

**Draft Environmental and Social Action Plan (ESAP)
Radzyń Chełmiński Wind Farm, Poland**

| No | Action | Benefits / Reasons and Implementation | Legislative requirement/Best practice | Investment Needs/Resources | Timetable / Milestones | Comment |
|---|---|---|---------------------------------------|-------------------------------------|--|--|
| <i>Actions required to contain/remediate past environmental damage and assessment of costs and/or further investigations</i> | | | | | | |
| 1 | None | | | | | |
| <i>Actions required to achieve compliance with national EHS legal requirements and EU environmental standards</i> | | | | | | |
| 2 | Undertake in cooperation with Voivodeship Cultural Heritage Conservator an archaeological survey of the construction sites for WTGs No. 1 and 3. | WTGs No. 1 and 3 are located close to identified archaeological stands. | Legislative | Archaeological consultants/services | Before commencement of construction works. | Muzeum im. ks. dr. Władysława Łęgi in Grudziądz is the chosen consultant |
| 3 | Undertake a post-construction noise measurements in accordance with requirements of Environmental Decision. If possible plan the measurements during winter in a presence of a snow cover. Work out and implement noise reduction program if necessary. | Identification of actual noise impact generated by the wind farms. | Legislative/best practice | External consultant | Within 1 month after the wind farm is fully operational. | |
| 4 | Undertake a post-construction monitoring of birds and bats. As a minimum follow methodology specified by Environmental Decisions. | Identification of actual wind farm impact on birds and bats. | Legislative/best practice | External consultant. | 3 campaigns with the first 5 years after the wind farm is fully operational. | |
| <i>Actions to improve ESHS management and performance in accordance with good international industry practice</i> | | | | | | |

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| 5 | Conduct regular (every 3 years) environmental audit of the wind farm. Report to lenders. | Improvement of the environmental management and mitigation of a potential for environmental and social risk for the company as a whole as well as for individual projects. | Best practice | Use internal resources or external consultants | Upon commissioning and then every 3 years. | Future audits can be undertaken as a part of EH&S management system audits. |
| 6 | Adopt and tailor general corporate EH&S procedures and standards to the project. This includes implementation of the EH&S management system at the facilities such as ISO 14000 and OHSAS 18000 or equivalent and development of the Stakeholders Engagement Plan. | Full implementation of the corporate policy and rules. | Best practice, compliance with PR1 | Own resources | Prior commissioning of the facilities implement corporate standards and attend certification of the EH&S management system within 2 years of commissioning the facilities. | |
| 7 | Implement Stakeholders Engagement Plan and make publicly available general environmental information on the project and company, including, NTS, ESAP, SEP and other project related documents for both the plant and associated power line. | Disclosure of information to project stakeholders. | Best practice, compliance with PR10 | Management time | Ongoing. Provide to the lenders summary of stakeholders engagement in annual reports. | The disclosure has to be meaningful and on internet. |

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| 8 | <p>Provide annual reports on the Environmental, Social, Health and Safety (ESHS) to the EBRD and other shareholders.</p> <p>A general (brief) summary of environmental and social issues to be provided on the web site.</p> | <p>Aspects to be considered for the content of the annual report:</p> <ul style="list-style-type: none"> • general information on the status of the portfolio; • information on the overall environmental performance; • summary of any areas of material non-compliance with Environmental regulations, or material breach of the relevant permit levels; • information on any material fines or other material penalties or pending prosecutions related to ESHS matters; • general information on ESAP implementation; • summary of any material regulatory changes related to the environmental or social aspects; • information on any changes to Natura 2000 areas or Important Bird Areas affecting GB Radzyń 401 wind farms (developed, under construction or at planning stage); • information on any new projects and status of EIA and public consultation; | Best practice/compliance with EBRD PRs | | Annually, published in first quarter of following years | Expand existing shareholder reporting system. |

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| 9 | As part of SEP implementation implement grievance procedures in line with the EBRD's Performance Requirements. This will include the setting up of procedure to process grievance notices to enable meaningful public consultation and information process | Early identification of problems and public grievances, allowing for timely implementation of solutions. | Best practice and compliance with EBRD requirements. | Operational costs of information office | Ongoing | |