

Draft Environmental and Social Action Plan (ESAP)
Zielona/Dębsk Wind Farms, Poland

No	Action	Benefits / Reasons and Implementation	Legislative requirement/Best practice	Investment Needs/Resources	Timetable / Milestones	Comment
General						
1.	Polenergia will implement the corporate ESAP agreed with Polish Energy Partners. This includes the requirement to develop and maintain an EHS management systems, and dedicated management of EHS issues at the Company level	Polenergia is to continue implementing the EHS management systems developed by Polish Energy Partners.	Lender requirements	Own	Report on implementation as part of annual report	
2.	Polenergia will develop and implement a Corporate Social Responsibility program and report in line with CSR GRI reporting guidelines	Ensure appropriate information is provided to all stakeholders	Lenders requirement	Own	Annual report from 2016 publically available	
Actions required to achieve compliance with national EHS legal requirements and EU environmental standards						
3.	Undertake post-construction noise measurements in accordance with Corporate ESAP. 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.	Corporate ESAP/best practice	External consultant	Within 6 months after the wind farms are fully operational.	

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4.	Undertake a post-construction monitoring of birds and bats. As a minimum follow methodology specified by Environmental Decisions as well as BirdLife/OTOP and EUROBATS methodologies. Should an excessive impact on birds or bats is observed, plan appropriate mitigation measures, including introduction of active turbine management systems	Identification of actual wind farms impact on birds and bats.	Legislative/best practice	External consultant.	Within 5 years after the wind farms are fully operational.	
5.	Should any trees be in need of cutting for the purpose of wind farm turbines delivery to the site, prepare and implement a plan for trees planting as a compensation of trees damages.	Compensation of damages to wild nature.	Good practice.	Management time	Within 2 years after completion of the construction works.	

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6.	Prior commencement of the construction works make sure the local societies of the villages affected by increased traffic due to delivery of materials/elements or removal of soils, are informed about increased road accident risks. Make sure, the citizens of affected villages are aware of the grievance mechanism.	To minimize a risk of traffic accidents and maintain good relationships with the local societies.	Best practice	Own resources	Prior commencement of the construction works	
7.	Place warning signs in a due distance at the access roads to individual WTGs, Place in cooperation with the appropriate road management authorities information boards at the roads Zielona-Kosewo, Kuczbork Wieś – Zielona, Olszewo-Chamsk and Olszewo – Kliczewo Duże.	To secure community safety.	Best practice	Own resources.	After completion of the building works, prior the wind farms are operational.	The information boards may inform individuals about entering the wind farm area and provide contact information to the Company.

8.	As far as possible persuade the farmers to maintain crops cultivation in the wind farms area in line with the environmental decisions constraints.	To reduce the site attractiveness for species of birds to acceptable level.	Environmental decision/best practice	Management time.	During the wind farm operations	
<i>Actions to improve ESHS management and performance in accordance with good international industry practice</i>						
9.	Conduct regular (every 3 years) environmental audit of the wind farms. 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.
10	Adopt and tailor general corporate EH&S procedures and standards to the project. This includes implementation of the EH&S management system such as ISO 14000 and OHSAS 18000 and development and update of the Stakeholders Engagement Plan.	Full implementation of the corporate policy and rules.	Best practice, compliance with PR1	Own resources	Prior commissioning of the wind farms.	Consider certification of EHS management system within 5 years of the wind farms are operational.

11	<p>Implement Stakeholders Engagement Plan and make publicly available general environmental information on the project and the company, including, NTS, ESAP, SEP, EIA reports, monitoring results, additional studies and other project related documents for both the wind farms and associated underground power transmission line.</p>	<p>Disclosure of information to project stakeholders.</p>	<p>Best practice, compliance with PR10</p>	<p>Own resources</p>	<p>Ongoing. Provide to the lenders summary of stakeholders engagement in annual reports.</p>	<p>The disclosure has to be meaningful, with information provided locally and on internet. Public in due time notifications in local paper and authority prior to public consultations in late November 2014</p>
12	<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; 	<p>Best practice/compliance with EBRD PRs</p>	<p>Own resources/ external consultant</p>	<p>Annually, published in first quarter of following years</p>	<p>Expand existing shareholder reporting system.</p>

		<ul style="list-style-type: none"> • information on any changes to Natura 2000 areas or Important Bird Areas affecting Polenergia wind farms (developed, under construction or at planning stage); • information on any new projects and status of EIA and public consultation; 				
13	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	