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**Consulting Services for Program Implementation
Regional Program for Energy Efficiency in the Transmission System II**

**Land Acquisition and Resettlement Plan for the
Construction of the 400kV OHL Obrenovac - Bajina Bašta
Project - SUMMARY FOR DISCLOSURE**

June 2025

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CONSTRUCTION OF THE 400KV OHL OBRENOVAC - BAJINA BAŠTA PROJECT

LAND ACQUISITION AND RESETTLEMENT PLAN SUMMARY

1 Introduction

Elektromreža Srbije (further referred to as EMS), intends to implement a project involving the construction and operation of a 400kV OHL from Obrenovac to Bajina Bašta. The Project comprises three components, as follows:

- construction of a 400kV OHL from Obrenovac to Bajina Bašta
- extension of the existing 220/35 kV substation Bajina Bašta and construction of a new access road
- upgrade of the existing substation in Obrenovac

The future OHL will be 109 km long, will comprise a total of 309 OHL towers and will pass through the territory of 6 municipalities in Serbia: Bajina Bašta, Kosjerić, Valjevo, Lajkovac, Ub and Obrenovac.

The Project requires acquisition of land for the extension of the Bajina Bašta substation, new access road, as well as the construction of OHL towers and the establishment of easement rights to enable the construction and operation of the OHL. Land is being acquired and easement rights are being established through the legal process of expropriation and in line with expropriation elaborates prepared during the project planning stage. Expropriation can be **complete** (when the land is permanently acquired and ownership is transferred to EMS) or **incomplete** (when easement rights to enable the construction and operation of the OHL are established, but the land remains in the property of the owner, with some restrictions of use). Details about compensation and assistance are provided in Chapter 6 of this document.

Close to 600 privately owned land plots will be affected by expropriation for the substation extension and access road, as well as the construction of OHL towers, while an additional 2,300 privately owned land plots will be affected by the establishment of easement rights and certain use restrictions. The affected land plots are owned by an estimated 2,700 owners of whom approx. 30% are women.

Project financing has been secured through a loan from the financial institution Kreditanstalt für Wiederaufbau (KfW). As the Project lender, KfW requires that project related economic displacement is addressed not only in line with national legislation, but also in full compliance with key international requirements contained in the Sustainability Guideline of the KfW Development Bank, including the World Bank Environmental and Social Standard 5, dealing with land acquisition, restrictions on land use and involuntary resettlement. To fulfil these requirements, a Land Acquisition and Resettlement Plan (LARP), this document, has been developed by EMS with assistance from a team of external consultants based in Belgrade (LINK 011), subcontracted for this task by the Consultant (GOPA-International Energy Consultants GmbH). A LARP summary (this document) has also been produced and is publicly available on the EMS official website (<https://ems.rs>)

At the time of finalising the LARP, expropriation is already well advanced. Land needed for the expansion of the Bajina Bašta substation and the access road has been legally acquired, as well as over 85% of land needed for the OHL towers. Construction activities in these locations may begin and the first field activities have already started in May 2025, while other needed land will continue to be acquired through expropriation in parallel until completed. Legal procedures for the securing of easement rights, as well as payment of compensation for trees (which will be cut down in the

easement zone in line with the Forest Cutting Report), have also been completed for close to 40% of the affected land plots.

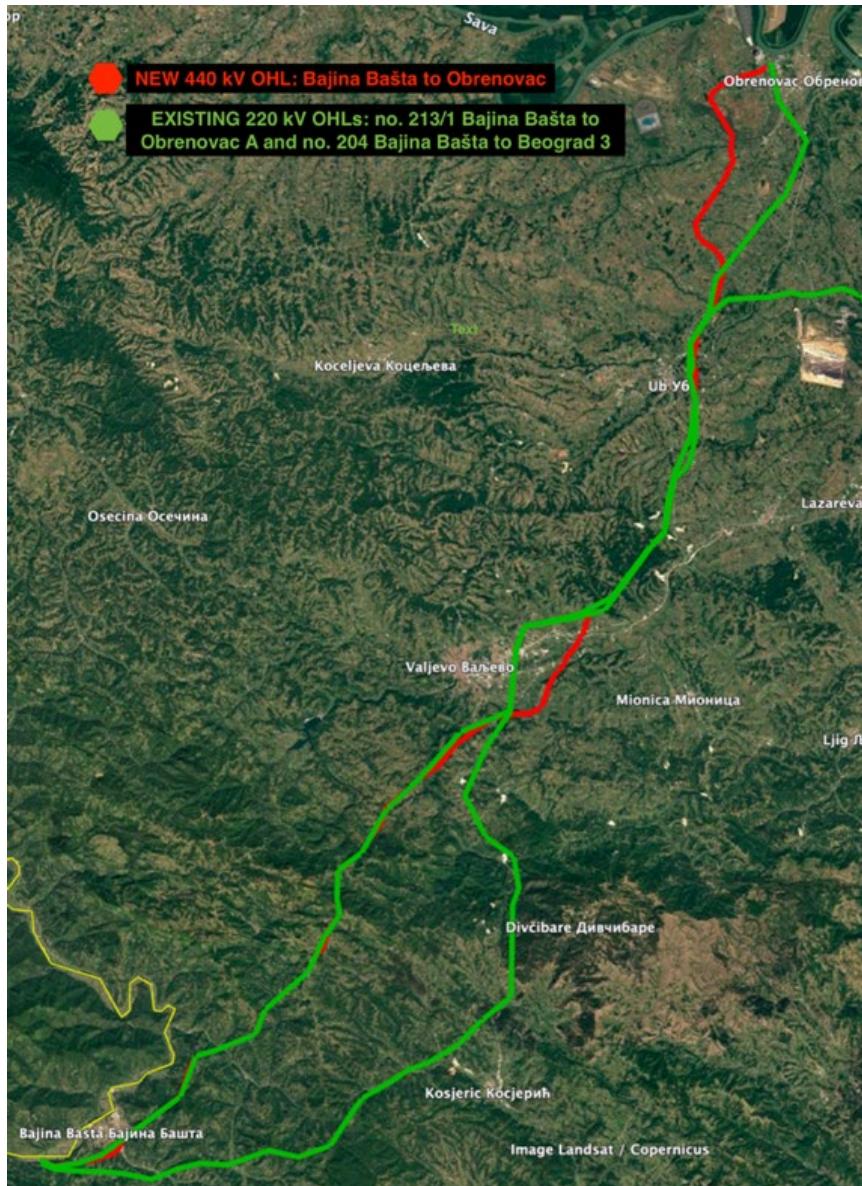
The overall responsibility for LARP implementation lies with the EMS. EMS will continue to manage legal aspects of expropriation, in line with national legislation, however for certain aspects of LARP implementation, EMS will rely on support provided by Implementation Consultant team (GOPA-International Energy Consultants GmbH), specifically the Social Expert within that team, as well as the Construction Contractor, as explained further in this LARP Summary.

2 Avoidance and Minimisation of Impacts

In designing the Project, the corridor of 2 existing OHLs was used to the extent possible, to minimise new impacts and they are:

- No. 213/1 from substation Bajina Bašta to substation Obrenovac A and
- No. 204 from substation Bajina Bašta to substation Beograd 3.

The figure below shows the route of the newly planned OHL in red, while the existing two OHLs are depicted in green.



In locations where these two existing OHLs are crossing inhabited areas, the new OHL route was diverted to avoid them, so that any physical displacement of households and crossing of construction land is avoided.

Where the routes of the new and old OHLs overlap, the design teams attempted to place new OHL towers in the same exact location where existing towers will be dismantled or as close to them as possible. In locations where complete overlap was achieved, the new transmission line conductors will also cross the same exact plots of land as before, and the old ones will be removed, causing no changes of the zone where easement rights (and use restrictions) apply.

Finally, on a micro level, the design teams attempted to place OHL towers on the boundaries of land plots, to the extent possible.

It is important to highlight that even in locations where the OHLs overlap, owners of affected land and assets are being fully compensated for all impacts, even though these impacts were already present on the land in question.

3 Expropriation Procedure

The Government of RS proclaimed public interest for this Project through the adoption of a special law in 2014 - Law on the Determination of Public Interest and Special Procedures of Expropriation and Obtaining Documentation for the Construction of the 400kV Electricity Transmission System 'Transbalkan Corridor - First Phase' (referred to as the Special Law).

In accordance with this Special Law, EMS submits a proposal for expropriation of relevant properties to the municipal property administration in the relevant municipality. The property administration sends the expropriation proposal to the owners of affected land plots (as registered in the Cadastre) and they have a deadline of five days to issue their statement regarding expropriation (if they agree, disagree, any particular facts that may be of relevance, etc.). If no statement is made by the owner, the municipal property administration passes a decision on expropriation. The affected owners have legal remedies available to contest the expropriation decision (administrative and judicial).

Although the mentioned law allows for this shortened procedure to be implemented, most of the municipal property administrations are implementing the procedure in accordance with the Expropriation Law. Instead of sending the expropriation proposal to affected owners with a deadline of five days for a response, this procedure involves inviting the affected owner to a hearing where he/she is presented with the expropriation proposal and has an opportunity to agree or voice any relevant facts or grievances in relation to expropriation at the hearing. After the hearing, if all legal conditions are met, the municipal property administration passes the expropriation decision and the process continues to the compensation stage.

After the expropriation decision becomes legally binding, EMS submits an offer of compensation to the municipal administration, which passes on this offer to the affected owner and schedules a hearing for the conclusion of a compensation agreement. If the owner accepts, the agreement is signed at the hearing and compensation is paid by EMS into the owners' bank account. If he/she declines the compensation offer, the municipal administration refers the case to the local court, to decide on the compensation amount.

In accordance with the Law on Expropriation, the compensation offer from EMS cannot be lower than the market value of the affected property, as determined by the Tax Administration. As a basis for preparing the compensation offer, EMS requests information from the local Tax Administration on the market value of the affected plot. In some cases, if the estimate on the market value of land from the Tax Administration appears to be below acceptable levels, certified valuers of an appropriate background are engaged to determine the market value of the affected land (agricultural expert for agricultural land, civil engineer for construction land, forestry expert for forest land).

As per the Expropriation Law, if there are assets on the affected land which need to be separately evaluated and compensated (crops, fruit trees, forest trees, etc.) certified valuers of an appropriate professional background are hired based on request of the municipal property administration, paid by EMS, to carry out a site visit, record all assets and provide a detailed calculation of compensation which EMS will submit to the affected owner as part of the compensation offer.

In case the affected owner declines the compensation offer from EMS and the case is referred to the court, a new valuation is carried out by new valuers of an appropriate background (appointed by a court decision and paid by EMS). The court considers the new valuation, as well as other relevant facts in the case and passes a decision on the compensation amount. EMS pays the determined compensation amount into the bank account of the affected owner.

EMS pays all costs of legal representation and all costs of valuations. The owners of affected properties have no expenses in connection to the expropriation procedure.

4 Compensation of Losses and Damages by the Construction Contractor

In accordance with the contract signed between EMS and the Construction Contractor, the Construction Contractor is obligated to compensate any losses or damages caused to third parties, including particularly, the owners and users of land which will be accessed and disturbed in any way, during the execution of works. This obligation is regulated by several different laws in the Republic of Serbia, including the Law of Contract and Torts of the RS (Articles 154 and 189), the Law on the Basis of Ownership and Proprietary Relations of the RS (Article 42) and the Energy Law of the RS (Article 216).

Before any field activities occur, the Construction Contractor contacts the owner (and user, if someone other than the owner is using the land) of any land that needs to be accessed to execute field activities, to obtain his/her written consent for accessing the property and to document the current state of the property. If there are any assets on the land (crops, fruit trees, forest trees, wells, fences, etc.), which may be lost or damaged when the Construction Contractor accesses the land, the Construction Contractor hires certified experts of an appropriate background, to carry out an inventory of the assets and to determine their value, in line with the same methodology defined by the Expropriation Law. The report is reviewed by the affected person and if a compensation agreement is reached between him/her and the Construction Contractor, compensation is executed into the affected person's bank account. If no agreement is reached, the case is referred to the court and the procedure for determining compensation, including a new valuation of damages and / or losses, is carried out to enable the court to make a final ruling on the compensation amount.

5 Eligibility for Compensation and Assistance

There are three main categories of people eligible to compensation and assistance, as outlined in the LARP:

- Persons with formal legal rights as registered in appropriate registries (e.g. the Cadastre).
- Persons with rights that are recognisable under national legislation, such as legal heirs, leaseholders, unregistered owners (who concluded a legal purchase of a property but did not register the change of ownership in the Cadastre).
- Persons with no legal rights or claims to the land they use (informal users of affected land), present in the Project area at the time of construction.

The eligibility of the first two categories is defined by legal instruments and the cut-off date is defined by the Expropriation Law, as the date of written notification (by post) that an expropriation proposal has been submitted, meaning that all investments into properties made after this date will not be

considered for compensation in the valuation process. In case of any disputes regarding eligibility, affected people can turn to the courts for their resolution, which has to be processed prior to the execution of compensation.

In case of informal users of land, no cut off date can be set in advance, as it is not possible to determine where land may be used informally. Nevertheless, informal users must be compensated for any damages caused to their assets on the affected land. Their eligibility will be determined when encountered in the field, during construction, based on statements from the owner (who allowed the use of his/her land) or local people who can witness that the informal user is the one who planted and maintained the affected assets and owns them.

A list of identified affected people is available in the expropriation study (elaborate) and information on whether someone is included in the list can be obtained using the contact details in Chapter 7 of this LARP summary.

Through engagement with affected people and other stakeholders it has been determined that some categories of affected people may be more vulnerable and in need of assistance in relation to land acquisition, as presented in the table below.

Categories of vulnerable people	Description of difficulties encountered by affected people
People of a lower educational status, including illiterate people	Difficulties to access information and understand their rights and entitlements in the expropriation procedure.
People faced with mobility constraints (e.g.) elderly, disabled or ill people People with low incomes	Difficulties in travelling to municipality centres (organising and / or paying for transport) to complete administrative tasks related to expropriation and/or compensation, or to collect cut down firewood and timber.
Elderly people, particularly women	Difficulties in being present in the field when valuations are carried out or when construction works begin, to ensure their assets are properly registered and valued, that there are no unforeseen damages, etc.

6 Compensation and Assistance Framework

6.1 Compensation for OHL Towers

The area of land which will be occupied by the tower is multiplied by the market value of land per m². For example, if the tower takes up 200 m² on one affected land plot and the market value of land is 1 EUR per m², the owner will receive a compensation amount of 200 EUR for the tower.

In addition, the loss of any trees or other assets located on the 200 m² which will be underneath the tower, are separately valued and added to the compensation amount.

If the expropriation of a part of the owner's property for the OHL tower, results in a situation where the owner has no economic interest in using the remainder of the property, or if, as a result, his livelihood on that remaining part of the property is prevented or significantly impeded, the owner can request that the remaining part of the property is also expropriated, in line with Article 10 of the Expropriation Law. The owner can request this anytime within a period of 2 years after the completion of construction works, as per Article 30 of the same law. A decision on whether the request is justified, will be based on the expert opinion of a certified valuator.

6.2 Compensation for Establishing Easement Rights

Approx. 30 m to each side from the most external conductors of the OHL, an easement area is being established. This means that the owner keeps his ownership rights, however, he/she will be faced with certain land use restrictions on land that is located within the easement zone. These use restrictions are defined by the Energy Law of the RS which states that structures may be built and trees and vegetation may be planted within the protection (easement) zone, if this is done in accordance with the relevant planning documents and legislation of the RS. The owner of a land plot who intends to build a structure within the OHL protection (easement) zone is required to request consent from EMS before submitting an application for a construction permit. EMS will grant approval in all cases when the safety of the OHL and the planned new structure is not jeopardised. In cases when that is not possible, EMS will cooperate with the owner of the land and suggest changes that need to be made on the planned structure or its location, so that approval may be granted.

The market value of the area affected by the easement is estimated as being reduced by 20 to 50%, depending on the type of land which is affected (the value of agricultural land is reduced less than construction land and forest land). The difference between the full market value of the affected area (as if there was nothing on the land plot) and the 20 to 50% reduction, is paid as compensation to the affected owner.

As an example, an owner has a plot of agricultural land of an area of 2,000 m² and half of the plot (50%) is affected by the easement, so 1,000 m². The market value of land is 1 EUR per m² meaning that the affected area of land has a value of 1,000 EUR. The value of that area of land is reduced by 20%, meaning that the new market value of the affected area is reduced by 200 EUR (20% of 1,000 EUR). The affected owner will receive as compensation 200 EUR which is the difference between what his plot used to be worth on the market and what it will be worth when the easement is established.

In addition, the loss of any trees or other assets located within the easement area (e.g. any trees that must be cut down), are separately valued and added to the compensation amount.

6.3 Compensation for Damages and/or Losses

Any damages caused during construction or repairs and maintenance, during operation, must be separately valued by certified valuators and compensated to the affected owner. For example, if the construction team has to access a certain plot to construct a tower in the middle of that plot and in that process they destroy a part of the crops in the field or a part of the trees in the forest, they have to compensate the owner for these damages at full replacement cost. The Construction Contractor will announce their plans to owners in advance, so that causing damages could be avoided or reduced to a minimum and a certified valuator will be engaged to assess the damages in advance and calculate the compensation amount, which will be paid to the owner. If the owner does not agree with the proposed compensation amount, he/she may turn to the court to seek higher compensation, when a new valuator will be engaged to carry out a new valuation.

6.4 Market Value of Land

The Tax Administration provides a general assessment of the market value of land per m² in the affected area (agricultural or construction land), which is calculated based on registered sale purchase transactions in the affected area or closest to it, in recent years. This is a general assessment which does not involve site investigations and does not pertain strictly to the land which is to be expropriated. According to the Expropriation Law, compensation offered for land cannot be lower than the assessed value provided by the Tax Administration.

To complement this assessment, expert valuators are hired to assess the value of specific land plots which are affected by expropriation, meaning that they need to visit the plot, to determine the specific

characteristics of the plot (position, size, current and potential use, access to infrastructure, etc.). Valuators then use data from recent sale/purchase transactions as well as announced sales (asking prices), which involve similar land plots, to determine an appropriate market price of affected land per m². At the end of the process, the highest attained value is selected by the valuator as the final one.

6.5 Value of Crops, Trees and Non-residential Structures

The assessment of the value of all assets located on the affected land is done by certified experts of an appropriate professional background (agriculture experts, forestry experts or civil engineers). This pertains to valuation by certified experts, both in the expropriation process and resulting from any construction related activities.

In the case of annual crops, the intention is to enable individuals to harvest all crops before any works are carried out on an affected land plot. If this is not possible, the certified valuator determines the full market value of the affected crops, as if they were harvested and includes this amount in the valuation report.

In the case of fruit trees, the certified valuator determines the full replacement cost, calculated based on the age and the productivity (yield) of trees and the amount of time (number of years) that would be needed to grow a new tree to the same productivity age, as well as the cost of affected timber, as defined by the Expropriation Law.

In the case of forest trees, full replacement cost is being calculated based on the type and maturity of the forest trees and the potential use of wood / timber, as defined by the Expropriation Law.

In the rare case that certain non residential structures are affected, for example, fences or wells, replacement cost will be calculated as the cost of rebuilding the same structure in a new location (same materials and characteristics), including the cost of purchasing new materials and transport and labour costs.

6.6 Livelihood Restoration Assistance

It is expected that the vast majority of people whose land and assets will be impacted by the Project, will receive adequate compensation and will not experience any economic displacement. However, as livelihood impacts on individuals and their households, cannot be excluded with a 100% certainty, some measures are planned in the LARP.

Due to the nature of the Project and the fact that livelihood impacts can only occur in relation to the use of the affected land, mitigation will focus on measures that can increase the productivity of the remaining land. To identify any such measures available through municipal support programmes or state subsidies, which can be accessed by the affected person (or a member of his/her household), the Social Expert will enquire with the relevant municipal departments and/or local service providers. As an example, numerous agricultural subsidies are available for the following types of activities:

- Plant production (production of crops, vegetables, fruits, including organic production, procurement of inputs such as fertilizer, fuel, insurance, etc.)
- Livestock breeding (breeding calves, lamb, pigs, bee keeping, fish production, organic breeding, insurance, etc.)
- Equipment and machinery (procurement of tractors, irrigation, greenhouses, all types of equipment, construction of animal shelters, production facilities, market placement, etc.)
- Product processing (fruits and vegetables, oil plants, medicinal, herbal and aromatic plants, bee products, meat, milk, etc.)

- Agricultural loans, etc.

The Social Expert will provide information to the affected person on how he/she can apply for such programmes and where concrete assistance to apply is being provided (in relevant municipal departments).

A second form of assistance which may be provided as a form of livelihood restoration assistance, includes engaging people whose land is affected by land acquisition, during construction, to carry out small tasks or even participate in construction, if they possess appropriate skills. The Social Expert will liaise with the Construction Contractor to identify opportunities for such assistance, in line with the needs of any individuals whose livelihoods could be impacted.

To enhance local livelihoods, the Construction Contractor is committed to using local resources to the extent possible, including organising local accommodation of workers or preparation of meals for them, hiring people with local machinery to participate in some of the construction activities, hiring local people for unskilled work, for safeguarding local equipment, or even just temporary storing of equipment on local people's properties, for which they will be compensated.

6.7 Vulnerability Assistance

Using the description of difficulties encountered by affected people and categories of vulnerable people who may be more prone to experiencing these difficulties (described in Chapter 5 of this LARP summary), the Social Expert will determine if a particular affected person and his/her household are in any way vulnerable and will be impacted to a higher degree by land acquisition and/or expropriation. For any such identified specific cases, the Social Expert will prepare a brief plan of action listing the activities that will be implemented, to assist him/her (and members of his/her household, if applicable), to overcome these difficulties.

Having in mind the types of difficulties encountered, assistance could include any of the livelihood restoration measures already presented above, or other activities, some of which may be organised with assistance from the Construction Contractor, such as:

- investing more time in meeting with the affected person to assist him/her to better understand the expropriation and compensation process
- assisting the affected person when he/she communicates with valuators or construction workers regarding access to his/her land, valuation of assets, payment of compensation, etc.
- assisting the affected person to access free legal aid in the municipality
- providing assistance to the affected person to open a bank account
- organising transport of the affected person to the municipal centre to carry out any administrative tasks associated with expropriation
- using construction vehicles or machinery to carry out any small scale improvements on the affected person's property, or to deliver wood that was cut down on the affected person's land to his / her house.
- any other specific support that may reasonably be provided by the Social Expert to assist the affected person in connection to project related land acquisition.

6.8 Entitlements Matrix

A summary of entitlements of each category of affected people, for specific losses and/or impacts, is provided in the table below. The entitlements matrix applies to any losses and/or impacts caused by the Project, both those stemming from expropriation, as well as those resulting from any construction related activities.

Type of potential loss / impact	Category of affected person / entity	Entitlements
Permanent loss of privately owned (agricultural, forest, construction, or any other) land for the construction of OHL towers.	Owner of land	<p>Cash compensation for affected land at full replacement cost, as determined by the Tax Administration or through certified valuations, whichever is higher.</p> <p>Any identified economically unviable – orphan land, will also be acquired, if requested by the owner and determined as unviable, by certified valuators.</p>
Reduced value of the affected privately owned land plot, resulting from the establishment of a permanent easement below the transmission line conductors.	Owner of land	<p>Cash compensation in the amount which corresponds to the difference between the full market value of an affected land plot and its reduced value, as determined by certified valuators.</p>
Loss of annual crops or plants or damages caused during construction or for OHL repairs and maintenance	Owner of crops (can be the owner of the land or the formal or informal user of the land)	<p>The right to harvest crops.</p> <p>OR</p> <p>Cash compensation for lost annual crops, at full replacement cost, as determined by certified valuators, in the expropriation process or caused by construction activities.</p>
Loss of fruit trees or damages caused during construction or for OHL repairs and maintenance	Owner of fruit trees (can be the owner of the land or the formal or informal user of the land)	<p>Cash compensation for lost perennial yields and timber (if applicable), at full replacement cost, as determined by certified valuators, in the expropriation process or caused by construction activities.</p>
Loss of forest trees or damages caused during construction or for OHL repairs and maintenance	Owner of forest trees	<p>Cash compensation for loss of forest trees, at full replacement cost, as determined by certified valuators, in the expropriation process or caused by construction activities.</p>
Loss of structures (fence, irrigation system, shed, etc.) or damages caused during construction or for OHL repairs and maintenance	Owner of structures	<p>Cash compensation for loss of structures, at full replacement cost, as determined by certified valuators, in the expropriation process or caused by construction activities.</p>
The obligation to request approval from EMS in the process of obtaining a construction permit for the construction of new structures on privately owned land within the OHL protection zone.	Owner of land requesting construction permit	<p>EMS will grant approval in all cases when the safety of the OHL and the planned new structure is not jeopardised.</p> <p>In cases when that is not possible, EMS will cooperate with the owner of the land and suggest changes that need to be made on the planned structure or its location, so that approval may be granted.</p>
Loss of income or livelihood associated with either of the above losses (economic displacement), resulting from the expropriation process or caused by construction activities.	All categories of affected persons - owner, user (formal or informal).	<p>Individually tailored livelihood restoration or improvement assistance (e.g. assistance to improve the productivity of other used land, assistance to access employment on the Project, assistance to identify and access other land for use, assistance to access available agricultural programmes or apply for subsidies, etc.)</p>

Type of potential loss / impact	Category of affected person / entity	Entitlements
Disproportionate / more severe impact, as a result of vulnerability, resulting from the expropriation process or caused by construction activities.	Vulnerable individuals / households	Individually tailored assistance (assistance to understand the expropriation procedure and rights to compensation in the expropriation process or caused by construction, or file a grievance, assistance to open a bank account, transport to the municipal centre to fulfil administrative tasks in relation to expropriation, delivery of timber to the affected person's residence, etc.)

7 Stakeholder Engagement

The following information and consultation activities will be carried out during the implementation of the LARP:

- This LARP summary will be published on the official website of EMS in Serbian and English.
- Several hard copies of this LARP summary in Serbian will be delivered to representatives of local communities in all villages along the OHL route, so that they can be shared with interested local owners of affected land.
- Notices about the grievance mechanism and contact details which people can use to submit any questions or grievances in relation to the Project and more specifically land acquisition and construction activities, will be put up in public places in the villages as agreed with local community representatives.
- Project affected persons (owners and users of affected land) will be contacted directly, in person at the villages along the Project footprint, or by phone but only in exceptional cases when they cannot be contacted in person, on site, by the Social Expert (Implementation Consultant) and/or the Construction Contractor, to:
 - address any questions and / or complaints submitted through the grievance mechanism
 - inform those who were not previously informed about the planned expropriation, so that they may contact the municipal property administration and participate in the relevant procedures (this includes particularly individuals who may have been assigned temporary representation, as they did not respond to the expropriation proposal)
 - identify and record any specific cases of vulnerability and / or informal land use, to determine if assistance is needed and the type of assistance that may be provided, as well as follow up calls during and after the implementation of assistance measures
 - inform individuals that their land plots will be accessed by valuers or construction workers, providing them with opportunities to be present on these occasions and provide their views on the least disruptive ways to access their plots or the best times for doing so (e.g. when crops have been harvested)
 - monitor the implementation of the LARP and evaluate outcomes, i.e. whether they are consistent with the LARP.

8 Grievance Management

Affected people can submit comments, complaints and/or requests for information regarding the Project, including particularly land acquisition, using the following contact information:

Name: Nikola Tomić

Title: LARP Social Expert

Company: GOPA Consultants

email: Nikola.Tomic@gopa.eu

Phone number: +381 69 766545

Address: GOPA Tech GmbH ogranak Beograd, Belgrade, Kneza Mihaila 1

It is important to highlight that at all times, people are able to seek legal remedies for their complaints in accordance with the laws and regulations of the Republic of Serbia and using the Project grievance mechanism does not prevent them from doing so.

Grievances can be submitted using the example grievance form provided at the end of this document. Persons who submitted the grievance will be informed about the receipt and recording of the grievance within 7 days and the grievance will be responded to within 30 days. For complex grievances, more time will be needed, in which case the person who submitted the grievance will be regularly informed about the expected time frame for the response and resolution of the grievance.

Grievances will be processed in regular meetings held between the Social Expert, a representative of EMS, as well as a representative of the Construction Contractor, if they pertain to construction related issues. The Social Expert will present the received grievances and the group will agree a response or identify who else needs to be involved or contacted (e.g. from EMS, the Supervision Engineer team, the construction team, the municipality), to be able to respond to and resolve the grievance. Involvement of EMS senior management may also be needed to address serious grievances, particularly those involving more complainants or any group petitions, NGO complaints, etc. Follow up meetings with the person/organisation who submitted the grievance may also need to be organised, to be able to identify a solution to the grievance, acceptable to all parties.

Grievances in relation to construction activities will be addressed directly by the Construction Contractor and their management will be monitored by the Social Expert. The contact details of persons responsible for contacts with local people/communities and grievance management on behalf of the Construction Contractor will be made available in all villages along the OHL corridor. The Construction Contractor is expected to have offices / construction camps in the field, in Bajina Bašta, Valjevo and Obrenovac and the exact locations of these camps will be included in the grievance contact details, so that affected people can approach the Construction Contractor in person.

9 LARP Implementation Timeline

Project construction began in May 2025, and will last for 36 months in total. It is expected that most of the expropriation and execution of compensation will be completed during the first two years of implementation.

Completion of expropriation for OHL towers remains a priority for EMS, as this is where construction activities will occur and where the majority of impacts on land can be expected. It is understood that the conductors are installed between towers after they have been completed, through the air, without the need to access land underneath. This is why the establishment of easement rights through expropriation, is of a lower priority compared to OHL towers. However completion of all cases involving compensation for trees, which need to be cut down to enable the installation of conductors, must also be completed on time, to enable construction to proceed as scheduled.

Example Grievance Form

Reference No (to be filled in by the responsible person):	
Full Name	
Contact Information and Preferred method of communication Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide postal address: <input type="checkbox"/> By Telephone: Please provide telephone number: <input type="checkbox"/> By E-mail: Please provide E-mail address:
Preferred language	<input type="checkbox"/> Serbian <input type="checkbox"/> English
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration 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?	