

Stakeholder Engagement Plan

Environmental and Social Assessment Ukraine: Resilience and Livelihood Framework Hansen Affordable Housing

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ABBREVIATIONS

AoI	Area of Influence
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirements
FFE	Furniture, Fixtures & Equipment
GBVH	Gender-Based Violence And Harassment
HUM	Housing Unit Management
IDP	Internally displaced people
NGO	Non-governmental organization
NTS	Non-Technical Summary
RTO	Rent-to-Own
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

1.1. OVERVIEW

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is considering providing financing to HANSEN UKRAINIAN MISSION (“HUM” or the “Company”), through the formation of LLCs by Dell Loy Hansen, created to ensure access to dignified and affordable housing in Ukraine. The financing will support the first phase of HUM’s Affordable Housing Platform, which will focus on affordable rental housing for internally displaced persons (IDPs), low- to middle-income households, and other vulnerable groups. Subsequent phases are expected to introduce rent-to-own (RTO) housing schemes and expand the platform’s social impact across Ukrainian municipalities.

The Project is structured through a vertically integrated platform comprising of Ukrainian SPVs – local legal entities owning and operating specific housing assets.

The HUM is a philanthropic initiative founded in 2023 by U.S. land developer and philanthropist Dell Loy Hansen, aimed at addressing the critical needs of Ukrainian IDPs who have lost their homes and livelihoods due to the ongoing conflict in Ukraine. The foundation focuses on rebuilding communities, restoring dignity, and renewing hope by delivering affordable, rent-free housing solutions along with supportive community infrastructure.

To date, HUM has successfully implemented:

- Hansen Town — a community with over 420 apartments housing more than 2,000 people, including orphaned children and people with disabilities;
- Miracle Town — a residential complex providing individual apartments for over 250 elderly residents without rent or utility costs;
- Hansen Apartment Complex — a project providing 274 residences for internally displaced persons and individuals evacuated from conflict zones.

All of these communities are designed with the following approach: they have access to social infrastructure including schools, kindergartens, sports and recreational facilities, medical clinics, and emergency shelters. This promotes social cohesion and helps residents rebuild their lives.

The Project is categorised “B” and has initially been assigned Low Medium Risk, as per the EBRD Environmental and Social Policy (2024).

AVgroup B.V. has been appointed as the Consultant to undertake the Environmental and Social Assessment (ESA), including preparation of the Environmental and Social Action Plan (ESAP), Stakeholder Engagement Plan (SEP), and Non-Technical Summary (NTS) (the “Assignment”). As part of the ESA, AVgroup B.V. conducted a site visit to the HUM Project locations, during which the team engaged directly with key project stakeholders, including HUM personnel, tenants, local citizens and EPC contractors, to gather relevant information for ESA and SEP development, and understand stakeholders’ concerns.

This document is a Stakeholder Engagement Plan (SEP) for the Project, identifying relevant stakeholders and defining communication channels and plans of HUM.

The SEP is based on national legislation, EBRD Environmental and Social Requirement 10: Stakeholder Engagement, and international best practices related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a living document and will be reviewed periodically during Project implementation and updated as necessary to reflect new or modified activities, changes in Project design, or newly identified stakeholders.

1.2. OBJECTIVES OF THIS STAKEHOLDER ENGAGEMENT PLAN

This SEP outlines the approach that will guide consultation, disclosure, and engagement activities throughout the implementation of the Project. The SEP has been developed in accordance with the EBRD ESP 2024, particularly ESR 10, and applicable national requirements, considering current restrictions on sensitive information disclosure due to wartime conditions in Ukraine.

The objectives of this SEP are to:

- 1) Define the applicable legal and regulatory disclosure and consultation requirements at the national and international levels.
- 2) Identify and categorize stakeholder groups that could be affected by, or have an interest in, HUM's operations and services under the Project, including vulnerable groups requiring tailored engagement approaches.
- 3) Ensure that stakeholders are provided with timely, relevant, understandable, and accessible information and are engaged through a process of meaningful consultation on issues that may affect them.
- 4) Maintain a constructive, transparent, and culturally appropriate relationship with stakeholders throughout the Project lifecycle, including addressing any concerns or queries they may have.
- 5) Establish a clearly defined grievance mechanism to allow stakeholders and service users to submit complaints, questions, or comments and to ensure these are handled promptly and transparently.
- 6) Summarize any prior stakeholder engagement activities carried out to date in relation to the Project.
- 7) Define the documents that will be disclosed, including language requirements, formats, and disclosure methods, while respecting security restrictions.
- 8) Plan engagement activities in a manner free from manipulation, interference, coercion, or intimidation, with particular attention to the needs of vulnerable or marginalized groups, including women, the elderly, internally displaced persons (IDPs), and persons with disabilities.
- 9) Provide for ongoing monitoring, reporting, and adaptation of the stakeholder engagement process to ensure it remains effective and appropriate over time.
- 10) Assign clear responsibilities for implementing stakeholder engagement activities and managing stakeholder relations throughout the Project.

The SEP is intended to serve as a practical guide to ensuring that stakeholder engagement activities are systematic, inclusive, and aligned with both best international practice and the specific operational context of Ukraine at the present time.

As a result of this SEP was developed a Stakeholder Engagement Implementation Plan (see [Appendix 1](#)) that shall be implemented by HUM when implementing and coordinating overall activities.

2. PROJECT DESCRIPTION

The Affordable Rental Housing Program (Phase 1) consists of 182 residential units across two Projects, complemented by adjacent supporting infrastructure facilities. The Projects are located in the village of Sofiivska Borshchahivka, Buchansky district, Kyiv region, in an area with well-developed residential and social infrastructure. The Program is situated adjacent to 2 existing Hansen Mission in Ukraine projects (274 residential units), which provide free housing for internally displaced persons and veterans. These projects also include a substantial social and rehabilitation program working with vulnerable populations (social and psychological assistance, administrative and legal support, and organization of educational clubs for children and elderly people).

For the purposes of this SEP, the primary areas of influence are defined as the village of Sofiivska Borshchahivka and adjacent communities, including:

- residents living near the Project implementation sites;
- local service providers (utilities, educational and healthcare institutions);
- municipal authorities responsible for land use and community development.

HUM defines “affordable rent” as 70% of the market rent (30% discount to prevailing market rates), with eligibility based on verified minimum and maximum household income thresholds. The targeted demographic groups include Ukrainian IDPs:

- whose homes have been destroyed;
- whose homes are located in occupied territories; or
- who have not received compensation or alternative housing through governmental programmes.

Priority groups include healthcare workers, teachers, firefighters, veterans, Ukrainian soldiers, widows of soldiers, and families caring for orphans of the war.

All affordable housing rental units will be acquired in “shell & core” condition from Ukrainian developers, after which LLC will complete the renovation and fit-out based on a standardised schedule of furniture, fixtures, and equipment (FFE). Homes will be offered fully finished and furnished, ready for immediate occupancy. Beyond housing, HUM will provide property management, leasing, community management, and a range of social and reintegration services tailored to the needs of IDP households.

Scope of Phase 1:

- *Project Mezova* – 58 units. Expected delivery: September 2025.
- *Project Parkway House* – 124 units. Expected completion of Phase 1 (62 apartments) in December 2025 and Phase 2 (62 apartments) in June 2026.

The Project has been classified as Category B under the EBRD Environmental and Social Policy (2024), meaning that environmental and social risks and impacts are site-specific, limited in scale, and manageable through targeted mitigation measures. An ESA has been undertaken to evaluate HUM’s management systems, stakeholder engagement practices, and alignment with applicable standards.

In terms of legal and institutional requirements, the Project must comply with:

- Ukrainian national law on public disclosure and consultation, including environmental permitting, building codes, and housing regulations;
- EBRD Environmental and Social Policy (2024), specifically ESR 10 (Information Disclosure and Stakeholder Engagement), which requires the development and implementation of a fit-for-purpose SEP proportionate to project risks;
- Any additional requirements of financiers supporting HUM’s Affordable Housing Platform, as well as HUM’s own corporate governance commitments to transparency and accountability.

At present, HUM's stakeholder engagement practices are carried out fully in accordance with national legislation. In the course of cooperation with the EBRD and other international partners, HUM will further strengthen these practices by adopting and applying international good practice standards in information disclosure, consultation, and grievance management, ensuring full alignment with EBRD requirements.

As part of project implementation, HUM commits to implementing this SEP to:

- Ensure meaningful engagement with affected and interested stakeholders;
- Provide timely and accessible disclosure of Project-related information (subject to legal and confidentiality limitations);
- Maintain an accessible, inclusive, and responsive grievance mechanism to receive and resolve stakeholder concerns in a fair and transparent manner.

3. STAKEHOLDER ENGAGEMENT REQUIREMENTS

3.1. OVERVIEW

This SEP has been developed to comply with the legal and national policy requirements and meet the EBRD's information disclosure, consultation, and stakeholder participation requirements.

3.2. NATIONAL REGULATIONS

During martial law in Ukraine, additional restrictions and changes apply to the publication of information, namely:

- Law of Ukraine "On Access to Public Information" (Article 6) dated 13.01.2011, No. 2939-VI. [Link](#)
- Decree of the President of Ukraine «On extending the term of martial law in Ukraine» dated 19.04.2025, No. 4356-IX. [Link](#)

SEP is based on the requirements of national legislation:

- Constitution of Ukraine dated 28.06.1996 № 254k/96-VR. [Link](#)
- Law of Ukraine "On Environmental Impact Assessment", dated 23.05.2017 № 2059-VIII. [Link](#)
- Law of Ukraine "On Information" dated 02.10.1992 No. 2657-XII. [Link](#)
- Law of Ukraine "On Access to Public Information" dated 13.01.2011, No. 2939-VI. [Link](#)
- Law of Ukraine "On Appeals of Citizens" dated 02.10.1996 No. 393/96-VR. [Link](#)
- Law of Ukraine "On Prevention of Corruption" dated 14.10.2014 No. 1700-VII. [Link](#)
- Law of Ukraine "On Local Government in Ukraine" dated 21.05.1997, No. 280/97-VR. [Link](#)
- Law of Ukraine "On Housing and Communal Services" dated 09.11.2017, No. 2189-VIII. [Link](#)
- Law of Ukraine "On State Regulation in the Field of Communal Services" dated 07.09.2010, No. 2479-VI. [Link](#)
- Law of Ukraine "On Public Procurement" dated 25.12.2015, No. 922-VIII. [Link](#)
- Law of Ukraine "On Peculiarities of Access to Information in the Fields of Electricity Supply, Natural Gas, Heat Supply, Centralized Hot Water Supply, Centralized Drinking Water Supply and Sewerage" dated 10.12.2015, No. 887-VIII. [Link](#)
- Law of Ukraine "On Local State Administrations" dated 09.04.1999, No. 586-XIV. [Link](#);
- Law of Ukraine "On the Status of Deputies of Local Councils" dated 11.07.2002, No. 93-IV. [Link](#);

- Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Procedure for Conducting Public Hearings in the Process of Environmental Impact Assessment" dated 13.12.2017, No. 989. [Link](#)
- Resolution of the Cabinet of Ministers of Ukraine "On approval of the Instruction on record keeping on appeals of citizens in public authorities and local governments, associations of citizens, enterprises, institutions, organisations regardless of ownership, in the media resources" dated 14.04.1997, No. 348. [Link](#);
- Decree of the President of Ukraine "On priority measures to ensure the implementation and guarantee of the constitutional right to appeal to public authorities and local governments" dated 07.02.2008, No. 109/2008. [Link](#);
- Resolution of the Cabinet of Ministers of Ukraine "On Amendments to Clause 2 of the Instruction on Record Keeping of Citizens' Appeals in State and Local Self-Government Bodies, Associations of Citizens, Enterprises, Institutions, Organizations Regardless of Ownership, in Means mass media» dated 19.01.2011, No. 26. [Link](#).

3.3. EBRD REQUIREMENTS

According to the EBRD Environmental and Social Policy (ESP, 2024), stakeholder engagement is characterized as a continuous and inclusive process designed to foster constructive connections with impacted communities, employees, and other relevant stakeholders. It is most efficacious when initiated early and sustained throughout the project lifespan, as an integral component of identifying, managing, and monitoring environmental and social risks and impacts.

According to ESR 10, stakeholder engagement must include:

- Timely information disclosure in accessible and culturally appropriate formats;
- Meaningful consultation, with feedback integrated into project decision-making where relevant;
- An effective grievance mechanism, allowing stakeholders to raise concerns safely and without fear of retaliation.

The EBRD requires that engagement be:

- Proportionate to project scale, risks, and level of public interest;
- Structured, with clear roles, responsibilities, and dedicated personnel;
- Ongoing, covering identification and analysis of stakeholders, disclosure, consultation, grievance management, and monitoring and reporting.

Good practice guidance, including the [Meaningful Stakeholder Engagement](#) handbook developed by multilateral financial institutions, complements ESR 10 and sets out practical approaches for implementing effective and inclusive engagement.

4. IDENTIFICATION OF STAKEHOLDERS AND COMMUNICATION METHODS

4.1. IDENTIFICATION OF STAKEHOLDERS

HUM recognises that the success and sustainability of its projects depends on active, transparent, and inclusive engagement with a broad spectrum of stakeholders. Stakeholder identification has therefore been carried out as an integral part of the SEP, drawing on HUM's corporate policy Transparency and Communication with Stakeholders, the findings of the Environmental and Social Assessment, and consultations held to date.

The process considered both affected stakeholders those who are directly influenced by project activities, either positively or adversely and interested stakeholders, who may not be directly impacted but have a legitimate interest in the Project or influence over its outcomes. Particular attention has been given to the needs of vulnerable or under-represented groups, ensuring that consultation methods will be adapted to address barriers such as literacy, mobility, income, gender, language, or social stigma.

In practice, this means that IDPs, widows, elderly residents, persons with disabilities, and families with many children will be provided with additional opportunities to participate through accessible venues, tailored communication formats, and where needed, individual household-level engagement. To ensure gender responsiveness, consultation activities will actively encourage the participation of women, schedule events at times that are compatible with household responsibilities, and provide safe, confidential channels for raising sensitive concerns, including gender-based violence and harassment (GBVH).

The mapping exercise also assessed the types and degrees of impacts each stakeholder group may experience, from housing access and social benefits for tenants, to temporary disruptions for host communities, compliance obligations for contractors, and coordination needs for local authorities and utilities. For stakeholders with limited ability to voice concerns openly, HUM will ensure that the grievance mechanism offers anonymous, confidential, and anti-retaliation channels.

The results of this analysis are summarised in Table 1: Stakeholder Mapping and Consultation Methods, which sets out stakeholder groups, potential impacts, engagement activities, communication methods, and indicative timeframes.

Stakeholder mapping approach

HUM applies approach to stakeholder mapping to ensure that engagement strategies are tailored, relevant, and proportionate to both stakeholder needs and project risks. The analysis considers stakeholders' level of interest in the Project and their level of influence over its outcomes.

- High influence / high interest stakeholders (e.g. financiers, regulators, municipal authorities) require regular and active engagement, as their decisions are critical for project success.
- High influence / low interest stakeholders (e.g. certain government bodies) must be kept satisfied and updated to prevent negative impacts.
- Low influence / high interest stakeholders (e.g. residents, vulnerable groups) should be informed through accessible and inclusive channels, as their feedback provides valuable insights into local conditions, risks, and opportunities.
- Low influence / low interest stakeholders are monitored, with engagement adjusted as needed.

Engagement intensity and frequency increase in line with the degree of influence or the level of impact experienced by stakeholders. HUM reviews its stakeholder mapping periodically to capture changes in project context or community dynamics and maintains an updated stakeholder database as a management tool. This ensures that communication methods remain inclusive, and appropriate for example, using printed materials, social media, or face-to-face meetings depending on the preferences and accessibility needs of each group.

Table 1. Stakeholder mapping and consultation methods

No.	Stakeholder group	Specific stakeholders	Type of impact (positive/adverse)	Engagement activities	Communication methods	Timeframe
1.	Government and Institutions (national & local authorities)	Ministry for Development of Communities and Territories of Ukraine, Verkhovna Rada of Ukraine, Kyiv Regional State Administration, Bucha District State Administration	+ Oversight of housing allocation, service delivery, and policy alignment – Potential administrative delays or inconsistent coordination	Coordination on eligibility rules, permits, integration with state housing programmes, and access to local services	Face-to-face consultations, joint working groups, official correspondence, periodic review meetings	Before and during project implementation
2.	Municipalities	Sofiivska Borshchahivka Village Council,	+ Coordination of local infrastructure, provision of permits, and facilitation of community services – Potential administrative delays or inconsistent coordination	Regular coordination meetings, joint planning sessions, review of project documentation.	Face-to-face consultations, official correspondence, joint working groups, public hearings	Before and during project implementation
3.	International community	UN agencies, INGOs, humanitarian organisations	+ Technical assistance, policy alignment, potential funding or programme partnerships	Strategic dialogue, joint initiatives on IDP housing and social support	Online/offline meetings, technical missions, correspondence	Ongoing
4.	Investors & Lenders	EBRD, donors, private investors	+ Financing, technical expertise, reputational association – Risk if non-compliance with E&S standards	Reporting on E&S performance, financial accountability, participation in project milestones, workshops	Reports, online/offline meetings, site visits, correspondence	Ongoing
5.	Civil society, volunteers, NGOs	Volunteer organizations supporting IDPs, human rights advocacy groups, environmental NGOs monitoring construction and housing projects	+ Delivery of psychosocial, legal, and reintegration services – Risk of overlapping or uncoordinated initiatives	Public consultations, community engagement programmes, training for volunteers	Participatory meetings, social media, printed materials, focus groups with vulnerable groups	Ongoing
6.	Local communities & host residents	Residents of Sofiivska Borshchahivka, residents of nearby residential complexes, owners of local business	+ Improved housing and social infrastructure – Temporary construction nuisances (dust, noise, traffic) and increased demand on local services	Needs assessments, consultations on community priorities, information disclosure on impacts	Community meetings, posters/noticeboards, local media, grievance mechanism	Before and during project implementation
7.	Project beneficiaries / tenants	IDPs, veterans, widows, elderly, families with children, persons with disabilities	+ Access to affordable housing and services	Needs assessments, orientation sessions, community-building activities,	Focus groups (including gender-segregated if needed), home visits, printed guidance, digital	Before and during occupancy

			– Risk of exclusion due to unclear eligibility/exit criteria, or tenure uncertainty	feedback and grievance processes	platforms, tenant committees	
8.	Vulnerable groups	Widows, elderly, persons with disabilities, large families, IDPs without income, orphans	+ Priority access to housing and services; – Risk of exclusion due to barriers (literacy, income, mobility, stigma)	Tailored consultations, household-level engagement, grievance support	Accessible venues, large-print materials, translation, home visits, confidential grievance channels, gender-responsive spaces	Continuous
9.	Business entities	Contractors, suppliers, service providers	+ Business opportunities, employment, skills development – Risk of non-compliance with labour, OHS, ESG standards	Prequalification, capacity-building, compliance monitoring	Training sessions, coordination meetings, contract clauses, HUM audits	Before and during construction/renovation
10.	Utility providers & emergency services (water, gas, electricity, waste, police, fire, civil defence)	Service Cooperative 'Society of Centralized Network Users "Sofiiivka", DTEK Kyiv Region Power Grids, State Emergency Service of Ukraine	+ Expanded service provision opportunities – Risk of overload if not coordinated	Coordination on service demand, emergency planning, shelter and safety arrangements	Joint planning meetings, correspondence, site inspections	Before and during project implementation
11.	Media (local, regional, national)	National media outlets (e.g., Ukrinform, Interfax-Ukraine, Kyiv Independent), regional press (Kyiv region newspapers and TV), local online community platforms and social media pages	+ Dissemination of information, transparency – Risk of misinformation or negative framing	Press releases, project launches, information campaigns	Press briefings, social media, newsletters, interviews	Ongoing
12.	Academic and professional institutions (universities, research centres, associations)	Kyiv National University of Construction and Architecture, Taras Shevchenko National University of Kyiv (urban studies, sociology), Ukrainian Academy of Public Administration, professional associations of architects, engineers, and social workers.	+ Research partnerships, knowledge sharing – Risk of limited engagement without formal cooperation	Joint research, capacity building, technical workshops	Academic conferences, publications, workshops	Periodic
13.	HUM project staff	HUM personnel	+ Professional development, role in ensuring compliance – Risk of unclear responsibilities if procedures are not formalised	Training on ESMS, SEP, and grievance procedures, internal communication	Staff handbook, meetings, emails, noticeboards, trainings	Ongoing

4.2. VULNERABLE GROUPS

The participation of vulnerable individuals and groups in public consultations and other project-related activities provides inclusive and equitable stakeholder engagement. Vulnerability may arise from a variety of factors, including origin, gender, age, health status, income level, marginalised social position, dependency on others, or exposure to conflict-related risks.

A preliminary demographic and socio-economic analysis of the Project's area of influence has identified the following vulnerable groups:

- elderly people;
- war veterans and demobilised military personnel;
- persons with disabilities;
- low-income households reliant on state support;
- female-headed households and single mothers with underage children;
- unemployed individuals and households without stable income;
- IDPs and families affected by hostilities;
- children and youth, including orphans and those affected by displacement.

Engagement barriers may include language differences, cultural sensitivities, gender and power imbalances, limited mobility, literacy challenges, or reluctance to participate in large public events. To overcome these challenges, HUM will implement tailored communication and participation strategies, such as:

- Organising small-group discussions in accessible and safe locations;
- Conducting home visits for those unable to travel;
- Partnering with local NGOs, associations, and community leaders who already work with vulnerable populations;
- Providing information in simple, accessible formats, including oral or visual methods where literacy is a barrier;
- Ensuring gender-responsive measures, such as offering women-only sessions or female facilitators when appropriate;
- Using remote engagement methods (phone, online platforms) where security or mobility constraints apply.

Given the ongoing conflict and martial law in Ukraine, conflict-affected groups face heightened risks of psychological trauma, instability, and insecurity. Consultations will therefore prioritise voluntary participation, ensure confidentiality of information, and apply anti-retaliation safeguards, particularly for those raising sensitive issues through the grievance mechanism.

HUM will periodically review the categories of vulnerable stakeholders and adapt its engagement methods to evolving conditions. More information on specific engagement activities, frequency, and responsibilities is provided in [Appendix 1. Stakeholder engagement implementation plan](#).

5. STAKEHOLDER ENGAGEMENT

5.1. INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT ACTIVITIES

HUM conducts stakeholder engagement in accordance with Ukrainian legislation and the requirements of EBRD ESR 10, ensuring that affected communities, government agencies, and other relevant

stakeholders are informed and consulted throughout the project lifecycle. Engagement is designed to be meaningful and proportionate to the scale, risks, and impacts of the projects.

- Consultations provide stakeholders with information on:
- The purpose, nature, scale, and expected duration of the Project;
- Potential environmental and social risks and the proposed mitigation measures;
- Opportunities for participation, enabling affected communities to voice concerns and provide feedback;
- The time, location, and format of public consultation meetings;
- Available grievance mechanisms for raising project-related concerns.

Information is disclosed in Ukrainian and presented in accessible and culturally appropriate formats, consistent with HUM's principles of transparency, completeness, and inclusiveness.

At present, disclosure practices are adjusted to comply with martial law restrictions in Ukraine, which limit the level of detail that can be publicly released on certain types of assets and locations. While HUM's housing projects are not classified as critical infrastructure, national security regulations may still affect the disclosure of sensitive information (e.g., detailed cadastral data, engineering documentation, or site layouts). HUM therefore provides stakeholders with all relevant non-sensitive information in a timely and accessible manner, while ensuring compliance with national law.

HUM will broaden disclosure to include full project-related documentation (e.g. Corporate SEP, ESAP, ESA summaries, NTS), made available online and in physical locations, accessible to both the general public and vulnerable groups.

The identified implemented communication methods are presented according to all previously held engagement events with the whole Project implementation and are compiled from applicable information obtained from the Company and open-data resources (refer to [Appendix 2. List of published information on the Project in mass media channels](#) for more information on disclosure in mass media).

Preliminary consultations and information disclosure activities conducted by the Company to inform stakeholders about the planned activities, take into account the opinions of the public and other stakeholders, as well as documents to be published and their availability are presented in the [Appendix 8. Preliminary consultations and disclosure activities](#).

HUM is recommended to use a sample format provided in this SEP for documenting engagement activities in the future activities (see [Appendix 3](#)).

5.2. PREVIOUS AND CURRENT STAKEHOLDER ENGAGEMENT ACTIVITIES

HUM informs the public through official channels with up-to-date information on Project implementation. These channels include:

- Official Website – Primary source for official announcements, procurement notices, project documentation, and regulatory disclosures.^{1, 2}
- Facebook Page – Widely used for public updates, press releases, photo reports, and stakeholder outreach in a more interactive format.³

¹ Source: Affordable Housing official website, [Link](#)

² Source: Hansen Ukrainian Mission official website. [Link](#)

³ Source: Facebook page, website, [Link](#)

- Instagram – Visual platform used to share highlights of site visits, community engagement events, and key milestones.⁴

HUM is implementing a stakeholder engagement based on open dialogue, transparency in decision-making and continuous feedback monitoring. Viktoriia Slyzhuk, Directorate Manager, is responsible for stakeholder engagement, overseeing public communications, consultations, and public information.

6. GRIEVANCE MECHANISM

6.1. EXTERNAL GRIEVANCE MECHANISM

In accordance with the HUM's document "Mechanism for reviewing citizens' complaints", HUM has established an External Grievance Mechanism to ensure that all stakeholders can raise concerns, complaints, or suggestions and receive timely responses. This mechanism ensures transparency, accountability, and accessibility for all interested parties and applies to all HUM projects, including the Affordable Rental Housing Program.

Channels for submission

Stakeholders can submit their appeals through the following channels:

- Hotline telephone number, available on HUM's website: +380-93-833-42-15
- Email address, available on HUM's website: hum.affordable.rent@gmail.com.
- Postal mail sent to HUM's headquarters: Tarasivka village, Kniahyni Olhy Street, 9.
- Special grievance boxes installed at project sites.
- In-person submissions directly to the designated grievance coordinator.

Information about submission options will be disclosed through community meetings, leaflets, posters at project sites, and HUM's official communication channels.

Receipt and Registration

All grievances are received by the designated HUM grievance coordinator. Each grievance is entered into the Grievance Register, noting the date, channel of submission, and a short description. Registration includes date, source/channel, category (complaint/suggestion), short description, and priority status.

Preliminary Assessment

The grievance is categorized according to urgency: ordinary (handled in standard timeline), priority (requires faster response), or critical (potentially urgent health, safety, or rights-related issue). If a grievance is outside HUM's scope, the complainant is informed and, where possible, referred to the appropriate institution.

Review and Investigation

The relevant department or grievance review committee investigates the issue. This may include fact-finding (document review, site visits, or interviews). Consultations with the complainant or other stakeholders may be organized if needed.

Decision and response

HUM issues a written or verbal response within 10–30 calendar days depending on complexity. If additional review is required, the response period may be extended up to a maximum of 45 days, with the complainant notified in writing. For anonymous grievances, responses are made publicly available (e.g., posted on HUM's website or displayed on project notice boards).

⁴ Source: Instagram page, website, [Link](#)

Monitoring and follow-up

HUM tracks the implementation of corrective measures resulting from grievances. Lessons learned from grievance cases are analyzed periodically to identify systemic issues and strengthen HUM's practices and policies. Summary data (number and type of grievances, resolution rate, trends) are included in HUM's project monitoring and donor reporting.

Grievances can be submitted in the format outlined in [Appendix 5. Grievance and Complaints Form](#), which includes two available options: submission with identification or anonymously (based on complainant preferences). Both formats are accepted and processed in accordance with the established Grievance Redress Mechanism. In case of anonymity option, the complainant shall inform at the beginning or reach out individually to receive the feedback. The grievance mechanism process is illustrated in [Appendix 4 Grievance mechanism process](#).

It is recommended to enhance the existing Grievance Register Log by adopting the following format for consistent use in future activities. A sample template of the grievance record sheet is provided in [Appendix 6. Grievance Register Form](#) for future use and reference.

6.2. CONFIDENTIALITY AND CONFLICT OF INTEREST

The Company allows for the submission of anonymous complaints. In such cases, HUM provides feedback in publicly available ways (e.g. via HUM's website or information board). To ensure impartiality and avoid conflicts of interest, multiple channels have been established for submitting grievances.

6.3. PROPOSED GRIEVANCE MECHANISM WITH ANONYMITY OPTION, INCLUDING GBVH

To strengthen accessibility and encourage open participation, HUM will expand its grievance mechanism with dedicated anonymous submission channels. These channels will be available to all stakeholders, including residents and tenants, local communities, HUM staff, contractors, suppliers, and partners.

Anonymous channels include

- Physical grievance boxes placed in visible, safe, and accessible locations at project sites. Boxes will be free from video surveillance and constant monitoring to preserve anonymity. A grievance form will be available next to each box. Boxes will be checked weekly by a designated staff member, and entries will be logged confidentially.
- Dedicated email address for anonymous appeals, restricted to trained grievance officers. This address will be widely communicated through HUM's website, social media, noticeboards, and internal communications.
- Telegram bot, designed to facilitate simple, mobile-based submissions. Submissions will be automatically logged into HUM's Grievance Register and processed under the same procedures as other channels.

Confidentiality and sensitive cases

- All grievances will be recorded in the central Grievance Log and reviewed according to urgency and category.
- Personal data will be protected in accordance with HUM's confidentiality procedures and national law.
- Sensitive cases such as GBVH, harassment, or discrimination will be handled through survivor-centred approaches by trained focal points. Where appropriate, cases may be referred to external professional services while maintaining strict confidentiality.

- Anonymous grievances will follow the same review, categorisation, and escalation procedures as identified complaints, with outcomes communicated via public channels (noticeboards, website).

7. MONITORING, EVALUATION, AND REPORTING

HUM will monitor, evaluate, and report on the stakeholder engagement process as part of its corporate monitoring framework and annual reporting obligations to the EBRD and other financiers (if applicable). This SEP is a living document and will be periodically reviewed and updated to ensure its effectiveness and relevance. Updates will reflect lessons learned, feedback from stakeholders, and changes in project conditions. The revised version will be published on HUM's website on an annual basis.

Monitoring will be carried out by HUM's designated Stakeholder Engagement Focal Point in cooperation with project managers and the E&S team. Monitoring and evaluation will cover:

- 1) Number and type of engagement activities conducted (public hearings, consultation meetings, focus groups, online consultations).
- 2) Frequency and consistency of engagement activities across project phases.
- 3) Geographical coverage of engagement, including outreach to remote settlements and vulnerable groups within the Project's Area of Influence (Aol).
- 4) Number and type of grievances received, resolved, and pending, with timelines for resolution tracked.
- 5) Trends in grievance categories and systemic issues identified.
- 6) Stakeholder feedback collected through surveys, grievance responses, or follow-up consultations.
- 7) Communication outputs, such as the number of press releases, social media updates, or website postings.

7.1. PERFORMANCE EVALUATION

The effectiveness of the SEP will be evaluated annually against the above indicators. Evaluation will focus on whether engagement activities were completed as planned, whether vulnerable groups were adequately included, and whether grievances were resolved effectively. Findings will be documented in the annual E&S monitoring report submitted to EBRD and will also be made available to the public in summary form.

Lessons learned will be integrated into updated SEP versions, ensuring continuous improvement of HUM's stakeholder engagement system. A proposed monitoring and evaluation framework is provided in [Appendix 7 SEP Monitoring and evaluation framework](#).

8. APPENDICES

APPENDIX 1. STAKEHOLDER ENGAGEMENT IMPLEMENTATION PLAN

Action	Content	Timing	Responsibility	Targeted Stakeholder Group
Disclosure of project information online	HUM website to include: project description, schedule, SEP, ESA summary, ESAP, NTS, and grievance procedure. Updated regularly.	Before project start; updated during construction and operation	General Director, E&S Manager	All stakeholders
Physical disclosure points	Hard copies of key documents available at HUM office (Kyiv), Sofiivska Borshchahivka village council, local community centres, and project site noticeboards. Notices also in local press (e.g. Holos Ukrainy, municipal newspapers).	Before project start; updated during construction and operation	Communications Unit, E&S Manager	Local communities, beneficiaries, vulnerable groups
Notification of consultations and disclosure	Announcements made at least 10 days in advance via HUM website, municipal websites, social media, local newspapers, radio, and noticeboards.	Before each disclosure/consultation event	Communications Unit	All stakeholders
Public relations campaigns and press releases	Press releases on project timetable, grievance mechanisms, and any major changes. Media briefings and interviews where relevant.	Before project start; ongoing throughout	General Director, Communications Unit	Local communities, NGOs, media
Direct communication with key institutions	Formal correspondence and meetings with government bodies, state institutions, local authorities, investors, and lenders.	Before and during implementation; ongoing	General Director	Government institutions, investors & lenders
Distribution of information to vulnerable groups	Tailored communication for vulnerable individuals (home visits, large-print materials, translations). Cooperation with NGOs to reach under-represented groups.	Before and during implementation; ongoing	E&S Manager, NGO partners	Vulnerable groups (elderly, IDPs, widows, persons with disabilities, etc.)

Public hearings and community meetings	Conduct public hearings in line with Ukrainian legislation. Record stakeholder feedback. Include information on grievance mechanism and communication channels.	Before construction start; during key phases	General Director, E&S Manager	All stakeholders
Future consultation activities	Regular resident committee meetings, focus groups with vulnerable groups, workshops with NGOs, and open days at project sites.	Quarterly during construction and operation	E&S Manager, Site Managers	Beneficiaries, vulnerable groups, NGOs
Handling stakeholder feedback and external communications	All comments (written/oral) logged in a stakeholder database. Responses provided within 30 days. Summaries shared online.	Continuous	SEP Focal Point/E&S Manager	All stakeholders
Grievance mechanism	Accessible grievance channels: hotline, email, postal address, grievance boxes. Confidential and anonymous options. Protocols for GBVH/discrimination. Clear timelines for acknowledgement (5 days) and resolution (30 days).	Continuous	SEP Focal Point/E&S Manager	All stakeholders
Social media updates	Project updates, key milestones, and grievance contacts posted on HUM's official social media pages.	Ongoing	Communications Unit	All stakeholders
Monitoring and reporting	SEP monitoring framework to include KPIs (consultations held, grievances received/resolved, stakeholder satisfaction). Annual SEP monitoring reports disclosed online and in print.	Annual; mid-term reviews	E&S Manager	Investors, lenders, government, communities
Reporting on engagement outcomes	Publish summaries of consultations and grievances, including how stakeholder feedback was considered in decision-making.	After major consultations; annually	E&S Manager, Communications Unit	All stakeholders
Material changes disclosure	Any significant changes in project scope, design, or timelines disclosed through press releases, HUM website, and additional public meetings.	As required	General Director, E&S Manager	All stakeholders
Data privacy and confidentiality	Personal data and grievance records securely stored; access limited to authorised staff. Information anonymised in public reporting.	Continuous	Data Protection Officer	All stakeholders

APPENDIX 2. LIST OF PUBLISHED INFORMATION ON THE PROJECT IN MASS MEDIA CHANNELS

No	Article	Date	Link
1.	Ukraine signs memorandum on affordable housing development at URC2025	13.07.2025	https://www.ukrinform.net/rubric-vidbudova/4014481-ukraine-signs-memorandum-on-affordable-housing-development-at-urc2025.html
2.	«Hansen Village»	28.03.2025	https://www.auc.org.ua/novyna/mistechko-hansena
3.	A large-scale housing project for displaced persons is being implemented in Ukraine	24.03.2025	https://media.ritm.group/news/v-ukrayini-realizuiut-masstabnii-zitlovii-projekt-dlia-pereselenciv
4.	Charity Hansen Ukrainian Mission is implementing a number of large-scale projects in Ukraine to build housing and social infrastructure for internally displaced persons	21.03.2025	https://www.gitn.org.ua/news/CharityHansenUkrainianMissionrealizuvUkraininizkumasshtabnikhproktivzbudivnitstvazhitlatasotsialnoi
5.	Charity Hansen Ukrainian Mission plans to build housing towns for IDPs in 20 communities in Ukraine	21.03.2025	https://mindev.gov.ua/news/charity-hansen-ukrainian-mission-planuie-pobuduvaty-zhytlovi-mistechka-dlia-vpo-u-20-hromadakh-ukrainy
6.	Oleksii Kuleba met with Dell Loy Hansen	20.03.2025	https://mindev.gov.ua/en/news/oleksii-kuleba-zustrivsia-z-dellom-loiem-khansenom
7.	The first phase of “Hansen Town” for IDPs was opened in the village of Tarasivka, Kyiv region	24.10.2023	https://unity.gov.ua/2023/10/24/u-seli-tarasivka-kyivskoyi-oblasti-vidkryly-pershu-cherhu-mistechka-hansena/
8.	Zelensky visited the construction site of the town in the Kyiv region	19.10.2023	https://vechirniy.kyiv.ua/news/89819/

APPENDIX 3. SAMPLE FORMAT FOR DOCUMENTING ENGAGEMENT ACTIVITIES

Stakeholder groups	Date/location	Purpose of engagement	Method of engagement	Key outcomes and actions	Status of actions identified in previous consultations	List of participants

APPENDIX 4. GRIEVANCE MECHANISM PROCESS

1. Grievance Receipt and Registration
Grievance received via written/verbal/email/hotline/mail/trust channel: • Hotline telephone number, available on HUM's website: +380-93-833-42-15 • Email address, available on HUM's website: hum.affordable.rent@gmail.com. • Postal mail sent to HUM's headquarters: Mezhova,7 street, Sofiivska Borshchahivka village, Kyiv region. • Special grievance boxes installed at project sites. • In-person submissions directly to the designated grievance coordinator. Grievance Coordinator registers in system or log
2. Preliminary Assessment
Grievance Coordinator assesses need for investigation Sets deadlines and assigns responsible department If project-related → sent to Director for direction Grievance Coordinator coordinates actions and monitors deadlines
3. Review and Investigation
Investigator collects facts (site visits, interviews, documents) Findings submitted to Grievance Coordinator Grievance Coordinator sends to senior management for approval Timeline: 10-30 days (max 45 under law)
4. Decision and response
Response via letter or email Includes findings and legal basis if applicable For anonymous grievances, responses are made publicly available (e.g., posted on HUM's website or displayed on project notice boards).
5. Monitoring and follow-up
HUM tracks the implementation of corrective measures resulting from grievances Lessons learned from grievance cases are analyzed periodically Summary data are included in HUM's project monitoring and donor reporting

APPENDIX 5. GRIEVANCE AND INQUIRY FORM

GRIEVANCE/INQUIRY RECORD (Form A)				
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attach any supporting documentation/letters as relevant.</i>				
Date Grievance Received:	Name of Staff Completing Form:			
Grievance Received (check ☒):				
☐ National	☐ Oblast	☐ Rayon	☐ Village	
Mode of Filing Inquiry or Grievance (check ☒):				
☐ In person	☐ Telephone	☐ E-mail	☐ Phone Text Message	☐ Website
☐ Grievance/Suggestion box	☐ Community meeting	☐ Public consultation	☐ Other _____	
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: ☐ Male ☐ Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	Oblast:	Rayon:	Village:	
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				
Category 1	Social Safeguards			
Category 2	Environmental Safeguards			
Category 3	Grievances regarding violations of policies, guidelines and procedures			
Category 4	Grievances regarding contract violations			
Category 5	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns			
Category 6	Grievances regarding abuse of power/intervention by project or government officials			
Category 7	Grievances regarding staff performance			
Category 8	Reports of force majeure			
Category 9	Grievance about project interventions			
Category 10	Other			
Who should handle and follow up on the grievance:				
Progress in resolving the grievance (e.g answered, being resolved, settled):				

APPENDIX 6. GRIEVANCE REGISTER FORM

No	Name/ Anonymously	Date of complaint receipt	How complaint was received	Who received the complaint	Description of the issues/complaints	Contact details of affected person	Notes, undertaken actions	Entities involved	Status of the issue

APPENDIX 7. SEP MONITORING AND EVALUATION FRAMEWORK

Monitoring Focus	Monitoring Indicator	Project Stage	Monitoring Frequency	Parties Responsible for the Monitoring
Effectiveness of SEP activities	• Number and type of consultation events held (public meetings, focus groups, online consultations) • Level of participation, including representation of vulnerable groups • Stakeholder feedback on clarity, relevance, and inclusiveness of consultations	Construction and Operation	Monthly (internal)	HUM Stakeholder Engagement Focal Point; Communications Officer; Independent Community Expert/Consultant
			Semi-annual (independent review)	
Information disclosure and grievance mechanism	• Number of project documents disclosed and formats used (online/printed) • Number and type of grievances received, resolved, and pending • Average grievance resolution time • Evidence of confidentiality safeguards (esp. GBVH cases)	Construction and Operation	Weekly (internal grievance logging)	HUM Stakeholder Engagement Focal Point; Public Information Officer; Independent Community Expert/Consultant
			Monthly (summary reporting) Semi-annual (independent review)	

APPENDIX 8. PRELIMINARY CONSULTATIONS AND DISCLOSURE ACTIVITIES

Date	Format	Participants	Key Topics Discussed	Stakeholder Feedback Summary
11.07.2025	Official consultations	Ministry of Development of Communities and Territories of Ukraine (Deputy Prime Minister for Recovery Oleksiy Kuleba); EBRD (Jean Marc Peterschmitt); Charitable Organization "CF Mission Hansen in Ukraine" (Executive Director Natalia Zubchenko)	Signing of Memorandum of Cooperation and Memorandum of Understanding; Launch of pilot affordable housing project "Dignified Rent and Rent with Purchase Option"; Roles and commitments of the parties in ensuring constitutional housing rights.	No complaints were received. Stakeholders expressed support for the initiative. No issues raised regarding compliance, site selection, or accessibility of housing programs.