

TABLE 1: UPDATED ENVIRONMENTAL AND SOCIAL ACTION PLAN FOR EXTENDED POTEOWO WIND FARM: POLAND

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
0	General Corporate and Project management						
0.1	Appoints to EHS manager for the project responsibility for Wieliszewo WF and Bięcino WF and maintain an EHS management system during construction and operation of the wind farms. This includes internal audits of contractors. Adopt project specific Key performance Indicators (KPIs) as part of EHS management system to Wieliszewo and Bięcino WFs	Ensure compliance and implementation of Corporate policies and Lender requirements.	Best practice Lender requirements	Own	Ongoing	EHS manager EHS management systems in place KPIs developed by time of commissioning	
0.2	Ensure fully compliance of the Project with Polish legislation, with Lender requirements and best practices Ensure that the Project meets the requirements of the Local development plans and appropriate consultation and communications done as part of development	Compliance Need to ensure public relations are maintained	National legislation Lender requirements	Own	ongoing	Compliance Summary of status in Annual report to Lenders	
0.3	Within 3 years of operations undertake an independent ESH&S audit of the Project to assess compliance and implementation of best practices. This will include operations issues as well as biodiversity issues.	Review post construction operations and ensure design criteria met and assess Key Performance Indicator (KPIs). Based on the audit amend the ESAP and EHS management plan	Lender requirement	External	Within 3 years of commissioning plant	Report to Lenders as part of annual report	

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	Based on this review EHS management plans and Wind Farm management Undertake an similar audit after 10 years of operations	accordingly to mitigate risks and ensure ongoing compliance with National legislation as well as Lender requirements.					
0.4	Submit regular reports to the Lenders on: <ul style="list-style-type: none"> • Environmental, social, occupational health and safety performance • KPIs • Status of ESMP implementation • status of each ESAP action 	To ensure measures within the ESIA/ESMP and permit conditions are being implemented appropriately.	Lenders Requirements	Own	Reports to be submitted on a 6 monthly basis during construction, and annually after.	Reports submitted on time, with no objection from lenders	
0.5	Maintain and if needed update corporate EHS management plans and CSR plan in line with best practice and disclose non-financial information to the public at the corporate level	CSR to include information on the Company and Key performance Indicators (KPIs). As part of the CSR and SEP develop any community support programs	Best practice	Internal and External	Within 3 years of commissioning or sooner	Link to CSR report in annual report	
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Implement the requirements of the ESIA including the ESSMP and permit conditions for the various components of the project Ensure requirement are included in any contractor tenders, and ensure contractors need to adhere to National and Lender requirements.	Compliance	National legislation Lender requirement	Own/External	ongoing	Report in annual report on compliance	

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1.2	<p>Maintain a contractor/sub-contractor management plan to manage ESHS performance of construction and other contractors including as a minimum:</p> <ul style="list-style-type: none"> • Inclusion of relevant ESAP and ESMP requirements in contracts/sub-contracts • Definition of roles and responsibilities between Mashav and contractors • Requirements for construction contractors to develop topic-specific ESHS management plans including HSS; Labour; Traffic & Transport etc • Client monitoring and auditing • Definition of ESHS contractor performance reports to allow Mashav to report to Lenders • Verification of competence and/or training of ESHS responsible staff 	Ensure that the contractor is contractually bound to deliver all ESIA and ESMP requirements	Lenders Requirements Good Practice	Internal and advisors	Prior to executing contracts	Plan developed and relevant requirements included in contracts	
1.3	Operational ESMP to include a disturbance management plan to address potential noise and shadow flicker monitoring and mitigation, including the requirements as noted in PR4 and bird and bat monitoring as defined under PR 6	Need for compliance	Lenders Requirements Good Practice	Internal and advisors	Prior to construction and ongoing	Overall compliance	

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PR2	Labour and Working Conditions						
2.1	Communicate to the workforce an HR policy and procedures to meet Lenders and national legislation requirements (contractors to have equivalent policies in place). Ensure both the Client and contractors retain appropriate responsible persons for PR2 implementation	Improved human resources practices and compliance with National legislations and PR2 requirements	Lender requirements (EU/ILO standards) National legislations	Internal/ Contractors	Prior to main construction phase	Report compliance Contractor policies & procedures approved by Client or independent professional	
2.2	Maintain a formal employee grievance mechanism for all direct and contracted employees and communicate it to the workforce.	Improved employee/contractor relationship and management	Lender requirements	Internal/ Contractors	Prior to main construction phase	Employee Complaints Procedure Complaint tracker Progress update on resolution of employee complaints included in lenders reports	
2.3	Maintain risk assessment for Wieliszewo and Bięcino WFs of core supply chain regarding working conditions and child and enforced labour in accordance with PR2	Labour unrest, company reputational damage	Lender requirements (EU/ILO standards) National legislations	Internal (oversee compliance)/ Contractors (develop and implement supply chain auditing and monitoring procedure)	Prior to construction Prior to operations	Supply chain risk assessment report	

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PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	<p>Within one year of commissioning, undertake post construction noise assessment to assess actual noise level at the closest residential areas according to national regulations</p> <p>Based on the results of the above assessment and consultation with residents develop additional mitigation plans to ensure compliance.</p>	Need to ensure noise and vibration within acceptable limits.	National legislation Best practice	External	Post construction	Report to Lender with recommendations	
3.2	<p>Implement all monitoring requirements for visual, noise and dust impacts management</p> <p>This is to be implemented during construction as well as operation</p>	<p>Compliance with International Best Practice and National Standards</p> <p>Ensure that nuisance claims are limited during construction phase</p>	<p>EBRD PR3</p> <p>Polish Standards</p> <p>World Bank Group: Environmental Health and Safety Guidelines Wind Energy</p>	<p>Project EHS Lead</p> <p>Contractors</p>	During construction and operation	Reporting against monitoring requirements as specified in the ESMMP, plus ongoing feedback.	
PR4	Health and Safety						
4.1	Maintain health and Safety standards and ensure staff and contractors in compliance with National standards	Ensure compliance	National legislation Lender requirements	Internal	ongoing	Report any non-compliance incidents in annual report.	
4.2	Develop and implement traffic and transport management plan(s) to cover turbine and materials delivery and include access, routing, diversions, exceptional loads, driver	Ensure compliance	National legislation Lender requirements	Contractors	Prior to delivery of equipment and materials and implemented	Plan(s) developed Reports on compliance with plan and traffic incidents	

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	training and consultation with local authorities				throughout construction		
4.3	Regular meetings to be held with households potentially affected by shadow flicker (see ESDD), investigate reports/complaints of shadow flicker. If needed, implement mitigations to reduce disturbance	Proactively manage stakeholder relations Reduce potential for disturbance and community complaints	Lender requirements Good practice	Internal	Quarterly meetings during first year of operation reducing to annual thereafter Complaints investigated upon receipt	Evidence of meetings Complaints register Mitigations implemented if required and agreed with affected people	
PR6	Biodiversity and Living Natural Resources						
6.1	Undertake bird and bat monitoring of the Project during construction as well as operational phases.	Review actual impacts based on data review	National Law Best practice, OTOP and Polish Wind Association Guidance	External	Ongoing	Monitoring during construction and post construction	
6.2	Appoint an independent qualified Ornithological expert (IEO) to undertake the monitoring reviews Review need for continued monitoring after 3 years of operations based on final recommendations of IOE in year 3. Publish summary of the report on intranet and make available as part of SEP. Share results also with regulators	Independent monitoring		External	Construction and Operation	Independent report provided each year. Summary provided to Lenders part of annual report	

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6.3	Update ornithological collision risk model with monitoring from first three years of operation and develop adequate future monitoring and mitigation measures. Based on this develop a long term Biodiversity Action Plan (BAP) and active turbine management plan to address monitoring and turbine management	Impacts on biodiversity receptors. Informing adaptive management of biodiversity risks.	EBRD PR6 Best Practice	Project Company EHS Management Time Biodiversity Specialists	In due time after completion of the monitoring.	Revised collision risk model undertaken and findings fed into the BAP. Audit of findings by suitably qualified specialist (Lender's E&S Advisor)	
6.4	Support and part take in any cumulative assessments of wind farms in the area.	Ensure cumulative issues are addressed. Share bird and bat data with regulators and other developers as appropriate to facilitate any additional future cumulative impacts	Best practice	As needed	As needed		
PR8	Cultural Heritage						
8.1	Maintain Chance Finds Procedure for Wieliszewo and Bięcino WFs and train personnel on its application	Minimise risk of impacts on cultural heritage	Lenders requirements	Internal/Contractor	Prior to construction	Plan prepared and submitted to Lenders for review	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	Maintain Stakeholder Engagement Plan (SEP) to be implemented	Ensure effective stakeholder engagement and maintain good community relations	Lenders requirements	Internal	Prior to operation	Plan prepared and submitted to Lenders for review and non-	

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	through construction and operation period Ensure regular consultation on project details with local communities and provision of summary reports on operations as required in line with best practice and CSR requirements.					objection received prior to implementation Meeting minutes and billboard notifications available for Lender review as part of annual reports	
10.2	Update the SEP to define operational phase engagement and reporting with local stakeholders including adjacent communities and implement This should include specific engagement required related to disturbance impacts as noted under PR3 & 4	Ensure effective stakeholder engagement and maintain good community relations	Lenders requirements	Internal	Prior to operation	Plan prepared and submitted to Lenders for review and non-objection received prior to implementation Meeting minutes and billboard notifications available for Lender review as part of annual reports	
10.3	Maintain developed and implemented effective community grievance mechanism (NB this is separate to the grievance mechanism described under PR2)	Ensure effective stakeholder engagement and maintain good community relations	Lenders requirements	Internal	Prior to construction and throughout construction and operation	Procedure developed and evidence of awareness raising of local communities on how to access the mechanism	