

Prepared by:

**Cryogas-Vysotsk Ltd.**

Date

**September 2020**

# **VYSOTSK LNG PROJECT STAKEHOLDER ENGAGEMENT PLAN OPERATION PHASE**



## CONTENTS

<b>ACRONYMS</b>	<b>5</b>
<b>1. INTRODUCTION</b>	<b>6</b>
1.1 Project Description	6
1.2 Introduction to the Stakeholder Engagement Plan	7
<b>2. REGULATORY REQUIREMENTS AND OTHER SOURCES REFERENCED DURING THE PLAN DEVELOPMENT</b>	<b>8</b>
2.1 National legislation	8
2.2 International conventions and IFI	8
2.2.1 International conventions	8
2.2.2 IFI requirements	8
2.2.2.1 Equator Principles III requirements	8
2.2.2.2 The IFC performance standards	8
2.2.2.3 EBRD's Environmental and Social Policy	9
2.2.2.4 OECD Common Approaches	9
<b>3. STAKEHOLDER ENGAGEMENT TO DATE</b>	<b>10</b>
3.1 Key Stakeholder Engagement Activities	10
3.2 Cooperation and assistance agreements	10
3.3 Grievance management	10
<b>4. STAKEHOLDER IDENTIFICATION</b>	<b>12</b>
4.1 Definitions and overview	12
4.2 Key Stakeholders of the Project	13
4.2.1 Local communities	13
4.2.2 Company personnel	13
4.2.3 Contractors	13
4.3 Other groups and potential stakeholders	13
4.3.1 Land owners and users	13
4.3.2 Government and local authorities	13
4.3.2.1 Federal level	13
4.3.2.2 Regional level	13
4.3.2.3 Municipal level	13
4.3.3 Local residents in the Project area	14
4.3.4 Hunters, fishermen, gatherers and watercraft owners	14
4.3.5 Public non-profit organizations	14
4.3.6 Press and mass media	14
4.3.7 Higher education institutions	14
<b>5. STAKEHOLDER ENGAGEMENT PLAN</b>	<b>14</b>
5.1 Principles	14
5.2 Methods of engagement with external stakeholders	15
5.2.1 Project contact points	16
5.2.2 Face-to-face meetings	16
5.2.3 Focus groups	16
5.2.4 Disclosure of the Project information via the Internet	16
5.2.5 Printed Project information materials	16
5.2.6 Written grievances	17
5.2.7 Other activities	17
5.3 Methods of engagement with internal stakeholders	17
5.4 Disclosure of documented information	18
5.5 Consolidated Engagement and Disclosure Action Plan	18
<b>6. GRIEVANCE MANAGEMENT</b>	<b>22</b>
6.1 Key principles	22
6.2 Submission (acceptance) and registration of grievances	22

6.3	Assignment for review	23
6.4	Review, resolution and notification of grievant	23
6.5	Appeal	24
6.6	Complaint closure	24
6.7	Grievance monitoring	25
<b>7.</b>	<b>REPORTING AND MONITORING</b>	<b>26</b>
<b>8.</b>	<b>IMPLEMENTATION AND RESOURCES</b>	<b>27</b>
<b>ANNEX 1. LIST AND CATEGORIES OF EXTERNAL STAKEHOLDERS</b>		<b>28</b>

Issue **C**  
 Date **15.09.2020**  
 Prepared by **Pavel Maslov**  
 Checked by **Aleksey Yezupenok**  
 Approved by **Dmitry Schetkin**

*Version Control Record*

Issue	Date	Prepared by	Checked by	Approved by	Description
A	27/03/2018	IG	TK	IS	Version updated for the construction phase: RAMBOLL CIS RAMBOLL CIS
B	20/12/2019	IG	AE; EZ	DS; IS	Version updated for the operation phase RAMBOLL CIS
C	15/11/2020	PM	AE	DS	Version updated for the operation phase

## ACRONYMS

RF	Russian Federation
LR	Leningrad Region
AO	Joint Stock Company
OAD	Open Joint Stock Company
OOO	Limited Liability Company
GPB	Gas Pipeline Branch
HS	Hydraulic Structure
IMS	Integrated Management System
CA/PA	corrective actions/preventive actions
KPI	Key Performance Indicators
LNGT	Liquefied Natural Gas Terminal
CSP	Commercial Sea Port
IFI	International Financial Institutions
IFC	International Finance Corporation
ESIA	Environmental and Social Impact Assessment
OHS	Occupational Health and Safety
E&S	Environmental and Social
OECD	Organisation for Economic Cooperation and Development
CRI	Corporate Regulatory Instrument
CR	Corporate Regulation
SEP	Stakeholder Engagement Plan
ESMP	Environmental and Social Management Plan
LNG	Liquefied Natural Gas
EPC	Engineering, Procurement and Construction
ESAP	Environmental and Social Action Plan
EHS	Environment, Health and Safety
SIP	Social Investment Plan

## 1. INTRODUCTION

### 1.1 Project Description

Cryogas-Vysotsk Ltd. successfully carried out the project named “Terminal for production and transshipment of liquefied natural gas in the port of Vysotsk in Leningrad Region, with the production capacity of 660,000 tons of LNG per year, including a gas pipeline branch connected to Leningrad-Vyborg main gas pipeline” (hereinafter – Vysotsk LNG, the Project), and operates the project since March 2019.

The project is located in Vyborg district of Leningrad Region which borders with Finland to the west, Republic of Karelia to the north, Priozersk district to the north-east, Vsevolozhsk district of Leningrad Region to the east, and with Saint-Petersburg, City of federal importance, to the south-east (see Figure 1.1).

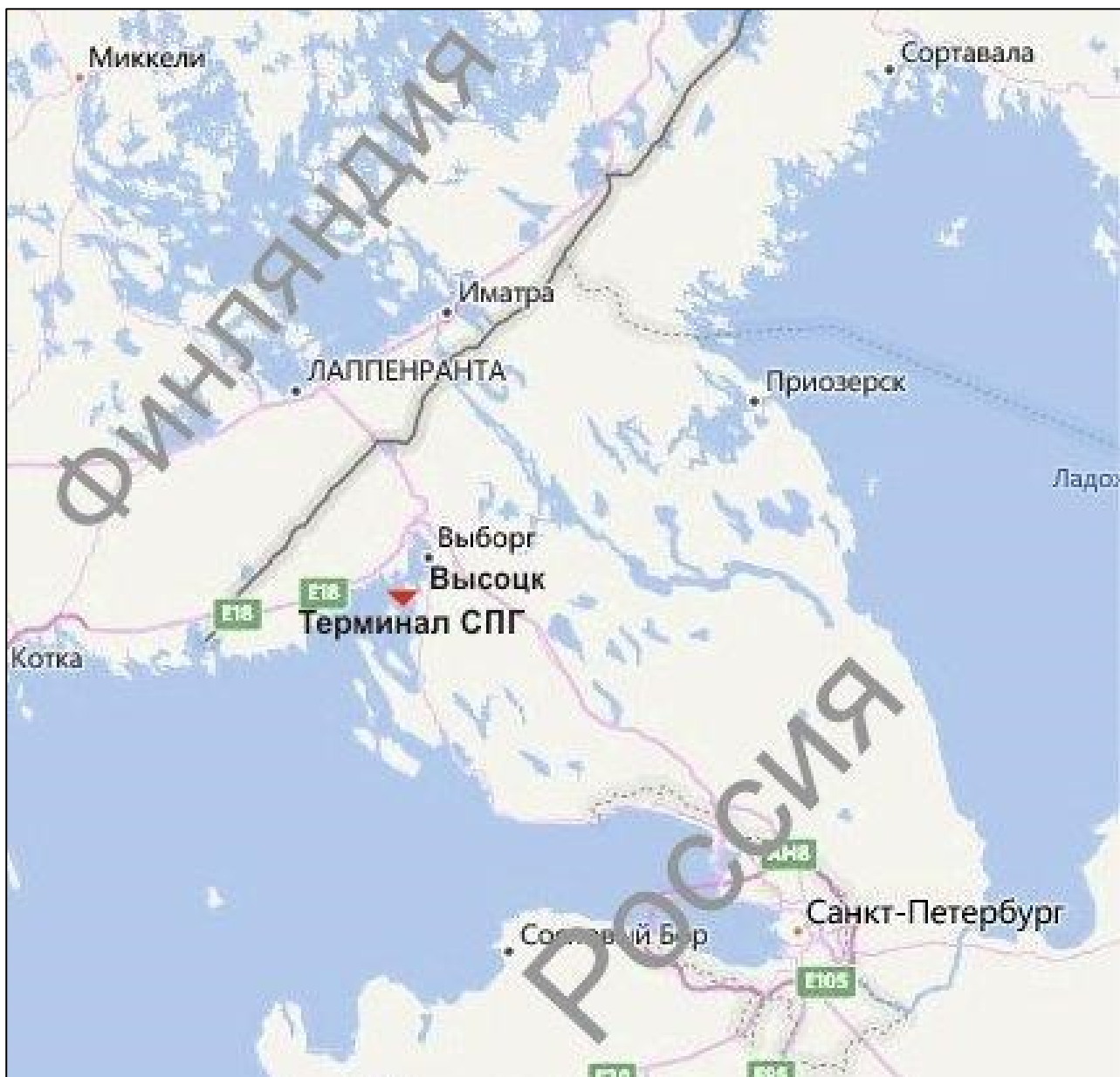


Figure 1.1 - Project location map

The following main facilities have been constructed for the Project:

- Berth facilities comprising two jetties for offloading and bunkering of LNG carriers;
- Gas pipeline branch of the Leningrad-Vyborg-State Border main gas pipeline leading to the LNG plant in the Port of Vysotsk in Vyborg District, Leningrad Region (hereinafter - the GPB);
- A terminal for production and handling of LNG in Port Vysotsk, Leningrad Region, with the production capacity of 660,000 tons of LNG per year (hereinafter - the Terminal);
- Supporting infrastructure: local roads, aerial electrical transmission lines, storage and maintenance facilities, emergency fuel storage site, water and wastewater systems, waste incineration system, and other facilities including workers' accommodation.

The LNG Terminal is intended for reception of the feed gas supplied by the gas pipeline branch, pre-treatment of gas, production, storage and offloading of LNG to consumers. Gas transportation by sea is provided using gas carriers with design capacity of up to 30,000 m<sup>3</sup>. The liquefied natural gas produced at the Terminal can be supplied both for domestic needs and for export.

A more detailed description of the Project is provided in the Environmental and Social Management Plan for the Operation stage (ESMP (Operation)) and other Project documents.

## 1.2 Introduction to the Stakeholder Engagement Plan

Stakeholder Engagement Plan is a part of the corporate Integrated Management System (IMS). Along with mitigation of the Project impacts, open community engagement is an element of the Company's holistic approach to maintaining positive relations with local communities and other stakeholders in the Project area of influence.

The Plan development and implementation is focused to:

- Establish and maintain long-term positive relationship between the Company, local communities and other stakeholders;
- Obtain a "social license to operate" from host communities and other stakeholders;
- Minimise the risks in the Company relations with local communities, businesses and authorities.

This Plan is a mandatory CR which is approved by the Company Order.

The Plan is structured as follows:

- Chapter 2 defines legal requirements for the Company's social engagement relevant to the Project operation
- Chapter 3 describes the main stakeholder engagement activities during the past stages of the Project implementation
- Chapter 4 describes the approach to identification of stakeholders and includes a list and summary information on the Project stakeholders
- Chapter 5 describes the applicable engagement mechanisms and activities
- Chapter 6 describes the grievance mechanism
- Chapter 7 defines the approach to monitoring of stakeholder engagement and reporting formats
- Chapter 8 describes the mechanism of allocation of resources for stakeholder engagement activities

## 2. REGULATORY REQUIREMENTS AND OTHER SOURCES REFERENCED DURING THE PLAN DEVELOPMENT

### 2.1 National legislation

In the Russian Federation the stakeholder engagement process, applicable to the Project, is regulated by the following legislation:

- Federal Law of 10.01.2002 No 7-FZ "On Environmental Protection", which requires that community is involved in decision-making on economic and other activities that have environmental impact. In particular, decisions about specific location of facilities, economic or other activity, which may cause damage to the natural environment must consider public views.
- Federal Law of 24.04.1995 No 52-FZ "On Wildlife" ascribes individuals and legal entities, including community associations and religious organizations, with a right to conduct a public environmental expert review, perform public oversight, take actions aimed at wildlife and habitats protection and assist in implementation of relevant state programmes. Government bodies are obliged to account for propositions and recommendations of individuals and entities while performing their duties in the field of wildlife use and protection.

### 2.2 International conventions and IFI

#### 2.2.1 International conventions

Public consultation is regulated by the Convention of the UN European Economic Commission (UNECE), "On Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters" – usually referred to as the "Aarhus Convention" (1998);

While Russia has not ratified the UNECE convention, most Europe-based international lending institutions do apply it.

The objective of the Aarhus Convention is to guarantee the right of the public for information, to facilitate participation in the decision-making process and to provide access to justice in environmental matters. It sets out the basic principle of disclosure of information on environmental issues – *Environmental information should be disclosed proactively to any affected party.*

#### 2.2.2 IFI requirements

##### 2.2.2.1 Equator Principles III requirements

Equator Principles III (EPIII) requirements applicable to public engagement are essentially contained in Principles 5 (Stakeholder Engagement), 6 (Grievance Management) and 10 (Reporting and Transparency). Public involvement is to be considered an essential part of any business venture and a way to improve project quality and delivery.

##### 2.2.2.2 The IFC performance standards

The IFC Performance Standards are internationally recognised standards on social and environmental sustainability, applied by the IFC (the private sector arm of the World Bank Group) and by a number of large commercial banks and Export Credit Agencies within the framework of the Equator Principles. Of particular relevance to the stakeholder engagement process is Performance Standard 1: "Assessment and Management of Environmental and Social Risks and Impacts".

The key requirements of PS 1 pertaining to public engagement are the following:

- Promote improved environmental and social performance through effective use of management systems;
- Ensure grievances from affected individuals, groups, and communities and external communication from other stakeholders are responded to and appropriately managed;



- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and ensure relevant environmental and social information is disclosed and disseminated.

#### 2.2.2.3 EBRD's Environmental and Social Policy

EBRD's Environmental and Social Policy includes Performance Requirement 10 on "Information Disclosure and Stakeholder Engagement", which requires the following:

- Identify people or communities that are or could be affected by the project, as well as other interested parties;
- Ensure that such stakeholders are appropriately engaged in environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation;
- Maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement at all stages of a project.

PR 10 states that stakeholder engagement should:

- Focus on social and environmental risks and adverse impacts, and proposed measures and actions to address these; and
- Be carried out on an on-going basis as issues, impacts and opportunities evolve.

In addition, the EBRD is bound to abide by the Aarhus Convention.

#### 2.2.2.4 OECD Common Approaches

The common approaches of the Export Credit Agencies of OECD member states are defined in the Recommendation of the Council on Common Approaches for officially supported export credits and environmental and social due diligence (the "Common Approaches"). This document presents the common approaches to environmental and social issues taken, amongst others, by Export Credit Agencies of OECD member countries. It categorises projects along similar guidelines as those adopted by the IFC, and requires ECAs and other similar finance institutions to benchmark all projects they review for potential finance against the World Bank Environmental and Social Standards, or the IFC's Performance Standards.

In practice ECAs of OECD countries apply IFC's Performance Standards to private sector projects they consider for finance or insurance.

### 3. STAKEHOLDER ENGAGEMENT TO DATE

#### 3.1 Key Stakeholder Engagement Activities

The main stakeholder activities during the Project implementation included:

- Project public hearings;
- Meetings held with landowners whose land had to be acquired or occupied for Project purposes;
- Stakeholder engagement (meetings, consultations, surveys of affected communities and stakeholders) during the ESIA process;
- Stakeholder engagement (meetings, consultations, surveys of affected communities and stakeholders) during the Project implementation;
- Other engagement activities organised by Cryogas-Vysotsk Ltd. and ZAO "Cryogas", including participation in exhibitions and other fora.

The Project stakeholder engagement and disclosure activities were conducted at the regional, district and local levels.

The engagement activities involved the following main stakeholders: government bodies (regional/local authorities and self-government), public authorities, land users, communities, businesses (business partners and businesses (organizations) operating in the district).

The Company participates in corporate programme of cooperation with higher educational institutions "NOVATEK VUZ", which is administered by the parent company, PJSC NOVATEK. As of November 2020, Cryogas-Vysotsk Ltd. signed 10 apprenticeship agreements under this Programme with students of Gubkin Russian State University of Oil and Gas.

In cooperation with the Administration of Vysotsk City and a Community Interest Group, the Company plans and implements social investments on an annual basis (SIP Plan and Program). For year 2020, the following social investments were identified and are being implemented in Vysotsk:

- purchase of a fence for local cemetery;
- participation in the city events (organization of the City Festival of Vysotsk; the Clean Beach action; citywide New Year celebrations in Vysotsk).

In addition, at the initiative of PJSC NOVATEK, the Company made a financial contribution to the Place in the Sun Charity Fund, to support the care and rehabilitation of sick children and children with disabilities, children's medical institutions, provision of rehabilitation equipment.

#### 3.2 Cooperation and assistance agreements

As of 2020, no valid agreements or contracts with stakeholders (regional, district or local level) are in place that would define the Company's social commitments.

#### 3.3 Grievance management

The Company developed and applies a Grievance Mechanism. Grievances registered between January and August 2018 (the Project implementation period) concerned the following issues:

- Internal grievances:
  - Quality of telephone and internet communication in the shift accommodation camp;
  - Too small meals served by the canteens (the catering practices have been adjusted accordingly).
- External grievances:
  - Noise from diesel power units (complaint from residents of Pikhtovoye village); the grievance has been addressed by providing noise barriers, and noise impact measurements were taken.

No grievances were received from stakeholders between August 2018 and present time (September 2020). The person in charge on the part of the Company (Business Support Department Manager) maintains constant contact (by telephone) with the Head of the Vysotsk Urban Municipality. The Company, on

requests from the Head of the Vysotsk Urban Municipality, provides assistance for public needs, such as making available special equipment, provision of minor services and auxiliary equipment (tent for the City Festival of Vysotsk, etc.).

## 4. STAKEHOLDER IDENTIFICATION

### 4.1 Definitions and overview

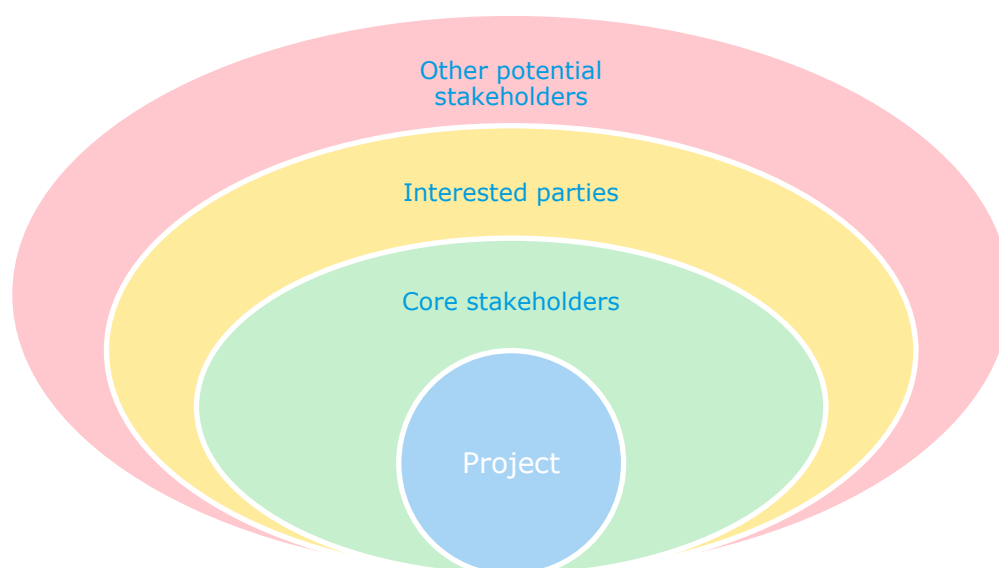
**Stakeholders**<sup>1</sup> are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

During this SEP, the *salience* (the priority level attributed by the Company to particular stakeholder groups) of the stakeholder groups will be identified. The most salient stakeholder groups are categorized as key groups and will be the focus of the main engagement activities.

Salience of a stakeholder for the Project/Company is determined by the presence and extent of the following attributes:

- **Power**: understanding the influence of the stakeholders on the Project by ascribing them one of the following influence level:
  - a. High (may influence the Project to a large extent);
  - b. Medium (may influence the Project to some extent);
  - c. Low (no or limited influence on the Project is expected).
- **Legitimacy**: understanding the status of relationship of the stakeholder to the Company by ascribing it one of the following relationship types:
  - a. Contractual (the stakeholder has agreement-based or contractual relationship with the Company);
  - b. Consultation-based (the Project recognizes the stakeholder although not formal agreement is yet reached);
  - c. Out of Company's scope of engagement (the Company does not have and/or does not plan to arrange relationship with the potential stakeholder).
- **Urgency**: understanding how critical and time-sensitive the needs of the stakeholder are in relation the Project activities by ascribing them with the following levels:
  - a. High (the claim is critical and time-sensitive);
  - b. Medium (the claim is either critical or time-sensitive);
  - c. Low (the claim is neither critical nor time-sensitive).

The stakeholder groups (categories) are placed on an indicative diagram in Figure 4.1 below.



**Figure 4.1 Categorisation of Project's stakeholders**

<sup>1</sup>

IFC, Stakeholder Engagement Handbook, 2007

The stakeholder identification and categorisation refers to the actual social conditions in the Project area, the phase (Project operation), commitments assumed by the Company, and other factors.

In case of changes in the Project (expansion, reorientation, etc.), in the social obligations of the Company, or in other factors that determine interaction with stakeholders (power, legitimacy and urgency), or when new stakeholders appear or social tensions in relation to the Project increase, the engagement plan and activities are subject to revision.

Sections 4.2 through 4.3 provide a concise description of the core stakeholder groups of the Project. A more detailed list of stakeholders (updated in September 2020) is provided in Annex 1 to this document.

## **4.2 Key Stakeholders of the Project**

### **4.2.1 Local communities**

The Project activities affect the residents of Vysotsk and Pikhtovoye<sup>2</sup>, while the expected impacts are assessed as largely beneficial<sup>3</sup>.

In the engagement process in relation to the Project, the interests of the residents of Vysotsk and Pikhtovoye will be represented by the Municipal Administration and Community Interest Group.

### **4.2.2 Company personnel**

About 220 people are involved in the Project (at the operation stage), including 150 people employed at the LNG Terminal in the port of Vysotsk and the Gas Pipeline Branch, and 70 people in the St. Petersburg office. Most of the personnel of the LNG Terminal in the port of Vysotsk and the Gas Pipeline Branch live in Vyborg. Some of the workers are involved on a rotational basis and are housed in the Company's residential quarters near Pikhtovoye.

### **4.2.3 Contractors**

At the Project operation stage, a small number of contractors and subcontractors are involved for certain specific tasks such as security, catering, and cleaning services.

## **4.3 Other groups and potential stakeholders**

### **4.3.1 Land owners and users**

Landowners and land users (including owners/tenants of summer cottages and holiday goers), whose land has been or will be temporarily or irreversibly disturbed by Project activities, are stakeholders of the Project.

### **4.3.2 Government and local authorities**

#### **4.3.2.1 Federal level**

Ministries of the Russian Federation and Federal Supervision Agencies.

#### **4.3.2.2 Regional level**

Government of Leningrad Region and related authorities at the regional level.

#### **4.3.2.3 Municipal level**

At the Municipal/District level, the Project stakeholders are:

- Authorities of the Vyborg District Municipality;
- Authorities of the Sovetsky Urban Municipality;
- Authorities of the Goncharovo Rural Municipality.

---

<sup>2</sup> Administratively, Pikhtovoye is a part of the Vysotsk Urban Municipality.

<sup>3</sup> More details of the beneficial and adverse impacts on local communities are provided in the Non-technical Summary of the ESIA available at the website of PJSC NOVATEK.

#### 4.3.3 Local residents in the Project area

The following population centers may be affected by the Project operation: Vyborg, Sovetsky, Goncharovo, Cherkasovo, Perovo, and other settlements in the Vyborg District of Leningrad Region.

#### 4.3.4 Hunters, fishermen, gatherers and watercraft owners

Hunting is not widely practiced in the Vyborg District of Leningrad Region. However, some local residents do practice amateur hunting migratory birds, elk and wild boar. There are no specific commercial or informal popular hunting sites in the Project area.

The water area of the Gulf of Finland (Vyborg Bay) of the Baltic Sea in the Project area, as well as nearby bays and large watercourses, is a place for commercial and recreational fishing (from the shore and/or water craft). There are no unique fishing areas at the Project sites.

Territory in the Project location area is used by local communities and summer residents for picking wild crops (mushrooms, bilberries, lingonberries, etc.).

The Project does not affect designated conservation areas or territories of particular importance (value) for local or other communities.

#### 4.3.5 Public non-profit organizations

Public non-profit organizations can be considered by the Company for providing charitable assistance.

#### 4.3.6 Press and mass media

Federal and local media (television, Internet, newspapers, radio) operating in the Vyborg District can be used for the Company's stakeholder engagement activities (mainly for disclosure of Project information).

#### 4.3.7 Higher education institutions

The Company participates in corporate programme of cooperation with higher education institutions "NOVATEK VUZ", which is administered by the parent company, PJSC NOVATEK. The scope of engagement of Cryogas-Vysotsk Ltd. with higher education institutions under this programme is determined by PJSC NOVATEK.

## 5. STAKEHOLDER ENGAGEMENT PLAN

### 5.1 Principles

The principles used by the company in devising its stakeholder engagement methods to a large extent derive from PS1 of the IFC and PR10 of the EBRD. The main element of engagement with stakeholders of the Project and Cryogas-Vysotsk Ltd. is timely and voluntary disclosure by the Company of reliable information on environmental and social performance of the Project. Information is disclosed in a culturally appropriate and understandable manner, without manipulation, coercion or intimidation.

The general (typical) list of methods of stakeholder engagement that can be used by the Company is provided in Figure 5.1.

Printed information materials public	<ul style="list-style-type: none"> <li>•Tools: Factsheets and brochures/leaflets</li> <li>•Objectives: Disclosure of general Project-related information</li> </ul>
Information repositories	<ul style="list-style-type: none"> <li>•Tools: Use of libraries, city halls, post offices and schools</li> <li>•Objectives: Reaching broader public with Project-related information</li> </ul>
Media (TV, newspapers, e-media)	<ul style="list-style-type: none"> <li>•Tools: Entries, advertisements, press releases, interviews</li> <li>•Objectives: Reaching broader public with Project-related information</li> </ul>
Information and reading centers	<ul style="list-style-type: none"> <li>•Tools: Dedicated space with a wide range of Project-related materials and consultation facility</li> <li>•Objectives: Access to broad and detailed information, exchange of views</li> </ul>
Central and technical information contact	<ul style="list-style-type: none"> <li>•Tools: Talks in person with those interested in instant and deeper response regarding Project activities</li> <li>•Objectives: Project-communities information exchange</li> </ul>
Websites	<ul style="list-style-type: none"> <li>•Tools: Internet</li> <li>•Objectives: Disclosure of relevant information simultaneously to a maximum number of stakeholders</li> </ul>
Response sheets	<ul style="list-style-type: none"> <li>•Tools: Forms attached into Project-related materials are placed in public places, information repositories/centers or filled in on the website</li> <li>•Objectives: Receiving stakeholders' feedback</li> </ul>
Tours (site visits)	<ul style="list-style-type: none"> <li>•Tools: Tours for key stakeholders, elected officials, media and school students groups</li> <li>•Objectives: Clarification of Project activities and trust-building</li> </ul>
Community Council	<ul style="list-style-type: none"> <li>•Tools: A representative group of key stakeholders</li> <li>•Objectives: Project-communities information exchange</li> </ul>
General community meetings	<ul style="list-style-type: none"> <li>•Tools: Meetings with a wide range of stakeholders</li> <li>•Objectives: Project-communities information exchange</li> </ul>
Face-to-face meetings	<ul style="list-style-type: none"> <li>•Tools: If required, personal meetings with stakeholders are held by the Company</li> <li>•Objectives: Project-communities information exchange</li> </ul>

**Figure 5.1 Typical (generally accepted) methods of stakeholder engagement**

It is important to note that the above list is for reference only. The Company independently determines the appropriate methods of engagement with stakeholders depending on the Project context and the key stakeholders.

Different stakeholders may require different approaches and methods in engagement. The main methods adopted by the Company for engagement with the identified key stakeholders are listed in Section 5.2 of the SEP.

## 5.2 Methods of engagement with external stakeholders

This section describes the methods that will be used by the Company for engaging with the key and other external stakeholders.

#### 5.2.1 Project contact points

Appointment of the main contact persons for the Project allows local communities and other stakeholders to receive feedback to their queries, resolve any issues or conflicts in the shortest possible time and with minimal effort.

The main contact persons appointed by the Company for engagement with stakeholders are:

- Head of the Business Support Department;
- Head of the Administrative Support and Document Management Department;
- Deputy Head of the HSE Department.

The main stakeholders directly engaged through the Project contact points are local administrations and communities.

The engagement is conducted on a regular basis to address the needs of the Company and stakeholders.

#### 5.2.2 Face-to-face meetings

Face-to-face meetings are a good way to build personal relationships, and are often used in engaging authorities and local leaders. It is important to set expectations with the interlocutor on how the information will be used and the range of other people to be consulted, so no one is disappointed if all of his/her ideas are not reflected.

The following main stakeholders will be targeted by this method:

- Governmental authorities at all levels;
- Local communities;
- Project contractors.

The engagement is conducted on a regular basis to address the needs of the Company and stakeholders.

#### 5.2.3 Focus groups

Focus group meetings allow grouping people interested in the same issues. Focus groups can be established by age category, by gender, by type of activity, by place of residence, etc. They provide a very useful method to address issues of concern for many people. In holding focus groups, it is important to ensure that (i) all different opinions are all expressed; (ii) the discussion is kept focused on the issue for discussion; and (iii) to wrap up with concrete proposals made and next steps if relevant.

The stakeholder group targeted by this method is local community.

The engagement is conducted on a regular basis to address the needs of the Company and stakeholders.

#### 5.2.4 Disclosure of the Project information via the Internet

Information about the Project, the Company's HSE Policy, SEP and other information, the disclosure of which is relevant for meaningful interaction between the Company and stakeholders, are freely available on the website of PJSC NOVATEK (the page of Cryogas-Vysotsk Ltd.). This information is subject to updating as necessary, in order to ensure its relevance.

This method has been successfully applied for engagement with all stakeholders.

The engagement is continuous (information on the website is available at any time).

#### 5.2.5 Printed Project information materials

A simple presentation brochure (free form) is being developed for the Project, with the following information:

- Introduction to the Project;
- Project main environmental and social impacts;
- Stakeholder engagement mechanisms used by the Project;
- Contact information.

The brochure can be placed in local administration offices and/or other public places. The printed information materials are subject to updating as the Project evolves or in case of any changes in its social



end environmental impacts, as well as other information that may influence efficiency of stakeholder engagement (contact details, responsible officers, etc.).

The stakeholder group targeted by this method is local community.

The engagement is continuous (brochures are available on weekdays during the working hours of the administrations).

#### 5.2.6 Written grievances

Collecting views, suggestions and other communications in writing on paper or electronically is a low-cost and effective way of obtaining feedback from stakeholders. With this method, stakeholder can give feedback, make request or query (anonymous or with full contact details to receive a response) to the Company through post/courier service, Project contact points, by electronic communication or through the grievance boxes of Cryogas-Vysotsk Ltd. Among other methods of communication, special grievance boxes are provided for reception of written grievances (lockable, can be accessed only by personnel of the HSE Department) at the Project site and in the population centres (Vysotsk and Pikhtovoye).

This method has been successfully applied for engagement with all stakeholders.

The engagement is carried out through daily collection and processing of the incoming information.

#### 5.2.7 Other activities

The Company may consider and, if considered relevant, apply other measures of engaging the Project stakeholders: public meetings, media publications, establishing and participating in public councils, site visits, etc.

### 5.3 Methods of engagement with internal stakeholders

Internal stakeholders of the Project are the Company's personnel. The Company applies the following methods to ensure effective internal communications and engagement:

- The Corporate Code of Conduct of Cryogas-Vysotsk Ltd. is developed, introduced and strictly observed by all personnel of the Company and contractors;
- Disclosure of the corporate policies and Integrated Management System;
- Induction and unscheduled briefings, covering the issues of personnel behaviour, environmental and social matters, corporate Integrated Management System, grievance mechanisms, and other relevant information for employee adaptation to the working/living/leisure conditions and establishing stable communication links.
- Special boards with information of potential interest for the workers;
- Sports or other corporate events;
- Providing an effective workers grievance mechanism. The Company personnel can make a proposal/request or file grievance through their line manager, Head of the HR and Payroll Department, Deputy Head of the HSE Department, or Deputy General Director for the line of business. The employee formulates a proposal/request or grievance in an understandable form and informs the interested person in the Company in any convenient way (verbal or written, on paper or electronically). Grievances can be filed anonymously or in person. In the case of personal contact, a competent and comprehensive feedback should be provided to the grievant as soon as possible. Among other methods of communication, special grievance boxes are provided for reception of written grievances (lockable, can be accessed only by personnel of the HSE Department) at the Project site and in the office in Saint Petersburg.
- Regular meetings aimed at comprehensive consideration and solution of pressing issues and problems.
- Regular meetings of the Company management with workers' representatives to discuss current concerns of the Project personnel.

The process of engagement is continuous.

## 5.4 Disclosure of documented information

The following Project documents are subject to disclosure on the website of PJSC NOVATEK:

- Environmental, Social, Health and Safety Policy of Cryogas-Vysotsk Ltd.;
- Key principles of openness and intervention in hazardous situations;
- Environmental and Social Impact Assessment (Non-technical Summary);
- Stakeholder Engagement Plan;
- Certificates of conformity of the corporate IMS (ISO 14001:2015 ISO 45001:2018).

Further information about the Project is disclosed through printed brochures placed in the local administration office (Vysotsk) and other public places (post office in Vysotsk, school in Vysotsk, notice board in Pikhtovoye).

Vacant jobs are advertised by the Company on specialized websites (*HeadHunter* and *SuperJob*).

Press releases, thematic presentations and other Project documents are disclosed by the Company as needed, using an appropriate method.

## 5.5 Consolidated Engagement and Disclosure Action Plan

Consolidated Engagement and Disclosure Action Plan is provided in Table 5.1 below.

Stakeholder engagement activities of Cryogas-Vysotsk Ltd. continue throughout the life of the Project.

Table 5.1 Project Stakeholder Engagement Plan

N°	Stakeholder (refer to Chapter 4)	Activity (refer to Sections 5.2 - 5.3)	Information Disclosure (refer to Section 5.4)
<b>Core stakeholders</b>			
1.	Local administrations (Vysotsk, Pikhtovoye)	<p><b>Planned activities:</b></p> <p>1. Drawing up a list of social investments in the Vysotsk Urban Municipality.</p> <p><i>Conducted on the Company's initiative in Q4 of each year. The person in charge on behalf of the Company (Head of the Business Support Department) informs the Administration of the Vysotsk Urban Municipality by telephone about the intention to hold a working meeting on social investment for the next year, a preliminary date and time are agreed. In addition, through the Administration and information brochures in public places (see Section 5.4), the Company informs the local community about the discussion of the investment program. Representatives of the Community Interest Group are notified personally (by phone). At the working meeting with the Administration of Vysotsk and representatives of local community (Community Interest Group), the actual needs of the stakeholders are discussed. At this meeting, the main activities for the next year are determined, which the Company can implement within the scope of its assumed social commitments.</i></p> <p><i>Social changes that took place during the previous year in the Vysotsk Urban Municipality and Vyborg District of Leningrad Region in general are discussed at the same meeting. Development prospects of the District and potential mutual influence with the Project are considered.</i></p> <p>The measures proposed by the Head of the Administration of the Vysotsk Urban Municipality and the Community Interest Group are submitted for review and approval by the Company's Management. Additional consultations with interested parties can be conducted as appropriate.</p> <p><b>Unscheduled activities (potential):</b></p> <p><u>Project contact points.</u> For engagement with the Administration of the Vysotsk Urban Municipality in the Project area of influence, the Company appointed its contact person - Head of the Business Support Department.</p> <p><u>Face-to-face meetings and written communications.</u> Face-to-face meetings (consultations) and written communication are conducted by the Company (through its authorized representatives) as appropriate.</p> <p><u>Printed Project information materials.</u></p> <p><i>The Project information brochures are available in public places (refer to Section 5.4). Information is updated as appropriate.</i></p> <p><u>Disclosure of the Project information via the Internet.</u> Project information is always available on the website of PJSC NOVATEK.</p>	According to Section 5.4 and on additional (reasonable) requests (provided at the discretion of the Company).
2.	Local communities (Vysotsk, Pikhtovoye, including the Community Interest Group in Vysotsk)	<p><b>Planned activities:</b></p> <p>1. Drawing up a list of social investments in the Vysotsk Urban Municipality (see above).</p> <p><b>Unscheduled activities (potential):</b></p> <p><u>Project contact points.</u> For engagement with local communities of the Vysotsk Urban Municipality in the Project area of influence, the Company appointed its contact person - Head of the Business Support Department.</p>	Refer to Section 5.4.

N°	Stakeholder (refer to Chapter 4)	Activity (refer to Sections 5.2 - 5.3)	Information Disclosure (refer to Section 5.4)
		<p><u>Face-to-face meetings.</u> Face-to-face meetings (consultations) with individual representatives of the local population are conducted on verbal or written request (submitted on paper or electronically).</p> <p><u>Focus groups.</u> Personal meetings (consultations) with community interest groups are conducted on verbal or written request from stakeholder (submitted on paper or electronically).</p> <p><u>Printed Project information materials.</u></p> <p>The Project information brochures are available in public places (refer to Section 5.4). Information is updated as appropriate.</p> <p><u>Disclosure of the Project information via the Internet.</u> Project information is always available on the website of PJSC NOVATEK.</p> <p><u>Written grievances.</u> The Company accepts and registers all incoming written grievances from the local residents (both anonymous and with contact details of grievant for feedback). After registration, grievance is assigned to the relevant division for competent review, preparation of feedback, and taking corrective actions (if necessary). Further personal meetings or other methods of interaction can be applied as appropriate to resolve the issue.</p>	
3.	Project Contractors and Sub-contractors	<p><b><u>Planned activities:</u></b></p> <p>1. According to the terms of the contract agreements.</p> <p><b><u>Unscheduled activities (potential):</u></b></p> <p><u>Project contact points.</u> The contact persons on behalf of the Company for interaction with contractors and subcontractors are administrators of respective contracts.</p> <p><u>Written grievances.</u> The Company accepts and registers all incoming written grievances from contractors and/or their personnel (both anonymous and with contact details of grievant for feedback). After registration, grievance is assigned to the relevant division for competent review, preparation of feedback, and initiation of corrective actions (if necessary). Further personal meetings or other methods of interaction can be applied as appropriate to resolve the issue.</p> <p><u>Disclosure of the Project information via the Internet.</u> Project information is always available on the website of PJSC NOVATEK.</p>	<p>Refer to Section 5.4.</p> <p>Further information is provided in accordance with the terms of the contract agreements, corporate regulations of the Company applicable to the contractor/subcontractor, and on additional (reasonable) requests (provided at the discretion of the Company).</p>
4.	Project personnel	According to Section 5.3 of the SEP.	<p>Refer to Section 5.4.</p> <p>Company's CRs.</p> <p>Additional information is provided according to the areas of responsibility and functions of respective structural units.</p>
<b>Other groups and potential stakeholders</b>			
5.	Government Authorities of the Russian Federation (Federal and regional level),	<p><b><u>Planned activities:</u></b></p> <p>No activities are planned.</p>	According to Section 5.4 and on additional (reasonable) requests

N°	Stakeholder (refer to Chapter 4)	Activity (refer to Sections 5.2 - 5.3)	Information Disclosure (refer to Section 5.4)
	District Administrations (Sovetsky, Goncharovo, etc.), media, civil society organisations, land users and water users, residents of other settlements of the Vyborg District, etc.	<p><b>Unscheduled activities (potential):</b></p> <p>Engagement with non-key stakeholders of the Project is carried on ad hoc basis when needed or on request. The method of engagement depends on the stakeholders' context and subject of engagement.</p>	(provided at the discretion of the Company).

## 6. GRIEVANCE MANAGEMENT

### 6.1 Key principles

The international standards referenced in this Plan (IFC, EBRD, Equator Principles, OECD Common Approaches, etc.) require that a mechanism is established and available for submission of grievances by all stakeholders. This mechanism has been successfully implemented by the Company and will be maintained throughout the Project lifecycle.

The grievance mechanism provides for a fair system of registration, examining and, if necessary (appropriate), redress, stakeholder grievances in relation to the Project. One of the key objectives of this mechanism is to seek amicable resolution of grievances about the Project activities and thus avoid resorting to the judiciary.

The grievance management mechanism includes the following main processes:

- Submission (acceptance) and registration of grievances;
- Examination of grievance by authorized and competent officers of the Project;
- Decision-making;
- Informing the applicant (feedback) of the decision taken (if the grievant is identified and his contact information is available);
- Appeal (if applicable);
- Closure.

### 6.2 Submission (acceptance) and registration of grievances

Grievances related to the Project activities can be communicated to Cryogas-Vysotsk Ltd. in any of the following ways:

- By e-mail: [info@vysotkspg.ru](mailto:info@vysotkspg.ru); [vspg.hse@vysotkspg.ru](mailto:vspg.hse@vysotkspg.ru)
- By Post to: *26B Savushkina St., St. Petersburg, Russia 197374;*
- By telephone *+7 (812) 605-08-60;*
- Through the grievance boxes;
- Directly to the Company personnel.

Any person whose interests are affected by the Project activity is free to lodge a grievance (in any format) and communicate it to the Company by any method of the listed above. The grievant may remain anonymous if he deems it appropriate (necessary).

Boxes for collection of stakeholder grievances, comments and proposals are provided in the following locations:

- At the first (outer) checkpoint of the LNG Terminal (outer wall of the checkpoint before passing the turnstile);
- At the TAC checkpoint (outer wall of the checkpoint before passing the turnstile);
- Hall of the office building of the Vysotsk City Administration;
- Post office in Vysotsk;
- On the 8th floor of the Atlantic City business center (St. Petersburg).

All incoming requests are accepted by the HSE Department (directly or through other persons who received the complaint), registered in the log and screened to identify the officers competent to deal with the issue.

If the grievant can be identified and his contact details for feedback are available, the HSE Department, within 24 hours after accepting the grievance acknowledges it (verbally or in writing) and informs about the approximate timing of its consideration. Each accepted grievance is assigned

an incoming reference number corresponding to the serial number of the entry in the Grievance Register, which is also communicated to the grievant.

The Grievance Register is maintained both on paper and electronically and contains the following records:

- Incoming reference number and date of receipt of the grievance;
- The method of receiving the grievance and identity of officer who received the grievance;
- Grievant and his contact information;
- Details of the Company's division and officer(s) to whom the grievance was assigned for examination and resolution;
- Date of the resolution;
- A summary of the resolution, method of further interaction with the grievant, including the mechanism for his notification of the resolution;
- Planned time for closing-out;
- Results of the discussion of the resolution with the grievant and the date of receipt of feedback from him;
- Actual closing-out date;
- Categorisation of the grievance, according to one of the following categories:
  - For external stakeholders:
    - Violation of the land or forestry legislation of the Russian Federation;
    - Recruitment and employment;
    - Nuisances (dust, noise, vibration);
    - Environmental issues (deterioration of natural components (water, air, soil, flora and fauna, etc.), as well as factors affecting it (emissions, discharges, waste));
    - Access to information (lack of available information, its corruption, etc.);
    - Other.
  - For internal stakeholders:
    - Living and/or working conditions;
    - Violation of employment contract;
    - Discrimination;
    - Conflicts with other workers;
    - Other.

### **6.3 Assignment for review**

After registration in the Grievance Register, HSE Department transfers each complaint received to the Company's Management in order to nominate the persons with responsibility for its consideration. Officers who will deal with the received grievance are appointed depending on the nature of grievance, by Deputy General Director - Chief Engineer and/or General Director.

If resolution of a grievance falls within the scope of a contractor, the Company should make its best efforts to resolve the issue. For this purpose, the grievance is communicated to the management of the contractor, and the Company appoints officers (administrator of the contract with the contractor and specialist of the appropriate profile in the Company, depending on the nature of grievance) in charge of monitoring the grievance examination and corrective actions taken by the contractor.

### **6.4 Review, resolution and notification of grievant**

The term for examining a grievance should not be longer than 30 calendar days from the date of its registration. The complaint received is examined by the responsible officers of the Company,

and, if necessary, by third party experts. Consultations with the grievant and/or other stakeholders may be held during the grievance examination. After a comprehensive examination, responsible officers submit the proposed resolution to the Company Management. Company Management (Deputy General Director - Chief Engineer and/or General Director) approves the resolution on the grievance.

If the grievant's identity and his contact details are known, the officer responsible for examination of the grievance notifies the grievant about the resolution. This information can be communicated verbally, in writing, electronically or on paper.

The company retains information about the grievance, resolutions and notifications made, as well as all related materials, if any (written queries, minutes of working meetings, orders and instructions on the decisions made, notifications sent to the grievant).

If the grievant is notified of the decision taken, the responsible officer conducts additional consultations to explain him the decision and determine the degree to which the grievant's needs are satisfied.

The Company's officer to whom responsibility for examination of the grievance was assigned, will also follow up implementation of the decision taken on the grievance.

Contractors should be guided by a similar procedure for dealing with stakeholder grievances received from the Company. Contractors shall immediately inform responsible officers of the Company about all the decisions made and feedback from grievants.

## **6.5 Appeal**

If the grievant is not satisfied with the resolution, he should notify the Company (using any of the above methods). The company should consider the grievant's arguments (appellation) for the disagreement and, depending on circumstances:

- Adjust the resolution;
- Hold further negotiations (consultations) in order to identify a compromise solution;
- Reject the grievant's claim and uphold the original decision.

The Company should notify the grievant (if possible) of the outcome of the appeal.

In cases where the Company fails to reach a compromise with the grievant and so close the complaint, it, at its sole discretion, may initiate establishing a special conciliatory committee, which may include the following members:

- The head or advisors of the head of urban/rural municipality, as well as other officials and civil servants (competent and empowered for participation in resolving the issue);
- Representatives of local community organizations, if possible and/or appropriate;
- Representatives of the Company, its founders and investors;
- Other stakeholders (competent and empowered for participation in resolving the issue).

If no compromise agreement is reached on the grievance, the parties may take the dispute to court. Any party is free to initiate legal action at any stage of the grievance management process. After one of the parties goes to court, resolution of the grievance falls under exclusive jurisdiction of the law of the Russian Federation and should not rely on this document.

## **6.6 Complaint closure**

Grievance is registered as closed in the Grievance Register:

- After the decision on the grievance is made (if it was submitted anonymously);
- If the grievant agreed with the decision made and all measures according to the decision have been carried out in full;
- If, despite the efforts made, the Company could not reach an agreement with the grievant.



## **6.7 Grievance monitoring**

The HSE department should keep a statistical record of grievances by preparing quarterly reports with the following information:

- Number of grievances opened in the quarter;
- Number of grievances closed in the quarter;
- Number of outstanding grievances as of the end of the quarter and comparison with past quarter;
- The total number of submitted and closed grievances (from the start of the Project operation (March 2019)).

## 7. REPORTING AND MONITORING

The HSE Department will use the following key performance indicators to monitor and assess the efficiency of the stakeholder engagement activities:

- The engagement events (various forms, such as meetings, consultations, polls, public hearings, etc.) conducted with each category of stakeholders and the number of participants;
- Number of stakeholders identified as "key stakeholders";
- Number of suggestions and recommendations received by the Company using various feedback mechanisms;
- Number of publications covering the Project in the local, regional and national mass media;
- Grievances statistics as detailed above (see section 6.7).

The performance of grievance management will be evaluated on a quarterly basis as the ratio of the number of accepted and resolved grievances. Performance assessment of other stakeholder engagement activities is carried out on an annual basis.

The HSE Department annually (Q1 of the year following the reporting year) draw up a report on the Company's performance and activities carried out in the sphere of stakeholder engagement. The report is prepared in the form of a letter from the Company to stakeholders and posted on the website of PJSC NOVATEK.

This SEP will be reviewed annually and updated as appropriate. The grounds for updating the SEP include the following: development of the Project (expansion or reduction of production), changes in social situation in the district and/or legislation of the Russian Federation, as well as other factors that may trigger a revision of the Company's approach to stakeholder engagement or the list of stakeholders.

## **8. IMPLEMENTATION AND RESOURCES**

The Company assigns responsibility for engagement with stakeholders to:

- the Management;
- the General Services Department;
- the HSE Department;
- the Administrative Support and Document Management Department;
- the HR and Payroll Department.

On an annual basis, as part of the budgeting process, the Company provides a material base for consistently functioning stakeholder engagement mechanism.

## **ANNEX 1. LIST AND CATEGORIES OF EXTERNAL STAKEHOLDERS**

No.	Stakeholder	Power	Legitimacy	Urgency	Category	Comment
<b>Federal level</b>						
<i>Authorities</i>						
1	Ministry of Civil Defence, Emergencies and Disaster Relief	C	C	C		Potential stakeholders.  Ad hoc interaction, by sending out or responding to official queries.
2	Ministry of Health	C	C	C		
3	Ministry of Transport	C	C	C		
4	Ministry of Energy	C	C	C		
5	Ministry of Construction, Housing and Utilities	C	C	C		
6	Federal Service for the Oversight of Consumer Protection and Welfare	C	C	C		
7	Federal Service for Hydrometeorology and Environmental Monitoring	C	C	C		
8	Federal Service for Supervision of Natural Resources	C	C	C		
9	Federal Agency for Water Resources	C	C	C		
10	Federal Agency for Fisheries	C	C	C		
11	Federal Service for Environmental, Technological, and Nuclear Supervision	C	C	C		
12	Federal Agency for Forestry	C	C	C		
13	Federal Agency for Maritime and River Transport	C	C	C		
14	FGUP 'Rosmorport'	B	B	C		Other stakeholder.  Relationship within the framework of the joint fulfilment of the duties to ensure safety at sea under the RF Law.
<i>Civil society organisations</i>						
15	Greenpeace Russia	C	C	C		Potential stakeholders.
16	WWF Russia	C	C	C		There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
<b>Regional level</b>						
<i>Authorities</i>						
17	Leningrad Region Committee of Construction	C	C	C		Potential stakeholders.
18	Leningrad Region Committee for Roads	C	C	C		There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
19	Leningrad Region Committee of Architecture and Urban Planning	C	C	C		
20	Leningrad Region Committee of Construction Supervision and State Expertise	C	C	C		
21	Leningrad Region Committee of Economic Development and Investment	C	C	C		
22	Leningrad Region Committee of Labour and Employment	C	C	C		
23	Leningrad Region Committee of Social Security	C	C	C		
24	Leningrad Region Committee of Agriculture and Fishery Sector	C	C	C		
25	Leningrad Region Directorate of State Technical Supervision and Control	C	C	C		
26	Leningrad Region Committee of Fuel and Energy Sector	C	C	C		
27	Leningrad Region Committee of Environmental Supervision	B	B	C		Other stakeholders.

No.	Stakeholder	Power	Legitimacy	Urgency	Category	Comment
28	Leningrad Region Directorate of Organization of and Control over Waste Management Activities	B	B	C		Interaction within the scope set by the law of the Russian Federation.
29	Leningrad Region Main Directorate of Civil Defence, Emergencies and Disaster Relief	B	B	C		
30	Leningrad Region Branch of the Federal Service for the Oversight of Consumer Protection and Welfare	B	B	C		
31	North-Western Branch of the Federal Agency for Fisheries (Leningrad Region and Saint-Petersburg Department)	B	B	C		
32	North-Western branch of the Federal Service for Environmental, Technological, and Nuclear Supervision	B	B	C		
33	North-Western department of the Federal Agency for Forestry	B	B	C		
34	North-West Interregional Directorate of Rospirodnadzor	B	B	C		
35	Baltic-Arctic Interregional Directorate of Rospirodnadzor	B	B	C		
36	Neva-Ladoga Catchment Management Authority	B	B	C		
37	Rospotrebnadzor Department for Leningrad Region	B	B	C		
38	Leningrad Region Center for Hygiene and Epidemiology	B	B	C		
39	State Labour Inspectorate for Leningrad Region	B	B	C		
Academic and Research Organizations						
40	Saint-Petersburg State University	C	C	C		Potential stakeholders.  There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback, or in relation to one-time joint events.
41	Peter the Great St. Petersburg Polytechnic University	C	C	C		
42	National Research University of Information Technologies, Mechanics and Optics (ITMO)	C	C	C		
43	National Mineral Resources University (and its branch in Vyborg)	C	C	C		
44	Saint Petersburg State University of Engineering and Economics	C	C	C		
45	Saint-Petersburg State University of Architecture and Civil Engineering	C	C	C		
46	Saint Petersburg State Institute of Technology	C	C	C		
Civil society organisations						
48	Zelyony Krest (Green Cross) NGO	C	C	C		Potential stakeholders.
49	Ekologichesky soyus (Ecological union) NGO	C	C	C		There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
50	Zelyony front (Green front) NGO	C	C	C		
District level						
Government authorities and institutions						
51	Administration of Vyborg District, including	B	B	C		Other stakeholder.  Interaction within the scope set by the law of the Russian Federation.
52	Administration of Vyborg	C	C	C		Potential stakeholder.  There is no ongoing engagement. Engagement is possible through outgoing

No.	Stakeholder	Power	Legitimacy	Urgency	Category	Comment
						queries and provision of feedback
53	Administration of the Vysotsk Urban Municipality	A	B	B		Key stakeholder. Ongoing engagement on social matters.
54	Administration of the Vysotsk Urban Municipality	C	C	C		Potential stakeholders. There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
55	Administration of the Goncharovo Rural Municipality	C	C	C		
56	Roshchino Forestry Department	B	A	C		Other stakeholder. Interaction within the scope set by the law of the Russian Federation.
57	FKU Sevzapupravtdor	C	C	C		Potential stakeholders.
58	Vysotsk City Library	C	C	C		
59	Vyborg City Out-Patient Clinic	C	C	C		There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
60	Vyborg City Hospital	B	B	C		Other stakeholders.
61	Vyborg Emergency Medical Care Station	B	B	C		Interaction through a contractor.
<b>Communities</b>						
62	Residents of Vysotsk and Pikhtovoe (in general)	B	B	B		Key stakeholder. Ongoing engagement on social matters.
63	Residents of Vyborg (in general)	C	C	C		Potential stakeholders.
64	Residents of Sovetsky (in general)	C	C	C		
65	Residents of Goncharovo (in general)	C	C	C		There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
66	Residents of Medyanka (in general)	C	C	C		
67	Residents of Cherkasovo (in general)	C	C	C		
68	Residents of Perovo (in general)	C	C	C		
69	Residents of Sokolinskoye (in general) (part of the Sovetsky Urban Municipality)	C	C	C		
70	Disabled residents of the abovementioned settlements	C	C	C		
<b>Local non-permanent communities</b>						
71	SNT Vysotskoye	C	C	C		Potential stakeholders.
72	SNT Solnechnoye	C	C	C		
73	SNT Sputnik 2	C	C	C		There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
74	SNT Berezovaya Dolina	C	C	C		
75	SNT Rechnoye	C	C	C		
76	SNT Lesnoye	C	C	C		
77	SNT Belye Nochi	C	C	C		
78	SNT Sosnovy Mys	C	C	C		
79	SNT Lada	C	C	C		
80	SNT Perovskoye	C	C	C		
<b>Local land users</b>						
81	Hunters communities	C	C	C		Potential stakeholders.
82	Fishers communities	C	C	C		
83	Gatherers communities	C	C	C		There is no ongoing engagement. Engagement is possible through outgoing
84	Yachtsmen	C	C	C		

No.	Stakeholder	Power	Legitimacy	Urgency	Category	Comment
						queries and provision of feedback
<i>Businesses</i>						
85	Residential and recreational complex Pikhtovoye	C	B	C		Other stakeholder.  The business is considered by the Company as a contractor under one-time (short-term) contracts.
86	OOO Port Vysotsky (port)	C	C	C		Potential stakeholders.  There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback
87	OAo RPK Vysotsk Lukoil II (oil transshipment terminal)	C	C	C		
88	OOO Vyborskaya Lesopromyshlennaya Korporatsiya (pulp and paper)	C	C	C		
89	OOO Primorsky Rybaki (fishing)	C	C	C		
90	Other SMEs (Quarries, Farms and other facilities)	C	C	C		
91	SPK Kirovsky transportnik	C	C	C		
92	SPK Matrosovo	C	C	C		
93	JSC Russian Railway	C	C	C		
94	Project contractors and suppliers	A	A	A		Key stakeholder.  Continuous engagement under the contracts.
<i>Civil society organisations</i>						
95	Local community organization of disabled persons 'Favorit Plus'	C	C	C		Potential stakeholder.  There is no ongoing engagement. Engagement is possible through outgoing queries and provision of feedback