

*Sunal*

**Stakeholder Engagement Plan**

## **1. Introduction**

The plan aims to identify and engage all relevant stakeholders throughout the entire project implementation, from preparatory work to the completion of construction and the commissioning of the factory. Its goal is to establish effective communication, collaboration, and transparency for the successful execution of the project in the best interest of all involved.

The participation of stakeholders in the construction of the Sunal alcohol factory is a complex and dynamic process that requires careful planning and continuous alignment. We provide timely information to all stakeholders, both those currently involved and those who may become involved in the future, and enable active participation in all phases of project implementation, in accordance with their influence and interest.

This plan will be regularly updated, particularly depending on the project phase, changes in the importance of different stakeholder groups, potential impacts, key issues of interest, as well as the identification of potential risks.

The project for the construction of the Sunal alcohol factory in Kovačica represents a significant investment by Sunoko in diversifying its business and strengthening Serbia's export sector. The project will enable an annual production of 30 million liters of alcohol, making Serbia a net exporter of alcohol for the first time, rather than an importer. The factory will be equipped with state-of-the-art technology, ensuring high quality and efficiency in production processes.

Alcohol production will be organized in three forms: food-grade, pharmaceutical, and bioethanol, with corn as the primary raw material. Additionally, the project includes the construction of a grain storage facility, which will strengthen local supply and contribute to the development of the production chain in the region.

## **2. Basic information about the project**

On cadastral parcels 8690/4, 8690/3 in the Kovačica cadastral municipality and parcel 3573/2 in the Debeljača cadastral municipality, next to the sugar production factory 'Sunoko' DOO, the construction of a factory for the production of extra neutral alcohol (ENA), pharmaceutical alcohol (PG), or ethanol as a component of fuel (FUEL) is planned

On parcels 8690/4, 8690/3 in the Kovačica cadastral municipality and 3573/2 in the Debeljača cadastral municipality, the construction of a complex consisting of two spatial-functional units is planned:

1. Construction of the facilities of the ENA/PF/Fuel Alcohol Production Plant of the SUNAL d.o.o. complex - spatial-functional unit no. 1.
2. Construction of the silo facility – spatial-functional unit no. 2.



The expected capacity of the Plant will be 100,000 liters per day, or 21,600 tons per year of extra neutral alcohol, pharmaceutical alcohol, or ethanol as a component of fuel. The main raw material for alcohol production will be merchant corn. The plant will be supplied with the main raw material—corn—through a silo facility, which will also be located on cadastral parcel 8690/4. The capacity of the plant will be 100,000 liters per day of extra neutral alcohol, pharmaceutical alcohol, or ethanol as a component of fuel. It is anticipated that the produced ENA and FUEL alcohol will be stored in three tanks with a capacity of 2,000 m<sup>3</sup> each, while PG and technical alcohol will be stored in two tanks with a capacity of 500 m<sup>3</sup> each, and will be dispatched from the plant using tanker trucks.

### **3. Requirements of the European Bank for Reconstruction and Development**

For the European Bank for Reconstruction and Development (EBRD), stakeholder engagement is a key element of good business practice and corporate responsibility, as well as a way to enhance project quality, in accordance with Performance Requirement 10: Stakeholder Engagement of the EBRD Environmental and Social Policy (October 2024).

Stakeholder engagement must be tailored to each client and project, 'depending on the risks and negative impacts on affected communities, sector and environmental specifics, as well as the level of public interest.

- Identification of stakeholders (individuals and groups) and their analysis.
- Stakeholder engagement plan.
- Timely, relevant, understandable, accessible, and appropriate information dissemination (without manipulation, intervention, coercion, or intimidation).
- Meaningful consultation and public participation.
- Grievance mechanism – an effective process for providing comments and complaints.
- Continuous communication ('accountability for reporting - information,' which implies taking responsibility for impacts).

Stakeholder engagement must be organized gradually and is expected to begin at the earliest stage of project planning, when all options are still open, and to continue throughout the entire duration of the project, in conjunction with Performance Requirement 1 and Performance Requirement 2 of the EBRD Environmental and Social Policy (October 2024).

The project manager must clearly define roles, responsibilities, and competencies, as well as designate responsible personnel for the implementation and monitoring of the Stakeholder Engagement Plan. Although not explicitly stated, stakeholder analysis implies the identification of key environmental and social issues that are defined and promoted by individuals and/or groups, as they reflect public concern and enable investors and authorities to appropriately address these issues.

#### **4. Previous Activities on Stakeholder Engagement**

Based on the Law on Environmental Impact Assessment, public insight was provided, and a public presentation and public discussion were organized regarding the Environmental Impact Assessment Study for the project of constructing a neutral alcohol (ENA), pharmaceutical alcohol (PG), or ethanol as a fuel (FUEL) production plant, along with the accompanying documentation. The interested public was informed about these events through local newspapers in the official languages of the area that will be affected by the planned facility, namely 'Dnevnik Vojvodina pres d.o.o.', 'Magyar Szó,' 'Libertatea,' and 'Hlas Ludu,' as well as the Kovačica Municipal Administration, the Provincial Institute for Nature Protection, and the Ministry of Environmental Protection.

Public insight was also provided, a presentation was organized, and a public discussion was conducted regarding the Environmental Impact Assessment Study for the project of constructing a corn storage silo with a dryer and accompanying facilities. An announcement was published in the weekly newspaper 'Pančevac' and on the website of

the Kovačica Municipal Administration ( <https://kovacica.org/showpage/771> ) and on the notice board of the municipal administration, while the public discussion was held at the Kovačica Municipal Administration.

## 5. Identification of Stakeholders and Activities

<b>Stakeholders</b>	<b>Role</b>	<b>Level of interest</b>	<b>Level of influence</b>	<b>Method of Engagement</b>	<b>Suggested Communication Strategy</b>
Provincial Secretariat for Urban Planning	Regulator and Approver	High	High	Meetings, submission of documentation	Regular notifications and consultations, timely information on progress
Provincial Secretariat for Construction	Approves and regulates construction works	High	High	Coordination, Technical meetings	Timely exchange of information, approval procedures with technical support
Provincial Secretariat for Environmental Protection and Provincial Institute for Nature Protection	Regulates environmental aspects	High	High	Monitoring, inspections	Transparent reports, regular information sharing, and collaboration in the field of environmental protection
Energoprojekt / Axis	Main contractor	Medium	High	Control Meetings, Technical Reports	Regular meetings, timely information on the progress of work
Ministry of Internal Affairs	Security measures	Medium	Medium	Coordination, seminars	Information exchange, joint security plans
Local community and citizens of Kovačica	Have a high interest	High	Medium	Information through media, portals, local radio, printed media	Transparency and presentation of benefits for the local community

Future workers of the alcohol factory	Potential workers	Medium	Medium	Notification, information about the construction phase and the start date of operations	Transparent hiring process and communication
Suppliers of raw materials and equipment	Business partners	Medium	Low	Contracts, regular communication	Maintaining relationships, timely contracts
Investors and financial institutions EBRD	Financial support	High	High	Reporting, meetings	Transparent operations, regular progress reports on the project
Other local entities and the interested community	The broader public and stakeholders	Low	Low	Media campaign through all external communication channels	Open communication about the phases of project progress

## 6. Complaint submission and resolution mechanism

In order to ensure transparency, accountability, and effective management of the potential impacts of the project on stakeholders, a formal mechanism for the submission, recording, consideration, and resolution of complaints is established. This mechanism is available to all stakeholders.

### Objectives of the complaint mechanism

- Enable all stakeholders to submit complaints, suggestions, or comments regarding the project.
- Ensure a transparent and fair process for the consideration and resolution of complaints.
- Ensure timely and adequate responses to all submitted complaints.
- Identify potential issues and risks of the project based on submitted complaints and take corrective actions.
- Improve relationships with stakeholders and build trust.

### Methods of submitting complaints

Stakeholders can submit complaints in one of the following ways:

- In writing: By filling out the basic information about the complaint and sending it to the following address: Novi Vinogradi BB, Kovačica
- Electronically: By sending an email with the basic information about the complaint to the address **info@sunoko.rs**
- By phone: By calling the phone number: **+381 21 4878 111**

### **Content of the complaint**

The complaint should include the following information:

- Name and surname of the complainant.
- Contact phone number and/or email address.
- Detailed description of the issue or event that caused the complaint (What, when, and where it happened).
- Names of individuals or organizations involved in the event (if relevant).
- Evidence or attachments to the complaint (photos, documents, etc.).
- Consequences and impact on people and/or the environment.
- Proposal for resolving the issue.

## **7. Planned additional activities**

In addition to ongoing activities, such as regular meetings, information dissemination through the media, and collaboration with all stakeholders, the following activities are planned for the upcoming period:

### **Creation of the project website:**

**Objective:** Providing comprehensive information about the project, transparent communication, and facilitating the submission of complaints.

**Activities:** Defining the site structure, creating content, design, and technical implementation.

**Deadline for completion:** Last quarter of 2025.

### **Creation of the concept for the official opening of the Sunal alcohol factory:**

**Objective:** Promotion of the project, establishing good relationships with stakeholders, and raising awareness of the importance of the investment for the local community and the broader economy.

**Activities:** Defining the target audience and event messages, planning the program (including speeches, presentations, factory tours), preparing invitations and logistics.

**Stakeholders who will be invited:** Representatives of local and state authorities, investors, business partners, employees, representatives of the local community, and the media.

These planned activities will be carried out with the active participation and support of all relevant parties to ensure the successful implementation of the project and long-term benefits for all involved.

## APPENDIX 1 - PUBLIC COMPLAINT FORM

The public complaint form is available in the document Stakeholder Engagement Plan (SEP), which is publicly accessible on the official website of the company [www.sunoko.rs](http://www.sunoko.rs)

Name:
Surname:
E-mail adress:
Phone number (mobile or landline):
<ul style="list-style-type: none"><li>• I agree that my personal data from this complaint may be used for the purposes of submitting and processing my complaint</li></ul>
<ul style="list-style-type: none"><li>• I wish to remain anonymous</li></ul>
<b>Description of the incident / complaint / issue</b>
What happened?
How did it happen?



Where did it happen?
Who are the participants in the event?
Was there an injury at the same time?
Could this have a significant impact on people and/or the environment?
What could be the possible consequences?

What needs to be done to resolve this complaint/issue?

Date

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Signature

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