

STAKEHOLDER ENGAGEMENT PLAN

Niva Group

January 2020

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1. INTRODUCTION

1.1. BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) for Niva Group describing public relations and communication plans, regarding their operations and major investment programs planned in the future.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that Niva Group will adopt and those which will be used for major investment programs.

The SEP will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date. The SEP will also be reviewed periodically during project implementation and updated as necessary.

The specific objectives of the SEP are detailed below.

1.2. OBJECTIVES OF THE PLAN

The methods, procedures, policies and actions undertaken by Niva Group to inform stakeholders, in a timely manner, of the potential impacts of projects are the key subjects of this document.

A level of stakeholder engagement has already taken place as part of the requirements of the OVNS (Environmental Impact Assessment) of projects for the refurbishment and development of sites. Other stakeholder engagement in the past has involved communications on regulatory matters and internal engagement with employees.

Key stakeholders have been identified in this document. If any stakeholders have not been identified, they should contact Niva Group and ask to be included in future information and communications. Furthermore, this document describes the way that any concerns or grievances will be handled by the Company.

This document also provides a time schedule for consultations, which may be subject to revisions during project initiation, design and implementation. The resources available to implement the SEP are also described in this document.

1.3. SCOPE OF THE PLAN

This document covers the following:

- Chapter 2 - Project descriptions, location of the site and key environmental and social issues;
- Chapter 3 - Public consultations and information disclosure requirements;
- Chapter 4 - Identification of stakeholders and other affected parties;
- Chapter 5 - Overview of previous Niva Group stakeholder engagement activities;
- Chapter 6 - Stakeholder engagement program and methods of engagement and resources;
- Chapter 7 - Grievance mechanism.

2. PROJECT DESCRIPTION

2.1. OVERVIEW OF NIVA GROUP

Company Activities and Location of Sites

The Niva group started its operation in 1998 when Mr O. Mostipan, established Niva Pereyaslavshchyny LLC, a small scale crop production company with 500 ha of land. During 1998-2005 the company focused on its organic growth, gradually increasing its land bank. In 2005, Niva diversified into pig-breeding activities and by 2008 the Niva group developed its in-house slaughtering and meat processing facilities followed by development of its retail chain.

The Group currently consists of seven companies each of them operating separate business lines. JV LLC "Niva Pereyaslavshchyny" is in charge of the Group's principal operations in crop production and pig breeding, grain elevators, feed mill, slaughter and meat-processing workhouses and retail network of the Group's stores "Pyatachok". It leases and manages the Group's land bank either directly or via subsidiaries. Niva Farm LLC, Ital IK LLC, Agrofirma Yagotyn LLC, "Yagotynske" LLC, Farming "Shchedra Niva Yagotylna" subsidiaries of the Group "Niva Pereyaslavshchyny" lease and operate part of the Group's land bank, own production assets for the crop-production. Harvested crops are then transferred to EKHP for further handling and processing. PrJSC "Pereyaslavskiy EKHP" owns and operates the grain elevators. Also JV LLC "Niva Pereyaslavshchyny" has concrete plant, waste water treatment facility (all co-located) and a boiler plant operating on straw.

The Niva Group operates under four main segments:

- **Crop production:** Niva holds long term leases on a land bank in close proximity to Kyiv region, and growing a number of crops to a) satisfy the Group's needs for fodder and b) sell as grain. The Group has its own machinery park, silos (143,000 t grain capacity), grain collecting stations and feed mills (180,000 t annual capacity);
- **Pig farms:** Currently, the Group operates 11 pig farms constructed and operated using modern Danish farming technologies in Kyiv region and is collecting permitting documentation for the construction of the pig farm #12;
- **Slaughtering/processing:** In 2008, the Company launched its own primary (cutting, de-boning, packaging, etc) and secondary (sausage, cold baked pork, pig ribbings, bacon, cheek trimmings, etc) meat processing facilities. Processing facilities include storage chambers, slaughter house (40 heads per hour), deboning/cutting workshop and primary (sorted/pre-cut fresh meat) and secondary meat processing units (0.6 t per hour capacity);
- **Retail/distribution:** In 2012 the Company launched its small-scale format retail network under the Group's umbrella brand "Pyatachok" with the aim to diversify Group's distribution channels and increase the visibility of the Group's produced products. This retail network currently consists of 31 fixed stores and 1 mobile shop (van) which sells the Group's products.

Table 1: Information of Niva Group Operations in Ukraine

District, where the Group leases the land	Buildings
Pereyaslav District	Administrative office (one building) Grain elevators and dryers Feed mill Slaughterhouse and meat-processing workhouse Concrete plant Waste water treatment facility Boiler plant operating on straw Pig breeding farms #1, #8 Biomass boiler houses that consume straw (2 units)
Zgurivka District	Pig breeding farms #2, #3, #4, #6 Biomass boiler houses that consume straw (4 units)
Baryshivka District	Pig breeding farms #5, #7, #10, #11 Biomass boiler houses that consume straw (4 units)
Yagotyn District	Pig breeding farm #9 Biomass boiler house that consume straw (1 unit)

Production Activities

A summary of the key company details and production activities are summarised in the Table 2 below.

Table 2: Niva Group Operations

Number of Sites	<p>The Company operates a meat processing facility, feed mill, grain drier and silos, construction and agricultural department, wastewater treatment plant and nine pig farms with one further to be constructed in an area to the east of Kyiv.</p> <p>Company and subsidiaries</p> <ul style="list-style-type: none"> ■ JV LLC “Niva Pereyaslavshchyny” ■ Niva Farm LLC ■ Ital IK LLC ■ PrJSC “Pereyaslavskiy EKHP” ■ Yagotynske LLC ■ Agrofirma Yagotyn LLC ■ Farming “Shchedra Niva Yagotyna”
Ownership	TOMI International Trading Ltd (98.68%) and Mostipan O.O (1.32%)
Employees	Total employees of 1 640 (2019 figures)

<p>Main Products</p>	<p>Product Groups</p> <p>Live pigs for external sales amounting to 32 037 tonnes in 2019.</p> <p>In addition to the live pigs supplied to the market for slaughter Niva supplies 6 585 tonnes of pigs to its own meat processing facility for the supply of meat and pork products. The following products are supplied by Niva Group to the Ukrainian market:</p> <ul style="list-style-type: none"> ■ Pig by-products and semi-finished products along with pork brisket; ■ Paste and liver products; ■ Boiled sausages and cold baked pork; ■ Boiled and smoked produce including pig ribbings, cheek trimmings and bacon; ■ Cooked and smoked produce; and ■ Sausages (uncooked).
<p>Current Production Operations</p>	<p>The current pig production for the facilities visited are:</p> <ul style="list-style-type: none"> ■ Farm 1- places for 6,500 weaner and 15,500 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 2- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 3- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 4- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 5- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 6- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 7- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 8- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 9- places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 10 - places for 1,400 sows, 6,500 weaner places and 11,000 finishers along with a biomass boiler as well as slurry lagoons. ■ Farm 11 - places for 2,300 sows, 10,800 weaner places and 18,000 finishers along with a biomass boiler as well as slurry lagoons. <p>The main office site also includes a meat processing facility capable of processing 110,000 pigs per annum, feed mill with the capacity to produce 180,000 tonnes per annum of feed, a concrete batching plant capable of producing 2 520 m³ per month, wastewater treatment plant and construction, agriculture and transport department (including a locomotive).</p>

Future Production Operations	<p>The expansion programme will include the construction of:</p> <ul style="list-style-type: none"> ■ New Pig Farm #12 with 1,400 sows, 6,500 weaners from 7-25 kg and 11,000 finisher space capacity from 25-110 kg. ■ New rendering plant;
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2.2. INVESTMENT PLAN SUMMARY

Niva is currently embarking on a significant expansion and construction programme to increase pig production and ancillary infrastructure. The loans from EBRD and IFC will be used by the Company as part of a development program and will include:

- New Pig Farm #12 with 1,400 sows 6,500 weaners from 7-25kg and 11,000 finisher space capacity from 25-110 kg;
- New rendering plant;

3. PUBLIC CONSULTATION AND INFORMATION DISCLOSURE REQUIREMENTS

3.1. NIVA GROUP STRUCTURE AND MANAGEMENT

EHS matters are centrally managed within the group from the main office complex.

The General Director of Niva Group, Vitalij Sakelis, has overall responsibility for stakeholder communications.

Contact information for submitting appeals:

Occupational Health and Safety Manager: Eugenia Miroshnichenko; 08420, Ukraine, Kiev region, Pereyaslav-Khmelnytsky district, Pereyaslavsk village, 2 Pryvokzalna Str.; E-mail: e.miroshnichenko@niva-sa.com.ua

Environmental Issues: Tetiana Smashna; 08420, Ukraine, Kiev region, Pereyaslav-Khmelnytsky district, Pereyaslavsk village, 2 Pryvokzalna Str.; E-mail: t.smashna@niva-sa.com.ua

Land-related Issues: Oleksandr Butovich; 08420, Ukraine, Kiev region, Pereyaslav-Khmelnytsky district, Pereyaslavsk village, 2 Pryvokzalna Str.; E-mail: a.butovich@niva-sa.com.ua

HR Issues: Eugenia Kovalenko; 08420, Ukraine, Kiev region, Pereyaslav-Khmelnytsky district, Pereyaslavsk village, 2 Pryvokzalna Str.; E-mail: e.kovalenko@niva-sa.com.ua

Community Relations Manager: Galyna Tretyak; 08420, Ukraine, Kiev region, Pereyaslav-Khmelnytsky district, Pereyaslavsk village, 2 Pryvokzalna Str.; E-mail: g.tretyak@niva-sa.com.ua

The person responsible for recording and registration of applications/complaints: Maria Sydorenko; 08420, Ukraine, Kiev region, Pereyaslav-Khmelnytsky district, Pereyaslavsk village, 2 Pryvokzalna Str.; tel/fax +380503382327; E-mail: info@niva-sa.com.ua

3.2. CONSULTATION AND DISCLOSURE

Public consultations and information disclosure undertaken by Niva Group will comply with the requirements of the legislation of Ukraine and best international practice, as described in the requirements of the European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC).

National Legislation Requirements

An OVNS (EIA) is under development for Farm #12 and will be subject to public consultation.

Niva Group will comply with national regulations on the public consultation for major new developments.

European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC) Requirements

In accordance with the EBRD and IFC requirements for multi-site operations in receipt of general corporate finance, working capital or equity financing, Niva Group will adopt and implement a corporate stakeholder information and communication programme including a grievance mechanism (provided later in this document). The stakeholder engagement programme will be commensurate to the nature of the company's business and its associated environmental and social impacts, and the level of public interest. The programme will be rolled out to facilities in a timely manner. It will include procedures and resources to ensure that adequate stakeholder engagement is conducted at the facility level, and that stakeholders in close proximity to the facility receive

information on the relevant facility's environmental and social performance. On an annual basis, Niva Group will produce a public report on their social and environmental performance, including a non-technical summary of the Environmental and Social Action Plan (ESAP) and progress made with the implementation of the ESAP, against agreed indicators and targets.

Best International Practice

The key principles of effective engagement for projects are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

These principles will be reviewed and accordingly adopted by Niva Group, dependent of the nature and size of future projects undertaken.

General Stakeholder Communication Records Maintenance

Communication records will be maintained by Niva Group clearly logging the key information provided to stakeholders and also the key incoming communications (i.e. general questions, complaints etc.) to Niva Group, along with a summary of actions taken.

As part of this communications procedure, Niva Group will record and update these ongoing stakeholder engagement activities on an ongoing basis.

4. STAKEHOLDER IDENTIFICATION

4.1. IDENTIFICATION OF MAIN STAKEHOLDERS

Overview

This section of the document identifies interested parties i.e. stakeholders and others affected at a local, district and regional level.

Stakeholders could also be individuals and organisations that may be directly or indirectly affected by the project either in a positive or negative way, who wish to express their views.

In order to identify key stakeholders, the following definitions have been applied:

- **Stakeholders:** any person, group or organisation with a vested interest in the outcome of a body of work; and
- **Key stakeholders:** any stakeholders with significant influence on or significantly impacted by, the work and where these interests and influences must be recognised if the work is to be successful.

There are partnerships and formal advisory arrangements and also less formal but important relationships with groups or individuals with a particular interest in the work Niva Group undertakes.

Stakeholders can be grouped into the following categories:

- International.
- Government (Ukrainian state / regional and local).
- Advisory non-government.
- Services / suppliers.
- Clients.
- Institutions (universities, think tanks, etc.).
- The food and drink, farming, agribusiness industry.
- Internal stakeholders (Employees).
- General communities.
- Public groups - nearby hospital, local schools.
- The media.
- NGOs/activists.

All the key stakeholders identified are presented in Table 3 below.

If you are not on the list and would like to be kept informed about the company and projects, please contact:

Vitalij Sakelis

Niva Group
2 Pryvokzalna str,
v. Pereyaslavske,
district of Pereyaslav-Khmelnytskyi,
region of Kiev,
Ukraine
tel/fax +380503382327;
E-mail: info@niva-sa.com.ua

Table 3: Key Stakeholders and Other Key Affected Parties

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
<i>International</i>	<p>■ EBRD – London HQ <i>One Exchange Square, London EC2A 2JN, United Kingdom, Switchboard: +44 20 7338 6000</i></p> <p>■ EBRD – Ukraine Office <i>46 Antonovycha street, 03150 Kiev, Ukraine Tel: + 380 44 277 11 00</i></p> <p>■ IFC – Washington <i>2121 Pennsylvania Avenue, NW, Washington, DC 20433 USA, Switchboard: (202) 473-1000</i></p> <p>■ IFC – Ukraine Office <i>1 Dniprovskiy uzviz street, 04070 Kiev, Ukraine Tel: + 380 44 490 64 00</i></p>	<p><i>Equator Principles</i></p> <p><i>EHSS best practice</i></p> <p><i>EUIPPC Best Available Techniques (BAT)</i></p> <p><i>Environment and Social Action Plan (ESAP)</i></p>
<i>Government (Ukrainian, state/territory and local)</i>	<p>■ Zgurvka District Administration</p> <p>■ Pereyaslav District Administration</p> <p>■ Baryshivka District Administration</p> <p>■ Yagotyn District Administration</p> <p>■ Brovary District Administration</p> <p>■ Pereyaslav Tax Administration</p>	<p><i>National environmental policy</i></p> <p><i>Regulator and legislator bodies at local, regional levels and national level covering:</i></p> <p><i>Planning consents, EIA</i></p> <p><i>Permits</i></p> <p><i>Permit reporting - covering Waste, Water and ambient air etc,</i></p> <p><i>Compliance audits</i></p>
<i>Operational suppliers, clients and client representation</i>	<p>■ Local, national and international suppliers and retailers including supermarket chains and utility suppliers including:</p>	<p><i>Key clients</i></p> <p><i>Any others such as utility suppliers,</i></p>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
	<ul style="list-style-type: none"> - Skiold (equipment) - Skov (equipment) - Breeders (boars) - Eridon (seeds, pesticides, fertilizers) - Svit Agro (raw materials for feed) - Lubnymash (equipment for grain elevators and dryers) <p>■ Top 5 purchasers of Niva products:</p> <ul style="list-style-type: none"> - ADM Int SARL (corn, rape) - Globinsky Met Plant (pigs) - Rial Meat Plant (pigs) - Ukrainian meat products LLC (pigs) - Silpo Food (meat) 	<i>distributors etc</i>
<i>Internal stakeholders (Employees, labour unions)</i>	<p>■ Internal Employees</p>	<i>Internal training</i> <i>Employment and social policy</i> <i>Other procedures /policies</i> <i>Migrant workers</i>
<i>General communities</i>	<p>■ Local community residents (Direct Communication) including local schools, landowners and local village administration.</p> <p>Pereyaslav-Khmelnytsky district:</p> <ul style="list-style-type: none"> - Pereyaslavske village council - Somkova Dolyna village council 	<i>Local community centres, schools or hospitals involving:</i> <i>Local air quality, Wastewater, Noise</i> <i>Land use and construction traffic</i> <i>Migrant workers</i>

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
	<ul style="list-style-type: none"> - Kozliv village council - Studenyky village council Zgurivka district: - Nova Orzhitsya village council - Stara Orzhitsya village council - Lyzogubova Sloboda village council - Lubomyrivka village council - Paskivzhyna village council - Voznesenske village council - Baryshivka district: - Paryshkiv village council - Korniiivka village council - Gostroluchya village council - Yabluneve village council Brovary district: - Rusaniv village council Yagotyn district: - Kapustentsy village council - Lozovy Yar village council - Dvirkivshchina village council 	

Stakeholder Groups	Key Stakeholders	Summary of Specific Interest
<i>Other key affected parties</i>	<ul style="list-style-type: none"> - Pereyaslavsky visnyk - Baryshivsky visnyk - Yagotynski visti - Panorama (Zgurivka) - Newspaper "Agroprofi" 	<i>Media-Newspapers</i> <i>Advertising OVNS</i>
NGOs/activists	<ul style="list-style-type: none"> - Stopcor NGO - Lawyer Association ECOSECURITY - Others 	<i>Local air quality, Wastewater, Noise</i> <i>Land use and construction traffic</i> <i>Social collaboration</i>

The Media

In general, the media are considered as stakeholders for Niva Group through advertising the requirements from the OVNS ((EIA).

The identification of stakeholders will be reviewed and the range of interested parties can be expanded and contracted as required during the projects implementation.

5. NIVA GROUP STAKEHOLDER RELATIONS

5.1. OVERVIEW OF EXISTING STAKEHOLDER AND COMMUNITY RELATIONS

Community Relations

Stakeholder interaction has taken place between Niva Group and local village councils and community organisations through charitable works. Social responsibility and assistance to local communities are among the priorities of the Niva Group.

In the summer of 2015, the Charitable Foundation Niva Pereyaslavshchina was founded. Between 2015 and the end of 2019, charitable assistance worth **UAH 39,4 million** was provided to shareholders for their personal appeals, local communities, educational complexes, pre-school educational and sports institutions, hospitals, district administration of social protection, free production of own production for feeding children in educational institutions.

Other stakeholder engagement activities primarily involve engagement on regulatory matters and internal engagement with employees. There is ongoing correspondence with executive and regulatory bodies.

Previous Stakeholder Engagement

In the past, prior to the construction of the new facilities and on expansion of the sites, the development of OVNS (EIA) has been undertaken and as part of this process, a degree of stakeholder consultation activities have taken place in the form of notices published and distributed within local communities and in the newspaper as well as holding public meetings.

Niva Group are committed to undertaking communications with key stakeholders on future major investments and other key projects, through planning, design and project implementation. This Stakeholder Engagement Plan (SEP) has been developed, with the express objectives of identifying key stakeholders and ensuring that, where relevant, they are informed in a timely manner of the potential impacts of projects. The plan also identifies a formal grievance mechanism to be used by stakeholders for dealing with complaints, concerns, queries, grievances etc.

5.2. SUMMARY OF THE METHODS OF FUTURE ENGAGEMENT ACTIVITIES

EBRD and IFC Requirements

An example table demonstrating the type of public consultation and information disclosure that will be recorded for major projects is provided in the next section. Niva Group will record the following information on an ongoing basis:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, etc.), and how it was released or distributed.
- The locations and dates of any meetings undertaken to date.
- Individuals, groups, and / or organizations that have been consulted.
- Key issues discussed and key concerns raised.
- Company response to issues raised, including any commitments or follow-up actions.
- Process undertaken for documenting these activities and reporting back to stakeholders.

This table will be kept up to date on all public consultation and information disclosure that is undertaken for future projects.

In the context of planned new sites or major planned expansion of existing sites, an OVNS (EIA) will be undertaken to evaluate potential negative impacts on environmental and social conditions and public consultation during this process will be undertaken.

6. STAKEHOLDER ENGAGEMENT PROGRAMME

6.1. DISCLOSURE OF INFORMATION

The Types of Information to be Disclosed

The information that will be disclosed will be assessed on all projects of the Company. The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation.

The Methods of Communication

In general terms, internal and external communications are handled by Niva Group in a number of ways.

The types of information disclosed and the specific methods of communication to be undertaken by Niva Group are summarised in the Stakeholder Engagement Programme in Table 4 below.

6.2. THE FUTURE PROGRAMME

Sources for the communication of information will be presented at key locations:

Contact (Communications)

Vitalij Sakelis

Niva Group
2 Pryvokzalna str,
v. Pereyaslavske,
district of Pereyaslav-Khmelnytskyi,
region of Kiev,
Ukraine
tel/fax +380503382327;
E-mail: info@niva-sa.com.ua

EBRD (Ukraine Office)

46 Antonovycha street, 03150 Kiev, Ukraine Tel: + 380 44 277 11 00

IFC (Ukraine Office)

1 Dniprovskiy uzviz street, 04070 Kiev, Ukraine, Tel: + 380 44 490 64 00

Niva Group will collate any comments and feedback associated with future projects and will document these.

All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented within 'The Requirements' section provided in Section 3.2.

All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed on the outcome.

The future program of engagement is presented below which will be reviewed and updated on an on-going basis.

Table 4: Stakeholder Engagement Programme

Activity / Project	Type of information disclosed	Locations and dates of meetings / forms of communication	Stakeholder Groups Consulted
Major purchase / lease of new land	Size and location of land and description of planned operations	Notices at village notice boards, post offices, bus stops, shops, library, office of local village council and district administration Direct consultation with landowners on lease agreements, Niva Group newsletter	<i>General communities</i> <i>Public groups</i> <i>Internal stakeholders</i>
Pre-construction planning-development of pig farms and slurry tanks (if required) and of new slaughter and meat processing facility (adjacent to the existing processing plant), and new rendering plant;	Construction and operational impacts and mitigation proposals	Notices at village notice boards, post offices, bus stops, shops, library, office of local village council and district administration Public exhibitions / meetings, in particular in relation to OVNS (EIA) requirements disclosure.	<i>General communities</i> <i>Public groups</i> <i>International including contractors</i> <i>Government (local government planning authorities)</i> <i>Internal stakeholders</i> <i>NGOs/activists</i>
Corporate engagement	Annual update of ESAP etc	Reports	<i>International – EBRD, IFC</i>

6.3. MONITORING, REPORTING AND FEEDBACK MECHANISMS

Through communication channels such as media and newsletter notifications, surveys, exhibitions, one-to-one meetings and periodic meetings, Niva Group will monitor and provide feedback as appropriate.

Future important public consultation meetings or public exhibitions will be arranged at venues to enable stakeholders to participate. An open book (with pens provided) will be positioned in a suitable location for recording comments anonymously. This book will be presented in an obvious area of the exhibition but in an area that will not be directly monitored by host staff (e.g. by the exit). The information will be recorded by Niva Group so that a response and feedback can be made to stakeholders.

7. GRIEVANCE MECHANISM

Niva Group currently deals with internal enquires, complaints and grievances through informal processes such as:

- Anonymous complaints drop box (drop boxes outside the Company for employees to discreetly submit complaints):
 - Direct employee communication via senior managers;
 - Direct employee communication with HR Department if required.

For non-employees, a grievance mechanism (including anonymous ones) will be adopted as presented in Figure 1 below. The grievance form that will be used is also presented below.

The grievances will also be handled in accordance with Ukrainian Law “About applications of citizens” with responses provided within 1 month.

All grievances can be submitted in the following ways:

- 1. Personally:** applications received in an arbitrary or special form addressed to CEO of Niva Group;
- 2. By regular mail:** applications in the form of letters received in arbitrary or special form at the address of Niva Group;
- 3. By phone:** appeals/complaints received verbally on the phone;
- 4. By e-mail, through the website:** appeals/complaints received in arbitrary or special form electronically through the form posted on the corporate website of Niva Group or addressed to the e-mail;
- 5. Through complaints drop box:** appeals/complaints received in arbitrary or special form through the box for complaints located in the Company.

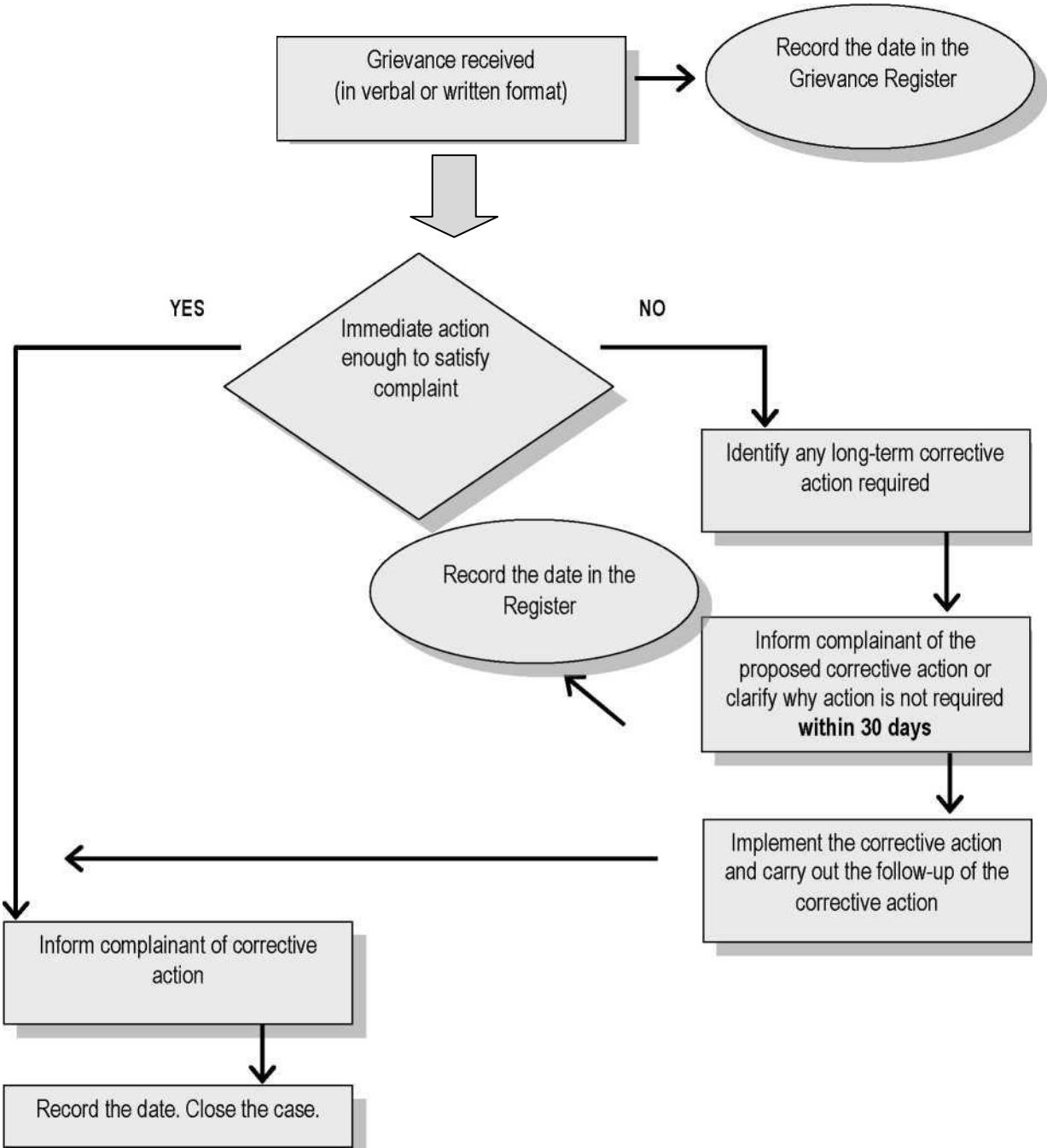
All appeals/complaints will be processed and recorded in the Appeals Record Book by a person responsible for recording and registration of applications.

The person responsible for recording and registration of applications/complaints will submit them to CEO of Niva Group. CEO of Company shall assign a person responsible for consideration and decision concerning the appeal or will personally give instructions regarding the settlement and providing response to the appeal.

Response to the appeal/complaint will be provided to the Applicant in the same way as it was received, unless otherwise agreed with the Applicant when considering the application/complaint.

Niva group creates opportunities for all stakeholders (including anonymous ones) to contact the Company and to be responded.

Figure 1: Flowchart for Processing Grievances



Public Grievance Form

Reference No:	
Full Name <small>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</small>	First name _____ Last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information <small>Please mark how you wish to be contacted (mail, telephone, e-mail).</small>	<input type="checkbox"/> By Post: Please provide mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> [English] <input type="checkbox"/> [Ukrainian/ Russian]
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem? 	
Date of Incident/Grievance	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? ____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem? 	

Signature: _____

Date: _____

Please return this form to:

Niva Group
 2 Pryvokzalna str,
 v. Pereyaslavske,
 district of Pereyaslav-Khmelnytskyi,
 region of Kiev,
 Ukraine