

KOSOVO SOLAR – TUCEP AND VERIQ ENVIRONMENTAL AND SOCIAL ASSESSMENT

Stakeholder Engagement Plan (SEP)

February 2026



CLIENT: European Bank for Reconstruction and Development (EBRD)
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ABBREVIATIONS

EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
GBVH	Gender based violence and harassment
KOSTT	Kosovo Transmission, System and Market Operator
MESPI	Ministry of Environment, Spatial Planning and Infrastructure
NTS	Non-technical Summary
PVPP	Photovoltaic Power Plant
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
TS	Transformer Substation



1 INTRODUCTION

1.1 Project Context

Overview. The European Bank for Reconstruction and Development (EBRD) is considering providing financing for the construction and operation of two large-scale solar photovoltaic power plants (PVPPs) and accompanying infrastructure in Kosovo, with a combined capacity of 142.2 MWp (the “Project”):

- > PVPP Tuçep – capacity 98.5 MWp; and
- > PVPP Veriq – capacity 43.7 MWp.

The Project has been categorised as “B” under the EBRD Environmental and Social Policy (ESP) (2024)¹. A detailed description of the Project is given in the next chapter.

Project implementor. The Project will be implemented by Quant Renewables Kosovo Invest Limited (the “Borrower”) as the EBRD loan recipient, with funds on-lent to its Kosovo-based special purpose vehicles (SPVs) – AKG Solar Tuçep and AKG Solar Veriq, which will operate the respective PVPPs. Both plants will be delivered under a single turnkey contract with SolarApex (the “Contractor”). SolarApex will be responsible for the construction phase and the first two years of Project operation and maintenance.

Project benefits. Potential benefits related to the construction phase of the Project include temporary employment opportunities for the local workforce and development of local workforce skillsets, as well as engagement of local subcontractors and generating opportunities for local businesses. More significant benefits resulting from Project implementation will be obtained in the operational phase, including:

- > Generation of renewable energy, contributing to the production of clean, pollution-free energy and reducing reliance on fossil fuels,
- > Contribution to the fulfilment of goals outlined in Kosovo’s strategic documents, i.e., contribution to climate change mitigation by reducing greenhouse gas emissions, as the need for energy production from fossil fuels will be decreased,
- > Contribution to air pollution reduction by decreasing emissions of air pollutants (SO_x, NO_x, PM_{2.5}, PM₁₀) from power plants using fossil fuels (due to reduction of needed energy from these plants),
- > Enhancing energy security and diversification through increased domestic renewable generation capacity,
- > Supporting sustainable economic development by promoting renewable energy investment.
- > Engaging local subcontractors and employment opportunities for locals.

National strategic framework. The Project represents one of the largest renewable energy investments in Kosovo to date and is fully aligned with the country’s energy transition priorities.

Kosovo has committed to implementing the Energy Community’s targets, which for Kosovo include a 32% reduction in net greenhouse gas emissions from the energy sector by 2031 and a minimum of 35% of electricity consumption from renewable energy sources by the same year. These targets

¹ EBRD’s 2024 ESP is available at: <https://www.ebrd.com/home/news-and-events/publications/institutional-documents/environmental-and-social-policy-2024.html>

are reflected in the Kosovo National Energy Strategy 2022–2031 and are directly supported by the Project.

Moreover, the Project contributes to achieving the renewable energy and decarbonisation goals outlined in the National Energy and Climate Plan 2025–2030, where promoting renewable energy is the second strategic objective.

The Project also supports the National Climate Change Strategy 2019–2028, which aims to mitigate greenhouse gas emissions and strengthen climate resilience in the energy sector by increasing the use of renewable energy and reducing dependence on coal for electricity generation.

1.2 Objectives and Scope of this Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) was developed by the Borrower in order to clearly communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

The objective is to facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with Kosovo legislation, as well as the requirements of EBRD.

This SEP is a live document that will be periodically updated as necessary to reflect key changes in Project activities or any new developments in the Project scope.

1.3 Responsibility for Implementation of this Stakeholder Engagement Plan

The Borrower, together with the SPVs, is responsible for Project implementation. The following person has been appointed as the contact person for all matters related to this SEP, including the general Project grievance mechanism:

Mr. Arten Bajrush, AKG SOLAR
E-mail: arten.bajrush@akgsolar.com
Phone: +383 49 789 907

Note: GBVH-related complaints will be handled through a separate, confidential pathway led by the Project's GBVH Focal Point (see Chapter 8 – GRIEVANCE MANAGEMENT).

2 PROJECT DESCRIPTION

A more detailed description of the planned works is provided in the **Non-technical Summary** which is part of the Project’s disclosure package together with this Stakeholder Engagement Plan.

2.1 Project Sites

PVPPs Tucep and Veriq will be located within the **Municipality of Istog**, in the District of Peja (Pejë) in north-western Kosovo.

PVPP Tucep will be installed in the vicinity of the **settlements of Kernine and Tucep**, while PVPP Veriq will be located near the **settlements of Veriq and Veriq i Ri** (Figure 2-1).

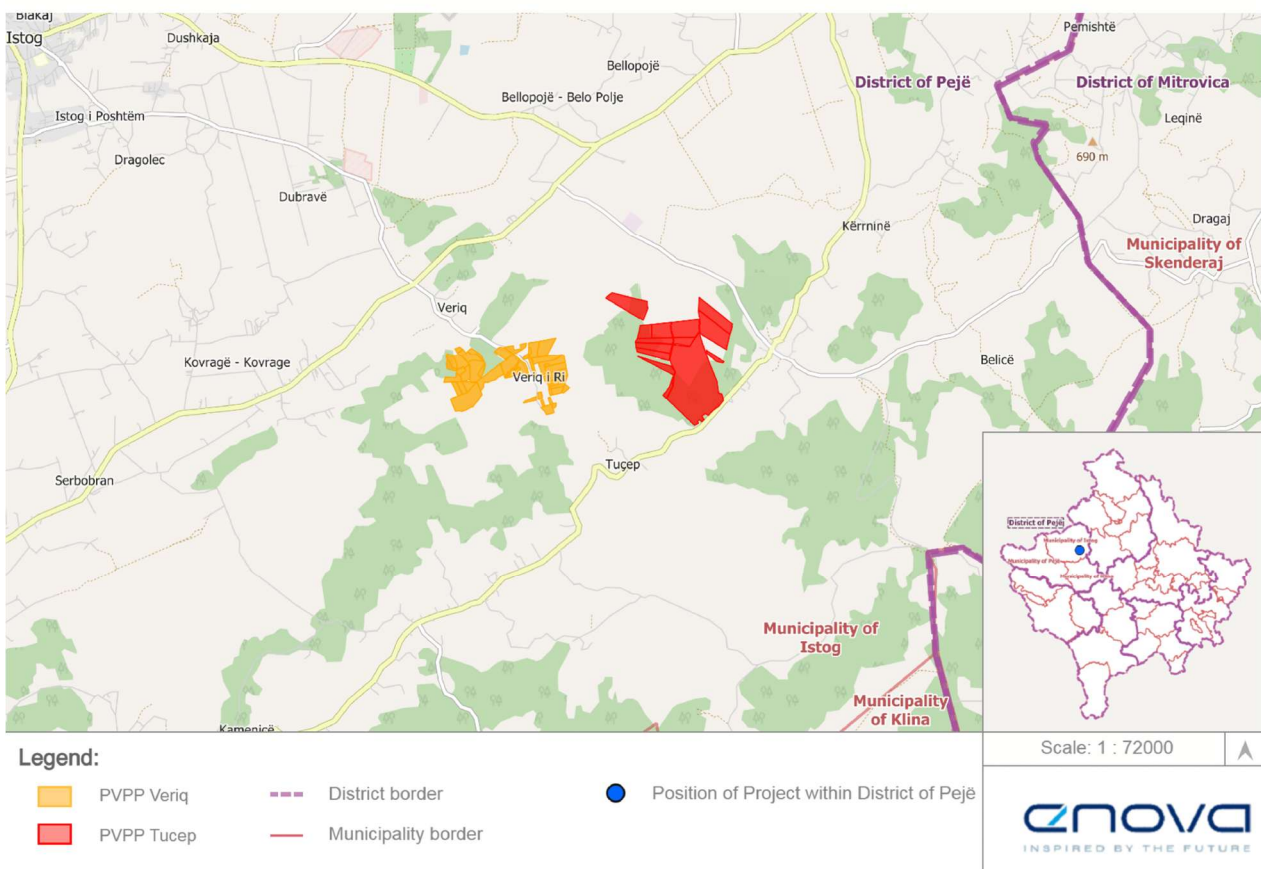


Figure 2-1: Project locations in the Istog area (Source: ENOVA)

The PVPP sites are included in the **Zoning Map of the Municipality of Istog** for the period 2024 – 2032².

2.2 Overview of Project Components

As specified in the Main Designs finalised in 2025, the Project will, in addition to the PVPPs, also include the construction of three **transformer substations (TS)**:

² Available at: <https://istog.rks-gov.net/harta-zonale-komunale-2024-2032/>

- > one 0.8/33 kV internal substations at the Tucep site,
- > one 0.8/33 kV internal substation at the Veriq site, and
- > one 33/110 kV Kërrninë 2 substation.

The two internal³ 0.8/33 kV substations will be connected to the 33/110 kV Kërrninë 2 substation, while the Kërrninë 2 substation will be connected to the existing 110/400 kV Peja 3 substation to ensure grid connection. All connections between substations will be achieved via underground cables.

At each PVPP site, an **administrative and storage building** will be constructed to support daily operational and security functions of the plant. These buildings will serve as control and monitoring points for on-site activities, housing security and maintenance personnel and providing space for the storage of operational equipment, spare parts and maintenance tools.

An overview of the described infrastructure is provided in the figure below.

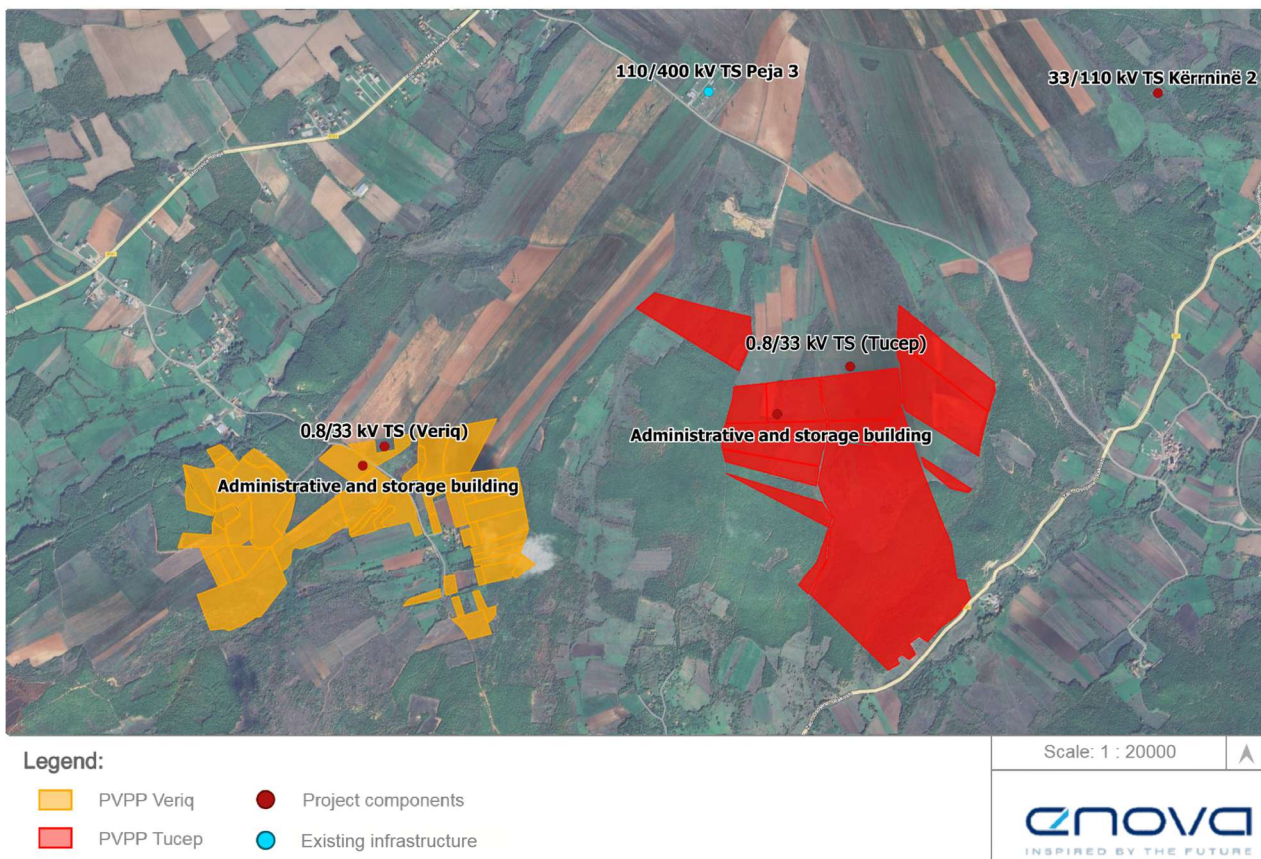


Figure 2-2: Map of Project components (source: ENOVA, based on Main Design drawings)

Both sites are accessible through the existing road network infrastructure. In addition, **internal access roads** within the PVPP plots will be constructed as part of the Project.

³ Internal substations are dedicated to a specific PVPP and are intended solely to serve the electrical output of that PVPP.

2.3 Status of Project Development

The Project has advanced through several key preparatory steps, primarily in terms of permitting and design. A summary of activities implemented to date is presented in the table below.

Table 2-1: Project development activities to date

STAGE	DESCRIPTION
LOCAL ENVIRONMENTAL IMPACT ASSESSMENT (EIA) AND PERMITTING	<p>In accordance with the Kosovo <i>Law on EIA</i>, the Project falls in the category of projects for which the need for a full EIA is determined by the Ministry of Environment, Spatial Planning and Infrastructure (MESPI) based on specific screening criteria set by this Law. MESPI determined that an EIA is required; therefore, EIA Reports for each PVPP were prepared in 2022.</p> <p>Public disclosure meetings were held in December 2022 to present the findings and conclusions of the EIA Reports.</p> <p>Following approval of the EIA Reports and public disclosure meetings, MESPI issued the Decisions on Environmental Consent for both PVPPs in January 2023. During the two-year validity period of the Environmental Consents, the SPVs were required to obtain the next applicable approvals, namely the Construction Conditions (for details, please see “Construction Approvals” below).</p> <p>After construction completion and before operation, an Environmental Permit will need to be obtained for each PVPP to confirm compliance of the works with the issued Decision on Environmental Consent. Environmental Permit is valid for five years.</p>
TECHNICAL DOCUMENTATION	<p>A Geotechnical Report assessing the geological and engineering conditions of the Project area was prepared in 2022 to inform foundation design and site-specific construction requirements.</p> <p>The Main Designs for each PVPP, covering architectural, structural, electrical, hydrotechnical, mechanical, and fire protection aspects, were finalised in March 2024.</p> <p>In addition, final energy production calculations for the PVPPs were performed using PVsyst software in October 2025.</p>
LAND LEASING	<p>Both SPVs concluded separate long-term land lease agreements with “Gekos,” the entity holding a 99-year lease with the state, with the right to further sub-lease. The agreements include an 80-year sub-lease for PVPP Tucep (signed in December 2023) and a 78-year sub-lease for PVPP Veriq (signed in January 2024).</p>
CONSTRUCTION RELATED APPROVALS	<p>In February 2024, the Ministry of Agriculture, Forestry and Rural Development granted approval for the temporary change of land use for the PVPP Tucep site, allowing the conversion of agricultural land to construction land for the purpose of constructing a solar park⁴.</p> <p>Subsequently, in August 2024, MESPI issued the Construction Conditions for both PVPPs. The Conditions define the layout and technical requirements for PVPPs and accompanying infrastructure (internal roads, TS, administrative and storage building, security fencing, etc.). The Construction Conditions are valid for two years and serve as a prerequisite for obtaining the Construction Permit.</p>

⁴ This approval was granted for 16 hectares which were not designated as a solar park via Municipal Zoning Map. The rest of land was designated as a solar park in the Municipal Zoning Map.

STAGE	DESCRIPTION
	<p>Construction Permits for both sites were obtained in January 2026.</p> <p>Upon completion of construction, the SPVs will be required to obtain an Occupancy Certificate for each PVPP, issued by MESPI.</p>
<p>CONNECTION AGREEMENTS</p>	<p>In December 2024, Connection Agreements with Kosovo Transmission, System and Market Operator (KOSTT) were signed for both PVPPs. These agreements define the main terms of grid connection (e.g., the connection point, voltage level, capacities, respective responsibilities of the parties), which allows the Project to formally secure grid access. The final technical specifications for the transmission assets (new TS, underground 110kV cable, and connection inside Peja 3 TS) are currently being prepared by KOSTT and are expected to be finalised by the end of November 2025.</p> <p>Energy Generation License will need to be obtained from Energy Regulatory Office for both PVPPs after construction completion.</p>



3 REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

3.1 Local Legislation Requirements

Kosovo laws regulating information disclosure and public consultations of relevance to this Project are:

- > *Constitution of the Republic of Kosovo* stipulates that documents of state authorities must be publicly accessible, with exceptions made for privacy, trade secrets or security reasons. Additionally, it emphasises collective responsibility for the environment, ensuring public opinions are heard and considered when decisions affecting the environment are made. *In the context of this Project, the constitutional principles on access to information, environmental responsibility and public participation are applied through transparent disclosure of Project information and the systematic consideration of public views during spatial planning and environmental decision-making processes.*
- > *Law on Access to Public Documents No 06/L-081* guarantees the right of every person to have access to public documents. Public institutions are obliged to proactively publish any public documents produced, received, maintained or controlled in electronic form, through publication on the official website of public institutions, irrespective of a person's request for access. Publication is made in electronic, printed, broadcasting or in any other form which allows an access of a larger number of public. *In the context of this Project, the responsible institutions (the Municipality of Istog and the Ministry of Environment, Spatial Planning and Infrastructure) have complied fully with the requirements of this Law, informing the public and affected and interested parties using multiple media such as webpages, local radios, public postings, etc., to ensure that all participate in the process, are informed and voice their concerns and interests.*
- > *Law on Environmental Protection No 03/L-025* and the *Law on Environmental Impact Assessment No 08/L-181* provide the obligation of the central and local institutions and all other authorised organisations to regularly, timely and objectively inform the public. *These obligations have been complied with in the context of this Project, with the Ministry of Environment, Spatial Planning and Infrastructure conducting the review and informing the public during the EIA process.*
- > *Law on Spatial Planning No 04/L-174* contains provisions on mandatory public participation and public review during the adoption of spatial plans, as well as requirements for issuing Construction Conditions. *Administrative Instruction No. 05/2014* contains further guidance on the principles and procedures for public participation in spatial planning. *These requirements were duly applied during the approval of the Istog spatial plans and Municipal Zoning Map. In accordance with the Law, the Ministry of Environment, Spatial Planning and Infrastructure as the central oversight authority does not approve spatial planning documents unless all statutory public consultation procedures have been fully implemented and documented. Although the spatial planning and zoning processes are not part of the Project itself, they are considered relevant pre-project actions that preceded and enabled the Project.*
- > *Administrative Instruction on Transparency in Municipalities No. 03/2020* requires municipal bodies to publish regulations, decisions and documents issued by municipal bodies which are in the interest of citizens and other stakeholders and to

make all such information accessible to the public. *In the context of this Project, the Municipality of Istog kept public consultation records from municipal level spatial planning processes, available to all interested parties.*

- > *Law on the Use of Languages No 02/L-37 regulates the use of official languages, as well as languages of communities whose mother tongue is not an official language, in Kosovo institutions and other public organizations and enterprises. Grants equal status to Albanian and Serbian as the official languages of Kosovo and equal rights as to their use in all institutions. All communities have the right to preserve, maintain and promote their linguistic identity. This will be complied with in the context of this Project by making the Project's disclosure package available in both Albanian and Serbian (see Chapter 7.1- Encouraging Participation of Vulnerable Groups*

The Project recognises that some stakeholders may face barriers that limit their ability to access information or fully participate in consultation activities. Such barriers may relate to reduced mobility or disability, limited financial means, advanced age, caregiving responsibilities, lack of access to digital communication tools, etc.

To support meaningful participation of these groups, the Borrower will apply targeted measures, including:

MEASURE	HOW IT WILL BE IMPLEMENTED	REFERENCE TO SEP SECTION
ACCESSIBLE DISCLOSURE OF INFORMATION	Key Project documents and consultation materials will be made available both online and in hard copy, in Albanian and Serbian. Announcements on their availability will be posted on the Municipality bulletin board and the online news portal "Zëri", and will include clear instructions on where materials can be accessed.	See Chapter O (Hata! Yer işareti başvurusu geçersiz.)
CONVENIENT AND ACCESSIBLE PUBLIC MEETING LOCATION	Consultation meeting will be held at a local venue that is easy to reach for affected communities.	See Chapter 7.3 (Planned Consultations)
ALTERNATIVE CONSULTATION FORMATS	Small-group or one-on-one consultations will be organised as needed for vulnerable households to provide a safe and comfortable environment for expressing concerns. Where appropriate, these consultations may be conducted by telephone or in another format convenient for the stakeholder.	
PROACTIVE OUTREACH THROUGH LOCAL CHANNELS	The Borrower will collaborate with local village leaders to distribute information.	
FLEXIBLE SCHEDULING	Meeting schedules will be adjusted to accommodate caregiving responsibilities and the time constraints of individuals engaged in agricultural work. This may include organising repeat sessions of the same consultation at different times and/or on different days, and holding meetings outside peak working hours (e.g., evenings or weekends) to enable broader participation.	

- > Disclosure of Project Documents).
- > *Law on Personal Data Protection No. 03/L-215 defines the rights, responsibilities, principles and punitive measures related to the protection of personal data and privacy of individuals. It defines the responsibilities of the institution responsible for*

overseeing the legitimacy of data processing and access to public documents. *In the context of this Project, the tools and record-keeping templates in this SEP explicitly reflect Kosovo data protection requirements. Specifically, Appendix 2 (Grievance Registry) includes the note: “Any personal data will be processed in line with the Kosovo Law on Personal Data Protection” and Appendix 3 (Internal Stakeholder Engagement Registry) includes the same note. These templates will be used consistently for logging grievances and stakeholder engagement activities, ensuring that any personal information captured is handled lawfully, kept confidential and disclosed only in anonymised/aggregated form in public-facing reporting, in line with Law No. 03/L-215. In addition, all data collected during the development of this SEP to support stakeholder engagement activities were collected and processed in line with the Law. All persons interviewed were either asked to provide informed consent (e.g., by signing a consent form) for the collection and use of their personal data, or their personal data were not collected.*

- > Other relevant legislation ensuring proper consultation and equal treatment include the *Law on Protection from Discrimination No 05/L-021; Law on Construction No 04/L-110; Law on Gender Equality No. 05/L-020; and Law on Protection and Promotion of Rights of Communities and their Members in Kosovo No. 03/L-047. In the context of this Project, the principles and requirements of these laws are applied by ensuring non-discriminatory and inclusive stakeholder engagement, equal access to information and consultation processes, gender-responsive participation and respect for the rights of communities and their members throughout the Project.*

3.2 EBRD Requirements

In its ESP 2024, EBRD has defined a comprehensive set of specific Environmental and Social Requirements (ESRs) that projects are expected to meet. [ESR 10 \(Information Disclosure and Stakeholder Engagement\)](#) emphasises the importance of open, meaningful and transparent engagement with stakeholders.

EBRD’s ESR 10 requirements can be summarised as follows:

- > The stakeholder engagement process involves **stakeholder identification and analysis**, engagement planning, information disclosure, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Engagement must begin early in the project development and continue throughout the project life cycle.
- > Clients must ensure that stakeholders have **access to timely, relevant and understandable information**, and that engagement is conducted in a culturally appropriate and inclusive manner, free from manipulation and coercion. The client will disclose relevant project information, in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs appropriate. Throughout the life of the project, the client will continue to provide information to identified stakeholders on an ongoing basis.
- > The client will undertake **meaningful consultation**, based on the nature and scale of the project’s adverse risks and impacts and the level of stakeholder interest.
- > To respond to stakeholders’ concerns related to the project in a timely manner, the client will establish an **effective grievance mechanism** as early as possible in the

project development process, to receive and facilitate resolution of stakeholders' concerns and grievances.

- > Clients are required to **develop and implement a SEP** that describes how engagement will be carried out, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The client will identify project-affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable.



4 PROJECT STAKEHOLDERS

Project stakeholders have been identified to address the different consultation requirements. Stakeholders have been categorised into two main categories:

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

In this SEP, primary stakeholders include Project-affected communities/households/businesses, informal land users and residents potentially affected by glint and glare, as well as the Borrower/SPVs/Project management team and Project workforce. Secondary stakeholders include authorities, institutions and other organisations (e.g., media and NGOs) that may have an interest in, or influence over, the Project.

Stakeholder mapping was carried out during the development of this SEP based on:

- > site visits to the Project area and discussions with local residents,
- > discussions with the Director of the Municipal Urban Planning Department, a member of the Municipal Assembly and two village leaders (Veriq and Kernine) and
- > review of available Project documentation and media search.

The identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in the following chapter. *It should be noted that any stakeholders not identified at this stage of the Project may directly contact the contact person defined in [Section 1.2 Objectives and Scope of this Stakeholder Engagement Plan](#) to make themselves and their needs known, and to facilitate the effective implementation of the SEP.*

- 1) **Local communities (households and businesses) who may be affected by construction and operation of the PVPPs (primary stakeholders)**

The **Tucep PVPP site** is located above the settlements of Kernine (50–400 m) and Tucep (300 m). The road R-221, passes between the PV site and these settlements, effectively separating them. There are 6–7 houses that are near the site (50 m south), while the wider area is sparsely populated.

The **Veriq PVPP site** is near the settlements of *Veriq* and *Veriq i Ri* which are connected by a local road (called Shaban Hajzeraj). Within *Veriq i Ri* settlement, there are 5–6 houses at distances ranging from 10 to 60 m from PV *Veriq*. In the *Veriq* settlement, around 50 houses are at between 50 and 800 m from the PV area.

In addition, the following businesses were identified in *Veriq*:

- > Two farms located approx. 200–300 m from the *Veriq* PVPP, behind the hill and at a lower elevation. Both farms use the local road that will also be used for construction traffic.
- > A heavy machinery company operating excavators, bulldozers and trucks for land preparation works, which also uses the same access road planned for transport of construction materials.

- > A grocery shop located at the entrance of Veriq, directly along the road that will be used for construction material transport.

Construction may generate temporary risks to local communities in the settlements of Tucep, Kernine, Veriq and Veriq i Ri, including:

- > Dust emissions from earthworks, excavation, road reconstruction and machinery movement may affect residents and houses, particularly those located within 130 m from the Project area.
- > Noise will be generated from transportation, civil works, machinery operation and using construction equipment. Increased noise levels may be more noticeable in PVPP Veriq since the nearest houses are located approx. 10 m, although noise is also to be expected at PVPP Tucep site, as the nearest houses are located approx. 50 m away. The overall impact is assessed as low for both PVPP sites. Regular operation of PVPPs will not generate noise emissions.
- > Vibrations generated during anchoring may extend up to 2 km, but their intensity is expected to remain low and unlikely to cause disturbance or damage to nearby residents or structures.
- > Construction-related traffic on the existing main roads (R-101 and R-221), and especially on the local road Shaban Hajzeraj (Veriq) and the Drenica local road (Tucep), may cause road deterioration, accidents and increased safety risks for pedestrians and livestock.
- > Accident risks if proper fencing, signage and access restrictions are not implemented; nearby farmers and herders may be exposed due to proximity of agricultural fields and grazing areas.
- > Sensitive groups such as children, elderly, pregnant women and individuals with pre-existing health conditions may be particularly vulnerable to impacts from dust, noise and increased traffic during construction, as well as people with limited mobility, disabilities or restricted access to the Project's main communication channels (e.g., limited transport, limited internet/ access or literacy barriers) who may face additional challenges in receiving timely information and in submitting grievances.

2) Informal land users (primary stakeholders)

This stakeholder group includes individuals and households who have been using portions of the Project land for agricultural purposes on an informal basis, without formal ownership or tenancy rights. These users have cultivated the land for extended periods, primarily for crop production, and rely on it to varying degrees as part of their household livelihoods.

Although informal land users do not hold legal rights to the land, their long-term use of the area means that Project activities may result in partial economic displacement due to loss of access to cultivated plots. As such, informal land users are considered Project-affected parties for the purposes of this Stakeholder Engagement Plan.

Identified informal land users have been consulted as part of the environmental and social assessment process. Engagement with this group will continue throughout Project implementation, with a focus on timely information disclosure regarding construction schedules and land access restrictions, access to the Project grievance mechanism, and communication of applicable livelihood-related mitigation measures.

3) Residents who may be affected by glint and glare from the PV modules (primary stakeholders)

A glint and glare modelling was undertaken during the preparation of the Project. It was determined that up to five properties located on elevated ground approximately 750 m to the south-east of the PVPP Tucep in Kernine village would have a direct line of sight to the PV modules. Additionally, there are up to ten properties in Veriq i Ri located at a close distance (up to 150 m to the west) from the PVPP Veriq, where the potential impact of glare cannot be excluded. Vegetation screening in the form of scrub and trees is present around most of these properties, some of which are enclosed by it. This may limit the potential impact. The risk of glare for Veriq i Ri properties will be eliminated if planting of vegetative screening is implemented.

Therefore, a procedure for addressing glare-related complaints received from an affected owner/user of a property will be established. If glare is confirmed, mitigation will be implemented in consultation with the affected residents. This may include but not be limited to installation of screening structures (window blinds, shades), planting of vegetative buffers in front of houses, etc.

4) Stakeholders with a general interest in renewable energy and/or solar power projects (secondary stakeholders)

This category encompasses a broader spectrum of individuals and organisations that, while not directly affected by the Project, may hold an interest in its outcomes. This includes:

- > The media: Local and national media outlets play a pivotal role in disseminating information about the Project, shaping public opinion, and keeping people informed about Project updates, benefits and any potential concerns.
- > General population of the region or the country: The wider population is expected to be interested in Project's benefits.
- > Environmental NGOs: NGOs, especially those with a focus on renewable energy and environmental sustainability may be interested in the Project. Even though such organisations have not yet demonstrated a specific interest in this Project, all shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation. Any organisations interested in the Project can send their contact details to be included in this SEP and notified directly about Project events.

5) Relevant government authorities (secondary stakeholders)

This group includes regulatory bodies with oversight and vested interest in the successful completion and operation of the Project:

- > Municipality of Istog (responsible for spatial planning at municipal level)
- > Ministry of Environment, Spatial Planning and Infrastructure - MESPI (has already determined that an Environmental Impact Assessment (EIA) is needed for the Project, approved the EIA reports and issued the Decisions on Environmental Consent for both PVPPs in January 2023; is responsible for issuing the Environmental Permit after construction completion and before operation; MESPI has also issued the Construction Conditions for both PVPPs to define the layout and technical requirements for PVPPs and accompanying infrastructure)
- > Kosovo Transmission, System and Market Operator (KOSTT) (has signed Connection Agreements in December 2024 to define the main terms of grid connection which allows the Project to formally secure grid access; is preparing the final technical specifications for the transmission assets (new TS, underground 110kV cable, and connection inside Peja 3 TS)

- > Energy Regulatory Office (is responsible for issuing the Energy Generation License after completion of construction).

6) Borrower /SPVs /Project management team (primary stakeholders)

This stakeholder group includes the Borrower and the special purpose vehicles (SPVs), as well as the Project management team responsible for overall Project implementation. These internal stakeholders play a central role in ensuring compliance with applicable national requirements and EBRD standards, including the implementation of this SEP. Key responsibilities in the context of this SEP include coordination of stakeholder engagement activities, ensuring timely information disclosure, maintaining and monitoring the Project grievance mechanism, supervising contractor performance (including implementation of ESMP measures relevant to community health and safety and nuisance impacts), and maintaining records and reporting to relevant authorities and the EBRD.

7) Workers of SolarApex (Contractor) (primary stakeholders)

The Contractor's workers are a crucial stakeholder for the successful execution and delivery of the Project, ensuring safety and compliance during the construction process.



5 PREVIOUS STAKEHOLDER ENGAGEMENT DURING PROJECT PERMITTING

Stakeholder engagement activities to date for both PVPPs were implemented in line with Kosovo legal requirements, in cooperation with MESPI and Municipality of Istog.

1) Disclosure and consultations during local EIA: In November 2022, a public announcement was issued to invite all interested stakeholders to review the EIA Report (accessible via an online link) and participate in a public consultation meeting for both PVPPs. The meeting was held in December 2022, in Gurakoc, Municipality of Istog, with virtual access also provided through the Zoom platform. The meetings were attended by representatives of MESPI and the Municipality of Istog. Despite prior notifications on the municipal notice board and through the online newspaper Zëri, no citizens or other interested parties attended the sessions. Following the public consultation process, the EIA approvals for both PVPPs were issued in January 2023.

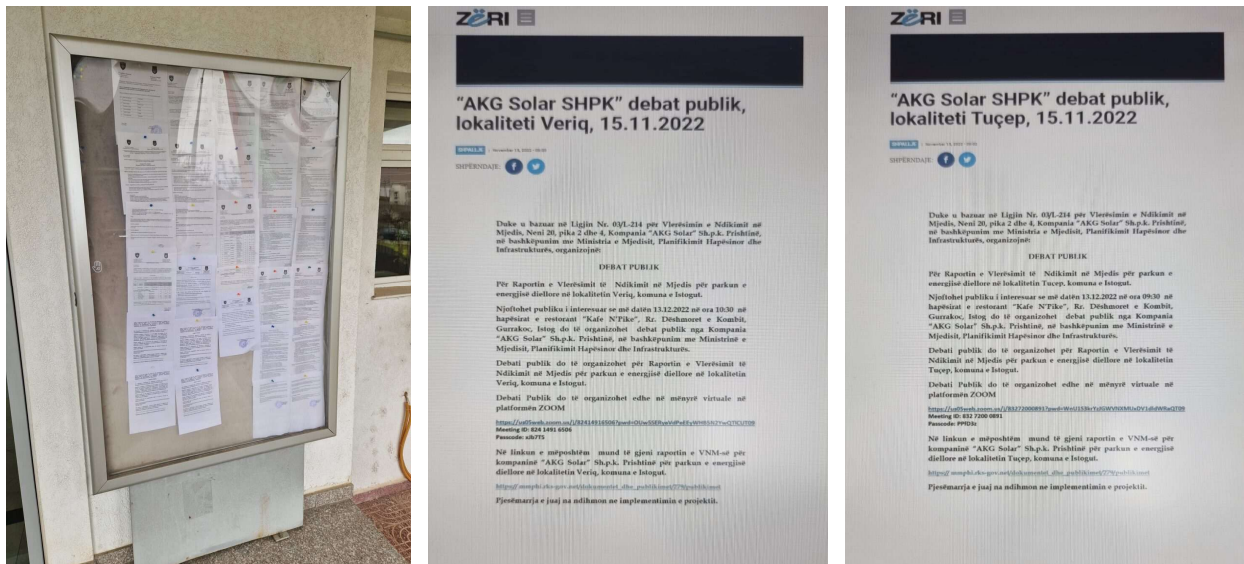


Figure 5-1: Public announcements during the local EIA process (November 2022)

2) Disclosure and consultations during the process of issuing Construction Conditions: MESPI published a public notice in July 2024 and informed the wider public of the opportunity to submit comments (see figures below).

In addition, as required by Administrative Instruction No. 01/19, MESPI organised a committee meeting to present the Project to institutional stakeholders. The committee included representatives from MESPI, Ministry of Economy, Ministry of Culture, Ministry of Internal Affairs, Ministry of Agriculture, KOSTT, Energy Regulatory Office and Municipality of Istog. The committee raised no objections.

Following these steps, the Construction Conditions for both PVPPs were issued in August 2024.



Figure 5-2: Public notice for Construction Conditions in online newspaper and on PVPP sites (July 2024)

3) Disclosure and consultations during the municipal spatial planning process: During the preparation of the Municipal Zoning Map (2024 – 2032), the Project was presented to the public along with other solar park proposals. The Municipal Commission approved some of the projects (including this Project) by confirming that solar projects may proceed within the zones designated as most suitable for such developments, while excluding all Category 1 – 4 agricultural lands. No specific comments were received during the 30-day consultation period related to the Project.

6 STAKEHOLDER ENGAGEMENT DURING THE ENVIRONMENTAL AND SOCIAL ASSESSMENT PROCESS

Stakeholder engagement was carried out as part of the environmental and social assessment, including preparation of this SEP, during November–December 2025 and January 2026. Engagement activities included meetings with municipal representatives and local community leaders, household-level surveys in nearby settlements and targeted interviews with informal land users.

Engagement with community leaders and local residents. Consultations were held with two village leaders (Veriq and Kernine) and a member of the Municipal Assembly (Municipality of Istog) to understand local awareness of the Project, perceptions within the communities, demographic trends, key infrastructure and services, and potential vulnerabilities among residents. A meeting was also held with the Director of the Municipal Urban Planning Department to discuss municipal expectations regarding Project implementation and any available insights into community attitudes toward the Project. In addition, ten household surveys were conducted with residents in Veriq, Tucep and Veriq i Ri to discuss awareness of the Project, local conditions, perceptions and attitudes and potential community benefits.

These consultations indicated that the settlements are experiencing long-term outmigration of younger residents, with a number of houses currently uninhabited; the remaining population is predominantly older. Agriculture and public-sector employment were identified as the main livelihood sources, supplemented in some households by income from employment abroad and private businesses. In terms of services and infrastructure, households have access to electricity and water supply, including wells in some locations, while wastewater is typically managed individually due to the absence of a public sewage network. Local roads were generally described as being in good condition and usable throughout the year. Residents access key services such as healthcare and education primarily in Istog, Rakosh, Gurakoc and Peja. No formal concerns or complaints were recorded during these consultations. All households generally considered the Project a positive development, most commonly due to the potential for employment, particularly for younger family members. Households also indicated that they were not aware of any nearby community features that could be affected (e.g., paths, grazing areas, fields or wells) in relation to the locations they use.

The planned mitigation measures related to community health and safety are summarised in the Non-Technical Summary.

Engagement with informal land users. Targeted interviews were also conducted with identified users of Project land to understand land use practices, duration of use, any claims to the land, investments made, household circumstances, the level of information received about the Project and the availability of alternative land and livelihood options. All interviewed users reported long-term use of portions of the Project land for crop production. Several households indicated that they anticipate partial income reductions. At the same time, all interviewed households indicated ownership of, or access to, other agricultural land that is actively used for crop production and/or dairy farming. This reduces the likelihood of severe or long-term livelihood disruption and supports the continued functioning of core agricultural activities. Accordingly, none of the interviewed households are expected to experience full livelihood displacement. Nevertheless, given the long-term and continuous use of the affected land by local families, loss of access will result in measurable livelihood impacts. In addition, one site-specific issue was identified relating to an informal agricultural structure (a barn) partially located within the Project footprint.

The planned mitigation measures related to informal land use and livelihood impacts are summarised in the Non-Technical Summary.

7 PLANNED STAKEHOLDER ENGAGEMENT PROGRAM

7.1 Encouraging Participation of Vulnerable Groups

The Project recognises that some stakeholders may face barriers that limit their ability to access information or fully participate in consultation activities. Such barriers may relate to reduced mobility or disability, limited financial means, advanced age, caregiving responsibilities, lack of access to digital communication tools, etc.

To support meaningful participation of these groups, the Borrower will apply targeted measures, including:

MEASURE	HOW IT WILL BE IMPLEMENTED	REFERENCE TO SEP SECTION
ACCESSIBLE DISCLOSURE OF INFORMATION	Key Project documents and consultation materials will be made available both online and in hard copy, in Albanian and Serbian. Announcements on their availability will be posted on the Municipality bulletin board and the online news portal "Zëri", and will include clear instructions on where materials can be accessed.	See Chapter O (Hata! Yer işareti başvurusu geçersiz.)
CONVENIENT AND ACCESSIBLE PUBLIC MEETING LOCATION	Consultation meeting will be held at a local venue that is easy to reach for affected communities.	See Chapter 7.3 (Planned Consultations)
ALTERNATIVE CONSULTATION FORMATS	Small-group or one-on-one consultations will be organised as needed for vulnerable households to provide a safe and comfortable environment for expressing concerns. Where appropriate, these consultations may be conducted by telephone or in another format convenient for the stakeholder.	
PROACTIVE OUTREACH THROUGH LOCAL CHANNELS	The Borrower will collaborate with local village leaders to distribute information.	
FLEXIBLE SCHEDULING	Meeting schedules will be adjusted to accommodate caregiving responsibilities and the time constraints of individuals engaged in agricultural work. This may include organising repeat sessions of the same consultation at different times and/or on different days, and holding meetings outside peak working hours (e.g., evenings or weekends) to enable broader participation.	

7.2 Disclosure of Project Documents

The Borrower will cooperate with the Municipality of Istog to disclose the following documents as early as possible in the Project development process:

- > this SEP and the Project Grievance Form ([Appendix 1](#) of this SEP), and

- > the Non-technical Summary (NTS) of the Project.

The documents will be available in Albanian and Serbian in printed form in the premises of the Municipality, while an announcement about their availability will be posted on:

- > the bulletin board of the Municipality⁵
- > online news portal “Zëri” (used for previous consultations, as there are no printed local newspapers in the area)

7.3 Planned Consultations

A public consultation meeting will be organised prior to construction to present the Project to the public and offer a clear understanding of the Project's scope and objectives, including information on expected duration of construction works, the available Project-specific grievance mechanism, potential job opportunities and any other relevant Project specifics.

This meeting will be organised at a locally accessible venue such as the restaurant “Kafe N’Pike” (where previous consultation meetings were held) to enable ease of access for all community members (without significant travel or logistical challenges).

The meeting will be scheduled to accommodate caregiving responsibilities and seasonal/peak agricultural work. Where needed, the Borrower will offer multiple sessions of the same consultation at different times and/or on different days, or organise meetings outside peak working hours (e.g., evenings or weekends), to enable participation of stakeholders who cannot attend standard daytime meetings.

Local residents will be informed about the exact date, time and venue where the meetings will be held 10 days in advance through the bulletin board of the Municipality and the online news portal “Zëri”. In addition, the village leaders in the area (Veriq, Tucep and Veriq I Ri) will be directly notified of the announcement and requested to further disseminate the information within their communities (e.g., through local notice boards and direct communication with households), with particular attention to reaching elderly residents, persons with limited mobility or disabilities, and other vulnerable stakeholders who may not regularly access online channels.

Specific consultations with individual organisations or households can also be organised as needed, for example, to discuss land-related matters, issues arising due to the proximity of houses to the PV site (e.g., nuisance or unanticipated impacts) or any other Project-related concerns. **The Borrower will be open to and facilitate such meetings upon request or will initiate such meetings where the Project identifies the need (such as in the case of vulnerable individuals who may not be able to attend public consultation meetings due to limited mobility, disability, etc.),** and will make reasonable efforts to arrange them promptly and in a format convenient for affected stakeholders. Where appropriate, these consultations may be conducted by telephone or in another format convenient for the stakeholder.

All consultations will be recorded in the Stakeholder Engagement Registry ([Appendix 3](#)).

⁵ There are no other local community centers in the area.

7.4 Informing the Public About Construction Works

Specifics about construction sites, anticipated commencement dates, expected duration of planned works and any predicted disruptions in traffic flows and any other potential inconveniences will be published at least 30 days before start of works through the bulletin board of the Municipality and the online news portal “Zëri”.

Once construction starts, information boards will be placed by SolarApex at the construction site to clearly display contact information for third-party concerns. Note: Measures to prevent and control dust, noise and traffic-related impacts (including for sensitive receptors and vulnerable groups) are set out in the Project's Environmental and Social Management Plan which will be implemented by the Contractor and supervised by the Borrower. A summary is provided in the Project's Non-technical Summary which is publicised alongside this SEP.

7.5 Consultations During Operation and Maintenance

Houses at a distance of around 10 m from the PV site (Veriq i Ri) will be visited within the first 3–6 months after commissioning to verify whether any unanticipated disturbances are occurring. Based on the feedback received, the need for additional mitigation measures will be assessed and reasonable adjustments implemented in consultation with the affected residents.

In addition, during this phase, direct meetings with households potentially affected by glint and glare from the PV modules will be held to verify absence of glint and glare effects during PVPP operation or to discuss measures. This refers to five properties located on elevated ground approximately 750 m to the south-east of the PVPP Tucep in Kernine village which would have a direct line of sight to the PV modules, as well as ten properties in Veriq i Ri located at a close distance (up to 150 m to the west) from the PVPP Veriq, where the potential impact of glare cannot be excluded. These households will be visited within 3 months of PVPP commissioning.

Note: The Project grievance mechanism (see Chapter 8) will be maintained throughout the lifetime of the Project to ensure that concerns and complaints can be raised at any time, with contact information updated as necessary. All grievances will be recorded and acknowledged, assessed and addressed within defined timeframes, and complainants will be informed of the outcome and any corrective actions taken. Records of grievances and responses will be retained, and recurring issues will be used to inform adaptive management and, where necessary, updates to mitigation measures and site practices.

7.6 Engagement Objectives and Methods

The list of identified stakeholders and specific communication requirements are provided in the table below, categorised as primary (directly affected) and secondary (influential and/or indirectly affected) stakeholders. For the purposes of the table, stakeholders are also grouped by type: internal stakeholders (personnel involved in implementation) and external stakeholders (parties outside the Project organisation).



Table 7-1: List of identified stakeholders and specific communication and engagement methods

STAKEHOLDER CATEGORY	TYPE OF STAKEHOLDER	IDENTIFIED STAKEHOLDER	SPECIFIC ISSUES OR INTERESTS	COMMUNICATION AND ENGAGEMENT METHODS WITH INDICATED TIMEFRAME	INFORMATION TO BE DISCLOSED
Primary	External	<p>Local communities and businesses who may be affected by construction and operation of the PVPPs</p> <p>This includes sensitive groups such as children and elderly who may be particularly vulnerable to impacts from dust, noise and increased traffic during construction, as well as people with limited mobility, disabilities or restricted access to the Project's main communication channels (e.g., limited transport, limited internet/ access or literacy barriers)</p> <p><i>Please see the separate item below for details about the potential receptors of glint and glare effects.</i></p>	<p>Construction related concerns (dust, noise, traffic safety, avoiding any damage to local roads, etc.)</p> <p>Interest in employment opportunities</p>	<p>Pre-construction phase:</p> <ul style="list-style-type: none"> > Access to Project SEP and NTS both online and in printed form > Public meeting prior to construction; information about public consultations 10 days in advance > Small-group or one-on-one consultations as needed for vulnerable households, including by telephone or in another format convenient for the stakeholders; collaboration with local village leaders to distribute information among locals > Disclosure of information on planned construction works at least 30 days before start of works <p>Construction phase:</p> <ul style="list-style-type: none"> > Information boards to be placed by SolarApex at the construction site <p>Operation phase:</p> <ul style="list-style-type: none"> > Within 3–6 months after commissioning of the PVPPs, closest households in Veriq i Ri will be visited to verify whether any unanticipated impacts are 	<ul style="list-style-type: none"> > SEP and NTS > Information on the extent, timing and duration of planned works > Information on availability of grievance mechanism



OFFICIAL USE

STAKEHOLDER CATEGORY	TYPE OF STAKEHOLDER	IDENTIFIED STAKEHOLDER	SPECIFIC ISSUES OR INTERESTS	COMMUNICATION AND ENGAGEMENT METHODS WITH INDICATED TIMEFRAME	INFORMATION TO BE DISCLOSED
				<p>occurring and to implement additional mitigation measures as needed.</p> <p>All Project phases:</p> <ul style="list-style-type: none"> > Community grievance mechanism > Providing timely responses to questions/grievances 	
Primary	External	Informal land users	Loss of access to cultivated land; partial livelihood impacts; construction schedule and land access restrictions; mitigation measures; access to grievance mechanism	<p>Pre-construction phase:</p> <ul style="list-style-type: none"> > Access to Project SEP and NTS both online and in printed form > Public consultation meeting prior to construction; information about public consultations 10 days in advance > Advance notice of land access restrictions and construction activities <p>All Project phases:</p> <ul style="list-style-type: none"> > Ongoing engagement as needed > Community grievance mechanism 	<ul style="list-style-type: none"> > Project scope and timeline; construction schedule > Land access arrangements > Livelihood-related mitigation measures > Employment opportunities > Project grievance mechanism



STAKEHOLDER CATEGORY	TYPE OF STAKEHOLDER	IDENTIFIED STAKEHOLDER	SPECIFIC ISSUES OR INTERESTS	COMMUNICATION AND ENGAGEMENT METHODS WITH INDICATED TIMEFRAME	INFORMATION TO BE DISCLOSED
Primary	External	Residents who may be affected by glint and glare from the PV modules	<p>Potential effects of glint and glare during the operation of PVPPs</p> <p>Mitigation measures to be implemented in consultation with the affected people</p>	<p>Pre-construction phase:</p> <ul style="list-style-type: none"> > Access to Project SEP and NTS both online and in printed form <p>Operation phase:</p> <ul style="list-style-type: none"> > Direct meetings with affected residents to verify absence of glint and glare effects during PVPP operation or to discuss measures – households to be visited within 3 months of PVPP commissioning > Community grievance mechanism 	<ul style="list-style-type: none"> > Information about potential solar reflection with details of timing and duration of the effect during the operation phase > Information on the procedure for glint and glare management to be developed and implemented for addressing complaints received from affected residents. The procedure will define how the solar reflection should be verified and what mitigation should be provided in response.
Secondary	External	Stakeholders with a general interest in renewable energy and/or solar power projects	<p>General success of the Project and alignment with international standards</p> <p>Interest in Project implementation, any issues with environmental aspects, etc.</p>	<p>Pre-construction phase:</p> <ul style="list-style-type: none"> > Access to SEP and NTS > Public consultation meeting <p>All Project phases:</p> <ul style="list-style-type: none"> > Ongoing engagement as needed 	<ul style="list-style-type: none"> > SEP and NTS > Information on the extent, timing and duration of planned works
Secondary	External	Relevant government authorities and organisations	Issuing permits, consents and opinions in accordance with national legislation;	<p>Pre-construction and construction phases:</p> <ul style="list-style-type: none"> > Official communication channels > Consultations with government authorities in the 	<ul style="list-style-type: none"> > Information on Project activities in the formats and as required by national legislation



STAKEHOLDER CATEGORY	TYPE OF STAKEHOLDER	IDENTIFIED STAKEHOLDER	SPECIFIC ISSUES OR INTERESTS	COMMUNICATION AND ENGAGEMENT METHODS WITH INDICATED TIMEFRAME	INFORMATION TO BE DISCLOSED
			monitoring of compliance	framework of permitting procedures Operation phase: > Reporting and monitoring based on national legislation requirements	
Primary	Internal	Borrower/ Project companies (SPVs)/ Project management team	Successful Project implementation	All Project phases: > Internal coordination meetings; toolbox/briefings; document control	> All Project requirements, reporting templates, communication protocols
Primary	Internal	Workers of SolarApex (Contractor)	Health and safety; labour and working conditions	Pre-construction and construction phases: > Induction training before mobilisation for Contractor's and sub-contractors' workers > Toolbox talks at construction sites on health and safety topics, Chance Find Procedure and other topics > Workers' grievance mechanism with clear procedures for submission, response, and resolution	> Work safety and health regulations, environmental protection requirements > Labour standards, workers code of conduct, workers grievance mechanism, identification, prevention and reporting of any gender based violence and harassment incidents > Information on workers' grievance mechanism



8 GRIEVANCE MANAGEMENT

Overview

The Borrower is striving to ensure that the construction of the PVPPs will not result in adverse impacts for those living near the Project sites or for other potentially affected stakeholders. A Project-level grievance mechanism has been set up for affected communities as a process for receiving, evaluating and addressing grievances from affected communities.

The grievance mechanism will address concerns promptly and effectively in a transparent manner, free from manipulation, interference, coercion, discrimination, intimidation and retaliation, and it will be accessible to all affected parties, at no cost.

This chapter includes the following supporting appendices: Project Grievance Form ([Appendix 1](#)) and template of the Grievance Registry ([Appendix 2](#)).

The following sections of this chapter elaborate the Project grievance procedure and steps. There are specific arrangements for gender-based violence and harassment (GBVH) complaints.

A separate grievance mechanism is available for workers.

Submitting grievances

Any concerns can be brought to the attention of the SEP contact person (information provided in [Section 1.3 Responsibility for Implementation of this Stakeholder Engagement Plan](#)) verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post or e-mail), without any costs incurred to the complainant. **Grievances may also be submitted anonymously or without the use of the form if preferred.**

After the start of construction works, the Project Grievance Form may also be submitted directly to SolarApex or the supervision engineer, which will forward any such received grievances to the SEP contact person without delay (within 24 hours) to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below).

The information boards to be placed at the construction site will clearly display contact information for third-party concerns (contact details of the dedicated contact person designated to address any issues or concerns raised by third parties – their name, position, phone number, and email address).

Recording and acknowledging grievances

All grievances will be recorded in a Grievance Registry ([Appendix 2](#)) and assigned a number. Written and non-anonymous grievances will be acknowledged within 5 working days. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

- > **description of grievance, including an indication of the type (topic) of the grievance** – such as: (i) grievances related to glint and glare effects during the operation phase, (ii) grievances related to gender-based violence and harassment, (iii) grievances related to construction noise or dust, etc. – to enable timely detection of most frequent incidents, ascertain trends and manage risks;
- > details about the complainant profile (gender, age, location and vulnerabilities if known), to understand who and where is most affected by potentially negative impacts of the Project (*note: this information will be considered confidential*),

- > date of receipt of grievance and when acknowledgement returned to the complainant,
- > description of actions taken (investigation, corrective measures, preventive measures), and
- > date of resolution and closure/provision of feedback to the complainant, including recording of level of satisfaction with the proposed resolution (see grievance close-out form below).

Assisting complainants

If the grievance is vague and not clear enough, the complainant will be assisted in formulating/redrafting the submission, in order for the grievance to become clearer, for purposes of an informed decision, in the best interests of persons affected by the Project and in consideration of the preferred resolution steps of the complainant.

Grievance resolution

All reasonable efforts will be made to address the complaint upon the acknowledgement of grievance. If this is not possible, a long-term corrective action will be identified. **The complainant will be informed about the proposed corrective action and follow-up of corrective action within 10 working days upon the acknowledgement of grievance.** Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

During the process of informing the complainant of the proposed action, complainant satisfaction will be validated through providing a **grievance close-out form** for the resolved grievance to be signed by the complainant (if the complainant agrees) and the SEP contact person to attest to their mutual satisfaction. Reasonable efforts will be made to follow-up with the complainant to verify successful implementation of the action.

If the issue raised cannot be addressed through the grievance mechanism or if action is not required, a detailed explanation/justification on why the issue was not addressed will be provided to the complainant. The response will also contain an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

At all times, complainants may seek other legal remedies in accordance with Kosovo legislation, including formal judicial appeal.

Specific arrangements for GBVH complaints

GBVH-related complaints (including sexual exploitation and abuse; sexual harassment; and other forms of harassment or violence) will be handled through a **particularly safe and confidential process**, applying a survivor-centred approach and ensuring respect, non-discrimination and protection from retaliation. All other grievances under the Project grievance mechanism are also handled in a confidential manner and without retaliation; GBVH complaints follow additional safeguards due to their sensitive nature.

GBVH complaints may be submitted through the standard Project channels; however, **complainants may also report directly to the designated GBVH Focal Point (which will be the Project's E&S Specialist to be appointed prior to commencement of construction).** The GBVH Focal Point will be an appropriately qualified E&S Specialist, with relevant experience and/or training in survivor-centred, confidential handling of GBVH complaints and referral pathways.

The GBVH Focal Point name and contact details will be displayed on construction site information

boards. Complaints can be submitted verbally or in writing, including anonymously. Complainants will not be required to use the standard grievance form and will not be asked to provide detailed information or evidence.

If a GBVH complaint is received by the general grievance contact person or any other Project representative, it will be immediately referred to the GBVH Focal Point (within 24 hours) for further handling. The person who receives such a complaint is obliged to adhere to the principles and arrangements described in this section, without sharing any details beyond those that are strictly necessary. Likewise, if the GBVH Focal Point receives a complaint that is not GBVH-related, it will be recorded and managed through the standard grievance mechanism by the general grievance contact person.

Access to GBVH complaints will be strictly limited to a small “need-to-know” group led by the GBVH Focal Point. **GBVH complaints will not be recorded in the general Grievance Registry with personal details.** Instead, they will be recorded using non-identifying information only. All records will be stored securely.

Upon receipt, **the GBVH Focal Point will agree with the complainant on a safe way to communicate** (if the complaint is not anonymous), **address any immediate safety needs and offer referrals to qualified service providers** (medical, psychosocial, legal, shelter) based on the survivor’s consent. If the allegation involves Project workers, the Borrower/Contractor will apply relevant Code of Conduct measures and other appropriate actions, while maintaining confidentiality and without requiring the survivor to confront the alleged perpetrator. GBVH cases will be reported only in aggregated, anonymised form.

KOSOVO SOLAR – TUCEP AND VERIQ PROJECT
GBVH Focal Point (E&S Specialist) – contact details:
Name: TBC (to be appointed prior to construction)
Phone: TBC
E-mail: TBC

The Borrower will update this SEP with the confirmed name and contact details once the E&S Specialist is appointed and in any case before construction starts. The confirmed contact details will also be displayed on construction site information boards.

EBRD’s Independent Project Accountability Mechanism

In addition to the Project-level mechanism, the EBRD’s Independent Project Accountability Mechanism⁶ (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

⁶ Information about the IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>



9 MONITORING AND REPORTING

The results of the stakeholder engagement process will be included in **Environmental and Social Reports to EBRD** which will be prepared by the Borrower, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism.

The reports will include, in particular, the following information:

- > **Number and types (topics) of received community grievances** raised in the reporting period, (such as: (i) grievances related to glint and glare effects during the operation phase, (ii) grievances related to gender-based violence and harassment, (iii) grievances related to construction noise or dust, etc. – to enable timely detection of most frequent incidents, ascertain trends and manage risks) with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism.
- > Number and types of information disclosure activities through all channels.
- > **Place and time of consultation meetings held and other types of engagement activities**, with information on the number of participants, issues and concerns raised during meetings and information on how the issues raised were taken into consideration.

The Borrower will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD and the public.

[Appendix 3](#) of this SEP provides a template for tracking stakeholder engagement activities.



10 APPENDICES

10.1 Appendix 1: Project Grievance Form

Reference Number	
Full name (optional)	
<ul style="list-style-type: none"> I wish to raise my grievance anonymously. I request that you do not disclose my identity without my consent. 	
Contact information	By Post: Please provide mailing address: ----- ----- -----
Please mark how you wish to be contacted (mail, telephone, e-mail).	By Telephone: ----- By E-mail
Preferred language of communication	- Albanian - Serbian - Other -----
Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / Grievance	
	<ul style="list-style-type: none"> One-time incident/grievance (date -----) Happened more than once (how many times? -----) On-going (currently experiencing problem)
What would you like to see happen?	

Signature: -----

Date: -----

Please return this form to:

Mr. Arten Bajrush, AKG SOLAR
E-mail: arten.bajrush@akgsolar.com
Phone: +383 49 789 907

For gender-based violence and harassment (GBVH) related grievances, you can contact directly:
GBVH Focal Point (E&S Specialist):
Name: TBC (to be appointed prior to construction)
Phone: TBC
E-mail: TBC

10.2 Appendix 2: Grievance Registry – Template

Notes:

1. Any personal data will be processed in line with the Kosovo Law on Personal Data Protection.
2. For GBVH-related grievances, do not enter names, contact details or descriptions in this registry.

	Name of complainant	Complainant profile	Contact information	Date received	Date acknowledged	Type (topic) of problem	Responsible person or department	Grievance description	Proposed solution	Due date for action	Results of intervention	Date of closure	Close-out form signed (Y/N)	Grievance follow-up	Recurrence (Y/N)	Action/ notes
1.	<i>Enter name or 'anonymous'</i>	<i>Gender, age, location and vulnerabilities if known</i>				<i>E.g. glint and glare, noise, dust, gender-based violence and harassment</i>										
2.																
3.																
4.																
5.																



10.3 Appendix 3: Internal Stakeholder Engagement Registry – Template

Note: Any personal data will be processed in line with the Kosovo Law on Personal Data Protection.

	Stakeholder category and name	Type of engagement	Date of engagement	Key issues/concerns	Follow-up action agreed	Notes on progress
1.	<i>(E.g., affected resident, cultural or religious institution...)</i>	<i>(E.g., official meeting, presentation, informal meeting...)</i>				
2.						
3.						
4.						
5.						

