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Stakeholder Engagement and Information Disclosure Plan

Sofia Airport, December 2024

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1 Introduction

Following a tender procedure announced by the Ministry of Transport and Communications of the Republic of Bulgaria, SOF Connect AD was awarded the concession of Sofia Airport for a period of 35 years. The project focuses on the redevelopment, expansion, financing, operation and maintenance of Sofia Airport.

As part of its commitment to transparency and regulatory compliance, SOF Connect is required to update the Stakeholder Engagement Plan annually, ensuring stakeholder engagement, particularly on environmental and social issues.

As part of its obligations to creditors, SOF Connect plc has committed to develop a Stakeholder Engagement Plan (the "Plan") and to update it annually .

The main objectives of this plan are:

- Define/identify people, communities, parties that may be affected by or

interested in the operation and future improvements of Sofia Airport.

- Through a process of research, awareness and consultation, ensure stakeholder participation in relevant environmental and social issues.
- Establish and maintain effective interaction with stakeholders at all stages of the Airport's development and operation.
- This Stakeholder Engagement Plan will be made publicly available on the Airport's official website and updated periodically.

The person responsible for the implementation of this Plan and the main contact person is:

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2 Project context

Sofia Airport is the largest international airport in the Republic of Bulgaria and is located about 10 km east of the centre of the capital - Sofia.

In 2024, Sofia Airport continues its transformation, attracting 6 new airlines and adding 28 new destinations. Improved facilities and streamlined operations will enhance the passenger experience with upgraded baggage handling systems, new car parks, an all-new Dufry duty-free shop and the construction of a state-of-the-art T2 dining area.

The aviation industry is facing new challenges such as the ongoing war in Ukraine, the war between Hamas and Israel and the rising cost of fuel.

The airport has one main runway (3,600 metres long), with the former runway now used as a parallel taxiway. The eastern part of the runway crosses the bed of the Iskar River via a specially designed bridge. The other main operational facilities (including passenger terminals, cargo facilities and fuel storage) are located on the south side of the runway and the parallel taxiway. Military operations and buildings are located north of the runway, but these areas are excluded from the concession area. The subway station that serves the airport area is also located outside of the concession area.

The site operates as a civil airport and SOF Connect AD is responsible for the safety, airport operations and maintenance of the site. "SOF Connect plc also performs aircraft ground handling services. Alongside it, three other ground handling operators operate – 'Swissport Bulgaria' AD, 'GoldAir Handling Bulgaria' Ltd. and 'Lukoil Aviation Bulgaria' Ltd. In the field of cargo services, two companies operate on the territory of Sofia Airport: Aviation Services Bulgaria and "SOF Connect". The operation of the fuel depot also falls under the responsibility of the company, as the aircraft refuelling operations are mainly performed by "Lukoil Aviation Bulgaria" Ltd. The fire-fighting facilities are owned by the Ministry of Transport and Communications, although the fire-fighting activities are assigned to the Fire Safety and Civil Protection General Directorate . Other major third parties operating at the airport are described in the table in Figure 2.

3 Objectives, expected results and scope

3.1 Objectives

The main purpose of this Plan is to build trust between key stakeholder groups and improve Sofia Airport's relationship with them; to communicate with those who may be affected by or have an interest in the Airport and to describe the mechanism for submitting complaints about the Airport.

In this sense, the objectives of the Engagement Plan are also directly linked to the objectives for achieving the Sofia Airport vision. And those are:

- Conversion into a 5-star regional airport;
- Achieving a high level of efficiency and associated financial performance measurable with the best airports in Europe;
- Sofia Airport is committed to reducing its greenhouse gas emissions by 28% by 2026, with a long-term goal of achieving climate neutrality by 2036. This includes infrastructure upgrades with a focus on energy-efficient systems, electric vehicles, and comprehensive environmental monitoring programs to ensure sustainable operations. Support local social and economic development by increasing GDP per capita by 0.8% in the long term along with increasing traffic and improving connectivity.

To achieve its vision and related objectives, Sofia Airport will engage appropriately with relevant stakeholders.

The main objectives that guide our strategy refer to the principles of transparency and cooperation. We want the airport to become a good neighbour for the community and a great place to work. Maintaining good relationships will impact economic development for local entrepreneurs, support airlines with improved efficiency of operations, create job opportunities, and partner with local educational institutions on job training programs and other community development initiatives.

3.2 Expected results

Result	Criteria for success
Timely identification of potential problems and conflict resolution	- The stakeholder management process is working - we have appropriate channels and responsibilities in place. An online-based feedback platform has been established through which our stakeholders can anonymously share their feedback. - In this way, the concerns of our stakeholders are directed directly to us - we are their first choice for expressing needs, concerns and ideas. For the latter, they use our communication channels. They don't look first to the media or other parties to solve their problems. Verification against these key quality indicators is done through self-assessment.
Existing disputes have been resolved in a manner that does not jeopardise future development plans for the airport.	- Zero unresolved issues. - Not a single issue becomes a conflict. - The acceptance time of a problem does not exceed 24 hours.
There is sufficient capacity to resolve issues with stakeholders.	- The organisation has the necessary capacity to manage stakeholder issues, with responsibilities clearly allocated to processes and described in working procedures. Training is provided to ensure that all staff are aware of the organisation's processes. Conflict resolution training is provided.
Stakeholder involvement in the airport development and operation process.	- Active stakeholder participation is encouraged in all key development projects through consultation and timely communication.

3.3 Scope

This Stakeholder Engagement Plan covers a one-year period of action - from January 1, 2025 to December 31, 2025, allowing for timely reflection of significant structural changes or other external factors that might affect implementation.

The Plan includes the general stakeholder principles that the Concessionaire is committed to comply with, in accordance with national legislation, international best practice and EBRD Performance Requirement 10 at the corporate level.

The plan is in line with the Sofia Airport Development Strategy, which is based on 4 main pillars:

- the passenger experience, which includes the entire process of serving the passenger and forms the passenger's assessment of the airport experience;
- efficiency and associated financial performance, measurable with the best airports in Europe;
- care for the environment, with a focus on reducing its own greenhouse gas emissions;
- the economic and social contribution that will contribute to increasing the country's GDP.

At this stage of the airport's development, the main objective of "SOF Connect" AD is the maintenance and renewal of the existing terminals, with Terminal 2 to be renovated. In this respect, the activities under the Plan are also in line with the scope of activities concerning the airport transformation project.

Upon completion of the redevelopment, passengers will be able to benefit from twice as many check-in counters, a new baggage handling system, completely new retail space, additional security and border control checkpoints, 3 additional passenger sleeves to serve wide-body aircraft, and a complete redesign of the upper level of Terminal 2, where the business lounges will be located. Domestic lines will be relocated so that travellers to Varna and Burgas will have access to all terminal facilities. Part of the terminal transformation is the separation of arriving and departing passengers according to Schengen requirements.

This document addresses external stakeholders only, as interaction with internal stakeholders and human resource management is conducted through SOF Connect procedures and processes approved by the Executive Director.

4 Legal and regulatory requirements

4.1 Legal requirements

Sofia Airport operated by “SOF Connect” AD under a Concession Agreement concluded on 22 July 2020. The Ministry of Transport and Communications (the Grantor) is a party to this agreement and accordingly the Concessionaire is obliged to report its activities to the Ministry on a regular basis and to carry out inspections in relation to these activities. In April 2021, the Concessionaire will be required to report to the Ministry of Transport and Communications. SOF Connect, as Concessionaire, has assumed the full responsibilities and business activities associated with the operation of the Airport.

The Airport currently has no statutory obligations relating to preventive disclosure and consultation with stakeholder groups other than the authorities. Such obligations can only arise in the context of legal procedures arising from environmental laws, such as Environmental Impact Assessments for major works and Environmental Assessment of Plans and Programmes. In fulfilment of its obligations under the Concession Agreement, the Grantor has developed an initial master plan for the development of Sofia Airport in accordance with the requirements of Clause 25.1 of the Concession Agreement and Article 43b(2) of the Civil Aviation Act, with a duration of 35 (thirty-five) years. Based on consultations with the Civil Aviation Administration (CAA) and the Ministry of Transport and Communications and an actualisation, the procedure for carrying out an environmental and social assessment of the Master Plan was launched in December 2023.

The most applicable legal procedure involving stakeholder engagement and information disclosure is the Environmental Impact Assessment (EIA) of investment proposals. The procedure for carrying out an EIA is set out in Art. 1 of the Ordinance on the Conditions and Procedure for Environmental Impact Assessments and includes the following consultation stages:

- Notification of competent authorities and affected population - the airport operator shall notify the competent authorities of its investment intention. The competent authority shall publish the proposal on its website and through the mass media or other appropriate methods
- Consultation, definition of the scope, content and format of the EIA report - the EIA report must contain full information in relation to the specifics of the upcoming construction, the characteristics of the existing environment, the estimated extent of the expected future impact, as well as alternative investment proposals. The EIA report shall be prepared by a team of independent experts and shall include sources of information, methodology for projections and EIA, measures to mitigate future adverse environmental impacts
- Organisation of public consultation in relation to the EIA report - the competent authorities or a duly authorised official of the same, shall also indicate the municipalities/town halls concerned to be included by the airport operator in the joint organisation of public consultation in relation to the EIA report and its relevant annexes, as the record of the public consultation shall be submitted to the competent authority, which may decide and give

prescriptions on the supplementation of the report as a result of the comments, opinions In such cases, it is necessary to organise a new public consultation

In line with the newly adopted European Sustainability Reporting Standards (ESRS), part of the EU Corporate Sustainability Reporting Directive (CSRD) and the Global Reporting Initiative - GRI, SOF Connect plc published its annual sustainability report in June. The transposition of Directive (EU) 2022/2464 into national law (Accounting Act) related to corporate sustainability reporting requires the provision of data to assess the climate effects of companies' economic activities. The information that companies provide must demonstrate that their business model and strategy are consistent with the transition to a sustainable economy and with the goal of limiting global warming to 1.5 degrees Celsius, in line with the Paris Agreement. It should also reflect the greenhouse gas emission reduction targets as well as the main actual or potential impacts associated with the company's operations and its sustainable consumption value chain.

SOF Connect's Sustainability Report 2024 is the first report to apply the principles of the dual materiality assessment and consists of 3 parts which include indices and operational data, a report on strategy and management approach, and on operations. They are available on the airport's official website . Sofia Airport is part of the Global Compact (UN Global Compact Network) and their ten principles related to human rights, labour standards, environmental protection and anti-corruption. This also includes responsible governance practices, energy efficiency and waste management, measures to reduce carbon emissions, as well as initiatives to engage the local communities.

4.2 Requirements of the European Bank for Reconstruction and Development

The European Bank for Reconstruction and Development (EBRD) is a creditor and indirect shareholder in SOF Connect AD. In accordance with EBRD policies, stakeholder engagement is an essential part of good business practice. Genuine public engagement is fundamental to the successful management of risks and impacts on communities affected by projects.

Stakeholder involvement in activities related to the airport's development and day-to-day management is guided by the following principles:

- Stakeholders have the right to receive public information about Sofia Airport and any new elements in its development that are essential;
- Stakeholders have the right to receive public information that is timely, relevant to the public interest, understandable and adequate;
- Interested parties may avail of a special complaints and objections procedure.

Stakeholder engagement is an ongoing process, part of the overall life cycle of the Concession.

5 Summary of stakeholder engagement activities to date

We have established a robust foundation for a high-performing company, equipped with effective communication channels to engage with key stakeholders. SOF Connect has introduced a new digital grievance platform for efficient feedback collection on flights, airport services, security, environmental

management, and noise concerns. The platform allows stakeholders to classify their complaints easily and ensures timely responses within 24 hours. Monitoring and Reporting: - Monthly reports are submitted to upper management, detailing grievances and resolutions. - The new grievance platform encourages stakeholder participation and improves transparency.

Currently, stakeholder issues are largely the responsibility of the Media and Digital Communications Directorate, which is also responsible for managing the complaints procedure.

The topics of the received complaints, signals, comments and questions include: service by ground operators at Sofia Airport, checked baggage complaints, service at passport control points, service at security checkpoints for passengers and hand luggage, parking services at Sofia Airport, provision of information about flights/services, lost forgotten items, questions about necessary travel documents, prohibited items to be carried in hand luggage, etc.

A key principle of SOF Connect's policy is transparency in communication with the public and all stakeholders. The company strives to provide up-to-date and accurate information to the general public through a variety of channels, including social networks and media. The Media and Digital Communications Department plays a key role in this process, maintaining active relationships with the media and managing our social media presence (Facebook, LinkedIn, Twitter, Google and YouTube).

Our social media channels serve as a platform for two-way communication between us and our stakeholders, where they can freely express their opinions.

"SOF Connect" AD has an active policy of supporting the activities of various causes and charities that aim to improve the living conditions and health status of vulnerable groups.

In accordance with the legal requirements for stakeholder consultation, a public consultation on the draft action plan to the strategic noise map for Sofia Airport was conducted in September 2020. This was based on the results of the noise monitoring in 2017, which indicated that Sofia Airport handled more than 50,000 aircraft movements per year. Sofia Airport is committed to reducing noise impacts in line with national and European legislation.

In 2024, the Strategic Noise Map for Sofia Airport and its Action Plan were updated in accordance with the relevant legislation. A public consultation on the Plan will be held, and all interested parties will be given the opportunity to familiarise themselves with the Plan in advance and then participate in the discussion. The objective is to guarantee that noise impacts on the public are managed effectively and that any concerns are adequately addressed.

Sofia Airport is committed to investing in modernising and improving passenger comfort. Notable recent developments include the installation of new smart drinking water fountains and an innovative leisure and work area, created in partnership with Mastercard. In addition to access to clean drinking water, passengers can recharge their devices and explore digital guides to the city.

The "I am proud of my parents' work" initiative is a joint effort between the Bulgarian Network of the UN Global Compact and SOF Connect, the operator of Sofia Airport. The Sofia AirCareer Port Exhibition was held on 11 and 12 October 2024 for the second consecutive year. The event showcased career opportunities in the aviation sector.

6 Approach to planned stakeholder engagement

6.1 Principles

The approach to stakeholder engagement is based on respect, inclusiveness, initiative, responsiveness, sensitivity to stakeholders, openness and honesty. The following stakeholder and community engagement principles are the foundation of this Plan:

- Recognition of the impact of and importance of the airport to nearby stakeholders in consultation with them;
- Ensuring that stakeholder management and communication activities are coordinated with the provision of notifications and responses to queries that are undertaken within specified timeframes;
- Adopt a collaborative approach when working with stakeholders and communities, and a neighbourly attitude;
- Ensuring that Project outcomes meet the balance of community needs and expectations;
- Annual monitoring and evaluation of communication activities, including identification of opportunities for continuous improvement and application of knowledge gained;
- Annual stakeholder analysis and update.

At Sofia Airport, we recognise the importance of stakeholder feedback in enabling us to maintain our commitment to corporate social responsibility and sustainable development. Performance indicators, including communication responsiveness and dispute resolution effectiveness, are monitored and evaluated on a monthly and annual basis. Stakeholder feedback is a key factor in the airport's commitment to corporate social responsibility and sustainability.

Based on ASQ surveys, Sofia Airport evaluates the passenger experience and the overall travel process, covering all steps from arrival to departure. Approximately 60 indicators are monitored, with 21 core indicators reported to the grantor and an additional 8 specific indicators provided for Terminal 2.

Complaints and comments are analysed on a monthly basis, including feedback from QR codes posted on stickers around Terminal 2.

6.2 Methods

- Regular stakeholder **identification** to target all airport activities in a timely manner and avoid risks. Understanding their needs in order to properly interact with them;

- **Timely provision of information** is the foundation of a good level of engagement. Stakeholders are given sufficient time to understand some of the activities foreseen and to reflect on important topics;
- **The consultations** will be used to clarify certain positions, expectations and concerns of stakeholders. One-to-one meetings will be held with key stakeholders;
- **Consultation** will be carried out prior to the implementation of a specific activity that will affect persons of high interest. The aim is to find the most appropriate solutions and to provide for certain actions to achieve a specific result;
- **Complaints management** - an excellent complaints mechanism provides a transparent, credible and fair process for all parties. It improves outcomes and gives people the satisfaction that their complaints are being heard, even if the outcome is not optimal;
- **Involvement in project monitoring** - it is essential to involve stakeholders in monitoring activities to establish trust and manage expectations. A good example of this would be to share data (preferably in real time) from noise measurement terminals with them;
- **Stakeholder reporting is the best way to manage all risks** - business risks, environmental risks, social risks. It is also a structured approach to internalise these topics to ensure the sustainability of the business. It is good practice to report in accordance with the Global Reporting Initiative Standard;
- **The development of project-specific Stakeholder Engagement Plans in future periods** - larger scale infrastructure projects, such as the construction of a new terminal and/or a new runway, would require the development and implementation of project-specific and Stakeholder Engagement Plans.

6.3 Stakeholder matrix

The table below shows the classification of stakeholder groups according to their level of interest relative to the Airport's level of influence. The stakeholder groups listed in the top right quadrant have the highest level of influence and interest - they are essential to the successful operation and development of Sofia Airport.

Figure 2. Stakeholder matrix

Influence / Interest	High Influence	Low Influence
High interest	Ministry of Transport and Communications (Contender) Ministry of Regional Development and Public Works Ministry of Environment and Water DG CAA Air Traffic Control Airlines	Environment and climate NGOs

	European organisation of the Airports Council International (ACI Europe) Eurocontrol Utility companies Branch tourist organisations	Local residents (including vulnerable groups)
Low interest	Other ministries Agencies Regional administrations, military units Sofia Municipality and regional administrations Trade Unions Public transport operators Ground handling (Swissport, GoldAir)	NGOs Technical University - Sofia Airport service providers (tenants - shops, restaurants, car rental, taxi companies, car park operators, etc.)

In order to build open and constructive relationships with stakeholders to contribute to the sustainable development of Sofia Airport and meet the needs of all stakeholders, we present different approaches to engage them:

A. High influence and high interest

- Frequency of communication: regular meetings
- Methods of engagement: consultations, working groups, participation in strategic planning.

B. Low influence and high interest

- Frequency of communication: annual meetings, seminars and information campaigns.
- Methods of engagement: feedback, public discussion of important issues.

C. High influence and low interest

- Frequency of communication: review important issues on a multi-month basis (three or six).
- Methods of engagement: newsletters, periodic reports on airport developments.

D. Low influence and low interest

- Frequency of communication: periodic information sessions and news releases.
- Methods of engagement: distribution of information materials and invitations to events.

4. Assessment and adaptation

- **Feedback:** gathering stakeholder views.
- **Adapting the strategy:** adjusting approaches depending on the data and changes in stakeholder interests **on an annual basis.**

6.4 Key topics for stakeholders

The following matrix (see Figure 3) is a tentative representation of the topics of interest (so-called Material Topics) for the Concessionaire and external stakeholders. The matrix has been prepared according to the requirements of the Corporate Sustainability Reporting Directive (CSRD) for a double materiality matrix.

It addresses topics that are significant and impact "from the inside out" such as climate and environmental impacts, social issues and governance, but also impacts "from the outside in" that present significant risks and opportunities to the company's operations and financial performance.

Initially, an extensive list of potential topics was compiled based on several key sources, such as 1) Sofia Airport's Environmental and Social Action Plan; 2) EBRD's Environmental and Social Policy; 3) the Global Reporting Initiative's Sustainability Reporting Standard; 4) Accreditation of Airports as Carbon Neutral Zones; 5) the UN Sustainable Development Goals; and 6) the Corporate Sustainability Reporting Directive (CSRD).

The assessment of the significance of the themes for Sofia Airport (horizontal axis) and the assessment of the significance of the financial impacts for SOF Connect (vertical axis) is based on:

- 1) meeting with directors and department heads to update the description of the topics and their relevance;
- 2) survey of heads of directorates and departments of Sofia Airport;
- 3) survey of key stakeholders: passengers, representatives of governmental institutions, NGOs, service providers, Sofia Airport partners, company employees.

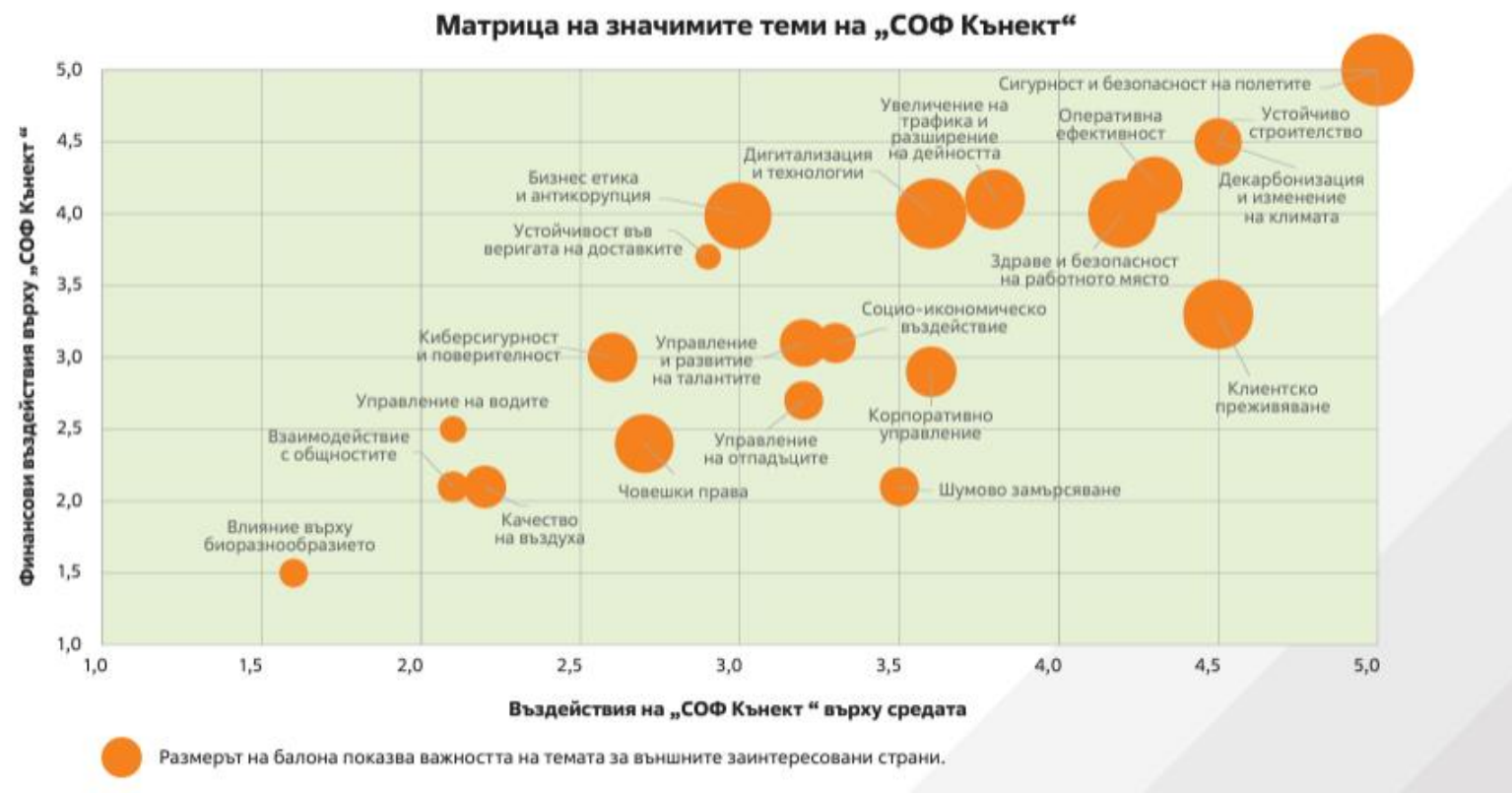


Figure 3. Dual materiality matrix

Topics of interest

MANAGED	Corporate Governance Business ethics and anti-corruption Cyber security and privacy Supply chain resilience
ECOLOGICAL	Noise pollution Waste management Decarbonisation and climate change Water Management Air quality Sustainable construction Impact on biodiversity
SOCIAL	Socio-economic impact Interaction with communities Human Rights Health and safety at work Talent Management and Development
ECONOMIC	Security and flight safety Customer Experience Operational efficiency Technology and Innovation Airport Accessibility Increase in traffic and expansion of activity

Figure 4. Key topics of interest

6.5 Stakeholder engagement activities

"SOF Connect plc regularly engages with its stakeholders on airport operations, upcoming developments and future planning through a range of channels as set out in the table below. The main engagement activities are outreach, consultation, reporting and partnering activities. The table also identifies key topics of common interest, a brief description of the approach, actions and overall timelines.

SOF Connect's approach to stakeholder engagement is based on the belief that knowing and respecting the roles and interests of stakeholders plays a key role in co-creating value throughout the partnership cycle. It is essential to note that the impacts that can be expected during Phase I of the concession development are as with any construction project - noise, dust, heavy vehicle traffic, inconvenience related to airport accessibility. Given the distances from neighbouring sites, it can be expected that the majority of the projects will not impact the local population in the immediate vicinity to a significant degree, but there may be exceptions.

Each stage of development will undergo a Social and Environmental Impact Assessment (SEIA) with appropriate stakeholder engagement. The current Stakeholder Engagement Plan will be updated according to new needs and new scope.

Table 1: Significant themes and stakeholder engagement approach

Interested party	Topics of general interest	Responsible organizational unit ¹	Engagement occasions and activities	Time and frequency	Channels and means of engagement
Clients					
Passengers and visitors	- Security and flight safety - Customer Experience - Airport Accessibility - Privacy of personal data	Directorate General "Operations" Media and Digital Communications Directorate	Consulting: measuring customer satisfaction with the services offered at the airport using digital surveys,	Quarterly measurement of satisfaction- disclosure of results to ministry on quarterly basis, to management on monthly basis.	Airport website, social media, digital channels
			Informing: sharing initial plans when implementing repair and construction activities, e.g., terminal repair and expansion, stakeholders need to be informed.	At least one month before taking action During the design and execution of the works	Signs and signage throughout the airport; website, social media, airport digital channels
Airlines and their associations	- Customer Experience - Security and flight safety - Technology and Innovation - Increase in traffic and expansion of activity - Operational efficiency - Airport charges	Marketing and Business Development Directorate Ground Handling Directorate Directorate General "Operations"	Information: when carrying out renovation and construction activities, e.g. terminal renovation and expansion, interested parties should be provided with information.	At least three months before the action is taken During the design and execution of the works	Operational calls and meetings
			Consultation: Sofia Airport discusses the issues with all operating airlines within the framework of the Airline Operating Committee (AOC).	Twice a month Twice a year Ad hoc events	Tactical meetings Strategic meetings Operational calls and meetings

¹ For more details on our corporate structure, see Figure 5: Schematic of the organizational and management structure of SOF Connect Plc.

Airport service providers (terminal cleaning and maintenance operators)	- Customer Experience - Operational efficiency	Directorate General Commercial Directorate General "Operations"	Information and advice: coordination of joint activities.	Daily	Operational calls and meetings
Tenants providing services at the airport (retail and duty-free shopping, restaurants, car rental, taxi companies, parking operators, bank offices and currency exchange offices, insurance companies, post offices, courier companies, freight forwarders, travel companies)	- Customer Experience - Airport Accessibility - Operational efficiency	Directorate General Commercial	Informing and advising: coordinating its activities with tenants. Informing: Timely provision of information regarding the renovation/construction plan.	Daily At least one month prior to commencement of works, continuously throughout the execution of the works Once a quarter Annually	Operational calls and meetings Strategic meetings Tactical meetings Strategic meetings

Institutions					
The following activities are tailored to the requirements of individual institutions and to existing procedural requirements.					
Ministry of Transport and Communications (Concessionaire)	- Compliance with the law - Follow up of the obligations under the Concession Contract as well as under contracts concluded with banks.	Executive Director Directorate General "Operations"	Informing and reporting on changes in performance and plans and meeting legal requirements	Monthly	Reports/reports concerning the conditions for the execution of the concession
				Monthly	Standing Joint Committee

	Also, ensure timely compliance with regulatory obligations and internal and external audit requirements. • Corporate Governance • Other topics relevant to the period	Directorate General "Technical" Legal Directorate Directorate-General for Finance Media and Digital Communications Directorate Corporate Administration Department		Ad hoc	Official correspondence (written and electronic)
Directorate General Civil Aviation Administration	• Security and flight safety • Approval of projects (T3, hangars, airfield master plan)	Directorate General "Operations" Corporate Administration Department Directorate General Technical Directorate Legal	Informing and reporting on changes in performance, plans and meeting legal requirements. Consultations and negotiations: obtaining permits (e.g. construction activities), licenses (e.g. security)	Daily	Operational calls and meetings Incident reports Official correspondence

General Directorate "Fire Safety and Population Protection", General Directorate "National Police", SANS, NSO, National Customs Agency	• Security and flight safety • Operational efficiency • Compliance with the law • Cyber security and privacy • Other topics relevant to the period	Directorate General "Operations" Legal Directorate Digital Transformation Directorate Directorate 'Security' Corporate Administration Department	Informing and partnering on current issues Informing and reporting on changes in performance, plans and meeting legal requirements.	Daily Monthly, quarterly and annually	Operational calls and meetings; Official correspondence Reports according to legal requirements
Other ministries, agencies, regional branches, military units, etc. (Ministry of Environment, Ministry of Regional Development, Sofia Municipality, Regional Inspectorate of Environmental Protection)	• All topics	Executive Director Directorate General "Operations" Technical Directorate Legal Directorate Media and Digital Communications Directorate Corporate Administration Department	Informing and reporting on changes in performance, plans and meeting legal requirements.	Monthly, quarterly and annually	Operational meetings; Official correspondence

Local organisations					
Trade Unions	All topics from category "Social"	Executive Director Directorate General "CHRACD"	Informing and advising: on issues in defence of employees' rights	Quarterly	Operational talks and meetings, collective bargaining negotiations, labour law advice
Airports Varna, Burgas, Plovdiv	All topics	Executive Director Legal Directorate Media and Digital Communications Directorate	Informing and partnering on current issues	Ad hoc	Operational calls and meetings
Association of Bulgarian Airlines (ABA)	- Security and flight safety - Operational efficiency - Technology Innovation and	Executive Director Media and Digital Communications Directorate Marketing and Business Development Directorate Operations Directorate Digital Transformation Directorate	Partnering: development of initiatives related to the interests of Bulgarian airlines	Twice a year Ad hoc	Operational calls and meetings

Joint Environmental Impact Management Board (JEMB, including all airports in Bulgaria, BULATSA, DG CAA and airlines) ²	All topics from category "Environmental"	Sustainable Development Directorate	Informing and partnering: membership; participation in key committees, initiatives and events Taking action on aircraft noise in the air and on the ground; ground-level air quality emissions; climate change emissions; sustainable aviation fuel deployment and uptake; water pollution; waste management	Annually	Tactical and strategic meetings
Union of Veterans of the Bulgarian Civil Aviation	Interaction	Media and Digital Communications Directorate	Partnering: aviation club development; providing meeting space	Ad hoc	Meetings and conversations
NGOs and civil society groups	- All social topics - All environmental topics, especially noise pollution, airport accessibility and air quality	Media and Digital Communications Directorate Sustainable Development Directorate OS and ISU	Inform: real-time noise and air quality measurement system with public online access.	In real time	The noise data is publicly available online from 31 March 2021.
				Monthly and quarterly	Noise and air quality reports are available online and sent to the competent authorities
			Consultation: sharing in advance with NGOs any plans relating to noise, air pollution abatement or biodiversity conservation.	Ad hoc	Public meetings and discussions with representatives of the Panel of Experts
			Inclusion: organising and running an annual open day, giving the opportunity to receive advance questions.	Once / twice a year	Public consultations for each major project (part of the EIA procedure)

² In 2012, Fraport TCEM AD joined the initiative of BULATSA to establish a forum for Joint Management of the Impact on the GA from Aviation Activities in the Airport Area (JMMA), and the operational stakeholders in Bulgaria adopted the relevant documents according to the specifications and with the support of Eurocontrol.

			Giving an answer: Creating information materials with ready-made questions and answers: online through a website and printed brochures with regular distribution through own communication channels and neighbouring municipalities (including administrative offices) and popular local areas; Responses are based on real problems, including as part of complaints management.	Permanent online	Provide information and data through all airport communication channels - website, telephone, conventional media channels, social media, annual sustainability report, public consultation, complaints management.
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International organisations					
ACI EUROPE - European Chapter of the Airports Council International (ACI WORLD) ³	• Decarbonisation and climate change • Security and flight safety • Customer Experience • Increase in traffic and expansion of activity • Resilience of supply chains	All Directorates	Informing, engaging and partnering: participation in specialised branch committees, events, drafting position statements, lobbying;	Daily, Ad hoc events	Official correspondence, meetings and events
			Participation in the Airport Carbon Accreditation Program	Once a quarter	Tactical and strategic meetings Reports as required by the organisations
			Accountability as required by the accreditation process (currently Level 3 and planned to achieve Level 4 certification);	Annually	Annual GHG inventory reports
Local authorities					
Sofia Municipality (Administration & Municipal Council) Regional administrations Slatina, Poduyane, Kremikovtzi and Vrazhdebna	• Overall socio-economic impact • Increase in traffic and expansion of activity • Airport Accessibility • Noise pollution • Air quality	Executive Director	Information and advice: individual meetings with local authorities to present plans and projects.	Ad hoc	Official correspondence and meetings
		Directorate General "Operations"	Partner: Send invitations to mayors and local officials for corporate events.		
		Media and Digital Communications Directorate	Participation in municipal projects, development of cultural and social initiatives		
		OS and ISU		Quarterly and annually	Strategic meetings

³ Branch organisation of the airport industry sector in Europe
Stakeholder engagement and disclosure plan
Sofia Airport, December 2024

			Partnering. Sofia to develop the capital as a tourist destination	Ad hoc	Planning meetings for projects and initiatives
Countries close to the airport					
Local population (Addressing vulnerable groups, if any)	- Noise pollution - Air quality - Increase in traffic and expansion of activity - Airport Accessibility	Media and Digital Communications Directorate Sustainable Development Directorate	Information: maintenance of a real-time noise measurement system and publication of the results on the website	Real time	Noise data - public data available from 31 March 2021.
				Ad hoc	The reports are available online and are sent to whistleblowers upon enquiries
				Ad hoc	Use of all communication channels at the airport
				Ad hoc	Organisation of public consultations for each major project (part of the EIA procedure)
				Once or twice a year	By operational means
			Advising: groups who may face difficulties in getting through the airport (wheelchairs, large families)		
			Inclusion: organise and run an open day - with the opportunity to send in preliminary questions and identify topics of interest.		

			Giving answers: giving answers based on real problems, including as an aspect of complaints management.	Permanent	The use of all communication channels at the airport; Making contact with local authorities and neighbouring municipalities
Commercial activities (Lufthansa Technik, delivery services, commercial and storage areas, etc.)	• Noise pollution • Air quality • Increase in traffic and expansion of activity • Airport Accessibility	Directorate General "Operations" Media and Digital Communications Directorate Sustainable Development Directorate Marketing and Business Development Directorate	Partnering: initiating joint projects with partners to protect the environment	Ad hoc	Decided according to the situation

Business					
State Enterprise "Air Traffic Control"	• Security and flight safety • Increase in traffic and expansion of activity • Noise pollution	Directorate General "Operations"	Partnering: Critical to the daily operations of the airport	Daily	Standing Joint Committee
		Media and Digital Communications Directorate		Monthly	Tactical meetings Joint working group to address aviation noise complaints
		Sustainable Development Directorate		Once a year	Strategic meetings
Ground Service, (Lukoil; Suisport, Golder, Aviation Services Bulgaria)	• Security and flight safety • Technology and Innovation • Increasing traffic • Decarbonisation and climate change	Directorate General Ground Handling	Informing and advising on renovation/construction plans that may impact their operations;	Once a year	Distribution of the Annual Sustainability Report
		Directorate General "Operations"	Participation in common initiatives or environmental projects (e.g. identifying opportunities for circular economy, reducing greenhouse gas emissions);		
		Sustainable Development Directorate			
		'Technical' Directorate			

"Sofia Airport EAD	• Security and flight safety • Airport Accessibility • Increase in traffic and expansion of activity • Hire of equipment	Executive Director Business Development and Marketing Directorate Directorate General 'Operations' Directorate-General for Finance " Ground Handling Directorate	Information: meetings to discuss changes to airport infrastructure; minutes of meetings between all users (airline operators and ground handling)	Weekly	Operative Official correspondence
Branch tourism organizations (NBT, BATA, KRIB, American Chamber of Commerce, Bulgarian-German Chamber of Commerce, etc.)	• Overall socio-economic impact • Traffic growth and expansion • Customer Experience • Airport Accessibility •	Executive Director Marketing Business Development Directorate Media and Digital Communications Directorate	Partnering: a special collaborative initiative linked to national brand image and destination promotion activities Informing on increased traffic and new airline contracts	Ad hoc	Providing information and data through all company communication channels
Utility companies, telecommunications companies, public transport	• Security and flight safety • Technology and Innovation • Increase and expansion of traffic • Operational efficiency • Supply chain resilience • Decarbonisation and climate change	Directorate General "Operations" Technical Directorate Sustainable Development Directorate	Partnering in airport operations	Ad hoc	Strategic meetings Official correspondence

Scientific and educational institutions					
Technical University - Sofia	- Partnerships and donations - Talent Management	Executive Director Directorate General "CHRACD" Media and Digital Communications Directorate	Partnering: to train future engineers under a collaboration agreement	Ad hoc calls and meetings	Meetings with the university management
Other Aviation Schools*/AUC, Fraport (Varna and Burgas), Military Academy	- Partnerships and donations - Talent Management	Directorate General "CHRACD" Media and Digital Communications Directorate	Partnering: curriculum development	Ad hoc calls and meetings	Meetings with the person responsible for curriculum development

* Ministry of Environment and Water; Ministry of Regional Development and Public Works; Executive Agency "Environment"; Regional Inspectorate for Environment and Water (RIEW), Sofia; Basin Directorate "Danube Region" - Pleven; Ministry of Tourism; Ministry of Health; Sofia Regional Health Inspectorate; Ministry of Defence; Regional Directorate "National Construction Control" - Sofia; etc.

** "Air Transport Institute" Ltd, "Private Transport College" Ltd - Sofia, "Aviation Training Centre" at "SOF Connect" JSC, "Sofema Aviation Services" Ltd, Aviation Training Centre "ESA Services" Ltd, Aviation Training Centre of State BULATSA

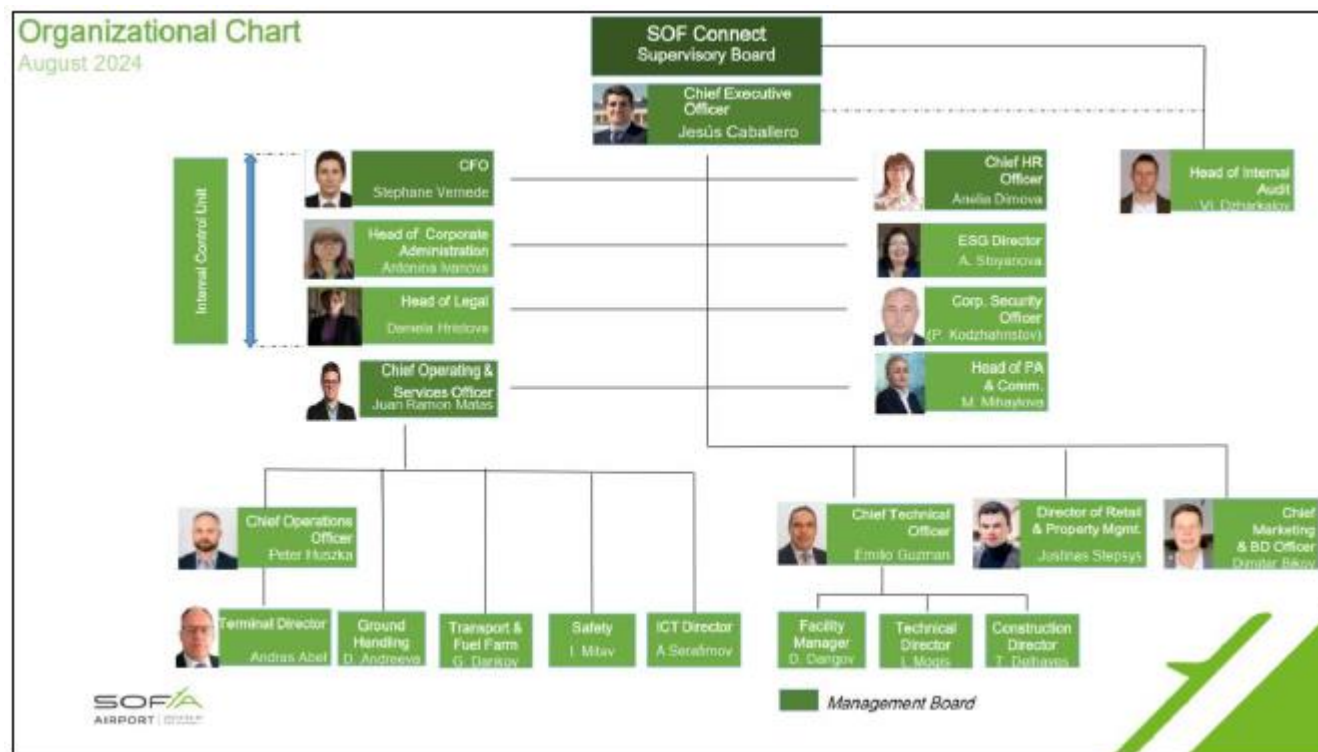


Figure 5. Scheme of the organizational and management structure of SOF Connect JSC

6.6. Complaints

Complaints can be submitted by email, online form, Sofia Airport office, postal address and social media. There are three telephone lines through which the public can obtain information about airport operations around the clock. The information line does not formally receive complaints, but only redirects them to the other channels.

6.6.1. New digital form for submitting complaints

A new digital complaints platform has been developed and is available on our website. The form covers 5 main categories: flights, airport services, security, environmental management and noise issues. The online form allows a detailed classification of complaints so that each customer can easily indicate the nature of their problem. This new tool will facilitate the exchange of feedback and two-way communication between SOF Connect plc and its stakeholders.

6.6.2. Means of lodging complaints

Complaints, claims, comments and recommendations addressed to SOF Connect AD may be submitted in the following ways:

- a) Online form on Sofia Airport website , "Contact" section
- b) Online form for submitting questions and comments related to aviation noise, available on Sofia Airport's website, under the "Environment" section
- c) Manual submission to the Office of SOF Connect AD
- d) By post - to the postal address of SOF Connect AD
- e) Social networks and other mail/forwarding companies

6.6.3. General Terms and Conditions

- a) The complainant may choose to address his/her issue anonymously or provide contact information
- b) Complaints are categorised under the following main headings: flights, airport services, security, environmental management, noise issues. These categories are presented in a detailed classification, which is part of the online form on the airport's website
- c) Complaints received are handled by a responsible person

6.6.4. Monitoring and reporting

- a) The Media and Digital Communications Directorate, prepares regular reports - annually, which are presented to the Executive Director and management staff. The annual reports are more detailed in relation to trends, recurring cases or the most active stakeholders.
- b) The OS and ISU Department shall prepare an annual report on aviation noise related alerts verified and analysed by the joint working group appointed by Order No. 3-42/28.07.2023 of SOF Connect AD and Order No. RD-14-8/01.08.2023 of BULATSA. The report shall be presented at the annual meeting of the EWS Council. The report shall contain information on the channel of receipt, the location of the complainant, the reason for the alert and the closure of correspondence.

6.7. Resources and responsibilities

A team from the Sustainability Policies and Projects department creates an engagement process for the airport (in coordination with the Public Relations and Corporate Communications team) that also includes internally all departments that need to add their input to different/applicable engagement topics. The heads of these departments are responsible for reporting progress to their line managers. Chapter 7 (Monitoring and Reporting) specifies the different reporting periods. The person responsible for the engagement process must proactively identify risks and mitigation plans to achieve effective outcomes, and report challenges and obstacles promptly.

Team member responsibilities include, but are not limited to:

- Timely communication to stakeholders
- Preparation of press releases, information and presentation materials
- Interaction with stakeholder groups; participation in joint projects, etc.
- Making and maintaining links with the local community
- Planning and organizing partner programs and corporate events

7 Monitoring and reporting

Monitoring and reporting will be implemented to measure effectiveness and facilitate continuous improvement of the stakeholder engagement process. It is in the Concessionaire's interest to be aware of the quality of the process and the relationships established; what the capacity is to identify potential problems and conflicts early; and how existing disputes are resolved in a way that does not hinder future airport development plans. Performance indicators that will be monitored include responsiveness and effectiveness of communication with stakeholders and the community, and the quality and intensity of information flow.

If new stakeholders are identified during the monitoring and reporting process, they will be added and communication with them will be initiated.

The table below includes the main elements of monitoring and reporting:

Element (what is observed)	Monitoring requirement (how monitored)	Frequency
Access to stakeholder information	Report on the number of responses to requests for information or data; website visits; document downloads;	Annually
Effectiveness of the complaints procedure	Report on number and nature of complaints; resolution rate; response times;	Annually
Effectiveness of the Joint Committees	Report on Joint Committee meetings - number, participation, minutes, decisions	Once a quarter
Compliance with the law	Report on the level of satisfaction of legal reporting requirements (if any) The Concession Management and Compliance Committee shall review the compliance with deadlines for all concession obligations, inspections carried out by inspection bodies and the implementation of an action plan to remedy identified non-compliances. Reporting depends on the number of inspections carried out in the previous period.	Once a month.
Sustainable management	Sofia Airport Sustainability Report, which includes relevant environmental, social and corporate governance topics and Global Reporting Initiative (GRI) compliance	Annually

Agreed:

DocuSigned by:

Antoaneta Stoyanova

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Antoaneta Stoyanova, Sustainable Development Director

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Milena Mihaylova

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Milena Mihaylova, Director Media and Digital Communications

DocuSigned by:

Desislava Gruva

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Desislava Gruva, Public Relations and Corporate Communications Department Expert

Annex 1: Report

Despite the challenges faced by the aviation sector, Sofia Airport reported significant growth in the first quarter of 2024. The number of flights operated reached 55,517 and the total number of passengers served exceeded 6.6 million. This is due to the successful cooperation with the leading airlines Ryanair, Wizz Air, Bulgaria Air, Lufthansa and Turkish Airlines, which account for over 80% of the total traffic. The variety of destinations continues to expand, with passengers able to choose from over 83 destinations in 35 countries for scheduled flights and 82 destinations in 40 countries for charter flights- as well as new direct flights to Riga, Helsinki and Baku.

Sofia Airport has received 421 complaints from passengers for the period January-October 2024. Each of these complaints has been carefully examined and processed. The airport team works proactively to ensure that all reports are dealt with promptly and efficiently. Through this process, the aim is to continuously improve service quality and passenger satisfaction.

Schengen-Non-Schengen area - Terminal 1: After Bulgaria's accession to the Schengen area and due to the infrastructure constraints of Terminal 1, it was necessary to separate two wings of the "Departures" to separate the passenger flows. *This measure led to overcrowding and insufficient seating and toilets.* Based on consultations with stakeholders, we have started the process of reconstructing the terminal buildings and creating border crossings in front of the aircraft gates, which will allow for the retention of a common Departures area.

Stakeholder consultation: we are actively working with various organisations and institutions to identify the best solutions and successfully implement the redevelopment project.

Terminal 2:

Smoking area: in response to numerous complaints about the lack of a smoking area after the baggage checkpoint, we have set up a team to design a new area. Our goal is to provide a comfortable and safe place for smokers.

New uniforms: we have initiated a procedure to renew the uniforms of the SOF Connect employees. We are organizing meetings with various departments to determine the most appropriate models and materials.

Operations:

Improving service quality: we regularly meet with partner companies to monitor contract performance and ensure high quality services for passengers.

Environmental initiatives:

Electric vehicles: we actively promote the use of electric vehicles at the airport by working with car rental and taxi companies.

Charging stations: we have concluded a contract with ElDrive Charging EAD for the construction of charging stations in the new car parks of Terminal 2. This will allow employees to charge their electric vehicles.

New contracts: we concluded new contracts for cargo and ground handling services, as well as contracts for the purchase of new electrical equipment.

Community Engagement:As part of our sustainability strategy, SOF Connect plc is dedicated to fostering the next generation of aviation professionals. To this end, we are organizing the only career expo in the aviation industry, held at an exceptional turnout in 2024. In addition, as a socially responsible company, SOF Connect also holds events for its employees on significant holidays such as Christmas, Women's Day, Mother's Day, Aviation Day, Easter, as well as a 'Human Resources' conference as part of ACI Europe.

Activities include lectures for architecture students, career forums, and training for employees on an annual program for positions that require certification and training to learn new professional skills. Trainings are also conducted for external companies operating at Sofia Airport.

Within the framework of its cooperation with the Technical University, SOF Connect sponsored an annual scientific conference of the Department of Air Transport, renewed a study hall for 80 students and internship programs - for second- to third-year students and for bachelor's students and organized an Open Day for them.

Joining the UN Global Compact's Bulgarian network underscores our commitment to working responsibly and being a sustainable leader- this partnership has also led to the "I'm Proud of My Parents' Work" event held on November 1, which gets employees' children up close and personal with their parents' work environment. We also participate in the "Let's Clean Up Bulgaria" initiative, which reflects our unwavering commitment to preserving the natural beauty and health of local communities. In addition, in 2024, we continue to organize meetings and lectures with students from the Air Transport Department of the Technical University of Sofia to learn about the practical aspects of the aviation industry.

In April 2024, the company reached an agreement with the trade union KNUB in favour of its workers- this is a direct result of the social dialogue between the employer and the trade unions and contributes to building a constructive relationship between the two parties. Sof Connect's 5% wage increase is not only a socially responsible step, but also a sound investment in the long term. Motivated employees are at the heart of any company's success, and in Sofia Airport's dynamic environment this is even more important. With this decision, Sof Connect not only improves working conditions for its employees, but also sends a positive signal to passengers and investors that Bulgaria is an attractive travel and business destination.