeline and potential community impacts. ▪ Employment & business opportunities. ▪ Environmental & safety measures. ▪ Community investment and Corporate Social Responsibility (CSR) initiatives.	▪ Once during the early stage of construction. ▪ Regular online & print updates throughout the construction phase. Grievance manager response to grievances.
▪ **Vulnerable Groups**	▪ If any specific vulnerable groups are identified, engage directly with at least one consultation to be made available virtually or in person conducted by the E&S Lead. ▪ Engagement tailored to specific needs of any other vulnerable groups identified by the Company over the course of the Project.	▪ SEP, NTS. ▪ Project-related risks affecting vulnerable groups. ▪ Opportunities for inclusion (employment, training).	▪ As soon as possible prior to the commencement of construction. ▪ Further engagement undertaken as needed.
▪ **NGOs**	▪ Provide relevant project documents (e.g. NTS, SEP, grievance mechanism) upon request via email or in coordination with local authorities or community channels. ▪ If NGOs express interest or raise concerns during Project development, NGEN is open to engaging in dialogue and sharing information as appropriate.	▪ SEP, NTS. ▪ Environmental and social management measures, where relevant. ▪ Project updates, if specifically requested.	▪ If and when NGOs express interest, during the construction and operation phases as relevant. Engagement will be initiated as needed and in response to actual NGO contact.

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
	▪ The approach to engagement will be adapted based on the nature of the NGO's interest and the phase of the Project.		
▪ **EPC Contractor and Suppliers**	▪ Meetings attended by NGEN periodically on a needs basis. ▪ Meetings with the Contractor and E&S Lead to report and discuss E&S measures and processes during construction.	▪ Updates on the ESAP, SEP and ESMP implementation on an as-needed basis. ▪ E&S issues and data shared with Supervising Engineer to develop resolutions to issues found. ▪ Code of conduct adherence.	▪ Meetings with NGEN held prior to construction upon contract signing and as needed during construction. ▪ E&S Lead and Contractor to meet weekly during construction. ▪ Ongoing performance reviews.
▪ **Construction Workers**	▪ Daily safety briefings /Induction training and toolbox talks. ▪ Regular assessments conducted by supervisors to ensure the well-being, safety, and working conditions of construction workers. ▪ Provision of information on the grievance mechanisms through internal communication channels such as induction briefings, noticeboards, or email updates. Feedback through the Project-wide grievance mechanism.	▪ SEP. ▪ EHS measures and processes to be followed. ▪ Grievance mechanism and resolution process.	▪ Throughout construction.
▪ **Business Environment**	▪ E&S Lead to engage directly with businesses in close proximity to site via the most appropriate available communication channel i.e., business email address, phone number, or an organised face to face meeting. ▪ Company website to include advertisements for tender opportunities and a mechanism for requests from suppliers and service providers.	▪ Raising awareness on the Project components, use of the grievance mechanism, and opportunity for community queries. ▪ Advertisements to include details of tender opportunities	▪ If and when further tenders are required during construction and operation.

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
		for suppliers and service providers as required i.e., cleaning and maintenance services.	
▪ **EBRD**	▪ Annually and on an as-needed basis, environmental, social and health & safety updates. ▪ Annual Environmental and Social Reports.	▪ Updates on the ESAP, SEP, and ESMP implementation and overall E&S performance.	▪ Annually and on an as-needed basis meetings before construction, during construction, and during the duration of the Project.

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

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

Whistleblower Officer, NGEN

Website: https://speakup.ngen-group.eu/sl

Address: Moste 101, 4274 Žirovnica, Slovenia

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

Company E&S Meetings

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

Community Consultation Meeting

The Project measures and activities will be explained through this public consultation meeting which will be held in Kidričevo. Interested community members will be able to meet with the Company and the E&S Lead, pass on their queries and to be informed on Project progress and on on-going issues.

Local Business Engagement Meetings

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

EBRD E&S Meetings

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

5. REPORTING AND GRIEVANCE MECHANISM

5.0. Introduction

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

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

The grievance mechanism for the Talum 3 BESS Project is outlined in this SEP and will be developed and implemented with the following aims:

- To address concerns promptly and effectively, in a transparent manner that is free from manipulation, interference, coercion, intimidation, or retribution, and is readily accessible to all affected parties at no cost.
- To ensure handling of grievances in a culturally appropriate manner that is discreet, objective, sensitive and responsive to stakeholders' needs.
- To guarantee that there will be no retaliation or discrimination against those who raise grievances, and that all grievances will be treated with confidentiality.
- To allow for anonymous submissions, and to ensure regular updates to complainants about progress.
- To ensure that this mechanism does not prevent access to formal judicial or administrative remedies.

5.1. Monitoring, Reporting and Feedback Mechanisms

NGEN will monitor the communication channels and will provide feedback as appropriate. A complaint form at the reception of the main Project site will be available for stakeholders during the construction phase and complaints can also be submitted by the company's whistleblowing channel at https://speakup.ngen-group.eu/sl or visiting the Company office in Žirovnica. Any complaints will be registered in a log for complaints by the E&S Lead who will also be the key contact person responsible for managing the grievance mechanism. The contact details of the E&S Lead will be shared to stakeholders during the engagement activities listed in Table 3.

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

5.2. Grievance Mechanism

NGEN will operate a Grievance Mechanism, established in-line with international best practice. Any comments or concerns can be brought to the attention of the

company verbally (in person or over the phone) or in writing by email or filling in a grievance form (see Appendix 1). The grievance form can be submitted in person at the reception of the Project site or to NGEN's office in Žirovnica or anonymously using a prepaid envelope provided at the reception.

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

All grievances, including anonymous submissions, will be recorded in the grievance mechanism log. The Supervising Engineer and E&S Lead will cooperate closely, sharing all information regarding any complaints or dissatisfaction.

How to Submit a Complaint

Stakeholders can submit grievances through any of the following channels:

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

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

Grievance Record-Keeping and Tracking

All grievances, including anonymous submissions, will be recorded in the grievance mechanism log. The Project Manager and E&S Lead will cooperate closely, sharing all information regarding any complaints or dissatisfaction. The grievance log will store the following information on the complaints received:

- Complaint number
- Category (aka subject of the grievance)
- Name of complainant (if provided)
- Complainant gender
- Complainant disability status
- Complainant address and contact details
- Date of complaint receipt

- How complaint was received
- Who received the complaint
- Description of the issues/complaints
- Date of response
- Date of final resolution
- Entities involved
- Status of the issue
- Notes on current status e.g. resolution activities planned and progress
- Number of days between complaint receipt and complaint acknowledgement
- Number of days between complaint receipt and complaint resolution

5.3. Guiding Principles of the Grievance Mechanism

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

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

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

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

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

The prevention of GBVH in the workplace is a priority for NGEN and its senior management. The grievance mechanism described in Section 5.2 is designed to

address all types of grievances, including those related to GBVH, and allows for the anonymous submission of complaints.

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

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

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

5.5. Grievance Resolution

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

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

Grievances submitted will be solved and followed-up in accordance with the procedures given below and **Appendix 2**:

- Stage 1 – E&S Lead receives and solves complaints. If at Stage 1 the complainant's grievance is not solved, he/she will be informed about grievance resolution procedures of Stage 2. The complainant has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. The E&S Lead will be aware of all the grievances submitted at Stage 1 through the grievance log, and will monitor their resolution remotely.
- Stage 2 – The E&S Lead receives and solves complaint. A Grievance Meeting attended by the E&S Lead and Supervising Engineer will be set up to resolve complaints (see Appendix 3).

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

5.6. Roles and Responsibilities

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

Whistleblower Officer, NGEN

https://speakup.ngen-group.eu/sl

Address: Moste 101, 4274 Žirovnica, Slovenia

Appendix 1

NGEN GRIEVANCE FORM

NGEN Grievance Form (Template)

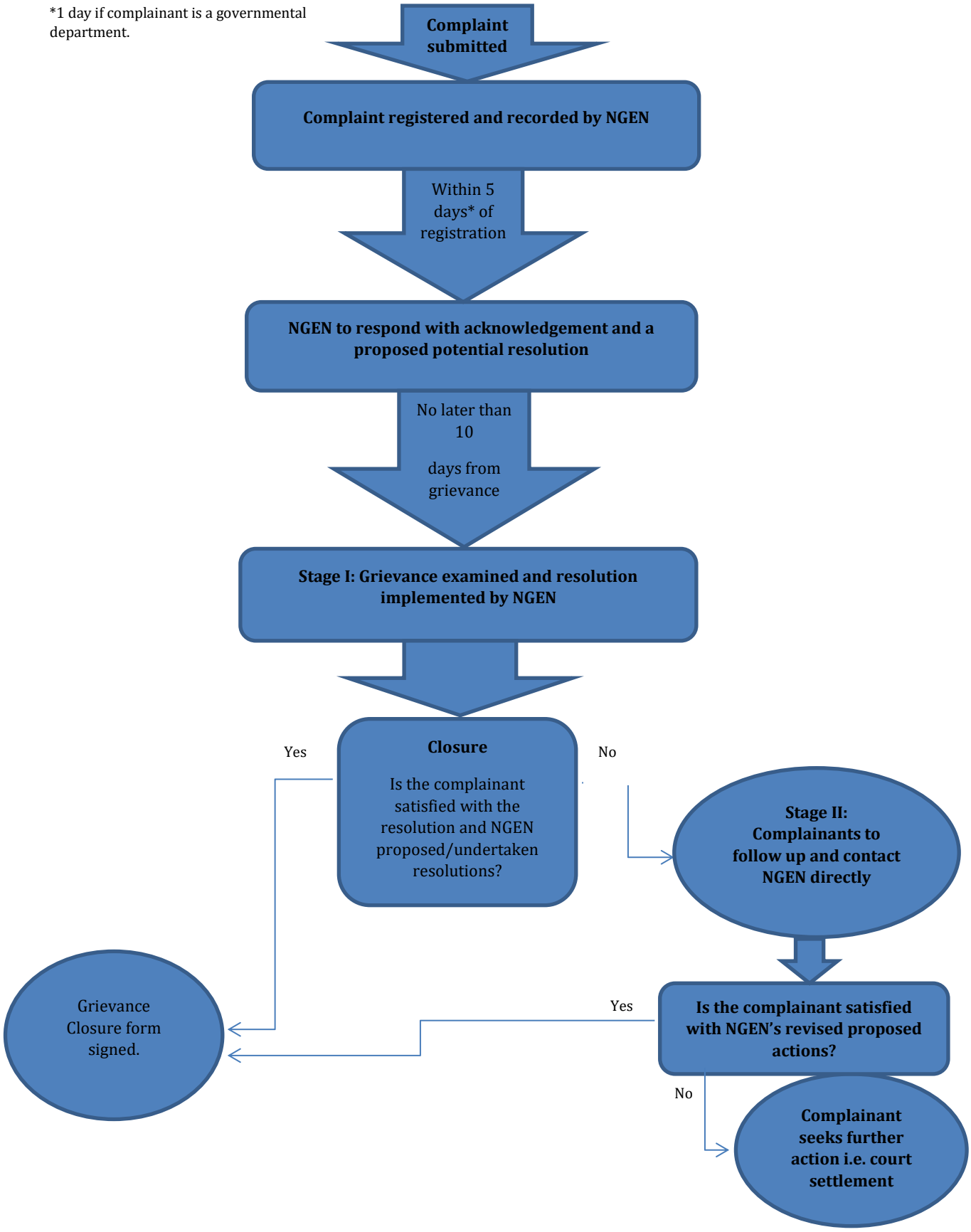
Reference No.	
Full Name (optional):	
Contact Information Please mark how you wish to be contacted and add contact details	☐ **By Post:** ☐ **By Telephone:** ☐ **By E-mail:** ☐ **Other (please specify):**
Description of Concern, Incident or Grievance	**What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?**
Date of concern, incident, or grievance	
☐ **One-time incident/grievance (date)** ☐ **Happened more than once (how many times?)** ☐ **On-going (currently experiencing problem)**	
What would you like to see happen to resolve the problem?	
Signature: **Date:**	
Please hand this at the reception or request a prepaid envelope to anonymously send it via mail.	

Appendix 2

COMPLAINT PROCEDURE

Grievance Process Chart

*1 day if complainant is a governmental department.



Appendix 3

NGEN GRIEVANCE RESOLUTION FORM

NGEN Grievance Resolution Form (Template)

How was the grievance received?	☐Grievance form (specify which location) ☐Direct contact with CLOs ☐Other		
Reference No:			
Description of Concern, Incident or Grievance: *What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?*			
Date of Grievance			
Has the Grievance been Resolved?	☐Yes ☐No; ***If not provide a justification below***		
Fill Out Either Section 1 OR Section 2 below			
Section 1			
Summary of Actions Undertaken to Resolve Grievance			
Date of Implementation			
Responsible Party			
Section 2			
Summary of Proposed Actions to be Implemented to Resolve Grievance			
Timeline for Implementation			
Registrar Name:		**Complainant Name:**	
Registrar Signature:		**Complainant Signature:**	
Date:		**Date:**	

Appendix 4

NEGN GRIEVANCE LOG

NGEN Grievance Log Sheet (Template)

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