



LAN-OIL

Stakeholder Engagement Plan

2025

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1. Introduction

1.1 Document Structure

The SEP is structured in accordance with the following chapters:

- Chapter 2 – Company and Investment Program Description;
- Chapter 3 – Regulatory Requirements;
- Chapter 4 – Consultation and Disclosure Policy;
- Chapter 5 – Review of Previous Stakeholder Engagement Activities;
- Chapter 6 – Stakeholder Identification;
- Chapter 7 – Disclosure of Information and Communication Methods;
- Chapter 8 – Stakeholder Engagement Algorithm;
- Chapter 9 – Grievance Mechanism;
- Chapter 10 – Management Functions.

Although this SEP focuses on LAN-OIL's Investment Program, the SEP is designed as a corporate framework for LAN-OIL to enable its use in future projects. The SEP has been drafted in such a way that LAN-OIL can adapt this document to meet the different projects' requirements with respect to stakeholder engagement.

1.2 Document Overview

This document is a corporate Stakeholder Engagement Plan (hereinafter – “the SEP”) for LAN-OIL. The SEP has been developed to enhance stakeholder engagement procedures for the Investment Program of LAN-OIL and its subsidiary companies (hereinafter – “the Investment Program”).

The purpose of the SEP is to:

- Identify the legal framework for consultation activities and the Investment Program disclosure requirements.
- Identify potential stakeholders of the Investment Program.
- Record previous consultation activities.
- Set out how concerns or grievances will be handled in the Company.
- Provide an algorithm for further consultations during preparation, construction, and operational phases of the Investment Program.
- Provide a disclosure plan, including identification of any locations where relevant Investment Program documentation will be available for review.

The SEP should be seen as an active working document that will be reviewed and updated on a regular basis.

The SEP should be posted on the official LAN-OIL website in two languages (Ukrainian and English) to promote stakeholder awareness of the methods and channels for submitting complaints and the procedure for their consideration.

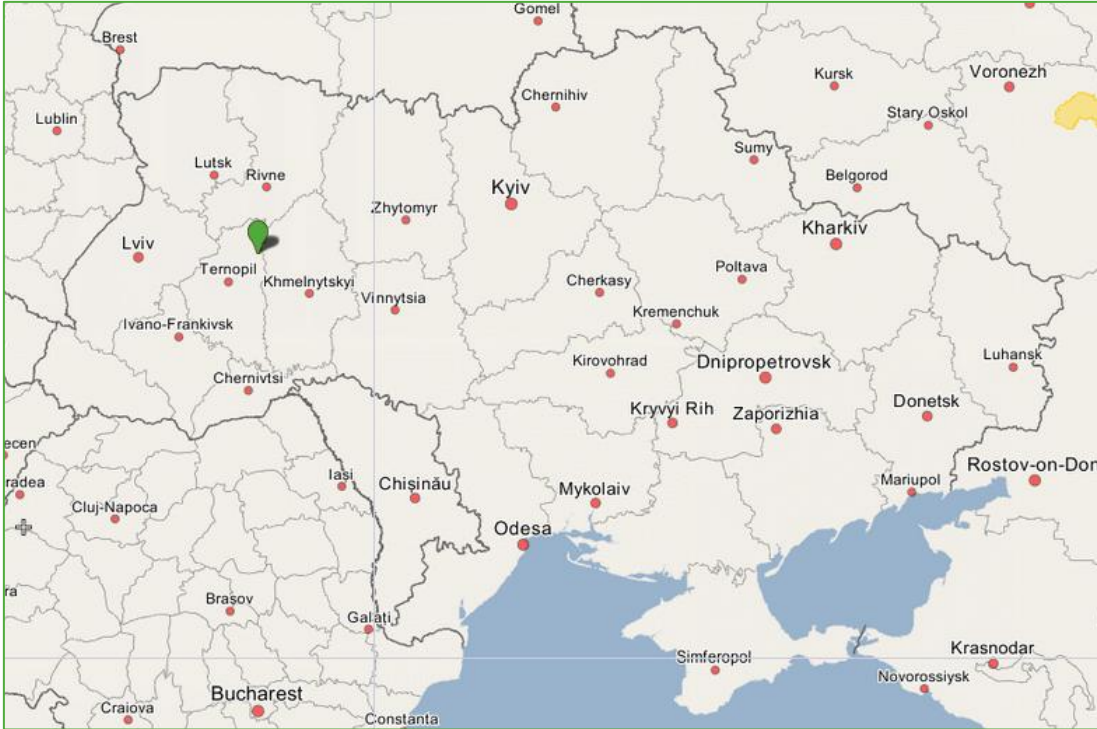
2. Company and Investment Program Description

2.1 General Overview of the Company and its Business

Limited Liability Company "Lan-Oil" established on 14 April 2003. This Company and its subsidiary, namely Privately Owned Enterprise "Lan-Oil Trade" are collectively referred to hereinafter as LAN-OIL.

The main activities of LAN-OIL include operating the plant to produce vegetable oil, meal, and husk. The plant's processing capacity includes oil and press facilities, granulation, and extraction.

Location of LAN-OIL manufacturing facilities



As of 2025, LAN-OIL operates:

- More than 250 employees.
- The plant which facilities allow to process 500 tons of sunflower, 400 tons of rapeseed and 300 tons of soybeans per day, ensuring a stable supply of high-quality products for the domestic market and export.

- Own railway track which allows for daily loading of up to 15 oil tank cars with a total capacity of 900 tons and 15 meal cars with a capacity of 1,050 tons.
- The elevator and siloes which has a total simultaneous storage capacity of 35,000 tons.

In general, LAN-OIL also provides storage services, toll raw material processing services, and transportation services.

Each year LAN-OIL updates ISCC Certificate : <https://hub.iscc-system.org//FileHandler/download/certificateFile/NTY2MDIfRVUtSVNDQy1DZXJ0LVVBMjIzLTAwMjQyMDI0>

2.2 General Outline of the Company's Activity Impacts

Potential impacts from LAN-OIL's activities include:

- Impacts on soil during construction.
- Impacts on water environment (sewage and foul water).
- Impacts on atmosphere (emissions of gasoline vapor, carbon dioxide, etc.).
- Impacts on social environment (assessed case-by-case).

LAN-OIL uses technical and organizational measures to minimize potential impacts and risks, including modern equipment and best practices in design, construction and managing.

2.3 Permit Requirements and the Company's Screening Criteria for Selection of Greenfield Sites

LAN-OIL selects sites for new facilities based on criteria such as:

- Location within commercially and technically reasonable areas.
- Compliance with sanitary protection-zone limits and other construction norms.
- Availability of all required title, technical, and other documents.

General permit requirements include lawful title to land, compliance with urban-planning legislation, environmental impact assessments, and obtaining necessary construction and operation permits.

2.4 Overview of the Investment Program

The Investment Program of LAN-OIL is implemented by obtaining long-term financing for capital expenditures and working capital needs. It includes:

- Construction of a bioethanol plant.
- Reconstruction of processing facilities.
- Improvement of energy efficiency.
- Updating and modernization of production and laboratory equipment.

3. Regulatory Requirements

3.1 Overview

This chapter summarizes the international and national legislation and standards applicable to stakeholder engagement in the Investment Program.

3.2 EBRD and EU Standards

The Investment Program is partly financed by EBRD, which promotes environmentally sound and sustainable development. Relevant standards include:

- [EBRD Environmental and Social Policy \(2019\)](#),
- [Access to Information Policy \(2019\)](#); and
- [PR 10 Information Disclosure and Stakeholder Engagement \(2014\)](#).

EBRD considers public consultation and stakeholder engagement as an on-going process that has to be started at the earliest stage of a EBRD-financed project and has to be continued throughout the entire life of the project.

The following EU standards are also applicable to the SEP:

- [UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters \(Aarhus Convention\)](#); and
- [EU Directive 85/337/EEC on Environmental Impact Assessment](#).

EBRD categorises each project to determine the nature and level of environmental and social investigations, information disclosure and stakeholder engagement required. This will be commensurate with the nature, location, sensitivity and scale of the project, and the significance of its potential environmental and social impacts, which are new and additional.

A project is categorised A when it could result in potentially significant environmental and/or social impacts, including direct and cumulative environmental and social impacts, which are new and additional and, at the time of categorisation, cannot readily be identified or assessed. Projects categorised as A require a formalised and participatory environmental and social impact assessment process.

A project is categorised B when its potential environmental and/or social impacts are typically sitespecific, and/or readily identified and addressed through effective mitigation measures. The scope of environmental and social appraisal will be determined by EBRD on a case-by-case basis.

A project is categorised C when it is likely to have minimal or no potential adverse environmental and/or social impacts.

This Project is Categorised B in accordance with the EBRD Environmental and Social Policy 2019.

3.3 National Standards

Ukraine's national standards include laws on environmental protection, health care, urban development, public information access and consideration of appeals such as:

- [Law of Ukraine on Environmental Protection \(25.06.1991\)](#);
- [Law of Ukraine on Health Care \(19.11.1992\)](#);
- [Law of Ukraine on Regulation of Urban Development Activity \(17.02.2011\)](#);
- [Law of Ukraine on Environmental Impact Assessment \(23.05.2017\)](#);
- [Law of Ukraine on Access to Public Information \(13.01.2011\)](#);
- [Law of Ukraine on Information \(02.10.1992\)](#);
- [Law of Ukraine on Consideration of Appeals \(02.10.1996\)](#).

The procedure of public hearings is established by Order of conducting public hearings in environmental impact assessment approved by [the resolution of the Cabinet of Ministers of Ukraine \(13.12.2017\)](#).

4. Consultation and Disclosure Policy

LAN-OIL's consultation approach is based on EBRD requirements and aligns with national requirements. It involves:

- Public disclosure of appropriate information to enable meaningful consultation with stakeholders;
- Meaningful consultation with potentially affected parties;
- A grievance procedure or policy by which people can make comments or complaints;
- Implementation of an Anti-Retaliation Policy; and
- Adoption of a Corporate Social Responsibility Policy.

4.1 Informed Consultation and Participation

For projects with potentially significant adverse impacts on affected communities, LAN-OIL will conduct an Informed Consultation and Participation (ICP) process that will result in the affected communities' informed participation and will be built upon the principles that will provide the affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and will allow LAN-OIL to consider and respond to them. The extent and degree of engagement required by the consultation process should be commensurate with the project's risks and adverse impacts and with the concerns raised by the affected communities. At the same time, effective consultation is always a two-way process that should:

- begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise,
- be based on the prior disclosure and dissemination of relevant, transparent, objective,
- meaningful and easily accessible information which is understandable to the affected communities,

- focus inclusive engagement on those directly affected as opposed to those not directly affected,
- be free of external manipulation, interference, coercion, or intimidation,
- enable meaningful participation, where applicable, and
- be documented.

5. Review of Previous Stakeholder Engagement Activities

5.1 Consultation

LAN-OIL regularly holds public hearings and communication events for new projects. Examples include:

- Detailed plan of the territory for the location of the industrial park on land plots with a total area of 31.0535 hectares – public approval was received for the development of Industrial Park “BIO-LAN” where the Investment Program is implemented.
- Construction of an elevator complex with a capacity of 90 thousand m³ of simultaneous storage with auxiliary warehouses and an oil transfer station – the Environmental Impact Assessment was received, and public hearings were held.

5.2 Property / Land Acquisition and Resettlement

LAN-OIL selects land plots after due diligence to identify and evaluate environmental and social risks. All land plots are either privately owned or leased, with no involuntary resettlements. Bioethanol plant is built on the land plot of former sugarbeets processing plant – so the land plot was with industrial application.

6. Stakeholder

6.1 Identification of Stakeholders

Stakeholder groups that may be affected by and/or are interested in the implementation of the project are presented below. The objective of stakeholder identification, which is closely connected to the identification of impacts, is to establish which individuals and organizations may be directly or indirectly, positively or negatively impacted by the project and to bring them forward to the first line of information.

The stakeholder list can change in the course of the process of implementation. It shall therefore be regularly reviewed and updated throughout the project cycle. The risk associated with each stakeholder group can also be subject to changes and shall be reassessed from time to time. As a minimum, the Stakeholder list should be revised at the start of the construction phase and at the start of the operation phase.

Not all impacts target all stakeholders equally, as some can be either influenced by subjective internal or objective external factors. The Stakeholders have been classified into the following groups:

<p>National Governmental Stakeholders –</p> <p>high interest, high influence, high power and the key high-level decision-making groups</p>	<ul style="list-style-type: none"> • Ministry of Environmental Protection and Natural Resources of Ukraine • State Environmental Inspectorate of Ukraine • Ministry of Energy of Ukraine • State Regulatory Service of Ukraine • State Labour Service of Ukraine
<p>Regional and Local Stakeholders –</p> <p>high interest, high local influence, high local power and locally important decision-making group</p>	<ul style="list-style-type: none"> • Ternopil Oblast Military Administration • Kremenets District State Administration • Lanovetska City Council • Ternopil Oblast Council
<p>Non-Governmental Organisations (NGOs) –</p> <p>high interest, medium to high influence, active in environmental, social and labour rights advocacy</p>	<ul style="list-style-type: none"> • Ecoaction (Ukrainian environmental NGO) • Ukrainian Nature Conservation Group (UNCG) • Regional ecological NGOs operating in project-affected oblasts • Labour rights and social protection NGOs • Community development organisations active in affected municipalities
<p>Suppliers and Service Providers –</p> <p>medium interest, medium influence, directly linked to operational continuity of LLC LAN-OIL</p>	<ul style="list-style-type: none"> • Utilities and energy supply companies • Chemical and consumable material suppliers • Logistics and transport service providers • IT and communications service providers
<p>Contractors and Subcontractors –</p> <p>high interest, medium influence, directly involved in construction, drilling and maintenance works</p>	<ul style="list-style-type: none"> • Main civil and construction contractors engaged for facility works • Workers and employees of contractors and subcontractors • Environmental monitoring and supervision subcontractors
<p>Clients –</p> <p>high interest, medium to high influence, dependent on LLC LAN_OIL's reliable and responsible operations</p>	<ul style="list-style-type: none"> • Existing commercial clients (offtakers and end-users) • Industrial and commercial customers supplied by LLC LAN-OIL • Prospective clients and off-take partners
<p>Internal Stakeholders –</p> <p>high interest, high influence over day-to-day operations and implementation of the SEP</p>	<ul style="list-style-type: none"> • Permanent employees of LLC LAN-OIL (all departments) • Temporary and contract workers engaged at operational sites • Senior management and board of directors of LLC LAN-OIL
<p>Directly Affected Residents –</p> <p>high interest, low to medium influence, subject to direct impacts of LLC LAN-OIL's operations</p>	<ul style="list-style-type: none"> • Residents living within the immediate vicinity of operational and construction sites • Landowners and land users in areas of pipeline and infrastructure routing • Residents exposed to noise, dust, vibration or traffic impacts from project activities

<p>Local Communities –</p> <p>high interest, low to medium influence, affected by cumulative social and environmental impacts</p>	<ul style="list-style-type: none"> • Village and town communities in the project-affected area • Schools, healthcare facilities and social institutions in proximity to project activities • Vulnerable groups: women, elderly/pensioners, persons with disabilities, minority communities
<p>Media –</p> <p>medium to high interest, high influence over public perception; affected by internal and external factors</p>	<ul style="list-style-type: none"> • Regional and national print and online media • Social media channels covering the project region

6.2 Overview of activities

LLC LAN-OIL continues to inform the public through its official website, local media channels, and other appropriate means regarding all significant project developments and issues, including environmental, health and safety, and social matters.

LLC LAN-OIL Management and the designated Stakeholder Manager maintain records of all stakeholder engagement activities undertaken, including records of engagement carried out by contractors and subcontractors. A grievance register is maintained and updated on an ongoing basis, recording all grievances received, the responses provided, and the resolution status of each case.

Where engagement activities involve or may affect vulnerable groups — including women, elderly persons, persons with disabilities, low-income households, and minority communities — LLC LAN-OIL ensures that additional and appropriate measures are taken to facilitate their meaningful participation. These include accessible public meetings, targeted individual outreach, plain-language information materials, and, where necessary, assistance with transportation or interpretation.

A detailed Stakeholder Engagement Plan for each phase of the Investment Programme (Construction Phase and Operational Phase) is presented in Table 2 below

Table 2 Stakeholder Engagement Plan

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
Construction Phase							
1.	Grievance Mechanism	<ul style="list-style-type: none"> • Employees and workers at operational sites • Directly affected residents and communities • Contractors and subcontractors • General public 	Ongoing throughout project lifecycle.	<ul style="list-style-type: none"> • LLC LAN-OIL Management • The Stakeholder Manager • Security Department 	<ul style="list-style-type: none"> • Distribution of Grievance Forms on public notice boards at affected sites and in nearby communities • Publication on LLC LAN-OIL official website • Direct distribution to affected residents • Announcement via local media channels 	<ul style="list-style-type: none"> • Enquiries and comments during meetings and via LLC LAN-OIL designated communication channels • Response via official correspondence • Grievance register open at all times 	<ul style="list-style-type: none"> • Notification of Grievance Mechanism disclosure via LLC LAN-OIL official channels • Grievance register maintained and updated • Records of all grievances received and responses issued
2.	Notify stakeholders on the Project activities and changes in the operational mode of LLC LAN-OIL	<ul style="list-style-type: none"> • Employees of LLC LAN-OIL • Directly affected residents • Local communities • Governmental authorities • General public 	At least 30 days prior to commencement of construction works. One-off with updates as required.	<ul style="list-style-type: none"> • LLC LAN-OIL Management • The Stakeholder Manager • Security Department 	<ul style="list-style-type: none"> • Meetings in affected communities • Announcements on LLC LAN-OIL official website • Announcements at main public places of the affected communities (notice boards) • Mass media (local newspapers, radio, TV channels, social media) 	<ul style="list-style-type: none"> • Enquiries and comments during meetings • Response via LLC LAN-OIL designated communication channels • Response via official correspondence and e-mail 	<ul style="list-style-type: none"> • Minutes of meetings • Attendance logs and photos • Notifications as published in affected communities and on website

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
Construction Phase							
3.	Disseminate information about anticipated construction activities to affected communities and keep all stakeholders informed of project or construction-related activities that might affect them	<ul style="list-style-type: none"> • Employees and workers at sites • Contractors and subcontractors • Directly affected residents • Local communities • General public 	From commencement of construction works in frequent intervals to allow stakeholders to receive and respond to information.	<ul style="list-style-type: none"> • Contractor • LLC LAN-OIL Management • The Stakeholder Manager 	<ul style="list-style-type: none"> • Announcements in affected communities • Announcements on LLC LAN OIL operational sites • Notices at main public places of the affected communities 	<ul style="list-style-type: none"> • Enquiries and comments during meetings and via LLC LAN-OIL designated communication channels • Contractor's Community Liaison Officer (CLO) available on site • Information boxes to be installed at construction sites 	<ul style="list-style-type: none"> • Minutes of meetings • Notifications as published in affected communities and on website • Written correspondence with relevant authorities and organisations
4.	Disclose information on project Environmental and Social construction documentation	<ul style="list-style-type: none"> • Employees of LLC LAN-OIL • Affected residents • General public 	Semi-annually and upon significant updates to E&S documentation.	<ul style="list-style-type: none"> • LLC LAN-OIL Management • The Stakeholder Manager 	<ul style="list-style-type: none"> • LLC LAN-OIL official website • Hard copies available at LLC LAN-OIL office upon request 	<ul style="list-style-type: none"> • Enquiries and comments via LLC LAN-OIL designated communication channels • Response via official correspondence 	<ul style="list-style-type: none"> • Notifications as published on LLC LAN-OIL official website and communication channels
Operational Phase							
5.	Ongoing stakeholder engagement and disclosure of operational performance	<ul style="list-style-type: none"> • Employees of LLC LAN-OIL • Contractors and service providers • Governmental authorities • Clients • Local communities • General public 	Quarterly for key stakeholders;	<ul style="list-style-type: none"> • LLC LAN-OIL Management • The Stakeholder Manager 	<ul style="list-style-type: none"> • LLC LAN-OIL official website updates • Quarterly newsletters distributed to key stakeholders • Scheduled meetings with governmental authorities • Annual public disclosure report published on website 	<ul style="list-style-type: none"> • Enquiries and comments via LLC LAN-OIL official communication channels and website • Grievance mechanism remains open throughout operational phase 	<ul style="list-style-type: none"> • Published reports and disclosures • Meeting minutes and attendance records • Correspondence log

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
Construction Phase							
6.	Environmental and Social monitoring and reporting	<ul style="list-style-type: none"> Governmental authorities (State Environmental Inspectorate) EBRD Directly affected residents NGOs 	In accordance with regulatory schedule and EBRD reporting requirements. Minimum annually.	<ul style="list-style-type: none"> The Stakeholder Manager External environmental monitoring consultant 	<ul style="list-style-type: none"> Submission of regulatory environmental monitoring reports to competent authorities Annual E&S report Notification to EBRD per agreed reporting schedule 	<ul style="list-style-type: none"> Enquiries and comments via designated communication channels Response via official correspondence within agreed timeframe 	<ul style="list-style-type: none"> Regulatory submission records Correspondence with regulatory authorities and EBRD
7.	Working conditions — engagement with employees and workers	<ul style="list-style-type: none"> Permanent employees of LLC LAN-OIL Temporary and contract workers 	Monthly internal briefings; quarterly town hall meetings; annually for collective bargaining consultations.	<ul style="list-style-type: none"> HR Manager LLC LAN-OIL Management The Stakeholder Manager 	<ul style="list-style-type: none"> Internal notice boards at all LLC LAN-OIL facilities Internal communications (email, internal briefings) Town hall meetings Training and awareness sessions Toolbox talks at operational sites 	<ul style="list-style-type: none"> Grievance mechanism available to all employees and workers Anonymous feedback channel for workers 	<ul style="list-style-type: none"> Minutes of town hall meetings Training attendance records Grievance register Collective bargaining records (where applicable)
8.	Engagement with vulnerable groups during operations	<ul style="list-style-type: none"> Vulnerable groups: women, elderly/pensioners, persons with disabilities, low-income households, minority communities 	As assigned under each respective operational activity. Ongoing throughout operational phase.	<ul style="list-style-type: none"> The Stakeholder Manager Gender Officer External specialist as needed 	<ul style="list-style-type: none"> All communication measures applied as described for vulnerable groups in item 5 above, adapted to the operational phase context Accessible information materials in plain language Individual outreach where required 	<ul style="list-style-type: none"> Individual or small group meetings Dedicated contact for vulnerable stakeholders 	<ul style="list-style-type: none"> As described for items 6 through 8 above Records of individual outreach visits

7. Disclosure of Information and Communication Methods

7.1 Communication Methods

LAN-OIL uses various methods to communicate with stakeholders, including:

- Meetings with stakeholders, investors, banks, and business partners;
- Website updates;
- Public hearings;
- Written information.

When and where appropriate, communication with stakeholders may also be undertaken through:

- Public hearings;
- Consultation activities (in particular, ICP activities with affected local communities);
- Provision of written information to interested stakeholders (on their request);
- Published documents; and
- Other project-related correspondence.

All information is usually disclosed in Ukrainian language. The content of documents for public comment provides accessible and adequate information on a project. At the same time, the type, scope, and level of information disclosure are to be adjusted to needs of a particular stakeholder to provide it with the most meaningful and relevant facts and data. Written information will be accompanied by visual illustrations and explanations to facilitate understanding of a project. If some specific concerns arise, technical workshops may be offered to explain technical processes, assessment techniques, and quality assurance measures to verify results and ensure mitigation procedures are followed.

7.2 Previous Engagement to Date

The following table records stakeholder engagement activities undertaken by LLC LAN-OIL prior to and during the preparation of this Stakeholder Engagement Plan. All entries are based on publicly available and verified sources. This register will be updated periodically to reflect new engagement activities as they occur throughout the project lifecycle.

No	Date	Activity / Description	Stakeholders Engaged	Method	Outcome / Status
1.	26 June 2024	Public hearing on the Detailed Territory Plan for the placement of an industrial park at Vyshnivets'ka Street, Lanivtsi (total area 31.0535 ha). The development of the Detailed Plan was financed by LLC LAN_OIL. The hearing was organised by Lanovetska City Council.	<ul style="list-style-type: none"> Residents of Lanovetska territorial community Lanovetska City Council Urban planning and architecture department of Lanovetska City Council Other interested parties	Public hearing held at the premises of Lanovetska City Council (Nezalezhnosti st, 34, Lanivtsi) at 10:00. Notice published on lanmisto.gov.ua on 6 June 2024. Written comments accepted from 27 May to 27 June 2024.	Public hearing held as scheduled. Stakeholders had the opportunity to review the draft Detailed Territory Plan and the Strategic Environmental Assessment report. Source: lanmisto.gov.ua, published 6 June 2024.
2.	30 October 2024	Disclosure of upcoming public hearings (scheduled for 18 November 2024) on the Environmental Impact Assessment receiving procedure. Printed copies of the announcement were placed in public places in Lanivtsi, including near the municipal centre, the mayor's building, and the Project site.	<ul style="list-style-type: none"> Members of the public Residents of Lanivtsi (Project Site area) Other interested parties	Physical posting of printed notices in public locations in Lanivtsi. Publication on the Kremenets District State Administration website. Source document: kremenets.te.gov.ua/storage/app/sites/35/ (PDF notice).	Public notification completed. Residents of Lanivtsi and surrounding area were informed of the upcoming EIA public hearing scheduled for 18 November 2024, accessible to any resident of the city.
3.	18 November 2024	Public hearings on the Environmental Impact Assessment (EIA) receiving procedure. The hearing was conducted in accordance with the Law of Ukraine 'On Environmental Impact Assessment'.	<ul style="list-style-type: none"> Members of the public Residents of Lanivtsi and affected communities Regulatory and environmental authorities Other interested and affected parties	Public hearing held in accordance with Ukrainian EIA legislation. Advance notice published and distributed (see entry No. 2 above).	Public hearing held as scheduled. Opportunity provided for public participation and submission of comments in accordance with Ukrainian legislation. Source: lanmisto.gov.ua/2024/06/06/uvaga-gromadski-sluhannya-10/
4.	24–31 December 2024	Media coverage of two significant developments relating to LLC LAN_OIL: <ul style="list-style-type: none"> Notice of issuance of an environmental impact assessment opinion. Information published that Lan-Oil Group is the largest taxpayer among companies operating in the city of Lanivtsi, Ternopil region, Ukraine.	<ul style="list-style-type: none"> Members of the public Local and regional media General public in Lanivtsi and Ternopil region	Media publications (local and regional press/online outlets).	EIA opinion issued and publicly reported (24 December 2024). LLC LAN_OIL's status as the largest taxpayer in Lanivtsi publicly confirmed and reported (31 December 2024), demonstrating the company's economic significance to the local community.

No	Date	Activity / Description	Stakeholders Engaged	Method	Outcome / Status
5.	19 September 2025	Commencement of the EIA procedure for the planned construction of a bioethanol plant with a capacity of 83,000 tonnes per year, located at vul. Vyshnivets'ka, 35, Lanivtsi, Ternopil region (EIA Register case no. 14269). The EIA notification was published in the Unified EIA Register and on the website of Kremenets District State Administration, in accordance with the Law of Ukraine 'On Environmental Impact Assessment'.	<ul style="list-style-type: none"> General public Residents of the affected community Kremenets District State Administration Regulatory and environmental authorities Other interested and affected parties	Publication of EIA commencement notice in the Unified Register of Environmental Impact Assessments. Publication on the official website of Kremenets District State Administration (kremenets.te.gov.ua).	EIA procedure formally initiated (case no. 14269). The EIA process provides the opportunity for public participation, submission of comments, and holding of public hearings in accordance with Ukrainian legislation. Source: kremenets.te.gov.ua, published 19 September 2025.
6.	2024 – present	Ongoing public information disclosure via the company's official website (lanoiltrade.com), available in Ukrainian and English. The website publishes information on production activities, product range, certifications (ISCC, HACCP, GMP+), key partners, and contact details for all departments.	<ul style="list-style-type: none"> General public Prospective clients and business partners Investors Other interested parties 	Official company website: lanoiltrade.com (Ukrainian and English versions).	Website is publicly accessible and regularly updated. Serves as the primary public information disclosure channel for LLC LAN_OIL. Source: lanoiltrade.com/en/about-us/.

Note: This register is a live document and will be updated at each key project milestone, or at minimum on a semi-annual basis, to reflect engagement activities undertaken and outcomes achieved. All entries are based on verified and publicly available sources.

7.3 Responsibilities, Forms and Channels for Communication

The chief public relations officer is responsible for stakeholder consultation and engagement. There are following channels for complaints and stakeholder communications with LAN-OIL:

Method of submitting an appeal	Channels
Direct (complaints) appeals personally or using special Grievance Form (added in Appendices)	<ul style="list-style-type: none"> The Stakeholder Manager (Katherina Zueva, +38 067 310 84 01) Gender Officer (Taras Bosyy, +38 097 979 78 37) Security Department

Method of submitting an appeal	Channels
Direct (complaints) appeals by email	<ul style="list-style-type: none"> ▪ Direct Manager or other Manager ▪ The Stakeholder Manager (Katherina Zueva, +38 067 310 84 01) ▪ Gender Officer (Taras Bosyy, +38 097 979 78 37)
Direct (complaints) appeals on the official site (added in Appendices)	Stakeholders have the option to choose anonymity, sending a complaint using the form at the direct link https://lanoiltrade.com/contacts/

Required to be registered all (complaints) appeals received by the Stakeholder Manager, Gender Officer and (complaints) appeals received through the following communication methods:

- Direct (complaints) appeals by email;
- Direct (complaints) appeals to Direct Manager; and
- Direct (complaints) appeals on the official site

The Stakeholder Manager is responsible for registering received complaints. A copy of the complaint register and an information about complaints and the results of their consideration may be provided by the Stakeholder Manager with the approval of the CEO of LAN-OIL for the investors, banks, and business partners.

8. Stakeholder Engagement Algorithm

LAN-OIL's the stakeholder engagement algorithm involves the following steps:

- Stakeholder identification (identification of all potential stakeholders – internal and external; recording their roles and level of influence);
- Analysis and classification (identification of the interests and expectations of each stakeholder);
- Development of engagement strategy (identification of optimal communication methods; selecting of engagement methods);
- Implementation of engagement (implementation of selected communication channels; regularly updating of information for stakeholders; responding to feedback);
- Monitoring and adjustment.

8.1 Site-Specific SEP: Preparation and Implementation

LAN-OIL's development policy focuses on projects with minimal environmental and social risks. The SEP includes steps for engaging stakeholders at different project stages.

9. Grievance Mechanism

9.1 Purpose and Scope

The grievance mechanism ensures responsiveness to stakeholder needs and includes clear instructions for submitting and handling grievances. Key elements of a grievance mechanism include:

- Clear instructions on how grievances are submitted and handled after submission, including a minimum period that a stakeholder must wait to receive a reply; and
- Alternatives for submitting a grievance in person to a staff member if a stakeholder is not able to or comfortable with submitting a grievance in writing.

An efficient grievance mechanism is based on the following principles:

- Legitimacy;
- Accessibility;
- Predictability;
- Fairness;
- Transparency;
- Gender equality;
- Possibility to submit anonymous grievances and
- No retaliation for the submitted complaints.

9.2 Responsibilities

The Stakeholder Manager coordinates stakeholder engagement activities and manages the grievance procedure.

The Gender Officer coordinates stakeholder engagement activities and manages the gender related complaints.

The security department is an independent facilitator which can investigate the cases and deliver its report to CEO.

9.3 Grievance mechanism

All complaints are considered as soon as possible and no longer than the time limits provided for by [Law of Ukraine on Consideration of Appeals \(02.10.1996\)](#). The grievance mechanism includes steps for receiving, registering, assessing, and resolving complaints:

Steps	Doings
① Submission of a grievance	A grievance can be submitted through various channels (online form, email, hotline, in person, etc.)
② Grievance registration	All received grievances are recorded in the complaint register by the Stakeholder Manager. A unique grievance number is assigned for tracking purposes
③ Preliminary assessment and classification	<ul style="list-style-type: none"> ▪ Identifying the type of grievances (administrative, financial, ethical, related to gender inequality, etc.); ▪ Assessing the severity and urgency of the complaint
④ Investigation and analysis	<ul style="list-style-type: none"> ▪ Assigning a responsible person; ▪ Gathering facts, analyzing the provided information, and possibly requesting additional details; ▪ Consulting with relevant departments or experts
⑤ Decision-making and response	<ul style="list-style-type: none"> ▪ Formulating a decision; ▪ Officially notifying the complainant; ▪ Providing recommendations for further actions
⑥ Grievance closure and monitoring	If the complainant is satisfied with the decision, the complaint is considered closed
⑦ Appeal	<ul style="list-style-type: none"> ▪ If the complainant is not satisfied with the decision, they have the right to file an appeal; ▪ The appeal process may include a reassessment of the complaint by an independent committee

10. Management Functions

LAN-OIL's management functions include regular internal communication, training, and development of stakeholder engagement strategies. The PR department manages stakeholder engagement activities and coordinates with contractors and stakeholders.

Appendices

Appendix A. Example grievance form

Reference Number:
Full Name (optional):
Organisation and position (if relevant):
Preferred language of communication:
Please mark how you wish to be contacted!
By Post: (Please provide mailing address)
By telephone:
By e-mail:
Description of the incident / Details of the grievance
What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of the incident/grievance:
One-time incident. Date:
Happened more than once. How many times:
On-going. Currently experiencing problem: Yes / No
What would you like to see to resolve this problem?
Signature.....
Date.....
Please return this form to:

Appendix B. The form for requests and grievances at the official site

LAN OIL

ABOUT US • OUR PRODUCTS • MATERIAL PROCUREMENT • PRODUCT SALES • CONTACTS

EN

Contact us

Submit a request

Your name

Phone number

E-mail

What is your question?

Your message or contact information so we can get in touch with you

Submit ↗

Link: <https://lanoiltrade.com/contacts/>