

27. Lev Tolstoy Street – MD 2001, Chisinau – Republic of Moldova Tel +373 (22) 889 300 – Fax +373 (22) 889 301

Corporate Responsible Land Acquisition Policy

1. Introduction

At Trans-Oil Group of Companies, we recognize that land acquisition is a significant and sensitive aspect of our operations. We are committed to conducting all land acquisition activities in a responsible, ethical and transparent manner, respecting the rights and interests of affected communities and stakeholders.

2. Commitment to Responsible Land Acquisition

We are dedicated to ensuring that our land acquisition processes are fair, transparent and compliant with all applicable laws and regulations. We strive to minimize adverse impacts on communities, promote sustainable development and enhance the positive benefits of our projects.

3. Key Principles

Our Land Acquisition Policy is based on the following key principles:

- a. Compliance with Laws and Regulations: We comply with all applicable land acquisition laws, regulations and international standards. We strive to exceed compliance requirements whenever possible.
- b. Fair Compensation: We ensure that all landowners and affected parties receive fair and adequate compensation for their land and any associated losses. Compensation is determined through a transparent process that considers market value and any additional factors relevant to the specific context.
- c. Free, Prior, and Informed Consent (FPIC): We respect the principle of Free, Prior, and Informed Consent (FPIC) for all land acquisitions, particularly when dealing with indigenous peoples and local communities. We ensure that affected parties have the opportunity to make informed decisions about land transactions without coercion.
- d. **Transparent and Inclusive Processes:** We conduct land acquisition processes in a transparent and inclusive manner. This includes engaging with all relevant stakeholders, providing clear and accessible information, and ensuring that all voices are heard and considered.
- e. **Minimizing Adverse Impacts:** We strive to minimize any adverse impacts of land acquisition on affected communities and the environment. This includes conducting thorough impact assessments and implementing measures to mitigate any negative effects.
- f. **Grievance Mechanism:** We establish clear and accessible grievance mechanisms to address any concerns or disputes related to land acquisition. We commit to resolving grievances in a fair, timely and transparent manner.
- g. Sustainable Development: We promote sustainable development in all our land acquisition activities. This includes considering the long-term social, economic and environmental impacts of our projects, and working to ensure that they contribute positively to local development.

4. Implementation and Monitoring

We implement this policy through the following measures:

- Stakeholder Engagement: We engage with affected communities, landowners and other stakeholders throughout the land acquisition process to ensure their concerns and interests are addressed.
- Impact Assessments: We conduct thorough environmental and social impact assessments to identify and mitigate any potential adverse effects of land acquisition.



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- Fair Valuation and Compensation: We ensure fair and transparent valuation of land and provide adequate compensation to affected parties.
- **Grievance Redressal:** We establish simple and clear mechanisms for stakeholders to raise concerns and ensure prompt and fair resolution of grievances.
- **Documentation and Record-Keeping:** We maintain comprehensive records of all land acquisition transactions, including agreements, compensation details and stakeholder engagements.

5. Reporting and Accountability

We commit to transparency in our land acquisition practices by regularly reporting on our performance and progress. We hold ourselves accountable to our stakeholders through continuous monitoring, evaluation and improvement of our land acquisition processes.

6. Review and Continuous Improvement

This policy will be reviewed periodically to ensure its relevance and effectiveness. We are committed to continuous improvement in our land acquisition practices and adapting to new challenges and opportunities.

7. Conclusion

At Trans-Oil, protecting biodiversity and promoting the conservation of natural ecosystems are fundamental values that guide our actions and decisions. We are dedicated to being responsible stewards of the environment, contributing to the health and resilience of our planet's biodiversity.

As Chief Executive Officer I am committed to this Responsible Land Acquisition Policy and to continuous improvement of our land acquisition practices.

Approved:

Vaia Jbash

Chief Executive Officer