



Goliat Photovoltaic Farm

Environmental and Social Action Plan

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Goliat Photovoltaic Farm

Environmental and Social Action Plan

PROJECT:

Goliat Photovoltaic Farm

Poland, Pomorskie Voivodship, Słupski County,
Potęgowo Municipality

EMPLOYER:

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CONTRACTOR:

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Glossary

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| ASER | Annual Social and Environmental Report |
| E&S | Environmental and Social |
| EBRD | European Bank for Reconstruction and Development |
| ED | Environmental Decision |
| EHS | Environment, Health and Safety |
| ESAP | Environmental and Social Action Plan |
| ESDD | Environmental and Social Due Diligence Report |
| ESMP | Environmental and Social Management Plan |
| ESMS | Environmental and Social Management System |
| GM | Grievance Mechanism |
| HR | Human resources |
| ILO | International Labour Organization |
| NTS | Non-technical Summary |
| O-ESMP | Operational Environmental and Social Management Plan |
| Plan BIOZ | Health and Safety Plan (pl. Plan Bezpieczeństwa i Ochrony Zdrowia) |
| PR | Performance Requirement |
| Project | Goliat Photovoltaic Farm |
| PV | Photovoltaic farm |

SCMP Supply Chain Management Plan

SEP Stakeholder Engagement Plan

Introduction

The project of the Goliat Photovoltaic Farm (PV, the Project) was developed in compliance with applicable national environmental and social (E&S) laws and regulations, including applicable European Union law as implemented in Polish law.

The competent authority issued the Environmental Decision (ED) for the Project, following an Environmental Impact Assessment (EIA) procedure prepared in accordance with the requirements of Polish laws and regulations. The ED contains conditions and requirements to ensure that the Project will comply with Polish laws and the *acquis communautaire* of the European Union, as transposed into Polish law during its implementation and operating phases.

The Project is expected to be financed by the European Bank of Reconstruction and Development (EBRD). In order for the Project to qualify for financing by this potential Lender, the Project shall be required to comply with specific, additional requirements derived from 'Environmental and Social Standards', including the benchmarks of the Equator Principles and the EBRD Performance Requirements (PRs), which are additional to the requirements set out in the EIA and the ED issued by the relevant Polish authority.

Actions required to ensure the Project is developed in line with these additional requirements (which the Project's promoter has committed to implement) are presented in the following Environmental and Social Action Plan (ESAP).

All deliverables outlined below in the ESAP are - at the request of the potential Lender - to be reviewed by a Lenders Independent Environmental and Social Consultant, which shall assess compliance with the ESAP and the Lenders' E&S Standards.

ENVIRONMENTAL AND SOCIAL ACTION PLAN FOR GOLIAT PV

| 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 |
|--|---|--|---|---|---|---|--------|
| Performance Requirement 1: Assessment and Management of Environmental and Social Risks and Impacts | | | | | | | |
| 1.1 | <p>Complete the ESMS by developing ESMPs for the construction and operational phases (see 1.2 and 1.3).</p> <p>Ensure regular review and improvement of the management system. Appoint designated EHS Manager for the Project, assign E&S responsibilities to site-based personnel and provide resources for implementation and monitoring.</p> | <p>Management of EHS risks and impacts</p> <p>Optimisation of environmental management through a formalised system</p> | <p>EBRD PR1</p> <p>National and European law</p> | <p>Internal resources</p> <p>Staff time</p> <p>Training cost</p> <p>EHS Manager</p> | <p>Before the start of construction phase</p> | <p>EHS responsibilities assigned to dedicated personnel and resources provided</p> <p>Description of EHS resources and responsibilities in ESMP and annual report</p> <p>EHS procedures developed and implemented, with periodic revision to reflect site-specific conditions and Project phase</p> | |
| 1.2 | <p>Require the Construction Manager (or a person commissioned by the Construction Manager) to prepare ESMP for the construction phase in the form of the BIOZ Plan, required by the national legislation. This should include measures provisioned in the ED, and any measures</p> | <p>Management of EHS risks and impacts</p> <p>Compliance with the ED requirements and ESAP provisions</p> | <p>EBRD PR1</p> <p>National and European law</p> | <p>Internal resources</p> <p>Construction Manager</p> | <p>Before the start of construction phase</p> | <p>Documented ESMP for the construction phase approved by the Company.</p> | |

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| | following the implementation of the ESAP actions. The BIOZ Plan shall be approved by the Company and implemented before work commences. | | | | | | |
| 1.3 | Require the Operation Contractors to develop and implement ESMP for the operational phase (O-ESMP). This should include measures provisioned in the ED, and any measures following the implementation of the ESAP actions. | Management of potential disturbance impacts to near-by receptors Compliance with the ED requirements and ESAP provisions | EBRD PR1 National and European law | Internal resources Operation Contractors | Prior to operation and implemented for the lifetime of the Project | Documented O-ESMP approved by the Company | |
| 1.4 | Undertake supervision of the construction works throughout the construction phase by designated EHS staff to confirm adherence to ESMP, conditions of the ED and good construction practices. | Good management practice in regard to EHS performance | EBRD PR1 EHS policy | Internal resources | Throughout the construction stage | Evidence of inspections in form of weekly reports | |
| 1.5 | Report to Lender(s) annually on the environmental and social performance of the Project. Include compliance with the national law, EBRD PRs, ESAP actions, and implementation of the ESMS, ESMP and SEP. | Compliance with national law, EBRD PRs and loan documentation | EBRD PR1 | Internal resources External consultants | During construction and operational phases | Annual Social and Environmental Report (ASER) | |

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| Performance Requirement 2: Labour and Working Conditions | | | | | | | |
| 2.1 | <p>Develop and communicate to the workforce an HR Policy and procedures which meet Lender(s) and national legislation requirements (contractors to have equivalent policies / procedures in place). This Policy should be accessible in the main language spoken by the workforce.</p> <p>Ensure both the Company and contractors retain appropriate responsible persons for PR2 implementation.</p> | <p>Improved human resources practices</p> <p>Compliance with national law and PR2 requirements</p> | <p>EBRD PR2</p> <p>National law</p> <p>ILO</p> | <p>The Company</p> <p>Contractors</p> | <p>Prior to the main construction phase</p> | <p>HR Policy</p> <p>Contractor policies and procedures approved by the Company or independent professional</p> | |
| 2.2 | Maintain a formal workers grievance mechanism in accordance with PR2 for all direct and non-employee workforce and communicate it to all personnel. | Improved workers / contractors relationship and management | EBRD PR2 | <p>Internal resources</p> | <p>Prior to the main construction phase</p> | <p>Grievance Mechanism</p> <p>Grievance Tracker</p> <p>Progress update on resolution of workers grievances included in annual reports</p> | |
| 2.3 | Maintain the Supply Chain Management Plan (SCMP). Conduct Supply Chain Due Diligence in accordance with | <p>Labour unrest</p> <p>Company reputational damage</p> | <p>EBRD PR2</p> <p>ILO</p> | <p>Internal resources</p> <p>Contractors</p> | <p>Before the start of construction phase</p> | Supply Chain Due Diligence | |

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| | the measures outlined in the SCMP. | | | | | | |
| Performance Requirement 3: Resource Efficiency and Pollution Prevention and Control | | | | | | | |
| 3.1 | Comply with the obligations outlined in ED regarding waste and pollution management. | Compliance with the ED requirements and national law Pollution prevention | EBRD PR3 National law Good international practice | Internal resources Contractors | Throughout the construction and operational phases | Reports on compliance in annual reports | |
| Performance Requirement 4: Health, Safety and Security | | | | | | | |
| 4.1 | Include health and safety information and requirements in the ESMP for the construction phase (in the form of Plan BIOZ), which should be developed prior to the commencement of construction. Maintain health and safety standards and ensure staff and contractors are working in compliance with the national law. Designate and ensure the presence of an EHS Manager during the construction of the Project. | Compliance with the national law | EBRD PR4 National law | Internal resources Contractors EHS Manager | Before and throughout the construction phase | ESMP for the construction phase Health and safety standards Reports on compliance with health and safety standards included in annual reports | |

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| 4.2 | <p>Comply with the obligations outlined in ED regarding the community health and safety and hazardous materials safety.</p> <p>Introduce solutions to minimise negative impacts on the landscape. Construct isolation green belts resulting from the Local Development Plan (Resolution No. LIX/564/2023 of the Potęgowo Municipality Council of 30 January 2023) and use subdued colours for construction of photovoltaic installation elements.</p> | Compliance with the ED requirements and national law | EBRD PR4 National law | Internal resources | Throughout the construction phase and before the operational phase | <p>Isolation green belts in place</p> <p>Reports on compliance in annual reports</p> | |
| 4.3 | Grievance Mechanism for communities in place to ensure the community can communicate their worries and concerns. | <p>Proactively manage stakeholder relations</p> <p>Reduce potential disturbance and community complaints</p> | EBRD PR4 | Internal resources | Complaints investigated upon receipt | <p>Grievance Tracker</p> <p>Mitigations implemented if required and agreed with affected people</p> | |
| Performance Requirement 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement | | | | | | | |
| 5.1 | Maintain and monitor the compensation process for people affected by land leases. Ensure all damage | Channels of communication with landowners | EBRD PR5 | Internal resources | Throughout the lifetime of the Project | <p>Evidence of payment of compensation</p> <p>Grievance Tracker</p> | |

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| | <p>associated with construction process is addressed.</p> <p>Maintain contact with the landowners. Grievance Mechanism in place to ensure the landowners can communicate about leases.</p> | | Good international practice | | | Mitigations implemented if required and agreed with affected people | |
| 5.2 | Upon completion of construction and reinstatement of temporary areas, appropriate information will be disclosed to the landowners. | Channels of communication with landowners | EBRD PR5 Good international practice | Internal resources | Upon the completion of construction | Evidence of information | |
| Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources | | | | | | | |
| 6.1 | Comply with the obligations outlined in ED in relation to biodiversity conservation measures. | Compliance with the ED requirements and national law | EBRD PR6 National law Good international practice | Internal resources Contractors EHS Manager | Throughout the construction and operational phase | Reports from supervision confirming these measures have been implemented Reports on compliance in annual reports | |
| Performance Requirement 8: Cultural Heritage | | | | | | | |
| 8.1 | Prepare Archaeological Survey Plan which must be presented to the Pomorskie Voivodship Conservator of | Compliance with the ED requirements and national law | EBRD PR8 National law Good international practice | Internal resources Contractors | Prior to the commencement of construction works | Archaeological Survey Plan approved by authority | |

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| | Monuments in Gdańsk which must approve the Plan. | Minimise risk of impacts on cultural heritage | | | | | |
| 8.2 | Ensure the presence of a certified archaeologist on site during the construction works. | Compliance with the ED requirements and national law Minimise risk of impacts on cultural heritage | EBRD PR8 National law Good international practice | Internal resources BoP Contractor External archaeologist | Throughout the construction phase | Reports on compliance in annual reports | |
| Performance Requirement 10: Information Disclosure and Stakeholder Engagement | | | | | | | |
| 10.1 | Maintain the Stakeholder Engagement Plan. | Ensure effective stakeholder engagement and maintain good community relations Community issues identified and expectations managed | EBRD PR10 Good international practice | Internal resources | Throughout the construction phase and before the operational phase | SEP implemented Reports on compliance in annual reports | |
| 10.2 | Update the SEP to define operational phase engagement and reporting with local stakeholders including adjacent communities. | Ensure effective stakeholder engagement and maintain good community relations Community issues identified and | EBRD PR10 Good international practice | Internal resources Contractors | Up to 3 years from the start of operation | Updated SEP for the operational phase implemented | |

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|------|---|--|---|---|--|---|--------|
| | | expectations managed | | | | | |
| 10.3 | Maintain developed and implemented effective Grievance Mechanism for communities. Disclose the GM on the Project website and make it available in form of a paper in the Potęgowo Municipality Office. Register each of the grievances. | Ensure effective stakeholder engagement and maintain good community relations | EBRD PR10 Good international practice | Internal resources | Throughout the construction phase and before the operational phase | Grievance Mechanism in place Reports on grievances received in annual reports | |
| 10.4 | Disclose EIA Report, NTS of the Project, SEP, GM and ESAP on Project's website. | Ensure effective stakeholder engagement and maintain good community relations Transparent disclosure of E&S performance Provide information on the Project to any interested party | EBRD PR10 Good international practice | Internal resources | Before the start of construction phase | Project documentation available to any interested party | |