

### **GRIEVANCE MECHANISM**

The grievance mechanism allows community members to be continuously involved in the project. It improves relationships and reduces social risks because it allows problems to be resolved at a very early stage. It thus prevents problems and conflicts.

The purpose of the procedure is to find solutions to issues that arise during project implementation. Responsible project management allows building a relationship with the environment that is based on trust. A grievance can be a complaint, concern, question, suggestion or other comment about the project or its implementation or impact.

During the construction period, the grievance mechanism can be managed by OW Polska Sp. z o.o., by the contractor, or by a dedicated entity specializing in public communications.

#### In summary:

- Any person or organization can send comments or complaints at any time and without cost in one of the following ways: in person, by phone, by post, by email using the contact information provided on the project website or by a grievance form available on the project website (understood as a subpage on the website <a href="https://www.bc-wind.pl">https://www.bc-wind.pl</a> and / or a subpage on the website of the municipality Choczewo https://www.choczewo.com.pl /). A proposal for a model of the complaint form is included in Annex 4.
- Entity dealing with the complaints will keep a log of all the grievances received. Proposition of the template for the Grievance Log is provided in Annex 5.
- The Grievance Log will be used to track the resolution of all grievances raised and to prepare management reports.
- All grievances will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the grievant.
- Individuals who submit a grievance have the right to request that their name be kept confidential.
- At all times, stakeholders have a right to complain to the relevant authorities or seek legal remedies in accordance with the laws and regulations of Poland.

The company will proceed with any complain and grievance in the timely and transparent manner. The Grievance Mechanism Procedure for the Project will be structured as follow:

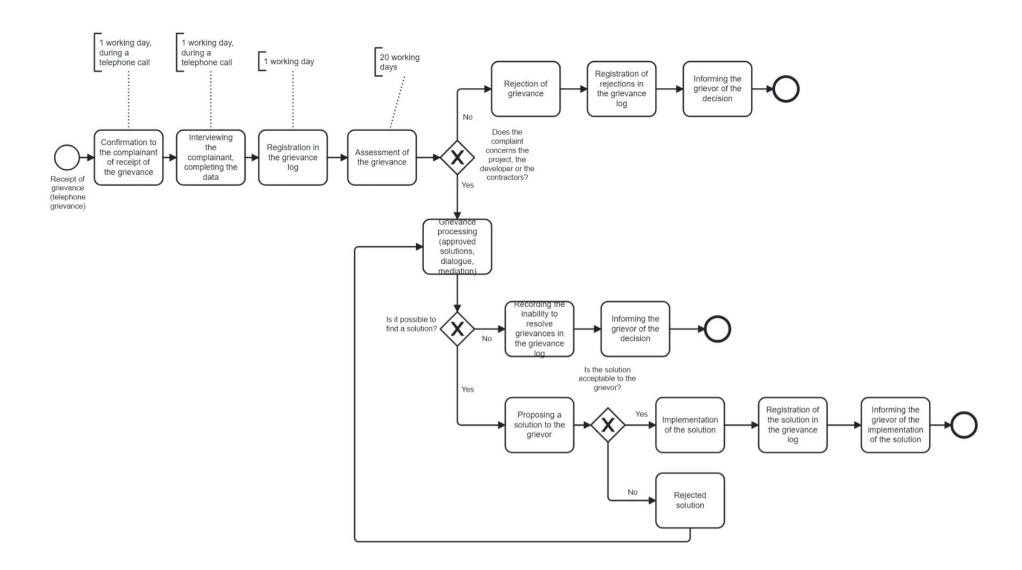
- Procedures have been developed for dealing with complaints submitted in writing, by telephone and by e-mail.
- The grievance is recorded in the Grievance Log, and receipt of the grievance is formally acknowledged to the person filing the grievance. If any clarification is required, the complainant is contacted for additional information.
- The grievance is assessed and a person responsible for resolving it is appointed. The process of dealing with the grievance begins. If immediate action is possible, the complainant is informed and corrective action is implemented. In other cases, other tools (dialogue, mediation) are used to find a solution.



- If the person making the grievance is not satisfied with the initial response to their grievance, the grievance handler will work with the complainant to find a mutually agreed solution.
- In the case of significant grievances, the case will be investigated in depth (with the involvement of the grievant if necessary) in order to find an appropriate solution to the problem.
- The case will be assessed and closed. A formal response to reported grievances should be provided within 20 working days of the complaint being registered (or 30 days in the case of serious non-compliance).
- If a grievance is rejected (in whole or in part) or cannot be resolved, the complainant is informed accordingly (by email, telephone or in writing).

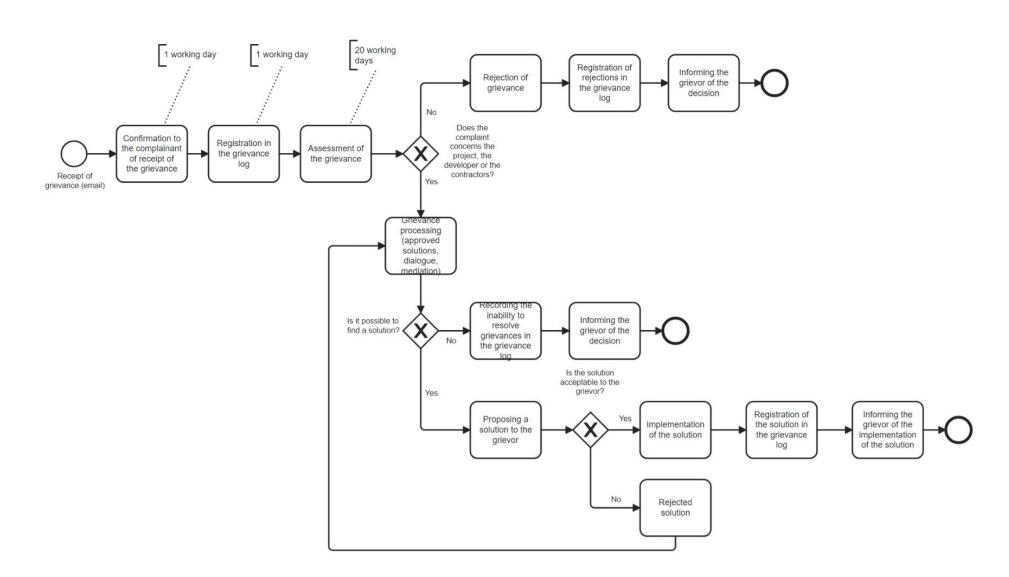


## Annex 1 - Grievance Procedure Flowchart - telephone grievances



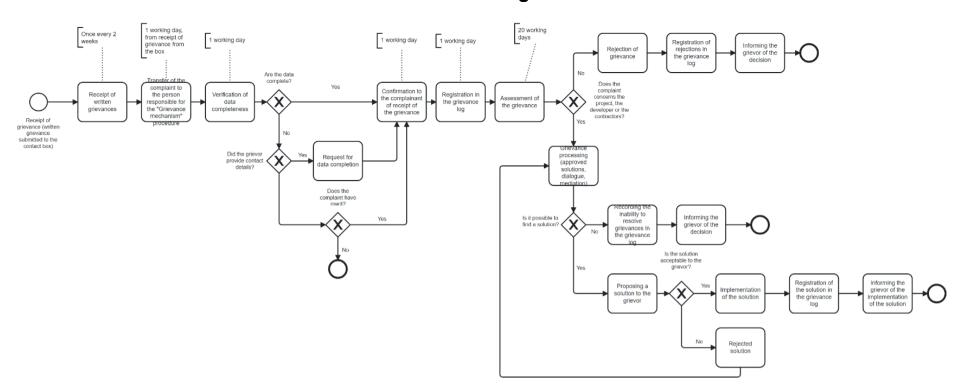


## Annex 2 - Grievance Procedure Flowchart - grievances sent by e-mail





## Annex 3 - Grievance Procedure Flowchart - written grievances submitted via the contact box.





## Annex 4 - Grievance form

		2.6							
Date		Reference number							
Name:									
$\square\square$ I wish to raise my grievance anor	nymously								
□□Please do not disclose my identity without my permission.									
Contact information	□□Ву								
Indicate how you would like to be	-								
contacted and provide your contact	□□Phone contact:								
information.	□□E-mail:								
Description of incident or grievance									
What happened? Where did it happen? Who was involved? What are the consequences?									
Date of incident:									
Occurrence of the subject of com-	□□One-time incide	ent							
plain/grievance		ore than once. How many tim	ies?						
	□□On-going probl	em							
How would you like to see this issue resolved?									
•									



☐ I consent to the processing of my personal data by OW Polska Sp. z o.o. for the purposes of the complaints process							
Grievance closed out (to be filled in by the receiving party)							
Steps taken to resolve the grievance and outcome of the process:							
Person Responsible:							
Date closed:							
Signature							

The Data Controller is OW POLSKA sp. z o.o., ul. Przyokopowa 33, 01-208 Warsaw. You can contact the Controller in person at their registered office or by email at rodo@oceanwinds.com.

The Controller will process your personal data (if provided) for the purpose of reviewing and handling complaints based on consent (Article 6(1)(a) of the GDPR) and, if applicable, for the purpose of establishing or pursuing claims or defending against claims, which constitutes a legitimate interest of the controller (Article 6(1)(f) of the GDPR). Providing your information is voluntary and not necessary to review the complaint, except for contact details, which are required to send a response. Failure to provide contact details will prevent us from sending you a response to your complaint or appeal.



#### **Data Recipients**

The Controller may share personal data with:

- Public authorities, institutions, and relevant entities of public and local government administration, in the scope and for the purposes required by applicable law.
- Companies providing services to the Controller, particularly in the fields of data protection, IT services, email services, insurance, and legal support.
- Contractors or entities specializing in public communication, if involved in the complaint resolution process.

#### **Data Retention Period**

Your personal data will be retained for the period necessary to process and handle the complaint, and thereafter for the period required by applicable legal provisions, for no longer than 3 years.

#### **Rights Related to Data Processing**

- If the legal basis is Article 6(1)(a) of the GDPR: the right to access data, the right to rectification, the right to erasure (the right to be forgotten), the right to restriction of processing, the right to data portability.
- If the legal basis is Article 6(1)(f) of the GDPR: the right to access data, the right to rectification, the right to erasure (the right to be forgotten), the right to restriction of processing, the right to object to processing.

#### **Right to Withdraw Consent**

If the processing is based on your consent (Article 6(1)(a) of the GDPR), we will process your data until consent is withdrawn. You can withdraw your consent at any time by sending an email to the address provided above or in person at the Controller's office. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

After the withdrawal of consent, the data will be processed to protect against claims (Article 6(1)(f) of the GDPR) for a period in accordance with applicable legal provisions, for a maximum of 3 years.

#### Right to Lodge a Complaint with a Supervisory Authority

If you believe there has been a violation by the Controller regarding the security of personal data processing, you have the right to lodge a complaint with the supervisory authority responsible for data protection, namely the President of the Personal Data Protection Office. The current address of the supervisory authority is: President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw.

Your data will not be processed in an automated manner, including profiling.



# Annex 5 - Grievance log template

Grievance			Person responsible		Problem				
Date re- ceived	Grievant name	Grievant contact info	Name	Contact	Type of problem (comment, question, grievance, incident)	Description of the problem	Action to be taken	Result of intervention	Closing date
			_	_					