

Stakeholder Engagement Plan

TELE-FONIKA Kable
Plant in Bydgoszcz

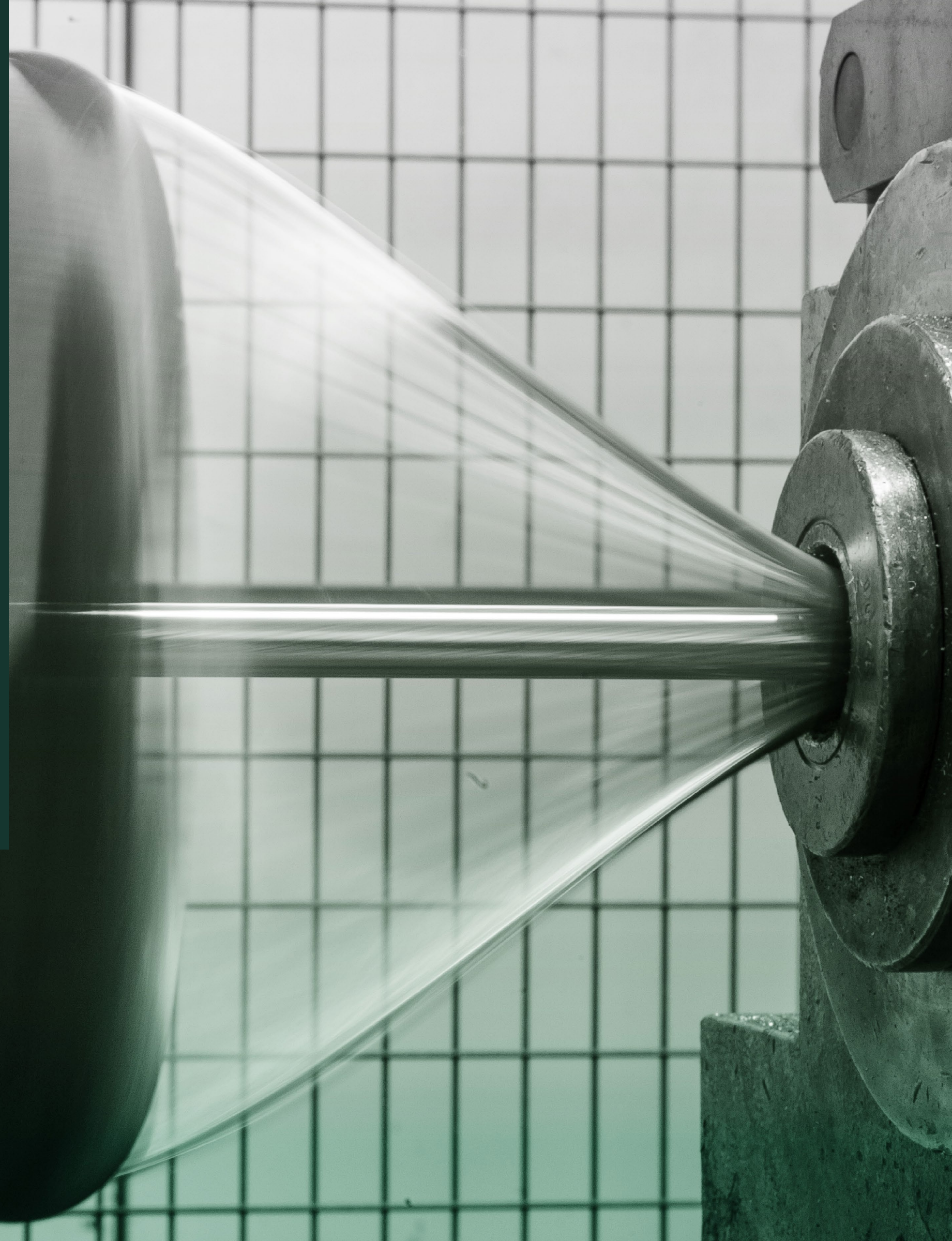


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1. Introduction

1.2. Project location and impacted areas

TELE-FONIKA Kable plant in Bydgoszcz is the oldest cable and wire factory in Poland and the largest plant producing medium, high and Extra-High voltage cables in Europe. It belongs to the elite group of direct suppliers of solutions for the submarine power transmission industry. In the plant there are located specialized research facilities, including the Extra-High Voltage Laboratory, which develops prototypes and technological guidelines for the production of HVAC and HVDC cables.

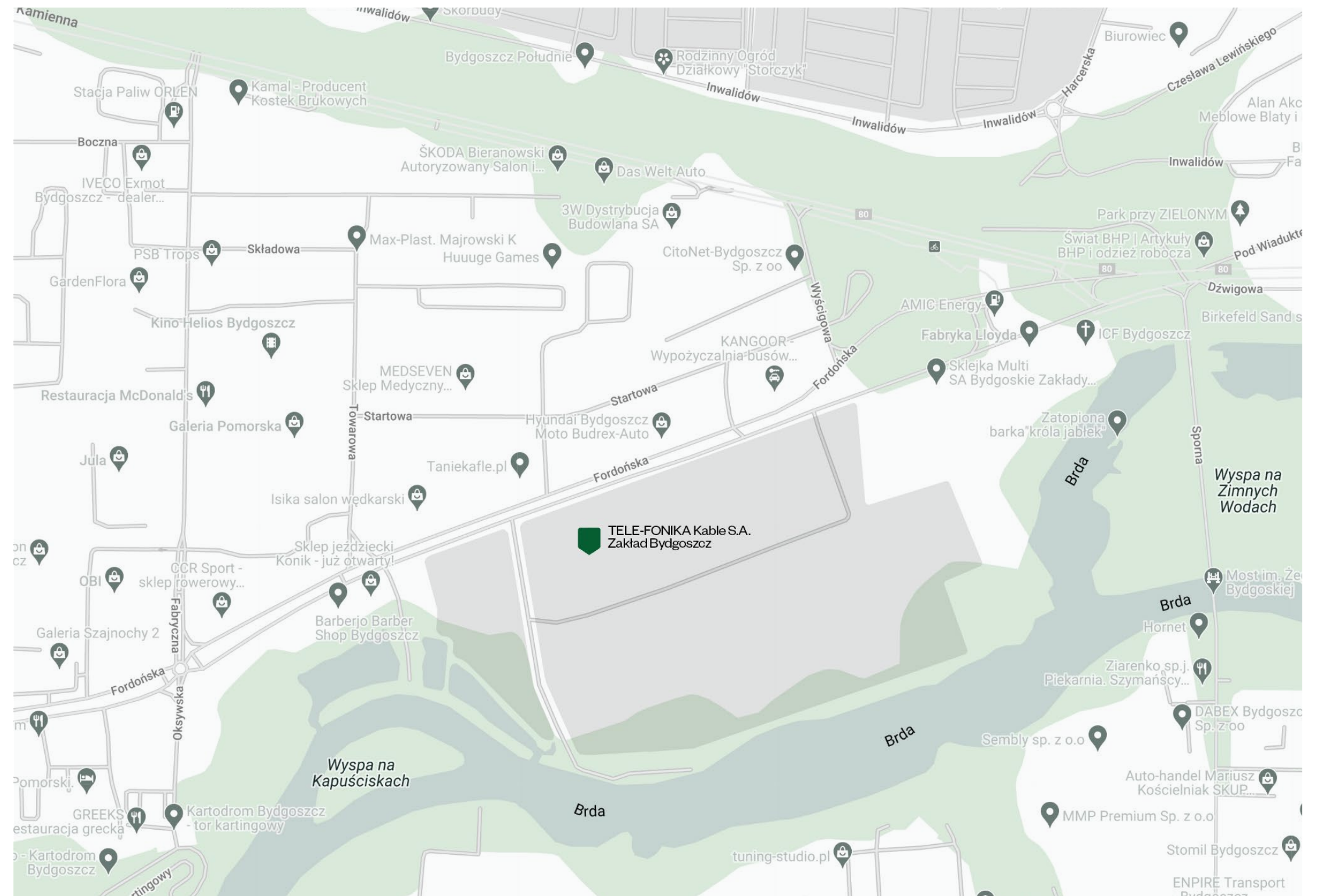
The project includes the extension of the TELE-FONIKA Kable plant in Bydgoszcz, within the area where the plant currently operates.

Impact on the neighbourhood community

TELE-FONIKA Kable plant in Bydgoszcz is located in industrial part of the city. The plant is located on an area of more than 24 ha.

The plant borders:

- from the north with a street behind which there are buildings, mainly buildings where production and service activities are carried out
- from the east with a plywood factory
- from the south and west with the Brda river



Picture 1: Neighbourhood of the TELE-FONIKA plant in Bydgoszcz

There are no residential buildings in the immediate vicinity of the plant, except for one building which is marked in the photo below.

The building is located on the southern side of the plant. In this part of the plant's area, products are stored, production halls are located in the second line.

No direct negative impact of the plant's activity on the people living in the building has been identified. There were also no reports from residents regarding the operation of the plant. Residents have the possibility of direct contact with representatives of the plant.

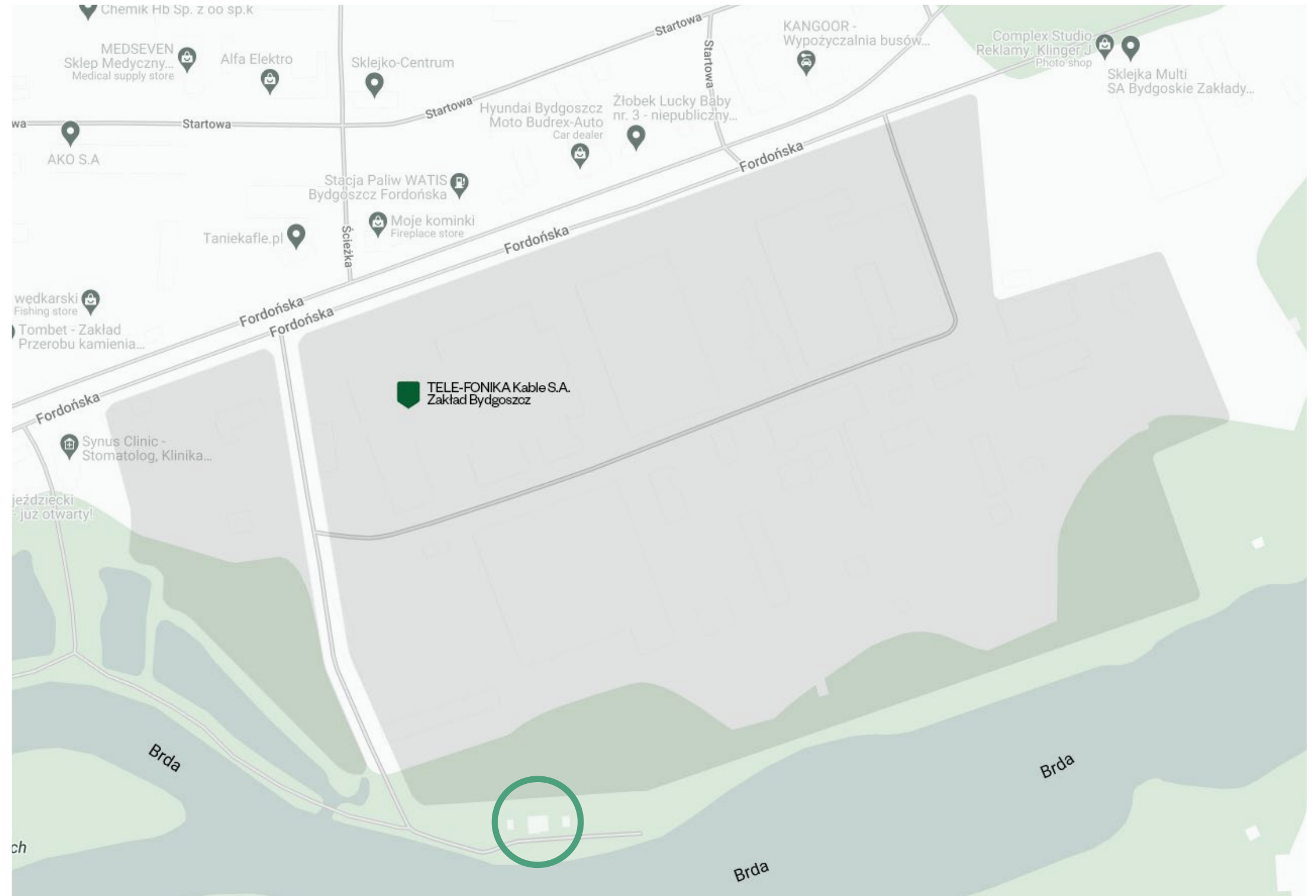
The operation of the plant is not burdensome for the local residents, but also for other entities, mainly due to the location, but also the specifics of the business operations. The plant is located near the national road No. 80 (DK80), which means that the transport of products to a small extent, it is carried out on local roads.

The conducted activity is not associated with unpleasant smell or other nuisances for employees of neighboring companies and residents in the near and distant surroundings. The inspection carried out in 2021 did not reveal any violations of the noise standards.

Impact on the environment

The plant is not located in protected areas or valuable in terms of biodiversity. The nearest biodiverse area is located 3.5 km from the plant. The natural inventory carried out in 2021 did not show significant negative impact of the project on the natural environment. It is recommended that trees and shrubs providing shelter and food for birds should be planted as part of environmental compensation after the project is finished.

The planned investment related to the expansion of the plant will be carried out in the area owned by TELE-FONIKA, where the plant is currently located. No new areas of negative impact on the community and environment that may result from the implementation of the project have been identified. A positive effect of the project for the community will be an increase in employment in the plant, and thus attracting new employees from the local labor market.



Picture 2: Residential buildings in the immediate vicinity of the plant

2. Stakeholders identification and assessment

2.1. Identification of stakeholders

“Stakeholders are those groups who affect and/or could be affected by an organisation’s activities, products or services and associated performance. This does not include all those who may have knowledge of or views about an organisation. Organisations will have many stakeholders, each with distinct types and levels of involvement, and often with diverse and sometimes conflicting interests and concerns.”

(source: AA1000 Stakeholder Engagement Standard, 2015)

Based on the:

- Results of the workshop on stakeholder identification and assessment with the representatives of TELE-FONIKA Kable plant in Bydgoszcz on stakeholder identification and assessment
- Consultant’s knowledge and experience from the previous, similar projects

the following stakeholder groups were identified for the plant.

In the table are presented all identified plant’s stakeholders:

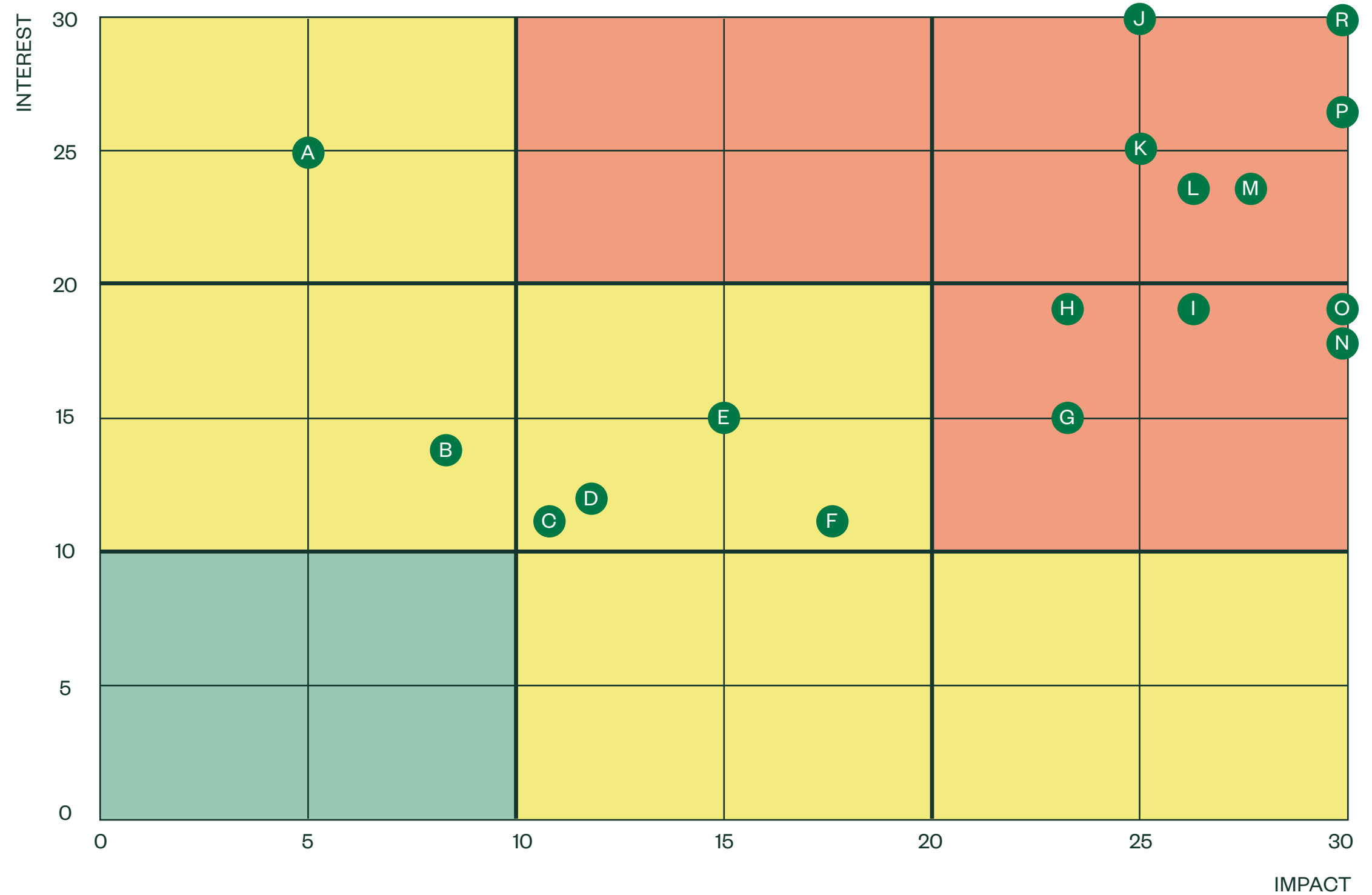
Group of stakeholders	Representatives	Impact (HIGH/MEDIUM/LOW)	Interest (HIGH/MEDIUM/LOW)
Employees	All employees	High	High
Potential employees		High	Medium
Retired employees	Entity called “Koło Emerytów”	Medium	High
Trade unions	3 trade unions	High	High
Competitors	Elpar, NKT, Prysmian, Nexans, importers	High	High
Carriers	Carriers of raw materials, finished products, waste	High	Medium
Suppliers	Suppliers of materials/raw materials, packaging	High	High
Key Clients	Clients from Energy and distribution sector	High	High
Other clients		High	Medium
Local industry and other organizations	Kuyavian-Pomeranian Union of Entrepreneurs and Employers, Association of Polish Electrical Engineers	Medium	Medium
Schools and kindergardens		Medium	Medium
Local administration	President of the city, city hall	High	High
Other institutions and offices	State Sanitary Inspectorate (SANEPID), Voivodship Environmental Protection Inspectorate, National Labour Inspectorate	High	Medium
Local media	Local media from Press Group	Medium	Medium
The scientific community	Universities (main: Bydgoszcz University of Science and Technology), external laboratories, technical/vocational schools	Medium	Medium
Neighbouring industrial plants	Other industrial plants in the area	Medium	Medium
Other	Certification bodies	High	Medium
Other	Site’s fire unit	High	High
Other	Other TFK/JDR plants	High	High
Other	Employee families	High	High

2.2. Stakeholders map

Based on the stakeholder identification and assessment stakeholder map was prepared. The stakeholder map is the main element on the basis of which the stakeholder engagement plan is constructed. It determines the significance of individual stakeholders for the plant due to:

- **impact of the plant on stakeholders** (HIGH/MEDIUM/LOW)
- **interest of the stakeholder in the plant** (HIGH/MEDIUM/LOW)

As key stakeholder groups, are defined stakeholders with both high impact and interest (red fields).



A — Retired employees; **B** — Local industry and other organizations; **C** — Neighbourhood industrial plants; **D** — Schools and kindergardens; **E** — Local media; **F** — Scientific community; **G** — Potential employees; **H** — Other institutions and offices; **I** — Other clients; **J** — Trade unions; **K** — City hall; **L** — Employee families; **M** — Suppliers; **N** — Certification bodies; **O** — Carriers; **P** — Key clients; **R** — Employees / Competitors / Other: site's fire unit / Other TFK/JDR plants.

2.3. Impact of the project on the stakeholders

In the second stage the impact of the project on the plant's stakeholders was assessed.

The impact on stakeholders was assessed for two phases of project implementation

- **construction phase - construction works carried out to expand the plant**
- **operation phase - operation of the plant, including new buildings**

CONSTRUCTION PHASE

Group of stakeholder	Type of stakeholders	Character of impact	Type of impact
Employees	Key	Possible traffic difficulties in connection with the ongoing construction works	negative
Potential employees		No impact	N/A
Retired employees		No impact	N/A
Trade unions	Key	No impact	N/A
Competitors	Key	No impact	N/A
Carriers		No impact	N/A
Suppliers	Key	No impact	N/A
Clients		No impact	N/A
Local industry and other organizations		No impact	N/A
Schools and kindergardens		No impact	N/A
Local administration	Key	Need to obtain certain consents and permits	neutral
Other institutions and offices	Key	Need to obtain certain consents and permits	neutral
Local media		No impact	N/A
The scientific community		No impact	N/A
Neighbouring industrial plants		Increased traffic and noise, possible traffic difficulties in connection with the ongoing construction works	negative
Certification bodies		No impact	N/A
Site's fire unit	Key	Potentially increased risk of fire	negative
Other TFK/JDR plants	Key	No impact	N/A
Employee families	Key	No impact	N/A

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OPERATION PHASE

Group of stakeholder	Type of stakeholders	Character of impact	Type of impact
Employees	Key	Increased stability of the plant and the job stability	positive
Potential employees		New jobs at the plant	positive
Retired employees		No impact	N/A
Trade unions	Key	Increased stability of the plant and the job stability	positive
Competitors	Key	Increased production at the plant, and increased competitiveness of the plant and TELE-FONIKA Kable	negative
Carriers		Increased production at the plant and increased demand for the carriers services	positive
Suppliers	Key	Increased production at the plant and increased demand for the supply	positive
Clients		Increased production at the plant, the ability to fulfill orders in a shorter time	positive
Local industry and other organizations		No impact	N/A
Schools and kindergardens		No impact	N/A
Local administration	Key	Increased production at the plant, resulting in higher local taxes paid by the plant	positive
Other institutions and offices	Key	The need to deal with more official matters	neutral
Local media		No impact	N/A
The scientific community		The possibility of implementing new projects together	N/A
Neighbouring industrial plants		No impact	N/A
Certification bodies		The need to obtain new/more certificates	neutral
Site's fire unit	Key	Increased site area, potentially greater need for fire support	negative
Other TFK/JDR plants	Key	Increased production, more space for cooperation and knowledge exchange	positive
Employee families	Key	No impact	N/A

3. Stakeholder engagement

3.1. Goal and approach to stakeholder engagement

Stakeholder engagement principles:

The key principles guiding the TELE-FONIKA Plant in Bydgoszcz approach to stakeholder engagement for this project are:

- to be open and transparent with stakeholders, engaging in an open process and providing meaningful information on relevant aspects;
- to be accountable and willing to accept responsibility as a corporate citizen and to account for impacts associated with the project activities;
- to have a relationship with stakeholders that is based on trust and a mutual commitment to acting in good faith;
- to respect stakeholders' interests, opinions and aspirations;
- to be responsive and to coherently respond in good time to stakeholders;

Goals of stakeholder engagement

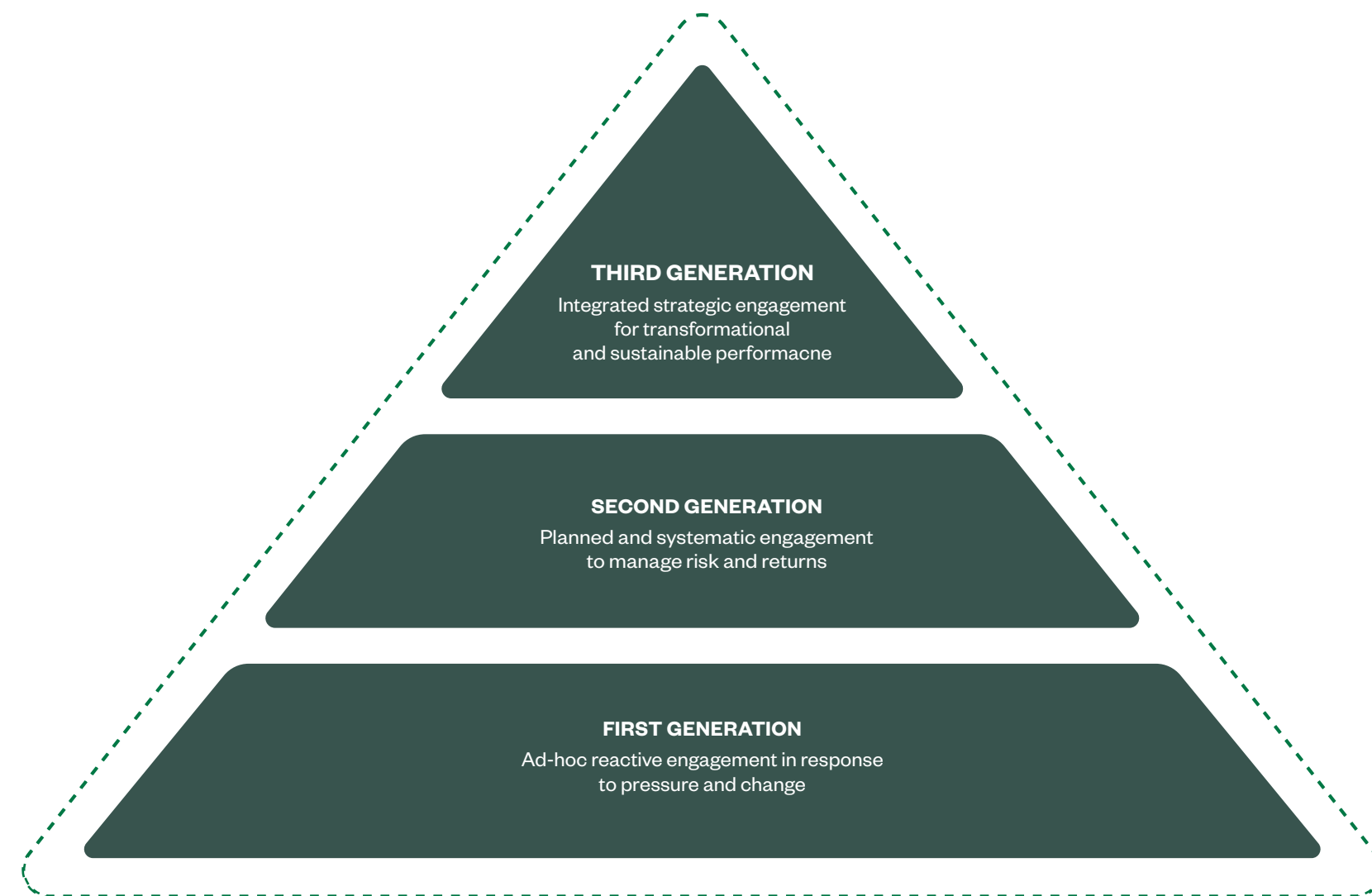
Goals of stakeholder engagement process in line with PR10:

“an open and transparent engagement between the client, its workers, local communities directly affected by the project and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship which will improve the environmental and social sustainability of projects. In particular, effective community engagement, appropriate to the nature and scale of the project, promotes sound and sustainable

environmental and social performance, and can lead to improved financial, social and environmental outcomes, together with enhanced community benefits. Stakeholder engagement is central to building strong, constructive and responsive relationships which are essential for the successful management of a project’s environmental and social impacts and issues”

Approach to stakeholder engagement

Level and approach to the stakeholder engagement will be in line with third generation of stakeholder engagement as proposed in AA1000SES:



source: AA1000 Stakeholder Engagement Standard, 2015

3.2. Activities to engage stakeholders

The TELE-FONIKA Kable plant in Bydgoszcz has already taken number of activities to structure and conduct constant dialogue with stakeholders, answer their questions and doubts. These are indicated in the table on the right side.

There is also a contact tab on the company's website that is available for all stakeholders.

For employees there is additional channel for grievances, which is anonymous box in the hall for reporting and the ability to contact the supervisor (not only with your direct supervisor, but it is possible to report to higher levels).

Stakeholder group	Activities taken
Employees	Ongoing contact, both with direct superiors and, if necessary, with the director of the plant
Potential employees	Participation in job fairs and other events aimed at pupils and students
Retired employees	Organization of meetings for seniors (Koło Emerytów), support (e.g. Christmas packages)
Trade unions	Direct contact, depending on the needs
Clients	Daily contacts, participation in conferences and fairs
Local industry and other organizations	Participation in conferences and meeting, knowledge exchange
Schools and kindergardens	Organization of fire brigade demonstrations for the community, participation in educational lessons
Local administration	Ongoing cooperation/daily contacts
Other institutions and offices	Ongoing cooperation/daily contacts
Local media	Direct contact, depending on the needs
The scientific community	Organization of joint post-graduate studies or dual studies with Universities, organization of internships and apprenticeships at the plant, education of the employees (postgraduate studies), lectures given by plant employees, implementation of joint projects, preparation of expert opinions, organization of Open Days
Neighboring industrial plants	Direct contact, depending on the needs
Certification bodies	Direct contact, depending on the needs
Site's fire unit	Representing the plant in competitions, participation in shows
Other TFK/JDR plants	Organization of joint meetings and workshops, exchange of knowledge and experience, Safety Days
Employee families	Layettes for the birth of a child; meetings/events for families "Mom, Dad, work safely"; site visits for children; families participate in running club, engaging children: art competitions and exhibitions (for children, e.g. regarding safety)

4. Stakeholder engagement action plan

The table on the right summarizes activities already in place, planned and recommended in a one stakeholder engagement action plan. It does not include everyday activities, the continuation of which was taken for granted. The action plan is prepared both for the construction and operation phases of the project. For the operation phase the aim of the planned activities is to present the results of the project and its impact on the stakeholders. As all identified stakeholders are Polish speaking all documents and communication materials will be prepared in Polish language.

Activity	Description	Timeline	Stakeholder group
Website	Separate tab on the website regarding the investment with contact details	ASAP	All stakeholders
Grievance mechanism	Implementation of grievance mechanism	ASAP	All stakeholders
Consultation/duty	Dedicated duty of the TELE-FONIKA Kable employee	Not less often than once for three months, duty not shorter than 2 hours	All stakeholders
Site tour	Site tour for media and representatives of local industry and other organizations to present the project results	After construction phase is finished	Local industry and other organizations, media
Open day	Site tours for the representatives of the scientific community	After construction phase is finished	Scientific community
Open day/Safety day	Site tour for clients, presentation of the results of the investment, quality and safety issues	After construction phase is finished	Clients
Inter-plant safety days	Presentation of the results of the investment, quality and safety issues	After construction phase is finished	JDR

5. Grievance mechanism

Since a grievance mechanism has not been identified that would enable all stakeholders to submit complaints and specify the process of their consideration, it is presented on the right side.

Purpose of developing a complaints mechanism

The purpose of the development of a complaint mechanism is to enable stakeholders to report their needs and expectations on a continuous basis, while ensuring the quality and transparency of the application process.

Principles on which the mechanism is based:

- **Availability** – accessibility of the mechanism to all stakeholders and the possibility for all interested parties to lodge a complaint, including people from disadvantaged groups such as those with reduced mobility or low digital skills
- **Transparency** – transparency of the process of receiving and investigating complaints
- **Objectivism** – objectivity in the complaints handling process, based on a clear process framework and collegiality of the adjudicating body
- **Replying** – replying to all complaints so that the sender can be identified and thus replied to directly

Channels for reporting complaints

In order to ensure that the mechanism is accessible and that any interested party can raise a complaint, the following contact channels shall be made available as part of the operation of the mechanism:

Grievance channel	Description
Regular letter	The possibility of sending a complaint by ordinary letter through the postal service. The letter should be sent to the address indicated at the plant's website. The content of the letter may be any, but it is recommended to use <i>the complaint form</i> available at the plant's website.
Personally	Possibility of filing a complaint in person, at the plant in the dedicated office. Complaints must be made in writing using the Complaint Form, available at the dedicated office at the plant. Give the completed form to the person who issued it. This person, with the submitter, places the form in an envelope, which he/she seals and describes "COMPLAINT".
E-mail	Possibility of sending a complaint by e-mail to the e-mail address indicated on the website. The content of the e-mail can be any, but it is recommended to use <i>the complaint form</i> available at the plant's website
Dedicated phone number	Call on the dedicated number – the number is available on the plant's website.

Anonymity

A complaint can be made by name or anonymously.

The effect of filing a complaint anonymously is:

- **Failure to respond to the resolution of the complaint to the person or organization making the complaint.**
- **Lack of possibility to ask the complainant to supplement or clarify the information contained in the complaint if the notification is imprecise and does not allow for unambiguous identification of what the complaint refers to. If it is not possible to clearly define what the complaint concerns, it will be considered negatively.**

5.1. Management of the complaint mechanism

The process of submitting and managing grievances

STEP 1: ACCEPTANCE OF GRIEVANCE

Acceptance of a complaint means actual receipt of the grievance through one of the channels indicated above. Every grievance – no matter what channel it was reported through – must be registered. The plant dedicates one person responsible for grievance registry. The task of this person is collection of all grievances submitted through all channels and register them. The register must be updated every working day. Register can be in paper or online form.

STEP 2: PRE-ASSESSMENT OF THE GRIEVANCE

Person responsible for grievance register conducts a pre-assessment and assigns grievances to appropriate categories as shown in the table on the right.

STEP 3: CONSIDERATION OF THE GRIEVANCE

For complaints and claims, the body responsible for consideration and decision is Grievance Committee. The Committee decision must be made within 7 days since they received the claim or complaint, unless there are circumstances that make it impossible to settle within this period. The Grievance Committee can make their decision online (via mail) – but in such case (if there is no meeting) all Committee members must vote (via mail) for or against the decision. The person responsible for grievance registry is responsible for filling the registry with these data (including the voting results).

Grievance channel	Description
Question	Person responsible for grievance register can answer the question if has the appropriate knowledge or ask the person with relevant knowledge and pass the answer
Comment (no certain reaction or answer expected)	No action needed.
Complaint	Person responsible for grievance register sends the complaint to the members of the Grievance Committee for consideration.
Claim	Person responsible for grievance register sends the complaint to the members of the Grievance Committee for consideration.
Other	Person responsible for grievance register decides on the procedure – depending on the topic.

STEP 4: GIVING ANSWER

Person responsible for grievance registry is responsible with giving the answer to the person that submitted grievance. Answer should be given via the same channel the grievance was submitted. If it is not possible – it should be sent via email. For the anonymous grievances – the procedure for the steps 1-3 remains. The results of the Grievance Committee voting must be noted in the grievance registry.

REPORTING

At the end of the month the person responsible for grievance mechanism sends to the Grievance Committee and other indicated persons report on grievances with statistical information on:

- **Number of submissions per category**
- **Number of cases ongoing**
- **Percentage of cases solved (in relation to submitted)**
- **Percentage of cases solved positive for stakeholder**
- **Average time of giving answer**
- **Additional comments – if required**

If there are no grievances in the certain month, the person responsible for grievance can just state that fact in the communication to the Grievance Committee.

Roles and tasks within the grievance mechanism

PERSON/UNIT	TASKS
Person responsible for grievance mechanism	<ul style="list-style-type: none"> • Daily monitoring of available complaint channels • Registration of complaints in accordance with the mechanism • Referral of complaints to the Grievance Committee • Communication of responses to complaints to stakeholders • Preparation of complaint reports
Grievance committee	<ul style="list-style-type: none"> • Dealing with complaints raised under the complaint mechanism

Deadlines for completion of individual tasks within the complaint reporting and handling process

	DATES
Registration of the complaint and processing of the complaint	Within 2 working days of the notification of the complaint
Consideration of the complaint by the grievance committee	Within 7 days of receipt of the complaint
Approval of the minutes of the meeting	Within 5 working days of the meeting of the Grievance Committee
Forwarding the reply to the complainant	Within 10 working days of receipt of the complaint

6. Monitoring and evaluation of implementation of SEP

Implementation of the Stakeholders Engagement Plan should be constantly monitored based on the defined indicators.

Indicator	Frequency of monitoring
COMMUNICATION AND CONSULTATION	
Number of people attending the duty	After each duty
Number of people contacting the plant (on project related issues) using the contact and information available on website	Monthly
Approval of the minutes of the meeting	Monthly
MEETINGS	
Number of people attending each open day/site visit	After each meeting
GRIEVANCES	
Number of submissions per category	Monthly
Number o cases ongoing	Monthly
Percentage of cases solved (in relation to submitted)	Monthly
Percentage of cases solved positive for stakeholder	Monthly
Average time of giving answer	Monthly
Number of complaints on the project to other stakeholders/institutions	Monthly

7. Reporting

Designated person prepares at the end of each quarter summary report on stakeholder engagement. The report should cover the construction phase and first two quarters of operation phase. The report should consist of the following data presented on the right side.

Summary report should be sent to the decision-makers in the project, who can make the decision to update or adjust the stakeholder engagement action plan.

<p>Engagement activities planned and conducted</p>	<ul style="list-style-type: none"> • Within 2 working days of the notification of the complaint Information about the activities planned for this period • Information about the activities conducted • Percentage of activities conducted (in relation to activities planned)
<p>Engagement activities planned and not conducted</p>	<ul style="list-style-type: none"> • Information about the activities not conducted with reasons why activities were not conducted • Percentage of activities not conducted (in relation to activities planned)
<p>Indicators</p>	<ul style="list-style-type: none"> • Monitoring indicators
<p>Conclusions</p>	<ul style="list-style-type: none"> • Conclusions • Recommendations/adjustments to the plan

Appendices

Appendix 1 terms and conditions for submitting a grievance

RULES FOR THE SUBMISSION AND HANDLING OF COMPLAINTS

Introduction

1. Regulations for submission and consideration of complaints describe the process and procedure for submission of complaints by the stakeholders of the TELE-FONIKA Kable plant in Bydgoszcz.
2. The Rules of Procedure shall be a document publicly available to all interested parties.

Filing and investigation of complaints

3. Any stakeholder shall have the right to lodge a complaint using this mechanism and the grievance channels established under the mechanism.
4. Complaints submitted using the tool available under the complaint mechanism i. e:
 - a. Complaints sent by post to the plant: ul. Fordońska 152, 85-752 Bydgoszcz marked "COMPLAINT"
 - b. Complaints filed in person at the plant
 - c. Complaints sent by e-mail to: compliance@tfkable.com
 - d. Complaints lodged with the dedicated phone number: +48 12 652 52 52
5. The Receiving Party is obliged to consider all complaints received within 30 working days of their receipt.

6. If the content of the complaint makes it impossible to clearly identify the problem to which the complaint relates or if the solution to the problem lies beyond the capabilities and/or scope of the company's activities, the complaint will be considered negatively.
7. Acceptance and investigation of a complaint means:
 - a. Receipt and recording of the complaint by the person responsible for receiving complaints
 - b. Preliminary classification of the complaint in the appropriate category
 - c. Consideration of the complaint by the Complaints Committee and a clear decision as to whether the complaint is granted or refused
8. Every decision of the Complaints Committee, whether the complaint is upheld or downheld, must contain a statement of reasons for the decision taken.
9. The decision of the Complaints Committee shall be final and there shall be no appeal. The person making the complaint has the right to make another complaint about the same issue.
10. A reply to a complaint shall be given to the person making the complaint in the same form in which the complaint was made. If this is not possible, a response to the complaint shall be provided by e-mail.

11. In the case of a complaint submitted anonymously, or in a way that makes it impossible to identify the sender, the receiving officer is not obliged to communicate the decision of the Complaints Committee to the complainant.

Documentation

12. All complaints received in accordance with the complaint mechanism shall be recorded in the register of complaints
13. The register of complaints is internal material of the host who is not obliged to make information about complaints public.

Appendix 2 Grievance form - template

COMPLAINT FORM

Complaint number *
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DETAILS OF THE PERSON LODGING THE COMPLAINT

Name of complainant
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You are not required to provide the name of the person making the complaint. The complaint can be made anonymously.

The effect of filing a complaint anonymously is:

- Failure to provide a response regarding the resolution of the complaint to the person or organization making the complaint
- No opportunity to supplement or clarify information where the notification is vague and does not clearly identify what the complaint is about. If it is not possible to clearly define what the complaint concerns, the complaint will be rejected.

Address
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Please provide an address to which a response to your complaint should be sent. There is no obligation to provide an address. The consequences of failing to give an address are the same as if a complaint had been lodged without the name of the complainant

CATEGORY OF COMPLAINT

Category	<input type="checkbox"/>	Noise
	<input type="checkbox"/>	Traffic
	<input type="checkbox"/>	Dangerous behaviour on construction site - a threat to residents' safety
	<input type="checkbox"/>	Other (which?)

Please select the category to which your complaint relates by marking an X in the appropriate box, or enter your own category

CONTENT OF THE COMPLAINT

Please write the text of your complaint explaining:

What actions have been taken within the framework of the project implementation or what actions have been omitted	
What was the effect on the complainant of taking or failing to take the action indicated above	
Whether the effect of the action extends only to the reporting entity or person, or to other persons, entities, or the environment more broadly	
What action the complainant expects to take	
Additional information	

Please provide any additional information relevant to the complaint

Date of receipt of the complaint

Name and signature of the person receiving the complaint

* Fields marked in grey are to be completed by the person filing the complaint.

Appendix 3
Answer for grievance – template

ANSWER TO THE COMPLAINT

[date, place]

Dear Sir/Madam,

In response to your complaint numbered

Please be informed that as per the decision of the Complaints Committee on

The complaint was investigated [positive/negative]

Justification:

.....
.....
.....
.....
.....
.....
.....

Thank you again for your application.

We carefully consider each report submitted to us regarding our impact on the environment in which we operate, believing that by doing so we can improve our operations and our relationship with the environment.

Yours faithfully

