

NeuConnect

GRIEVANCE MECHANISM FOR EXTERNAL STAKEHOLDERS

Revision Tracking

| Revision No. | Revision Date | Author | Approver | Revision Notes |
|--------------|---------------|-----------|------------|-------------------|
| Po1 | 16/12/2021 | W. Farmer | C. Vanhove | Original Document |
| | | | | |

1. Introduction

The purpose of this document is to define the procedure for managing stakeholder concerns and complaints (referred to as “grievances”) in a planned, timely, and respectful manner.

NeuConnect is committed to meeting its responsibilities to community and other stakeholders in the areas in which it operates. NeuConnect endeavours to conduct all activities in operations in a way that causes the least amount of disturbance to community and wider environment.

In line with the Equator Principles, NeuConnect has established and maintains a Grievance Mechanism open to all stakeholders, including affected communities. The purpose of the NeuConnect External Grievance Mechanism is to:

- Provide accessible avenues for all external stakeholders to contact NeuConnect
- Provide a mechanism for stakeholder concerns to be addressed effectively, in a timely manner and by the most appropriate department
- Identify and monitor stakeholder concerns to support effective stakeholder and risk management

This Grievance mechanism will be maintained throughout the Project’s lifecycle.

2. The Project

NeuConnect Interconnector will create the first direct power link between Germany and Great Britain, connecting two of Europe’s largest energy markets for the first time.

A pair of subsea cables will form an ‘invisible highway’ of around 720km, allowing up to 1.4GW of electricity to move in either direction, enough to power tens of millions of homes over the life of the project.

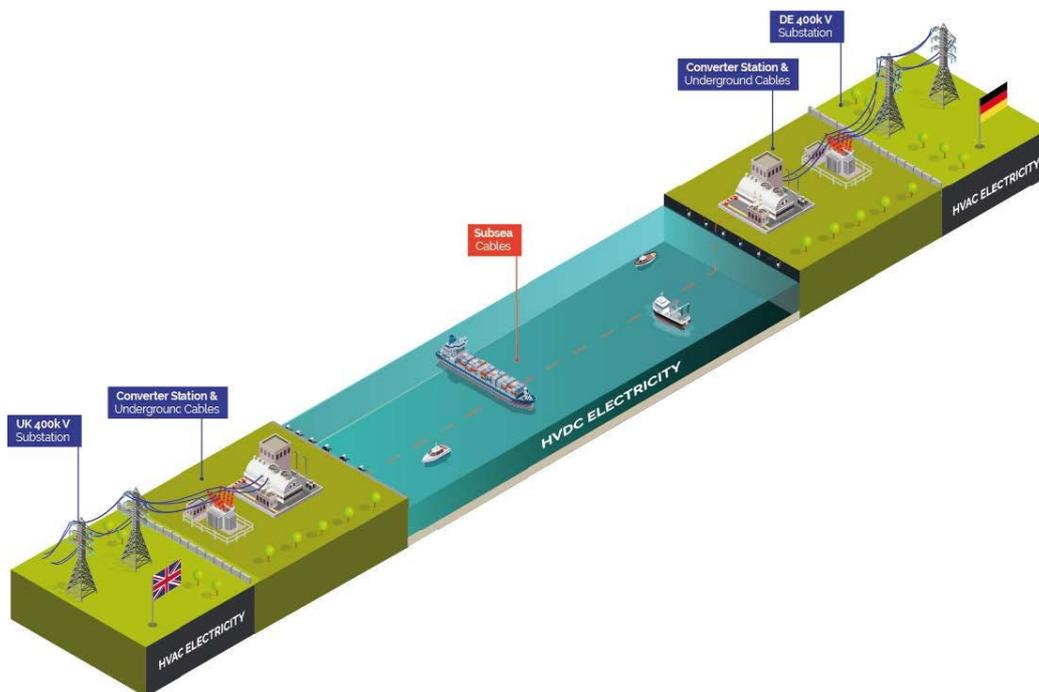


Figure 1: Key elements of the NeuConnect Interconnector

3. Definition

“A grievance is a concern or complaint raised by an individual or groups affected by a company's operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations, and may be filed in the same manner and handled with the same procedure.”¹

Key principles of the grievance mechanism are:

- Any person, group or organisation can submit a grievance at any time, without fear of retribution and at no financial cost.
- All grievances will be taken seriously and will be treated in a fair and respectful manner.
- The process by which grievances will be received, investigated and resolved will be consistent and transparent. Representatives of contractors may be involved in the investigation where applicable, and other third parties.
- Information relating to grievance investigations and eventual decision will be documented.
- Personal information about the affected stakeholders will be treated as confidential (in accordance with the requirements of the current legislation).
- NeuConnect will scrupulously respect all applicable laws.
- The mechanism will not impede stakeholder access to judicial or administrative remedies.

4. Contact details for submitting grievance

Grievances may be submitted, via post or email, to the following:

Ms Wendy Farmer
Executive Assistant
NeuConnect Britain Limited
105 Piccadilly
London W1J 7NJ
United Kingdom

Tel: +44 (0)20 3887 0122
E-mail: w.farmer@neuconnect.eu

A Grievance Form is available on NeuConnect's website - <https://neuconnect-interconnector.com/>.

5. Grievance Mechanism

The Grievance mechanism is described below. This mechanism is expected to be adjusted when the company enters into the construction phase.

Step 1 - Receipt of Grievance

¹ [IFC - International Finance Corporation](#) Addressing Grievances from Project-Affected Communities - Guidance for Projects and Companies on Designing Grievance Mechanisms

Grievances can be submitted via any stakeholder engagement and communication channel functional at the time of submission (including direct to the Company via e-mail address, telephone, and the mailing address).

Step 2 - Screening and Registration of Grievance

Grievances will be screened depending on the level of severity in order to determine the grievance owner and how the grievance is approached. See below table categorising the different levels:

| Category | Description | Grievance Owner |
|----------|------------------------------------------------------------------------------------------------------------------------|------------------------------|
| Level 1 | When an answer can be provided immediately and/or NeuConnect is already working on a resolution or one-off grievances. | Project Management Assistant |
| Level 2 | Repeated, extensive and high-profile grievances. | CEO |

The grievance owner may delegate responsibilities to other staff, but is ultimately responsible for:

- Defining and implementing resolution actions
- Investigating the grievance
- Consulting relevant departments or persons within the organisation
- Making sure resolution actions are completed
- Tracking progress of individual grievances
- Aggregating and forwarding feedback to Complainants
- Documenting resolution actions
- Gaining necessary approvals from, and reporting to, management

All grievances will be logged in the Grievance Register (Appendix 2) within 2 days of receiving the grievance.

Step 3 - Confirmation of Receipt

The Company will respond to the complainant to confirm receipt of the grievance within 5 working days from receipt. The grievance acknowledgement should include a summary of the grievance, the method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required the stakeholder(s) may be asked for any additional information or to clarify any issues.

While no response is necessary for anonymous grievances, these will be logged and reported with other grievances to facilitate continuous improvement.

Step 4 - Investigation

The grievance owner is responsible for investigating the grievance. Records of meetings, discussions and activities need to be recorded during the investigation. Information gathered during the investigation will be analysed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

The Company will strive to complete the process of investigating the incoming grievances and identifying a resolution within 30 calendar days, and in more complex cases – within 45 calendar days of the receipt of a grievance.

Step 5 - Resolution

A proposed resolution will be based on the results of the investigation and will then be formally communicated to the complainant. If the proposed resolution is not accepted, further investigation will be carried out.

Step 6 - Monitoring and Evaluation

After the accepted resolution has been implemented, it will be monitored, and its effectiveness will be evaluated for a period of time agreed between the complainant and the Company.

Contractors may implement their own Grievance Mechanisms, but they must be consistent with the Company's Grievance Mechanism. In this regard, NeuConnect will share this grievance policy with them. If contractors use their Grievance Mechanisms, then contractors will report on the performance of the Grievance Mechanisms on a regular basis to the Company.

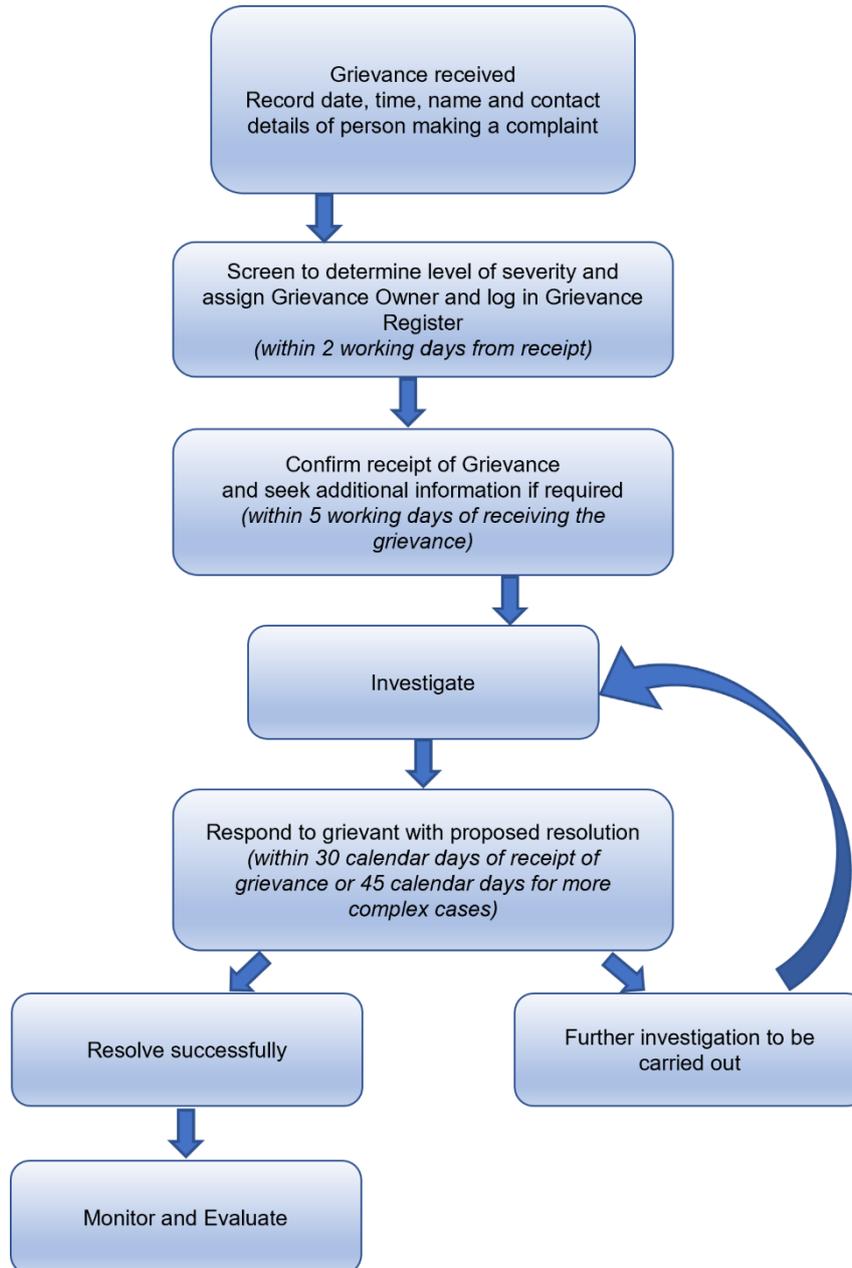
Figure 2 : Grievance Mechanism Flowchart

6. Data Protection

Any personal information provided by the Grievant will be held in strict confidence in accordance with General Data Protection Regulation 2016/679.

7. Implementation

Responsibility for the implementation of the Grievance Mechanism at the current project stage rests with the CEO.



Grievance Form

NeuConnect would like to know your concerns related to our work and that of our contractors. You can submit your concern anonymously. However, the more information provided, including contact details, the easier we will be able to follow-up.

| | | | |
|-------------------------------------------------------------------------|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Date : | | Time : | |
| Name : | | <input type="checkbox"/> You can use my name but do not use it in public <input type="checkbox"/> You can use my name when talking about this matter in public <input type="checkbox"/> I do not want to give my name | |
| Company : (if applicable) | | | |
| Preferred Contact Method : Please provide contact details | <input type="checkbox"/> Telephone | | |
| | <input type="checkbox"/> Email | | |
| | <input type="checkbox"/> Mail | | |
| Supporting Documents Attached? | <input type="checkbox"/> Yes <input type="checkbox"/> No | | |
| Please provide details of your grievance | | | |

| | |
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| | |
| <p>Please submit this form to the following address/email:</p> <p>Ms Wendy Farmer Executive Assistant NeuConnect Britain Limited 105 Piccadilly London W1J 7NJ United Kingdom</p> <p>Tel: +44 (0)20 3887 0122 E-mail: w.farmer@neuconnect.eu</p> | |

| For Office Use Only | |
|---------------------|-----------------------------|
| Grievance number: | Acknowledgement sent (date) |
| Assigned to: | |
| Action taken: | |
| Resolved: | Yes / No |

