Aldoga Solar Farm
Complaint Investigation and Response Plan



CONTROL

PREPARED BY	REVIEWED BY	APPROVED BY
Mooney, Renee	Dominic Luddy	Paul O'Connell
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[SIGNATURE]	*[SIGNATURE]*	*[SIGNATURE]*

*The signed original is kept by **ACCIONA**.*

RECORD OF CHANGES

REV.	DATE	DESCRIPTION
01	07/02/2019	Initial release of document
02	18/12/2025	Review and update of plan to ensure consistency between ACCIONA projects and with the AEAG Complaints Procedure. Template updated and aligning with other complaints plans.

CONTENTS

TITLE	PAGE
1. INTRODUCTION	3
2. COMPLAINT MANAGEMENT PROCESS	3
2.1. RECEIVE COMPLAINT	5
2.2. RECORD AND ACKNOWLEDGE	5
2.2.1. PRELIMINARY SCREENING	6
2.2.2. COMBINED COMPLAINT INVESTIGATION	6
2.2.3. COMPLAINTS UNRELATED TO THE SOLAR FARM	7
2.2.4. UNREASONABLE CONDUCT	7
2.2.5. REPEAT COMPLAINTS	7
2.3. ENGAGE, INVESTIGATE AND RESPOND	8
2.4. COMPLAINTS DURING CONSTRUCTION	8
2.5. COMPLAINTS RECEIVED BY THIRD PARTIES	9
2.6. OTHER DISPUTE RESOLUTION PROCESSES	9
2.7. RESOLVE AND CLOSE	9
2.8. ANALYSE AND REVIEW	10
2.9. PLAN REVIEW	10
3. ADMINISTRATION	10
3.1. TRAINING	10
3.2. AVAILABILITY	11
4. DEFINITIONS	11
5. RELATED DOCUMENTATION	12

1. INTRODUCTION

This document outlines the plan for investigating and responding to Complaints regarding the Aldoga Solar Farm (the ***Solar Farm***), including Complaints related to:

- construction;
- glint and glare; and
- ACCIONA Energia's practices and processes (this ***Plan***).

This Plan has been developed in accordance with ACCIONA Energia's obligations under the State Development Area Approval dated 19 July 2021.

All Complaints received will be treated in a respectful and courteous manner and be taken seriously by ACCIONA Energia. Pursuant to this Plan, ACCIONA Energia is committed to:

- providing an accessible avenue for people to raise concerns or make Complaints;
- engaging actively, meaningfully and transparently with people who raise concerns or make Complaints;
- ensuring all Complaints are managed fairly, sensitively and in a timely manner; and
- acknowledging the importance and value of Feedback and Complaints to the ongoing operation and management of the Solar Farm and relationships with project neighbours and the community in general.

This Plan has been developed in accordance with:

- Commonwealth Ombudsman (2023 Edition) 'Better Practice Complaint Handling Guide';
- Lane, T & Hicks, J (2014) Best practice community engagement in wind development;
- Standards Australia & Standards New Zealand (2014) *AS/NZS 10002:2014 Australia/New Zealand Standard, Guidelines for complaint management in organizations;* and
- Office of the National Wind Farm Commissioner (2019) *Annual Report to the Parliament of Australia.*

2. COMPLAINT MANAGEMENT PROCESS

ACCIONA Energia maintains a detailed Complaints Register for the life of all projects (from development through to decommissioning). All Complaints are recorded in ACCIONA Energia's Complaints Register (hosted on the Consultation Manager platform), which is used to capture, record and manage Complaint information, and manage investigations. This includes Complaints in relation to the Solar Farm.

The Community and Stakeholder Engagement Adviser is responsible for ensuring all Complaints are processed in accordance with this Plan, in conjunction with the Project Director, Site Manager and other ACCIONA Energia staff (as relevant).

There are five key steps in this Plan:

1. Receive Complaint
2. Record and Acknowledge
3. Engage, Investigate and Respond

4. Resolve and Close
5. Analyse and Review

These steps are outlined briefly in the following diagram:

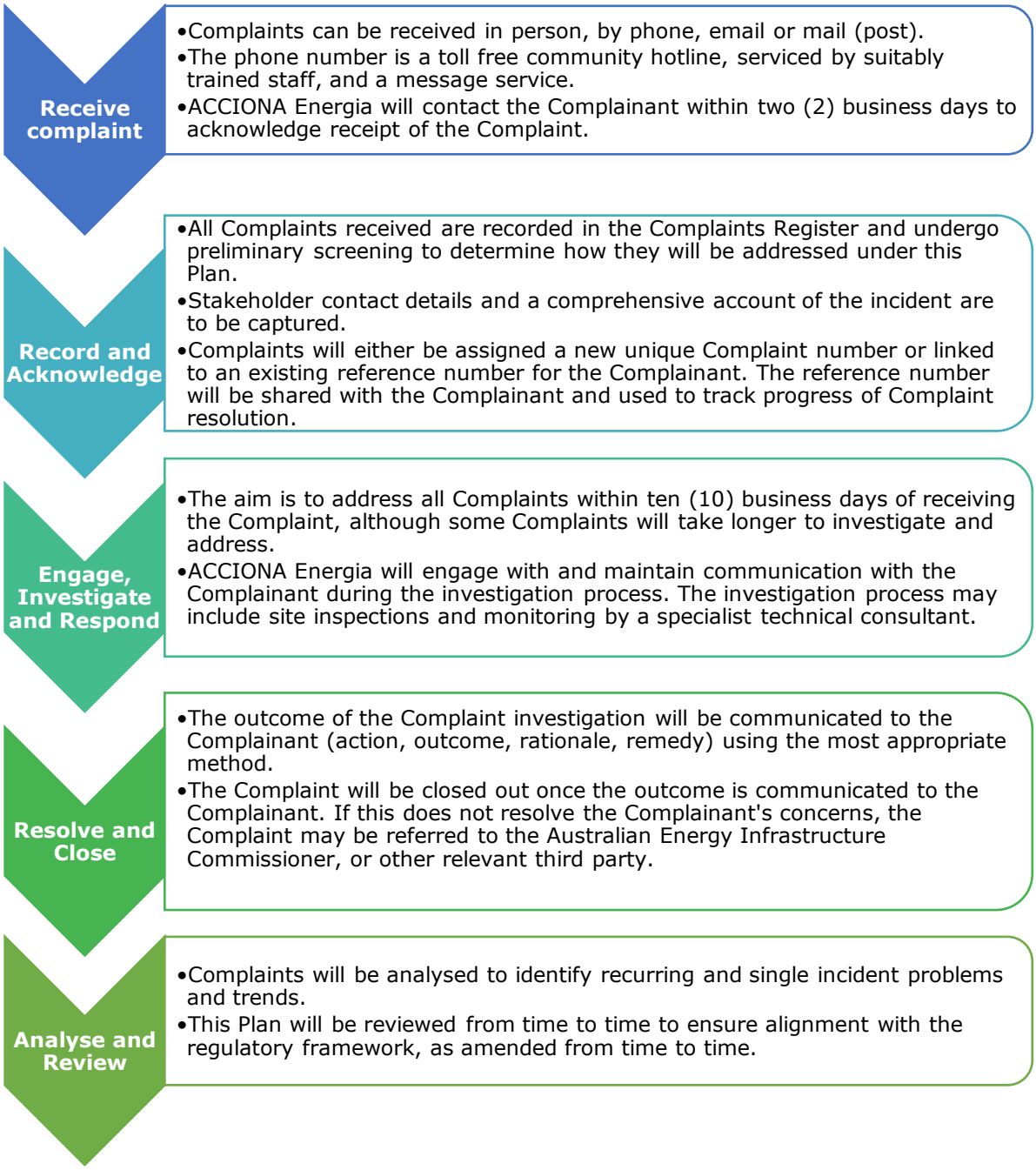


Figure 1: Complaint Management Process

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2.1. RECEIVE COMPLAINT

Complaints and Feedback can be directed to ACCIONA Energia in person, by telephone, email and postal services, via the following details:

In person:	Acciona Energia Shopfront Level 1, 72 Goondoon Street, Gladstone, 4680 Queensland
Community Hotline:	1800 283 550
E-Mail:	Aldoga.au@acciona.com
Mail:	ACCIONA Energia Attn: Community and Stakeholder Engagement Adviser PO Box 24110 Melbourne VIC 3000

ACCIONA Energia will promote these contact methods through its website, newsletters and other suitable communication methods associated with the Aldoga Solar Farm. Any changes to the above details will be published on the ACCIONA Australia website.

Complaints and Feedback may be about:

- any perceived impact from construction or operations at the Solar Farm (including noise, shadow/blade flicker, and telecommunications reception and interference); and
- ACCIONA Energia's practices and processes in relation to the Solar Farm.

Although ACCIONA Energia encourages Complaints to be directed to ACCIONA Energia directly, Complaints can also be addressed to the local Council, the Department of Environment, Tourism, Science and Innovation (DETSI) and the Australian Energy Infrastructure Commissioner.

2.2. RECORD AND ACKNOWLEDGE

ACCIONA Energia will register all Complaints received by it in the Complaints Register.

In order for a Complaint to be formally registered, the Complainant, when first making contact with ACCIONA Energia, will be asked to confirm that they would like to make a Complaint. If this is not stated, ACCIONA Energia will request confirmation from the Complainant to confirm the desired action.

Any Complaints received relating to an emergency will be dealt with in line with the Aldoga Solar Farm's Operational Emergency Response Plan. In the event of any emergency, the Complainant should first dial 000 before they contact the Community Hotline.

Upon receiving a Complaint, ACCIONA Energia will contact the Complainant within two (2) business days to:

- provide a formal acknowledgement letter/email of receiving the Complaint;
- provide a reference number for the Complaint;
- collect further information to support the investigation of the Complaint (if required); and
- discuss the next steps in this Plan.

The exception to the above is where a Complaint or Feedback is made anonymously, in which case it will be considered and recorded in the Complaints Register, however an acknowledgment or response will not be provided since there is no means of contacting the Complainant.

Details provided by the Complainant will be recorded, including (as applicable):

- the name, address and contact details of the Complainant;
- the date and time of the contact;
- the nature of the Complaint or Feedback;
- the location and time of the incident/issue;
- the outcome sought;
- any other information relating to the matter; and
- the name of the person / team member who received the Complaint.

Sufficient details will be sought regarding the specific nature of the Complaint to enable it to be clearly recorded, and to enable subsequent investigation and response.

The Complaints Register will also be made available to relevant regulators upon request.

All data is captured and stored in accordance with applicable privacy requirements. A copy of ACCIONA Energia's privacy policy can be found at https://www.acciona.com.au/privacy-policy/

2.2.1. PRELIMINARY SCREENING

All Complaints received by ACCIONA Energia will first be screened to determine how the Complaint can be best handled by ACCIONA Energia. This may include:

- identifying appropriate processes to investigate one or more Complaints from a single Complainant together; or
- determining that investigation of a particular Complaint will not proceed.

2.2.2. COMBINED COMPLAINT INVESTIGATION

In certain circumstances, ACCIONA Energia may determine that it is appropriate to investigate a number of Complaints together. For example, if a Complainant submits multiple Complaints within a short period of time, or which relate to the same or similar issues, those Complaints may be investigated and addressed together. Every Complaint received by ACCIONA Energia will be treated as a separate Complaint under this Plan unless ACCIONA Energia is satisfied that the timing and nature of the Complaints justify the Complaints being addressed together. This is intended to

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improve the efficiency for the Complainant and ACCIONA Energia in responding to Complaints, and to assist with identifying any underlying trends or issues.

Where Complaints are grouped in this way, ACCIONA Energia may allocate the group of Complaints a single Complaint reference number.

ACCIONA Energia will notify the Complainant if multiple Complaints will be investigated together, and will provide the Complainant with details of the relevant Complaint reference number. Specific events related to the same Complaint will be recorded individually against the Complaint – for example separate instances of noise impact. Each event will be referenced separately underneath the Complaint, with the dated reference provided to the Complainant.

2.2.3. COMPLAINTS UNRELATED TO THE SOLAR FARM

ACCIONA Energia may decide that some types of Complaints will not proceed to the investigation stage.

Complaints that do not appear to relate to the operation of the Solar Farm may be considered 'invalid'. This could include, for example, a Complaint associated with noise emanating from non-solar farm activities or as a result of third-party activities (***Invalid Complaint***).

If a Complaint is an Invalid Complaint, ACCIONA Energia will notify the Complainant within ten (10) business days of receiving the initial Complaint and the Complaint will be closed.

2.2.4. UNREASONABLE CONDUCT

If a Complainant makes unreasonable demands or behaves in a manner that is wholly unreasonable (for example, by making threats to ACCIONA Energia staff or third parties, or by using abusive language or unreasonable aggression), this conduct may be considered ***Unreasonable Conduct***.

ACCIONA Energia is committed to treating all Complainants with respect, and expects that ACCIONA Energia staff and contractors will receive the same level of respect in return. While Unreasonable Conduct will not necessarily preclude a Complaint from being addressed by ACCIONA Energia, this type of conduct may impede the resolution process. ACCIONA Energia may be unable to progress resolution of the Complaint in accordance with this Plan where Unreasonable Conduct is impeding that process.

2.2.5. REPEAT COMPLAINTS

Where multiple Complaints have been received by ACCIONA Energia from the same Complainant over an extended period of time, and the issues raised in those Complaints have been previously addressed in accordance with this Plan, ACCIONA Energia may, in certain circumstances, treat any new Complaints received from that Complainant as Repeat Complaints.

For Repeat Complaints, ACCIONA Energia will conduct an initial assessment, which may include a site inspection, review of existing noise reports or further testing to identify:

- new or different noise issues described in the Complaint;

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- new or different impacts reported by the individual Complainant;
- unusual site conditions or maintenance issues;
- different steps could be taken to address the Complaint; and/or
- whether a substantial amount of time has elapsed since the last similar Complaint was made.

If new or unusual issues are identified, further investigation will be undertaken under this Plan.

If no new issues are identified, and in ACCIONA Energia's reasonable opinion the Repeat Complaint has been:

- thoroughly investigated previously; and
- compliance with the applicable Noise Limits has been demonstrated at the relevant dwelling or representative location,

the Repeat Complaint will be closed, and ACCIONA Energia will notify the Complainant together with a short explanation regarding the outcome of the investigation.

2.3. ENGAGE, INVESTIGATE AND RESPOND

ACCIONA Energia will respond to and investigate all Complaints in an attempt to seek a resolution that is satisfactory to both the Complainant and ACCIONA Energia.

Where practicable, ACCIONA Energia will attempt to resolve Complaints within ten (10) business days of receiving the Complaint. When this is not possible, for example where the nature of the Complaint is complex, further investigations are required, or the Complaints or relevant issues are on-going, the Community and Stakeholder Engagement Adviser will notify the Complainant that further time is required. ACCIONA Energia will engage with and maintain communication with the Complainant throughout the investigation process as necessary.

Should ACCIONA Energia feel that their representatives are placed in a position whereby resolution would pose a conflict of interest, ACCIONA Energia will escalate the Complaint to the Office of the Australian Energy Infrastructure Commissioner, or another relevant third party. This is also applicable if ACCIONA Energia is unable to adequately resolve a Complaint.

2.4. COMPLAINTS DURING CONSTRUCTION

Complaints received during the construction phase will be directed to and/or reported within two (2) working days to the ACCIONA Energia Construction or Site Manager. This will include any Complaints relating to the construction process, either on or off-site, including noise, dust, traffic, and public road damage or related issues.

The ACCIONA Energia representative responsible for Site Health, Safety and Environment issues will be made aware of all Complaints relating to potential environmental or safety incidents. ACCIONA Energia will review the activity for which the Complaint is related to, and if it is not occurring in accordance with the required control measures, prepare an incident report and record the incident in the incident log and implement a plan to rectify the issue. The Complaint will also be recorded in Consultation Manager.

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2.5. COMPLAINTS RECEIVED BY THIRD PARTIES

If a Complaint is received by a government agency or statutory authority, such as the local Council, details of that Complaint may be forwarded to ACCIONA Energia. ACCIONA Energia will consult with the third party and with the Complainant to determine if that Complaint will be assessed in accordance with this Plan. If it is agreed that the Complaint received by a third party is related to the Solar Farm and the Complainant consents for ACCIONA Energia to investigate, then the Complaint will be assessed in accordance with this Plan. If a Complaint received by a third party is not related to the Solar Farm and/or the Complainant does not consent to ACCIONA Energia investigating their Complaint, then the third party will retain responsibility for investigating that Complaint.

2.6. OTHER DISPUTE RESOLUTION PROCESSES

In some circumstances, a matter which has been the subject of this Plan may progress to formal dispute resolution, adjudication or mediation. If that occurs, the resolution process for the relevant Complaints under this Plan will be terminated, to facilitate the matter in dispute being determined in accordance with that formal process. ACCIONA Energia will notify the Complainant if that occurs.

2.7. RESOLVE AND CLOSE

ACCIONA Energia will communicate the outcome of the Complaint investigation using the most appropriate method, and will advise:

- what actions were undertaken in response to the Complaint;
- the outcome;
- the reasons decisions have been made;
- any remedy or resolutions that have been offered; and
- information about other remedies that may be available to the Complainant.

If the Complainant does not accept the resolution advised by ACCIONA Energia, ACCIONA Energia will ask the Complainant to confirm the outcome sought following the investigation.

ACCIONA Energia will meaningfully and reasonably consider any further outcome sought by the Complainant before concluding that the Complaint cannot be resolved to the satisfaction of the Complainant.

If a Complaint cannot be resolved by ACCIONA Energia to the satisfaction of the Complainant, the Complaint may be escalated to a suitably qualified, impartial third party for mediation, or to the Australian Energy Infrastructure Commissioner. Once that referral has been made, the Complaint will be closed under this Plan.

Acciona may also close a Complaint in the following circumstances:

- when the Complainant confirms they are satisfied with the outcome of their Complaint and the action undertaken by ACCIONA Energia;
- when the Complainant advises they do not want to pursue the Complaint;

- when the Complainant cannot be contacted to discuss the Complaint, despite best efforts from ACCIONA Energia;
- when Acciona Energia does not receive a response from the Complainant within ten (10) business days of providing an outcome; or
- as otherwise outlined in this Plan.

After communicating the outcome of the Complaint investigation to the Complainant, ACCIONA Energia will close the Complaint in the Complaints Register.

2.8. ANALYSE AND REVIEW

All Complaints will be classified according to the nature of the Complaint. Complaints will be analysed to identify recurring and single incident problems and trends by running reports using the Complaints Register. If it is identified that there are significant recurring Complaints received from different Complainants, recommendations to implement solutions to reduce or eliminate future recurrence of the problem will be considered and implemented where appropriate.

A report including a reference map of complaint locations, and outlining complaints, investigations and remediation actions will be provided to the satisfaction of the Coordinator General (sdainfo@coordinatorgeneral.qld.gov.au) upon request.

2.9. PLAN REVIEW

ACCIONA Energia will undertake regular reviews of this Plan to ensure it is adequate for the operation of the Solar Farm.

Reviews will evaluate the performance of the Complaint management system to ensure it aligns with any changes in legislation and regulatory requirements, as well as to continually improve the effectiveness and efficiency of the system.

The review should also provide information on:

- conformity with Complaint management procedures; and
- suitability to achieve Complaint management objectives.

3. ADMINISTRATION

3.1. TRAINING

This Plan will be made available to all ACCIONA Energia employees. All employees handling Complaints will be provided with training to appropriately receive, record and resolve Complaints.

3.2. AVAILABILITY

This document will be made publicly available on the Solar Farm project website (http://community.acciona.com.au/aldoga).

4. RELATED DOCUMENTATION

CODE	TITLE
PAU02101_GAE07017	AEAG Complaints Handling Procedure

***NOTE**: Complete the table with the documentation, legislation, regulations, etc. that is relevant to the document.*

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