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Stakeholder Engagement and Information Disclosure Plan Sofia Airport, February 2024

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1 Introduction

Following a tender process launched by Ministry of Transport and Communications of the Republic of Bulgaria (the “Grantor”), SOF Connect (“Concessionaire”) has been awarded the Concession of the Sofia Airport for a duration of 35 years, to redevelop, extend, finance, operate and maintain the airport (the “Project”).

As part of its obligations to lenders, SOF Connect AD is committed to develop a Stakeholder Engagement Plan (the “Plan”) and to update it annually.

The main objectives of this Plan are:

- To define/identify people, communities, stakeholders who may be affected by or interested in the operation and future upgrades of Sofia Airport.
- Through a process of research, information and consulting, to ensure stakeholder involvement in relevant environmental and social issues.
- To build and maintain effective stakeholder engagement at all stages of development and operations of the Airport.
- This Stakeholder Engagement Plan will be publicly disclosed at the official website of the airport and periodically updated.
- The responsible person for the implementation of this Plan and key contact person is:

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2 Project Context

Sofia Airport is the biggest international airport on the territory of the Republic of Bulgaria and is situated at approximately 10 km east from the center of the capital – Sofia (see Figure 1 below).



Figure 1. Sofia Airport existing situation

- | | |
|----|---|
| 01 | Terminal 1 |
| 02 | Terminal 2 |
| 03 | Cargo terminal |
| 04 | Car park – Vehicle maintenance and self-service equipment (SSE) |
| 05 | Parking garage T2 |
| 06 | Outdoor parking T1 |
| 07 | Aircraft maintenance hangars |
| 08 | Technical zone T2 |
| 09 | Fuel storage facilities |
| 10 | Terminal for governmental planes |
| 11 | In-flight food preparation facilities |
| 14 | Rescue and fire station |
| 15 | Training pad for rescue and fire-fighting activities |
| 16 | Sofia Airport control tower |

In 2023 Sofia Airport handled more than 6.6 million passengers, compared to 6.5 million passengers in 2019. Passenger traffic has fully recovered from before the Covid-19 pandemic with a 1.3% growth at this point. The airline industry is facing new challenges such as the ongoing war in Ukraine, the war between Hamas and Israel, and fuel prices.

Despite the above-mentioned challenges facing the industry, more than 30 airlines operate scheduled and charter passenger flights at the airport, about 5 account for more than 80% traffic, namely Ryanair, Wizz

Air, Bulgaria Air, Lufthansa and Turkish Airlines. Direct flights are operated to 80 destinations in Europe and the Middle East. The top destinations from Sofia Airport with the most passengers in 2023 are London – 402 048, Frankfurt – 149 364, Milan – 125 164 and Istanbul – 122 115.

The airport operates one main runway (3,600 m in length), with a former runway now used as a parallel taxiway. The eastern end of the main runway crosses over the Iskar riverbed via a specially designed bridge. The other main operational areas (including passenger terminals, cargo facilities, and fuel farm) are located to the south of the runway and the parallel taxiway. Military operations and buildings are located to the north of the runway, but these areas are excluded from the concession area. The metro station serving the airport area is also located outside of the concession site boundary.

The site operates as a civil airport and the current operator (SOF Connect AD) is responsible for the safety, airport operations and maintenance of the site. SOF Connect AD also performs aircraft ground handling services. Two other ground handling operators, Swissport Bulgaria AD and Goldair Handling Bulgaria Ltd., operate alongside it. The operation of the fuel farm also falls under the responsibility of the current operator, although aircraft refuelling operations are mainly handled by Lukoil Aviation Bulgaria Ltd. Firefighting facilities are owned by the Ministry of Transport and Communications, although firefighting activities are contracted out to Sofia's Metropolitan Directorate of Fire Safety and Civil Protection. Other key third parties operating at the airport are described in the table in Figure 2.

3 Goals, Expected Results, and Scope

3.1 Goals

The main objective of this Plan is to build trust among crucial stakeholder groups and strengthen the relationships of Sofia Airport with them by communicating with people who may be affected by or interested in the Project, as well as to describe the grievance mechanism for people to raise any concerns about the Project.

In this sense, the objectives of the Engagement Plan are also directly linked to the goals for achieving Sofia Airport's vision and go as follows:

- Transform into a 5-star regional airport
- Achieve a high level of efficiency and associated financial performance comparable to the best-in-class airports in Europe
- Reduce own greenhouse gas emissions by 28% by 2026, with the goal of achieving climate neutrality by 2036 with 15% compensation and buy 2050 without compensation.
- Support local social and economic development by increasing GDP per capita by 0.8% in the long term, along with increasing airport traffic and improving connectivity

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

The flagship goals that drive our strategy rest on the principles of working transparently and collaboratively with compliance as the backbone. We want to be a great neighbour to the community and a great place to work. Sustaining good relationships will impact on the economic development of our local businesses, support the airlines with effective operations, create job opportunities, and partner with local educational institutions on apprenticeship programs and other economic development initiatives.

3.2 Expected results

Result	Success indicator
Created environment and processes for early identification of potential problems and conflicts through well-managed stakeholder expectations.	- The stakeholder management process is working - we have appropriately developed channels and established responsibilities. An online-based feedback platform has been established through which our stakeholders can share their feedback anonymously. - Thus, our stakeholders' issues are channeled directly to us - we are their first choice to express needs, concerns, ideas. They are using our communication channels for the latter. They don't seek first the media or other parties to solve their issues. The check against these quality KPIs is done by self-assessment.
Existing disputes are resolved in a way that does not hinder the future development plans of the airport.	- Zero unsolved issues. - No issue becomes a conflict. - Time for reception of an issue does not exceed 24h.
Sufficient capacity for solving issues with stakeholders.	- The responsibility associated with specific material topics is allocated along our value-chain. Every job description includes specific stakeholder engagement activities. - Yearly trainings are done to ensure all employees are aware of the process and know the responsibilities as per their job description.
Encouraged active participation of stakeholders in the process of airport development and operation.	- All key development projects include consultation and timely communication to stakeholders.

3.3 Scope

This Stakeholder Engagement Plan covers the period from 31.12.2023 to 31.12.2024, which allows for the timely inclusion of significant structural changes or other external factors that affect implementation.

The Plan includes the general stakeholder principles which the Concessionaire commits to following in line with national legislation, Good International Practices, and EBRD Performance Requirement 10 at a corporate level.

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

- passenger experience, which encompasses the entire passenger service process and shapes the passenger's opinion of their airport experience
- efficiency and associated financial performance comparable with the best-in-class airports in Europe
- care for the environment with a focus on reducing own greenhouse gas emissions
- economic and social contribution to be made for the increase of the country's GDP

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

Upon completion of the reconstruction, passengers will benefit from twice as many check-in counters, a new baggage handling system, completely new retail areas, additional security and border control checkpoints, 3 additional passenger boarding bridges to serve wide-body aircraft, and a complete redesign of the upper level of Terminal 2 where the business lounges will be located. Internal lines will be relocated and thus travellers to Varna and Burgas will have access to all of the terminal's amenities. Part of the terminal transformation is expressed through the separation of arriving and departing passengers as per Schengen requirements.

The document addresses only external stakeholders as the internal management of human resources is undertaken under a separate set of procedures and processes.

4 Legal and Regulatory Requirements

4.1 Legal requirements

Sofia Airport will be operated by SOF Connect AD under the Concession Agreement signed on July 22, 2020. Party to this contract is the Ministry of Transport and Communications (Grantor). The Concessionaire is obliged to regularly report its activities to the Ministry, and it is therefore checked. SOF Connect AD as Concessionaire, has assumed the full responsibility and business activities associated with the operation of the Airport.

At present, the Airport has no legal obligations related to pro-active information disclosure and consultation with stakeholder groups other than authorities. Such obligations may arise only within legal procedures stemming from environmental legislation such as Environmental Impact Assessments of major construction works and Environmental Assessment of Plans and Programs. In December 2023, the procedure for environmental and social assessment of the Master Plan was launched.

The most applicable legal procedure involving stakeholder engagement and information disclosure is an Environmental Impact Assessment (EIA). 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 persons - the airport operator shall notify the responsible authorities of its investment intention. The competent authority shall publish the proposal on its website, through mass media, or by using other appropriate channels
- Consultation, the definition of the scope, contents, and format of the EIA report - the EIA report must contain detailed information on the specifics of the upcoming construction, specifics of the existing environment, the estimated extent of expected future impacts, as well as alternative investment proposals. The EIA report shall be prepared by a team of independent experts and shall include sources of information, forecasting and EIA methodology, and mitigation measures for future adverse environmental impacts
- Organisation of public consultation in relation to the EIA report - competent authorities or a duly authorized representative of the latter, shall also indicate which municipalities/town halls concerned shall be included by the airport operator in the joint organization of public consultation in relation to the EIA report and its relevant annexes. The record of the public consultation shall be submitted to the competent authority, which may decide and provide prescriptions on the alteration of the report as a result of comments or opinions. In such instances, it is necessary to organize a new public consultation

It is essential to take into consideration the fact that under the development plans, no activities are expected to be carried out that would require the preparation of an EIA during Phase 1 of the development.

The new Corporate Sustainability Reporting Directive (CSRD) finally came into force in 2023. According to the Directive, as of January 1, 2024, large companies such as SOF Connect must publish an annual sustainability report for the previous year (2023). SOF Connect AD has published an annual sustainability report with key company data for 2021 and produced an annual sustainability report (in line with the Global Reporting Initiative - GRI) for 2022, committing to be published in June each year. The company's next Annual Sustainability Report will be prepared in accordance with GRI, but also in accordance with the Corporate Sustainability Reporting Directive and bearing in mind the requirements of the European Union

Taxonomy. The company's last two reports are available on the airport's official website.

4.2 Requirements of the European Banks for Reconstruction and Development

The European Bank for Reconstruction and Development (EBRD) is a lender and an indirect shareholder in SOF Connect AD. According to EBRD's policies, stakeholder involvement is an essential part of good business practices and corporate citizenship as a way to improve the quality of projects. In particular, genuine public engagement is essential for the successful management of risks and the impact on communities affected by projects. It is crucial in order to achieve greater benefits for the community.

Stakeholder involvement in activities related to the development of the airport and its everyday management is led by the following principles:

- Project stakeholders have the right to receive public information about Sofia Airport and all new developments which are material
- Project stakeholders have the right to receive public information that is timely, relevant to the public interest, understandable, and adequate
- Project stakeholders have access to a special procedure for complaints and appeals

Stakeholder engagement is an ongoing process, part of the overall project lifecycle.

5 Summary of Past Stakeholder Engagement

The period since the start of the concession was the first stage of the transformation of Sofia Airport towards a modern and streamlined organization. We hired new people and invested in their talent, but also integrated old employees into the new structure and ensured they can develop their potential. We learned how to work together as a team and face the challenges of the enormous change we went through and are still undergoing. We created new policies and processes in line with the new mission, vision and strategic objectives. We laid the foundation of a well-working company capable of communicating meaningfully with its stakeholders.

Currently, stakeholder engagement issues are largely covered by the Media and Digital Communications Directorate, which is also responsible for managing the complaints procedure. Between January and November 2023, 910 complaints, alerts, comments, compliments, complaints, recommendations, lost property, and issues were received and processed. 343 enquiries received by email were responded to directly.

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.

It is SOF Connect's policy to be transparent and pro-active in relating to parties. Providing up-to-date information to the public is a core principle. The department follows the same principals also in stakeholder management. The PR and CC maintains its own social media channels (Facebook, LinkedIn, Twitter, Google, and YouTube) that are crucial in stakeholder management. Besides this readiness, the department sustains good relations with media, that are also useful when channeling specific information.

Our social media channels serve as a platform for two-way communication between us and our stakeholders, where they can freely express their opinions. During the period 01 January - 15 December 2023, we saw strong growth on the social networking site Facebook, reaching over 3.8 million organic reach, nearly 200,000 organic page visitors and over 3,200 new followers. In the same period on LinkedIn, we reached over 432 thousand professional users and attracted 5,000 new followers who generated over 13 thousand interactions, 271 comments and 307 reposts.

SOF Connect has an active policy to support the activities of various causes and charity organizations, aiming to improve the living conditions and health status of vulnerable groups.

In relation to the legal requirements for stakeholder consultation, a Public Consultation on the draft Action Plan for the Sofia Airport Noise Strategic Map was organized in September 2020. These documents were prepared based on results from the noise monitoring of 2017 when Sofia Airport handled more than 50,000 aircraft movements per year. The consultation was conducted in accordance with the Environmental Noise Protection Act. It was attended by citizens affected by aircraft take-offs and landings, as well as representatives of DG CAA and BULATSA. Following the public consultation, written comments on the draft Plan were also received and reflected in the final version of the document by the developer.

The Action Plan to the Strategic Noise Map for Sofia Airport was approved by Order No. RD-01-164 of 12.03.2021 of the Minister of Health. The Action Plan is published on the Sofia Airport website, under the

"Environment" section.

An update of the Strategic Noise Map for Sofia Airport and its Action Plan is due in 2024. A public consultation on the Plan will be organised and all interested parties will be given the opportunity to familiarise themselves with it in advance and then to participate in its discussion.

In the past 2023, SOF Connect AD organized meetings with the three district mayors in the vicinity of Sofia Airport - SOF Kremikovtzi District, SOF Slatina District and SOF Poduyane District. The purpose of the meetings was to acquaint them with the plan for public safety zones at Sofia Airport, prepared on the basis of a study conducted by an external consulting firm. In addition, the possibilities for joint projects and support of the municipalities were discussed. Considering the political situation and the local elections that took place in autumn 2023, communication with the district mayors will be resumed in early 2024.

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6 Approach to Planned Stakeholder Engagement

6.1 Principles

The approach to stakeholder and Community Management as outlined in this Plan is based on respect, inclusion, proactiveness, responsiveness, sensitivity to those impacted, openness and honesty. The following stakeholder and community involvement principles underpin this Plan:

- Recognition of the impact and importance of the Airport to surrounding stakeholders in consultation with them.
- Ensure that stakeholder management and communication activities are coordinated with the delivery of notifications and responses to enquiries and complaints undertaken within the specified timeframe.
- Adopt a collaborative approach in dealing with stakeholders and communities and a neighbourly attitude.
- Ensure that the project outcomes meet the balance of community needs and expectations.
- Annual monitoring and evaluation of communication activities, including identification of continuous improvement and application of knowledge gained.
- Annual stakeholder list analysis and update

6.2 Methods

- Regular stakeholder **identification** to direct all Airport activities on time and avoid risks. Understanding their needs in order to properly interact with them.
- **Timely provision of information** is the basis of good engagement. Stakeholders receive enough time to understand some provisioned actions and to reflect on the topics of importance.
- **Counselling** will be used to clarify certain positions, expectations, and concerns of stakeholders. Individual meetings with key stakeholders will be held.
- **A consultation** will be performed prior to the implementation of a specific activity that will impact those with high interest. The goal is to find the most appropriate solutions and provide for adequate actions to achieve a specific result.
- **Grievance management** - a well-functioning grievance mechanism provides a transparent, credible, and fair process to all parties. It enhances outcomes and gives people the satisfaction that their complaints have been heard, even if the outcome is less than optimal.
- **Inclusion in project monitoring** – involvement of stakeholders in activity monitoring is key for establishing trust and expectations management. A good example of such would be to share with them data (preferably real-time) of the noise monitoring terminals.
- **Reporting to stakeholders is the best way of managing all the risks** – business, environmental, and social. This is also a structured approach to internalizing these topics to ensure the sustainability of the business. Reporting in accordance with the GRI Standard is a good practice.
- **Preparation of project-specific SEPs in the future** – larger scale infrastructure projects such as the building of a new terminal and/or a new runway would require the development and implementation of project-specific SEPs.

6.3 Stakeholders Matrix

The table below shows the classification of stakeholder groups according to their level of interest relative to the level of influence on the Airport. Stakeholder groups listed in the upper right quadrant have the highest level of influence and interest – they are critical to the successful operations and development of Sofia Airport.

INFLUENCE / IMPACT =>	• Other ministries • Agencies • Regional branches • Military • Customs, etc. (see complete list below) • Labour Unions • Sofia Municipality (administration and council) Needs response: Stakeholders with great opportunities to influence the processes/attitudes and show little to moderate interest in the airport.	• Passengers • Ministry of Transport and Communications (Grantor) • DG CAA • Authorities of the Ministry of Interior • Bulgarian Air Traffic Services Authority • Ground handling (Swissport, Goldair) • Airlines • Airport service providers (tenants - shops, restaurants, car rental, taxi companies, car park operators, etc.) Key players: Interested with above the average to high interest in the airport and having great opportunities to influence the processes / attitudes.
	• Utilities, telecoms, municipal transport (CEZ, Sofia water, BTK, mobile operators, Stolichen avtotransport, etc.) • Donation beneficiaries (numerous NGOs) • Technical University of Sofia • Other aviation schools Limited impact: Stakeholders with limited abilities to influence the processes /attitudes and showing little to moderate interest in the airport.	• ACI Europe • Eurocontrol • Commercial activities (Lufthansa Technic, delivery services, commercial areas and storage areas, etc.) • Tourism branch organizations (NBT, BATA, BTK,CRIB,AmCham, etc.) • Environmental and climate NGOs • Local residents (Attention to vulnerable groups – if any) Show concern: Interested and expressing above the average to high interest in the airport, but with limited opportunities to influence processes / attitudes.
	INTEREST =>	

Figure 2: Stakeholder Matrix

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. This year's matrix has been prepared accordingly to the requirements of the Corporate Sustainability Reporting Directive (CSRD) for a double materiality matrix. It addresses topics that are material and have an impact "from the inside out" such as climate and environmental impacts, social issues and governance, but also impacts "from the outside in" that present material 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.

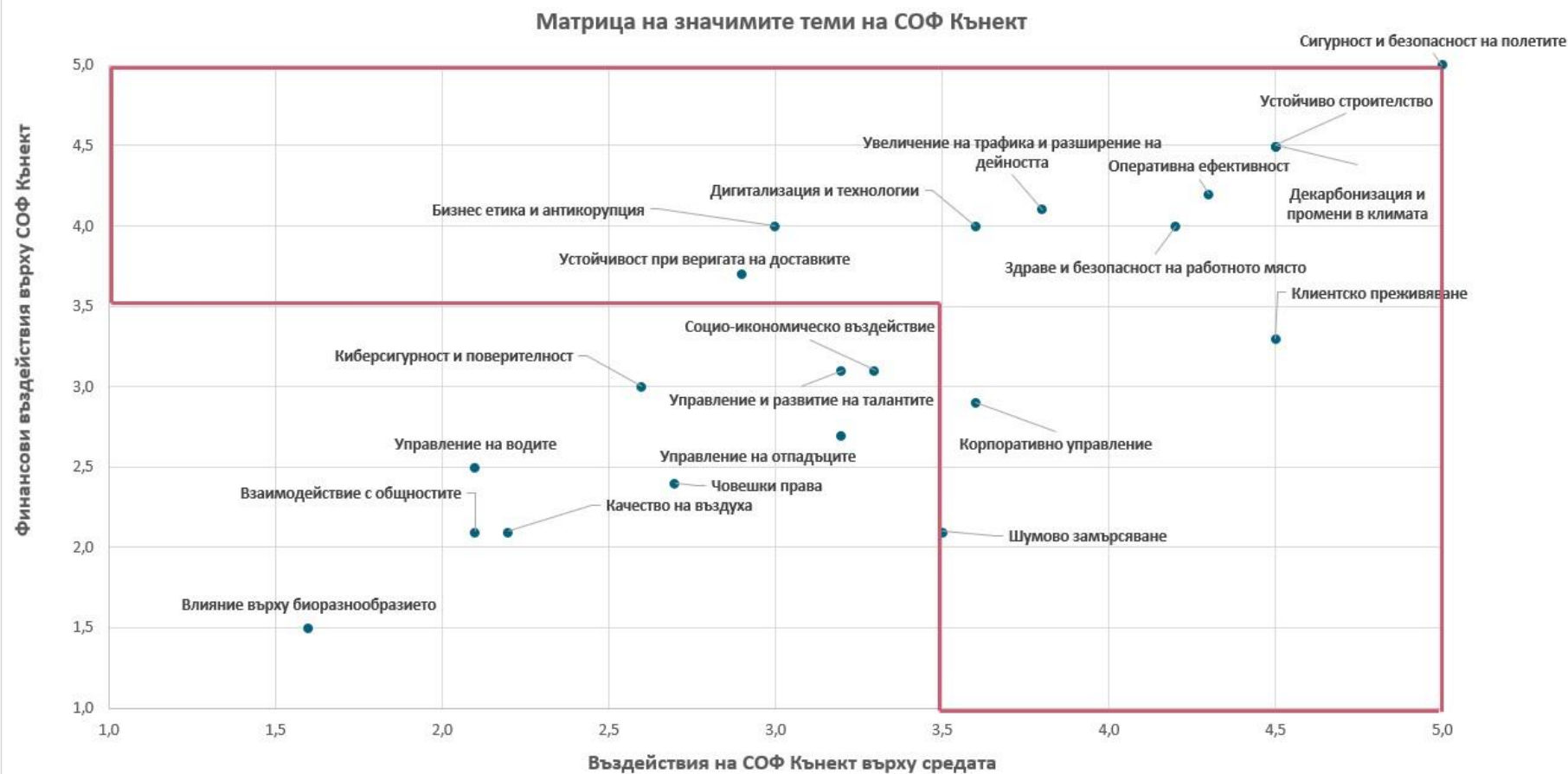


Figure 3: Double Materiality Matrix

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

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6.5 Stakeholder Engagement Activities

SOF Connect AD regularly engages with its stakeholders on the topics of 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.

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 the joint creation of mutual 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 the same as with any construction project - noise, dust, heavy vehicle traffic, and inconvenience related to airport access. Given the distances from adjacent sites, it can be expected that most of the projects will not impact communities to a significant degree, but there may be exceptions.

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

Project-specific Stakeholder Engagement Plans shall be developed and implemented for major construction projects. The project-specific SEP is prepared by the project manager.

Table 1. Material topics & Engagement approach to different stakeholders

Specific Stakeholder	Material Topics	SOF Connect responsible unit ¹	Engagement Occasions & Activities	Time-Frequency	Channels of Engagement
Clients					
Passengers and visitors	• Flight Security & Safety • Customer Experience • Airport Access • Personal Data Privacy	Main Operations Divisions	Consult: measuring customer satisfaction with airport services; sharing results publicly	Quarterly satisfaction measurement	Website, social media, and digital channels of the airport
		Media and Digital Communications Division	Inform: sharing initial plans as renovation and construction activities are implemented, e.g., terminal renovation and expansion, stakeholders need to be informed.	At least 1 month before taking action During the design and implementation of the activities	Signs and signage on airport premises; website, social media, airport digital channels
Airlines and their associations	• Customer Experience • Flight Security & Safety • Technology and Innovation • Traffic Growth & Expansion • Operational Efficiency • Airport taxes	Marketing and Business Development Division	Inform: when carrying out renovation and construction activities, e.g., terminal renovation and expansion, interested parties should be provided with information	At least 3 months before taking action During the design and implementation of activities	Operational calls and meetings
		Main Ground Handling Division Main Operations Divisions	Consult: Sofia Airport discusses the issues with all operating airlines within the framework of the Airline Operating Committee (AOC).	Bimonthly Biannually Ad hoc events	Tactical meetings Strategic meetings Operational calls and meetings

¹ For more details about our corporate structure, refer to Figure 5: Scheme of the organizational and management structure of "SOF Connect" AD.
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Airport service providers (international terminal cleaning and maintenance operators, retail and duty-free shopping)	• Customer Experience • Operational Efficiency	Main Commercial Division Main Operations Divisions	Inform & advise: coordinating joint activities	Daily	Operational calls and meetings
Tenants providing services at the airport (shops, restaurants, rental cars, taxi companies, parking lot operators, bank offices and currency exchanges, insurance companies, post offices, courier companies. freight forwarders, travel agencies.	• Customer Experience • Airport Access • Operational Efficiency	Main Commercial Division	Inform & advise: coordinating its activities with tenants	Daily	Operational calls and meetings
			Inform: Timely provision of information regarding the renovation/construction plan.	At least 1 month before taking action, constantly during operation	Strategic meetings
				Quarterly	Tactical meetings
				Annually	Strategic meetings

Institutions					
The following activities are tailored to the requirements of individual institutions and to existing procedural requirements.					
Ministry of Transport and Communications (Contracting Authority)	• Legal Compliance • Corporate Governance • Other currently relevant topics	Chief Executive Officer	Inform and report on changes in performance and plans and meeting legal requirements	Monthly	Reports concerning the conditions for the exploitation of the concession
		Chief Strategy Officer		Annually	Permanent joint committee
		Main Operations Divisions		Ad hoc	Official correspondence (written and electronic)
		Technical Division			
		Legal Division			
		Main Finance Division			
		Media and Digital Communications Division			
DG CAA	• Flight Security & Safety	Main Operations Divisions	Inform and report on changes in performance, plans, and meeting legal requirements. Consult and negotiate: obtaining permits (e.g., construction activities), licenses (e.g., security)	Daily	Operational calls and meetings Incident reports

Fire Safety and Civil Protection General Directorate, National Police General Directorate, SANS, NSS, National Customs Agency, Civil Aviation Administration General Directorate	• Flight Security & Safety • Operational Efficiency • Legal Compliance • Cybersecurity and Privacy • Other currently relevant topics	Main Operations Divisions Legal Division Digital Transformation Division	Inform and partner on current issues Inform and report on changes in performance, plans, and meeting legal requirements	Daily, monthly, quarterly, and annually	Operational calls and meetings; Official correspondence; Reports prepared as per legal requirements
Other ministries, agencies, regional branches, military units, etc. (See the full list of revisions below) *	• All topics	Chief Executive Officer Chief Strategic Planning Officer Main Operations Divisions Technical Division Legal Division Main Finance Division Media and Digital Communications Division	Inform and report on changes in performance, plans, and meeting legal requirements.	Monthly, quarterly, and annually	Operational calls and meetings; Official correspondence, Reports prepared as per legal requirements

Local organizations					
Trade unions	All Social topics	Chief Executive Officer Main Human Resources - Administration and Social Activities Division	Inform and advise: on issues regarding the protection of employees' rights	Quarterly	Operational calls and meetings, negotiations on collective labour agreements, consulting on labour legislation
Varna, Burgas, and Plovdiv Airports	All topics	Chief Executive Officer Legal Division Media and Digital Communications Division	Inform and partner on current issues	Ad hoc	Operational calls and meetings

Bulgarian Airlines Association	• Flight Security & Safety • Operational Efficiency • Technology and Innovation	Chief Executive Officer Media and Digital Communications Division Marketing and Business Development Division Main Operations Divisions Digital Transformation Division	Partner: development of initiatives related to the interests of Bulgarian airlines	Biannually Ad hoc	Operational calls and meetings
Joint Environmental Impact Management Board (JEIMB, including all airports in Bulgaria, BULATSA, DG CAA, and airlines) ²	• All Environmental topics	Sustainable Development Directorate	Inform and partner: 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-related emissions; sustainable aviation fuel deployment and uptake; water pollution; waste management	Annually	Tactical and strategic meetings

² In 2012 Fraport TSEM AD joined BULATSA's initiative to found a Joint Environmental Impact Management Board with focus on the impacts of the aviation sector in the vicinity of airports. Operational stakeholders ratified relevant documents in compliance with the specifications and the support of Eurocontrol.

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Union of Veterans of the Bulgarian Civil Aviation	Community Management	Media and Digital Communications Division	Partner: aviation club development; providing locations for meetings	Ad hoc	Meetings and conversations
NGOs and civil society groups	- All Social topics - All Environmental topics, especially noise pollution and access to airports, air quality	Media and Digital Communications Division	Inform: real-time noise and air quality measurement system with public online access.	Real time	Noise data is publicly available online from 31 March 2021.
		Sustainable Development Directorate			
		Environmental Protection and Rehabilitation Department			
			Consult: preliminary sharing of any plans regarding noise, air pollution abatement, or biodiversity conservation with NGOs	Monthly and quarterly	Noise and air quality reports are available online and sent to the competent authorities
			Consult: preliminary sharing of any plans regarding noise, air pollution abatement, or biodiversity conservation with NGOs	<i>ad hoc</i>	Public meetings and discussions with representatives of the Expert Panel
			Engage: organizing and running an annual open day, giving the opportunity to receive advance questions.	Annually / biannually	Public consultations for each major project (part of the EIA procedure)

			Provide answers: Preparation of information materials with ready-made questions and answers: online through a website and printed brochures with regular dissemination through own communication channels and neighboring municipalities (including administrative offices) and popular local areas. Responses are based on real problems, including situations identified through the grievance mechanism.	Constantly - online	Provide information and data through all airport communication channels - website, telephone, conventional media channels, social media, annual sustainability report, public consultation, and grievance mechanism.
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International organizations					
ACI EUROPE – European Branch of the Airports Council International (ACI WORLD) ³	• Decarbonization & Climate Change • Flight Security & Safety • Customer Experience • Traffic Growth & Expansion • Other currently relevant topics	All divisions	Inform, engage, and partner: participation in specialized branch organization committees, events, drafting general position statements, lobbying.	Daily Ad hoc events	Official correspondence, meetings, and events
			Participation in Airport Carbon Accreditation Program	Quarterly	Tactical and strategic meetings Reports prepared as per the requirements of the organizations
			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 and Vrazhdebna	• Overall socio-economic impact • Traffic Growth & Expansion • Airport Access • Noise Pollution • Air Pollution	Chief Executive Officer	Inform and advise: individual meetings with local authorities to present plans and projects	Monthly Ad hoc	Official correspondence and meetings
		Main Operations Divisions	Partner: sending out invitations to mayors and local officials for corporate events. Participation in municipal projects, and development of cultural and social initiatives.		
		Media and Digital Communications Division	Partner: participation in joint tourism	Biannually	Strategic meetings

³ Branch organization of the aerospace industrial sector in Europe.
Stakeholder engagement and disclosure plan
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		Environmental and Social Management Department	committee and discussion of tourism investments in the city of Sofia	Ad hoc	Project and initiative planning meetings
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Local stakeholders					
Local residents (Addressing vulnerable groups, if any)	- Noise Pollution - Air Pollution - Traffic Growth & Expansion - Airport Access - Investment intentions/new plans and projects	Chief Executive Officer	Inform: maintenance of a real-time noise measurement system and publication of results on the website	Real-time	Noise data - public data available from 31 March 2021.
		Main Operations Divisions		Monthly/quarterly	The reports are available online and are sent to whistleblowers upon request
		Main Finance Division	Inform: publication of information on investment intentions/projects	Ad hoc	The use of all communication channels at the airport
		Media and Digital Communications Division		Ad hoc	Public meetings and discussions with representatives of neighboring communities
		Environmental and Social Management Department		Ad hoc	Organization of public consultations for each major project
			Advise: groups who may face difficulties in navigating through the airport (wheelchairs, large families)	Ad hoc	

					(part of the EIA procedure)
			Engage: organizing and running an open day - with the opportunity to send in preliminary questions and identify topics of interest.	Annually / biannually	Public meetings and discussions
			Provide answers: giving answers based on real problems, including issues identified through the grievance mechanism	Constantly	The use of all communication channels at the airport; Making contact with local authorities and neighboring municipalities
Commercial activities (Lufthansa Technik, delivery services, commercial areas and storage areas, etc.)	- Noise Pollution - Air Pollution - Traffic Growth & Expansion - Airport Access	Main Operations Divisions Media and Digital Communications Division Sustainable Development Division	Partner: where possible, initiate joint conservation projects with partners	Ad hoc	Decided according to the situation

Business					
Bulgarian Air Traffic Services Authority (BULATSA) State Enterprise	- Flight Security & Safety - Technology and Innovation - Traffic Growth & Expansion - Noise Pollution	Main Operations Divisions	Partner: Critical stakeholder for the execution of daily operations of the airport	Daily	Standing Joint Committee
		Media and Digital Communications Division		Monthly	Tactical meetings Joint working group to address aviation noise complaints
		Environmental and Social Management Department		Annually	Strategic meetings
Ground Service, (Lukoil; Swissport, Goldair)	- Flight Security & Safety - Technology and Innovation - Traffic Growth & Expansion - Decarbonization & Climate Change	Main Ground Handling Division	Inform and consult on renovation/construction plans that may impact their operations;	Ad hoc Annually	Dissemination of the annual sustainability report
		Main Operations Divisions Digital Transformation Division	Participate in common initiatives or environmental projects (e.g., identifying opportunities for the circular economy, reducing greenhouse gas emissions);		
Sofia Airport EAD	- Flight Security & Safety - Technology and Innovation - Airport Access	Chief Executive Officer	Inform: meetings to discuss changes to airport infrastructure	Ad hoc	Strategic meetings

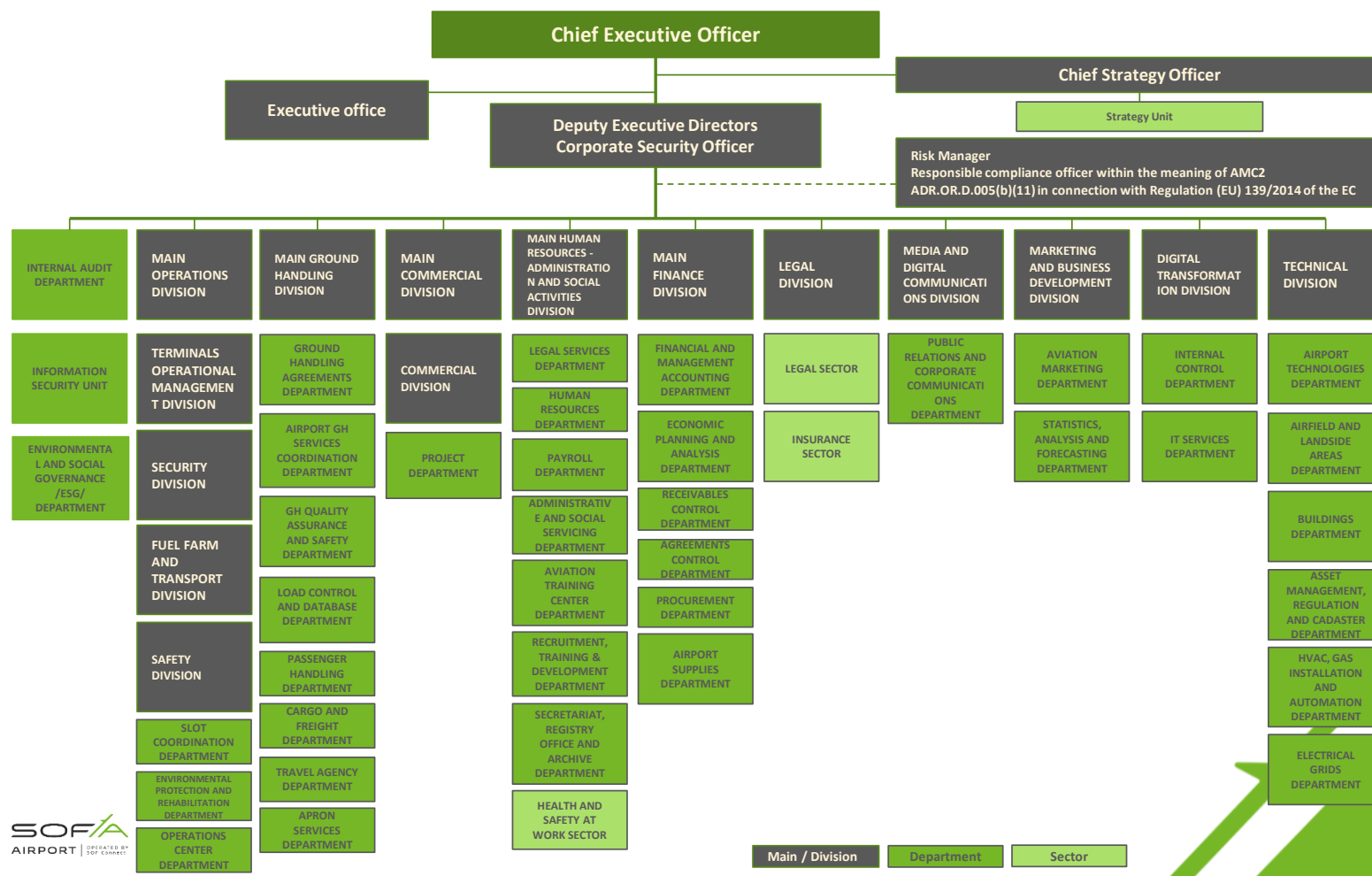
	• Traffic Growth & Expansion				
Branch tourism organizations (National Tourism Board, Bulgarian Association of Travel Agents, Bulgarian Tourism Chamber, etc.)	• Overall socio-economic impact • Traffic Growth & Expansion • Customer Experience • Airport Access • Sustainable Supply Chain	Chief Executive Officer Marketing and Business Development Division Media and Digital Communications Division	Partner: special collaborative initiative linked to national branding and destination promotion activities. Inform on increased traffic and new airline contracts	Ad hoc	Providing information and data through all airport communication channels Direct Emails Social Media Groups
Utility companies, telecommunications companies, public transport, medical laboratories	• Flight Security & Safety • Technology and Innovation • Traffic Growth & Expansion • Operational Efficiency • Sustainable Supply Chain • Energy and climate change	Main Operations Divisions Digital Transformation Division Technical Division Environmental and Social Management Department	Partner: joint airport operations	Ad hoc	Strategic meetings

Scientific and educational institutions					
Technical University - Sofia	- Partnerships and donations - Talent Management	Chief Executive Officer Main Human Resources - Administration and Social Activities Division Media and Digital Communications Division	Partner: sharing information of interest for training purposes of future engineers	Ad hoc calls and meetings	Meetings with the university management
Other aviation schools**	- Partnerships and donations - Talent Management	Main Human Resources - Administration and Social Activities Division Media and Digital Communications Division	Partner: sharing information of interest to accredit university/school programs, Engage: providing internships and training programs	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 Environmental Agency; Regional Inspectorate of Environment and Water (RIEW) Sofia; Danube River Basin Directorate – Pleven; Ministry of Tourism; Ministry of Health; Regional Health Inspectorate – Sofia; Ministry of Defence; National Construction Control Regional Directorate - Sofia; Fire Safety and Civil Protection Directorate General; National Police Directorate General; National Customs Agency; Labour unions; Civil Aviation Administration Directorate General

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

Figure 5: Scheme of the organizational and management structure of "SOF Connect" AD



6.6 Grievances

Complaints can be submitted by e-mail, through an online form, at the office of Sofia Airport, postal address, and social networks. There are three telephone lines through which the public can obtain information about airport operations 24 hours a day. The information phonenumber does not officially accept grievances, it only re-directs to other channels.

6.6.1. New digital grievances submission form

A new digital grievances 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. Grievances Submission

Complaints, claims, comments, and recommendations addressed to SOF Connect AD can 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 rules, Documentation, and Terms

- a) The complainant can choose whether to address a relevant issue anonymously or to provide contact information.
- b) Grievances are categorized under the following main headings: flights, airport services, security, environmental management, and noise issues. These categories are presented in a detailed classification which is part of the online form on the airport's website.
- c) Received grievances are processed by a qualified person

6.6.4. Monitoring and reporting

- a) The Media and Digital Communications Directorate prepares regular reports – on a monthly and annual basis – which are submitted to the Chief Executive Officer and other upper management staff. Annual reports contain greater detail on trends, recurring events of interest, or a list of the most active stakeholder groups
- 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 dedicated Environmental & Social Management Team sets up the engagement process of the Airport (in coordination with the PR and CC team) which also involves internally all the departments which may need to contribute to different/relevant engagement topics. The Directors/Managers of these departments are responsible for reporting progress to their respective superiors. Chapter 7 (Monitoring and Reporting) specifies the different reporting periods. Additionally, the persons responsible for the engagement process should proactively identify risks and prepare mitigation plans to achieve effective results, as well as report challenges and obstacles in a timely manner.

Responsibilities of the Department members will include but are not limited to:

- Timely communication to stakeholders
- Preparation of news releases, information, and presentation materials
- Engagement with stakeholder groups; involvement in joint projects
- Establish rapport with the local community
- Planning and organization of partnership programs and company events

7 Monitoring and Reporting

Monitoring and reporting will be undertaken to measure effectiveness and facilitate continuous improvement of the stakeholder engagement process. The interest of the Concessionaire is to be constantly aware of the quality of the process and the established relationships; what are the capabilities for early identification of potential problems and conflicts; how existing disputes are solved in a way that does not hinder the future development plans of the Airport. Performance indicators that will be monitored include the responsiveness and effectiveness of communication with stakeholders and the community as well as the quality and intensity of the information flow.

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

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

Element (what is monitored)	Monitoring requirement (how is it monitored)	Frequency
Access of information to stakeholders	A report on the number of responses to information or data requests; website visits; document downloads;	Annually
Effectiveness of Grievance procedure	A report on the number and nature of complaints; level of resolution; response times;	Monthly
Effectiveness of Joint committees	A report on the meetings of the joint committees – number, participants, protocols, decisions	Quarterly
Legal Compliance	Report on the level of satisfaction of legal reporting requirements (if any)	Quarterly
Process quality	A report prepared and submitted to the Secretary of the relevant department/s in relation to compliance with this Plan	Annually
Sustainability management	Sofia Airport Sustainability Report covering relevant ESG topics in compliance with the GRI Standards	Annually

Agreed:

Antoaneta Stoyanova, Sustainable Development Director	DocuSigned by: <i>Antoaneta Stoyanova</i> 6C16171748D0418
Milena Mihaylova, Director Media and Digital Communications	DocuSigned by: <i>Milena Mihaylova</i> 001AF6DCA4254F1...
Mr. Atanas Stoev, Head of OS and ISU Department	DocuSigned by: <i>Atanas V. Stoev</i> D5587D6F6550497...
Desislava Gruva, Public Relations and Corporate Communications Department Expert	DocuSigned by: <i>Desislava Gruva</i> 180640840B9247C...