

BALTIC POWER (BLP)

Environmental and Social Action Plan (ESAP)

Baltic Power Offshore Wind Farm

04 December 2023

Introduction

The project consisting of the offshore windfarm Baltic Power and its connection to the national grid (together the "Project") has been designed to be developed in accordance with applicable national environmental and social laws and regulations, including applicable European Union law as implemented in Polish law.

The competent authorities have granted to the Project the environmental decisions (the "Environmental Decisions") following Environmental Impact Assessments ("EIA"), prepared in accordance with the requirements of Polish laws and regulations. These Environmental Decisions contain conditions and requirements ensuring 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, amongst others, by the European Bank of Reconstruction and Development ("EBRD"), several export credit agencies ("ECAs") and other Equator Principles Financial Institutions ("EPFIs"). In order to be considered for financing by these potential lenders, the Project shall be required to comply with specific, additional requirements derived from each respective lenders' "Environmental and Social Standards", including the benchmarks of the Equator Principles ("EP IV"), the IFC Performance Standards ("IFC PSs") and the EBRD Performance Requirements ("EBRD PRs"), which are additional to the requirements identified by the EIA and the competent Polish authorities' "Environmental Decisions".

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 tables (the "ESAP").

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

Environmental and Social Action Plan

No.	Action	Risks / Benefits	Basis for Requirement and Requisite Deliverable Alignment	Resources / Responsibility	Deliverables	Deadline
PR 1. Environmental and Social Appraisal and Management / PS 1. Assessment and Management of Environmental and Social Risks and Impacts						
1.1	Develop, implement and maintain an overarching Environmental and Social Management System (ESMS) for the lifecycle of the Project. The ESMS shall be appropriate for the scale and complexity of the Project and as per Environmental and Social Requirements, capturing all Project actors (e.g., contractors and subcontractors). Regular review and updating of the ESMS will be established.	To promote effective management of environmental, social, health and safety risks and impacts, fostering continuous improvement of performance. To ensure harmonised performance across Project employees and contractors. To avoid issues related to E&S compliance, the social license to operate, and impacts to schedule and cost.	<ul style="list-style-type: none"> EPIV P4 IFC PS1 EBRD PR1 Alignment with ISO 14001 ISO 45001 Alignment with OHSAS 18001 	<ul style="list-style-type: none"> Internal resources of the Project External social and environmental consultant with E&S due diligence/risk management experience for Cat A projects 	<ol style="list-style-type: none"> ESMS submitted and deemed satisfactory by the LIESC. ESMS procedures developed and implemented, regularly reviewed to reflect site-specific conditions and Project phase. Both E&S responsibilities and accountabilities assigned to dedicated personnel; human resources allocated. ESMS regularly reviewed to reflect site-specific conditions and the Project phase. 	<ul style="list-style-type: none"> Items 1-3: April 30, 2024. Item 4: Reviewed on a semi-annual basis for revision.
1.2	Develop, implement and maintain construction and operation-phase Environmental and Social Management Plans (ESMPs) and Sub-Plans to oversee and operationalize	To optimise environmental and social	<ul style="list-style-type: none"> EPIV P4 IFC PS 1 EBRD PR1 	<ul style="list-style-type: none"> External social and environmental consultant with 	<ol style="list-style-type: none"> Provision of ESMP Scope of Work and Terms of Reference 	<ul style="list-style-type: none"> Item 1: August 28, 2023

	<p>compliance with legal and regulatory requirements and Lenders' E&S Standards and requirements, covering the following themes:</p> <ul style="list-style-type: none"> i) Worker Accommodation Management Plan and Influx Management ii) Livelihoods Restoration Plan (LRP) iii) Community-focused updates to the Emergency Preparedness and Response Plan iv) Hazardous Materials Safety and Management Plan v) Traffic and Road Safety Management Plan vi) Biodiversity Management Plan vii) Chance Find Procedures (onshore and offshore) viii) Noise and Vibration Management Plan ix) Supply Chain Management Plan x) Security Management Plan 	<p>management and performance through a formalised system; to avoid issues related to E&S compliance or social license to operate that impact Project schedule and cost.</p>	<ul style="list-style-type: none"> • Legal requirements under Polish and EU legislation 	<p>E&S due diligence/risk management experience for Cat A projects</p> <ul style="list-style-type: none"> • Contractors 	<p>for Majority Lenders (66%) acceptance.</p> <ol style="list-style-type: none"> 2. Draft ESMPs provided for LIESC's review and acceptance. 3. Compliance with the ESMPs a condition of contractors'/subcontractors' appointment. 	<ul style="list-style-type: none"> • Item 2: 6 weeks after finalization of the latest sub plan as set out below: <ul style="list-style-type: none"> ○ January 31, 2024: Traffic and Road Safety Management Plan; ○ April 28, 2024: Supply Chain Management Plan for the Onshore scope of works; ○ June 12, 2024: Supply Chain Management Plan for the Offshore scope of works; ○ January 31, 2024: Chance Find Procedure; ○ February 15, 2024: Worker Accommodation Management Plan and Influx Management; ○ May 15, 2024: Community-focused updates to the Emergency Preparedness and Response Plan; ○ May 16, 2024: Biodiversity Management Plan;
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1.3	Develop, maintain and implement a Contractor Management Plan (CMP), defining the Project approach to managing the E&S and occupational health and safety (OHS) performance of Project contractors, subcontractors, and other third parties during all phases of the Project.	To manage Contactor E&S risks and impacts.	<ul style="list-style-type: none"> ● IFC PS1 ● EBRD PR1 	<ul style="list-style-type: none"> ● Internal resources of the Project ● External consultant with social and environmental due diligence/risk 	<ol style="list-style-type: none"> 1. Provision of CMP Scope of Work and Terms of Reference (ToR) for LIESC acceptance. 2. Draft CMP provided for LIESC review and acceptance. 3. Implementation of CMP 	<ol style="list-style-type: none"> 1. September 30, 2023. 2. February 29, 2024 for the Onshore scope of works; and June 12, 2024 for Offshore scope

				management experience for Cat A projects		of works (both tied to completion of item 1.5 below). 3. Ongoing basis.
1.4	Develop a Human Rights Impact Assessment (HRIA).	To identify potential human rights risks and impacts of the Project. To ensure continual improvement of social performance. To avoid reputational damage.	<ul style="list-style-type: none"> EPIV P1 EBRD PR1 	<ul style="list-style-type: none"> External consultant with HRIA experience for Cat A projects 	1. HRIA provided for LIESC review and acceptance.	<ul style="list-style-type: none"> April 5, 2024.
1.5	Undertake Supply Chain Mapping and EHS Risk Assessment for primary supply chains. As per Action 1.3, incorporate mitigations for forced and child labour within contractors' supply chains in the Contractor Management Plan in accordance with Environmental and Social Requirements, including a Supplier Code of Conduct.	To identify, understand and manage supply chain risks. To ensure appropriate labour management practices in the Project supply chain, including avoidance of forced and child labour. To avoid human rights and reputational risks.	<ul style="list-style-type: none"> IFC PS1 and PS2 EBRD PR1 and PR2 	<ul style="list-style-type: none"> Internal resources of the Project External consultant with supply chain / HRIA experience for Cat A projects 	<ol style="list-style-type: none"> Supply Chain Mapping and EHS Risk Assessment. Supplier Codes of Conduct signed by Project suppliers. 	<ol style="list-style-type: none"> February 29, 2024 for the Onshore scope of works; and April 12, 2024 for the Offshore scope of works. Upon signing of contracts, verified on a semi-annual basis.
1.6	Expand socio-economic baseline and impact assessment to address:	To ensure appropriate identification and	<ul style="list-style-type: none"> EPIV P2 IFC PS1 EBRD PR 1 	<ul style="list-style-type: none"> External consultant with social due diligence 	1. Supplementary Socio-economic Baseline and Impact Assessment satisfactory to the LIESC.	1. May 31, 2024.

	<p>i) the number of units of temporary accommodations available in comparison to the peak construction workforce; and</p> <p>ii) additional mitigation measures to reduce indirect and induced impacts on the local tourism economy resulting from changes in the profile of those being accommodated.</p>	management of direct, indirect and induced economic impacts of the Project on a tourist-dependent region.		experience for Cat A projects		
1.7	Identify and assess cumulative socio-economic impacts of multiple, large offshore projects in the Project vicinity and develop appropriate mitigation measures.	To ensure the appropriate identification and holistic management of social risks related to the Project and related Projects planned for development in the regional context. To maintain social license to operate.	<ul style="list-style-type: none"> • EPIV P2 • IFC PS5 • EBRD PS5 	<ul style="list-style-type: none"> • External consultant with social due diligence experience for Cat A projects 	1. Cumulative Socio-economic Impact Assessment satisfactory to the LIESC.	1. May 31, 2024.
1.8	Review E&S risks of associated facilities (e.g., the PSE substation and 400 kV line connecting the PSE substation with the national grid as well as the port of Łeba if significant development work will be undertaken), with particular focus on impacts to cultural heritage, resettlement, economic displacement and biodiversity.	To ensure appropriate identification of potential E&S risks of associated facilities that may impact the Project schedule, reputation and/or its social licence to operate.	<ul style="list-style-type: none"> • EPIV P2 • IFC PS1 • EBRD PR1 	<ul style="list-style-type: none"> • External consultant with environmental and social due diligence experience for Cat A projects 	1. Associated Facilities Assessment satisfactory to the LIESC.	1. April 30, 2024.

1.9	Appoint a Lender's Independent Environmental and Social Consultant (LIESC) to monitor Project implementation against the ESAP and Environmental and Social Requirements of the Project. The LIESC will be provided access to all relevant / requested Project documentation, staff, contractors and consultants through which to review Project performance and produce one report for onshore and offshore activities, inclusive of cumulative issues, associated facilities and ancillary infrastructure relevant to each Project site.	To ensure adequate monitoring and reporting of E&S compliance, risks and/or incidents associated with the execution of a complex Cat A Project.	<ul style="list-style-type: none"> • EPIV P9 • IFC PS 1 • EBRD PR1 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with social and environmental experience in an LIESC role for Category A projects 	<ol style="list-style-type: none"> 1. LIESC draft ToR and Scope of Work acceptable to the Lenders for the engagement of the LIESC, circulated to shortlist of Lender-identified consultants as an RFP. Acceptance of scope and ToR shall be based on majority Lender approval. Acceptance shall be deemed received by the Project if Lenders do not respond within 10 business days. 2. Audit template acceptable to the Lenders. 3. Appointment of LIESC 4. LIESC Environmental, Social, Health and Safety Audit Reports. 	<ol style="list-style-type: none"> 1. Financial close. 2. Financial close 3. September 30, 2023. 4. Semi-annual reports during construction and annual reports during operation.
1.10	Have the LIESC conduct an Environmental, Health, Safety and Social (incl. Labour, Community Engagement and CSR) ("EHSS") Commissioning Audit after construction of the offshore wind farm and onshore facilities.	To verify that the Project has been built in accordance with all regulatory permits and Lenders' Environmental and Social Requirements, including the ESAP.	<ul style="list-style-type: none"> • EPIV P9 • IFC PS 1 • EBRD PR1 	<ul style="list-style-type: none"> • External consultant with social and environmental experience in an LIESC role for Category A projects 	<ol style="list-style-type: none"> 1. Commissioning Report template provided for Lenders' acceptance. Acceptance of scope, ToR and template shall be based on majority lender approval. Acceptance shall be deemed received by the Project if Lenders do not respond within 10 business days. 2. Commissioning Audit Report accepted by Lenders. 	<ol style="list-style-type: none"> 1. Within 60 days of commissioning. 2. Within one (1) year of commissioning.
1.11	Complete Decommissioning Plan in line with national and EU requirements and industry best practice.	To ensure Project decommissioning is comprehensively addressed at the appropriate junctures.	<ul style="list-style-type: none"> • IFC PS1 and PS4 • EBRD PR1 and PR4 	<ul style="list-style-type: none"> • Contractors 	<ol style="list-style-type: none"> 1. Decommissioning Plan 	<ol style="list-style-type: none"> 1. One quarter prior to Project commissioning. Update the Decommissioning Plan every 10 years, and 5 years

						before formal decommissioning.
1.12	Recruit an ESG Risk Management Officer at the senior management level to oversee the works and ensure adequate reporting and supervision. Ensure the ESG Risk Management Officer has relevant international experience with the assessment and implementation of Cat A projects to Lenders' E&S Standards (i.e., the IFC PS or the EBRD PRs). The ESG Risk Management Officer will provide resources for ongoing supervision of the Project and reporting. Until an ESG Risk Management Officer has been appointed and has begun working in the position, a senior E&S consultant with equivalent qualifications will serve in the role. The consultant's scope of work will extend a minimum of two (2) weeks after the start date of the ESG Risk Management Officer.	To ensure adequate capacity and accountability for ESG risk management at a senior corporate level. To ensure management system and assurance process allows for reporting and disclosure under the CSRD and ESRS.	<ul style="list-style-type: none"> • IFC PS1 • EBRD PR1 • ISO 14001 	<ul style="list-style-type: none"> • Internal resources of the Project (i.e., Human Resources for external recruitment) • A senior social consultant with experience in environmental and social due diligence for Cat A projects 	<ol style="list-style-type: none"> 1. Updated organizational chart (indicating vacant positions not yet filled as relevant). 2. Job description accepted by majority of the Lenders. 3. Scope and ToR for interim senior consultant accepted by the majority of the Lenders. 4. Appointment of interim senior consultant from shortlist of Lender-identified consultants and a copy of their CV. 5. Appointment of ESG Risk Management Officer and copy of CV. 	<ol style="list-style-type: none"> 1. Project signing. 2. August 31, 2023-September 15, 2023. 3. August 31, 2023. 4. September 30, 2023. 5. October 31, 2023.
1.13	Recruit a socio-economic impact assessment consultant- with international experience applying the IFC PS/EBRD PRs on Category A projects to oversee the completion of outstanding socio-economic baseline and impact assessment work, stakeholder engagement and subsequent socio-economic and stakeholder management, to ensure appropriate consideration and implementation of Lenders' Environmental and Social Requirements. Provide resources for ongoing alignment of the Project with the Lenders' Environmental and Social Requirements.	To ensure adequate capacity and accountability for the management of socio-economic and stakeholder-related Project risks at the operational level.	<ul style="list-style-type: none"> • IFC PS1 • EBRD PR1 	<ul style="list-style-type: none"> • External consultant with senior social due diligence experience on Cat A projects • Internal Resources (Community Liaison Officer) 	<ol style="list-style-type: none"> 1. ToR and Scope of Work accepted by the Lenders. 2. Appointment of Socio-economic Impact Assessment consultant and copy of CV and successful proposal. 3. Description of environmental, social and health and safety resources & responsibilities in ESMS and ESMPs. 	<ul style="list-style-type: none"> • Items 1and 3: September 30, 2023. • Item 2: January 31, 2024.
PR. 2 / PS. 2: Labour and Working Conditions						
2.1	Update and implement HSSE Plan for all Project phases, applicable to Project staff, contractors and subcontractors in accordance with the Lenders' Environmental and Social Requirements.	To minimise health and safety risks to workers.	<ul style="list-style-type: none"> • IFC PS2 and PR4 • EBRD PR 2 and PR4 	<ul style="list-style-type: none"> • Internal resources of the Project 	<ol style="list-style-type: none"> 1. HSSE Plan, accepted by the LIESC. 2. Contractual requirements for contractors to develop 	<ol style="list-style-type: none"> 1. January 31, 2024. 2. February 15, 2024 for Onshore scope of works; and July

					<p>Emergency Response Plans adhering to the ESAP and Lenders' Environmental and Social Requirements for their respective scopes of work.</p> <p>3. Semi-annual record of key health and safety (H&S) metrics (e.g., fatalities, near misses, days of lost work due to injury) involving workers and Project-related activities.</p>	<p>1, 2024 for the Offshore scope of works.</p> <p>3. On a semi-annual basis.</p>
2.2	<p>Update the Worker Code of Conduct, to be signed and acknowledged by all Project workers (employees, contractors and subcontractors), outlining requirements for staff behaviour in-community, on worksites and in worker accommodations, mirroring values outlined in the new HR Policy and addressing any risks outlined in the (to be completed) HRIA. Outline consequences for contravention of Worker Code of Conduct to the Project's discretion.</p>	<p>To manage labour and human rights risks and potential impacts to community character resulting from Project worker influx. To maintain social license to operate.</p>	<ul style="list-style-type: none"> • IFC PS2 and PS4 • EBRD PR2 and PR4 • Legal requirements under Polish and EU Legislation 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with labour and HRIA experience for Cat A projects 	<ol style="list-style-type: none"> 1. Updated Worker Code of Conduct. 2. Documentation of Worker Code of Conduct having been signed by all employees, contractors and subcontractors for LIESC verification. 	<ol style="list-style-type: none"> 1. September 30, 2023. 2. On an ongoing basis, to be verified by the LIESC semi-annually.
2.3	<p>Develop and implement a Human Resources (HR) Policy and accompanying procedures covering employees, contractors and sub-contractors. The Policy and accompanying procedures will define the Project's commitments with respect to labour and working conditions; maximizing local employment; ensuring equal opportunity and non-discrimination; presenting prohibitions against sexual harassment, gender-based violence and child and forced labour; establishing whistle-blower protection; protecting freedom of association and collective bargaining; and establishing retrenchment process requirements. The Project will ensure policies and procedures are communicated to the</p>	<p>To adequately manage labour and working conditions, reduce human rights-related risks and maintain social license to operate.</p>	<ul style="list-style-type: none"> • IFC PS2 • EBRD PR2 • Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with HRIA/labour experience for Cat A projects 	<ol style="list-style-type: none"> 1. HR Policy and Procedures developed for LIESC acceptance. 2. Distribution and communication of HR Policy and Procedures to the Project workforce in the main languages spoken. 	<ol style="list-style-type: none"> 1. September 30, 2023. 2. September 30, 2023 and ongoing thereafter.

	Project workforce and are accessible and in the main languages spoken by the workforce.					
2.4	Provide an Employee Grievance Mechanism to establish an avenue for all workers (i.e., employees, contractors and subcontractors) to raise concerns with the Project.	To improve workforce communication and promote the early resolution of issues. To mitigate labour, human rights risks and reputational risks.	<ul style="list-style-type: none"> • IFC PS2 • EBRD PR2 • Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> • Internal resources of the Project / external consultant with grievance mechanism experience for Cat A projects 	<ol style="list-style-type: none"> 1. Provision of Employee Grievance Mechanism Procedures. 2. Documentation demonstrating how the existence of the grievance mechanism is communicated to employees, contracted and subcontracted workers as part of introductory training. 	<ol style="list-style-type: none"> 1. January 31, 2024. 2. January 31, 2024.
2.5	As per Action 1.2 (Worker Accommodation Management Plan and Influx Management), identify safe and appropriate housing and facilities for workers both onshore and offshore (including gender-segregated facilities), with the objective of minimising impacts to tourist operators and their clientele. Ensure contractors and subcontractors (inclusive of agency workers) are captured and understand requirements to adhere to the Lenders' Environmental and Social Requirements.	To manage employment and human rights-related risks.	<ul style="list-style-type: none"> • IFC PS2 • EBRD PR2 • IFC and EBRD Guidance Notes on Workers' Accommodation Processes and Standards • ILO Maritime Labour Convention 2006, as amended (MLC 2006) Title 3 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with labour/HRIA experience for Cat A projects 	<ol style="list-style-type: none"> 1. Contractual requirements for contractors and subcontractors to adhere to IFC and EBRD Guidance Notes and ILO requirements, inclusive of agency workers. 2. Reports from third party inspections of accommodation facilities. 	<ol style="list-style-type: none"> 1. February 15, 2024 2. Thereafter, on a semi-annual basis until the completion of Project construction.
PR 3. Resource Efficiency and Pollution Prevention Control / PS 3. Resource Efficiency and Pollution Prevention						
3.1	As per Action 1.2, develop a Noise and Vibration Management Plan and undertake relevant noise monitoring throughout the construction and operations phases near residential premises, identified sensitive receptors and amenity sites.	To manage noise and vibration impacts on Project-affected people (PAPs) and sensitive species.	<ul style="list-style-type: none"> • Legal requirements under Polish legislation 	<ul style="list-style-type: none"> • Internal resources of the Project • Contractors 	<ol style="list-style-type: none"> 1. Implementation of the Management Plan verified by the LIESC. 	<ol style="list-style-type: none"> 1. Continuous implementation following the completion of the Noise and Vibration Management Plan development. 2. Verification semi-annually during Project construction;

						annually during operations.
3.2	<p>As referenced in Action 1.2 (Noise and Vibration Management Plan), implement comprehensive noise mitigation measures, carrying out Project work in the best possible weather conditions; using high quality equipment to reduce the noise levels generated; and providing effective noise protection for marine species.</p> <p>Carry out underwater noise monitoring utilizing best practice noise mitigation systems to ensure underwater noise levels do not exceed regulatory or permitting requirements. Ensure that Contractors responsible for piling develop an underwater noise monitoring programme to assess noise and vibrations on an ongoing basis, which takes into account cumulative and background noise and ensures regulatory and permitting compliance. Monitoring locations must also be defined.</p> <p>During piling and dredging, ensure measures established through the monitoring system and programme are effectively undertaken to reduce noise, vibration and sedimentation and ensure that Project-related noise does not impact marine life (including marine mammals).</p>	To reduce noise impacts to PAPs and sensitive species.	<ul style="list-style-type: none"> Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> Internal resources of the Project Contractors 	<ol style="list-style-type: none"> Monitoring programme established, reviewed and verified by the Supervision Engineer and an LIESC marine ecologist. Evidence of implementation of noise mitigation measures across Project activities for LIESC verification. 	<ul style="list-style-type: none"> Continuous implementation upon initiation of Project construction. Verification semi-annually during construction and annually during operations.
3.3	<p>Carry out dredging during site preparation works for offshore wind turbines and accompanying infrastructure simultaneously at up to three foundations or support structures. Carry out the work in the best possible weather conditions and implement noise mitigation measures using quality equipment to reduce the noise levels generated and provide effective noise protection.</p> <p>Use noise mitigation systems to ensure underwater noise levels and relevant regulatory guidelines and permits are not exceeded. Depending on the final technology chosen for piling works, the Contractors responsible for piling shall develop an underwater noise monitoring programme and define monitoring locations. This programme shall be reviewed and approved by the Supervision Engineer and the LIESC marine ecologist.</p>	To minimise environmental and disturbance impacts to sensitive marine species and ecosystems.	<ul style="list-style-type: none"> Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> Contractors 	<ol style="list-style-type: none"> Preparation of procedures as part of Noise and Vibration Management Plan. Formalize dredging coordination during site preparation. 	<ol style="list-style-type: none"> 3 months prior to the start of offshore installation works. Continuous implementation. Verification quarterly during construction.

	<p>The Project will not operate more than two piling ships at a time to ensure noise does not impact marine life, including marine mammals. The Contractor shall develop a monitoring system to ensure reduced impacts and adherence to permit conditions.</p> <p>During piling and dredging, ensure measure are taken to reduce noise, vibrations and sedimentation. Develop such procedures as part of the Noise and Vibration Management Plan. Provide all noise data to the LIESC to ensure the conditions have been met.</p>					
PR 4. Health and Safety / PS 4. Community Health, Safety and Security						
4.1	<p>As identified in Action 1.2, incorporate trespassing, hazardous materials management, security and communicable disease risks during construction and operations into the Emergency Preparedness and Response Plan for both the construction and operations phases. Implement Plan across Project phases.</p>	<p>To minimise community health and safety issues across the Project. To maintain social license to operate.</p>	<ul style="list-style-type: none"> • IFC PS4 • ERBD PR1, PR2 and PR3 • Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> • Internal resources of the Project (i.e., Procurement department and EHS Manager) • External consultant 	<ol style="list-style-type: none"> 1. Community-focused updates to the Emergency Preparedness and Response Plan accepted by the LIESC. 2. Evidence of disclosure to local community and Project stakeholders in writing and via an in-person stakeholder engagement. 	<ol style="list-style-type: none"> 1. May 15, 2024. 2. June 15, 2024.
4.2	<p>As referenced in Action 1.2, incorporate the requirements of the Voluntary Principles on Security and Human Rights into the Security Management Plan, to accompany the requirements of the International Ship and Port Facility Security Code and associated training. The Plan shall include a Site Security Code of Conduct.</p>	<p>To mitigate human rights-related risks associated with Project security.</p>	<ul style="list-style-type: none"> • IFC PS4 • EBRD PR4 	<ul style="list-style-type: none"> • External consultant with HRIA experience for Cat A projects 	<ol style="list-style-type: none"> 1. Security Management Plan 2. Site Security Code of Conduct 	<ol style="list-style-type: none"> 1. March 31, 2024. 2. March 31, 2024.
PR 5. Land Acquisition, Involuntary Resettlement and Economic Displacement / PS 5. Land Acquisition and Involuntary Resettlement						
5.1	<p>Assign a dedicated Community Liaison Officer (CLO) to engage regularly with affected fishermen, fishing companies, tourist operators, tourist outfitters and other stakeholders in the implementation of the Stakeholder Engagement Plan (SEP), the delivery of the LRP and the management of grievances under the Project-level grievance mechanism. The CLO will be responsible for maintaining the Project grievance log and reporting to the LIESC on the process of resolution of</p>	<p>To ensure accountability and management of grievances and community concerns.</p>	<ul style="list-style-type: none"> • IFC PS5 • EBRD PR5 	<ul style="list-style-type: none"> • Internal resources of the Project 	<ol style="list-style-type: none"> 1. CLO job description accepted by the LIESC. 2. Grievance Log 	<ol style="list-style-type: none"> 1. September 30, 2023. 2. Submitted semi-annually to the LIESC. Inclusion of high-risk issues such as E&S Incidents to communicate to

	concerns and/or complaints, including but not limited to those of a livelihood restoration focus.					the LIESC/Lenders within 20 business days. Where deemed necessary, the Lenders shall request an update on the status of the Grievance Log.
5.2	<p>Undertake a detailed assessment of socio-economic displacement impacts to inform the Livelihoods Restoration Plan (LRP). The social impact assessment will be supplemented to identify all potential group of PAPs during the construction and operations phases, including local businesses (e.g., fishers, tourist outfitters and tourism operators). This will be developed through a combination of secondary data held by local authorities (Gmina municipality - Gmina and town council), via business licenses and through leasing data held by local associations of fisherman and local chambers of commerce. Where gaps remain, the baseline shall be supplemented with primary data collection. Develop, disclose, and implement the Livelihood Restoration Plan (LRP) to address all economic displacement impacts on commercial and recreational fishermen, fishing and marine tourism companies, and other affected parties due to the Project and associated enforcement of exclusion zones. The LRP must be prepared in line with the LRF, EBRD PR5 and IFC PS5 and include:</p> <ol style="list-style-type: none"> i) A detailed construction phase impact avoidance and minimization plan. ii) Detailed information on compensation and entitlements for temporary and permanent loss of net income to affected parties (i.e., compensation rates, amounts, conditionalities, skills training, local procurement and vulnerability allowance). iii) In-person consultations with PAPs affected by exclusion zones / Project port usage during LRP development and upon finalization. 	<p>To identify, manage and mitigate Project-induced social and economic displacement impacts, through avoidance, mitigation and compensation. To promote social license to operate and avoid reputational risk.</p>	<ul style="list-style-type: none"> • EPIV P2 • IFC PS1 and PS5 • EBRD PR 1 and PR5 • Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with livelihood restoration experience for Cat A projects 	<ol style="list-style-type: none"> 1. A census of affected fishers (commercial and recreational, including those who are not members of fishing organizations). 2. Livelihoods Baseline Survey. 3. Socio-economic Survey. 4. Valuation Survey. 5. ToR for LRP development reviewed and accepted by the LIESC and the Lenders. 6. Gap analysis of Sector Deal compliance with PR5/PS5 (and if relevant, certification of Sector Deal compliance with PR5/PS5). 7. Draft LRP reviewed and accepted by the LIESC. 8. Draft LRP consulted with all economically displaced people via an in-person engagement activity and document access. 9. Meeting minutes /register of comments during in-person engagement session. 10. Final LRP reviewed and accepted by the LIESC. 11. Final LRP disclosed to all displaced people via an in- 	<ul style="list-style-type: none"> • Actions 1-6: May 31, 2024. • Action 7: September 30, 2024. • Actions 8-11: November 30, 2024 LRP consulted, finalized accepted by the LIESC and Lenders and disclosed prior to enforcement of exclusion zone. • Progress verified by LIESC on a semi-annual basis.

	The Project will seek to rely on the Sector Deal currently being rolled out to address impacts to fisheries by Q1 2024. Upon delivery of the Sector Deal or its components related to compensation and other entitlement support, the Project will undertake a gap analysis as part of the LRP process and define remaining gaps to meet PR5/PS5 requirements for eligible PAPs. The Project will address any identified gaps to ensure that at a minimum, the livelihoods and standards of living of those affected by the Project and/or the enforcement of exclusion zones are restored compared to pre-displacement levels. If the Sector Deal addresses all impacts in a manner that satisfies the Lenders Environmental and Social Requirements, the gap analysis must certify compliance with PR5/PS5.				person engagement activity and document access.	
5.3	Develop a Completion Report for the LRP, to be reviewed and endorsed by the Lenders.	To ensure Project-induced social and economic displacement impacts have been adequately addressed, to promote social license to operate and avoid reputational risk.	<ul style="list-style-type: none"> EPIV P9 IFC PS5 EBRD PR5 	<ul style="list-style-type: none"> LIESC endorsed by the Lenders 	1. LRP Completion Report submitted for LIESC and Lenders' acceptance.	1. Within 30 days of completion of LRP implementation.
PR 6. Biodiversity Conservation and Sustainable Natural Resource Management / PS 6. Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	As referenced in Action 1.2, collate and clarify the Project's biodiversity management measures via a dedicated Biodiversity Management Plan. The Plan must outline the actions, requirements, responsibilities and institutional accountabilities for biodiversity management measures across the Project and outline ongoing monitoring and evaluation measures for implementation. The Plan shall ensure ongoing compliance with No Net Loss under PR6/PS6	To identify, conserve, and protect habitats, biodiversity and living natural resources, minimising potential Project impacts and in	<ul style="list-style-type: none"> IFC PS6 PS6 Habitats Directive, Birds Directive EBRD PR6 Legal requirements under Polish and EU Legislation and Environmental Decision 	<ul style="list-style-type: none"> External consultant with marine/coastal biodiversity management experience for Cat A projects 	<ol style="list-style-type: none"> Biodiversity Management Plan reviewed and accepted by the Supervision Engineer and LIESC adopted and ready for implementation. Contractual requirements for contractors mandating adherence to the Biodiversity Management Plan. 	<ol style="list-style-type: none"> May 16, 2024 (as per Biodiversity Management Plan action in item 1.2 above). Implementation by the Project and contractors audited semi-

	<p>and must be reviewed and approved by the Supervision Engineer and the LIESC.</p> <p>The Biodiversity Management Plan will include a mitigation protocol for seabirds and migratory birds, including:</p> <ul style="list-style-type: none"> - intensifying the pace of construction work during the months of April to September offshore export cable, when seabird numbers in the area are at their lowest - piling will be carried out under the supervision of a contracted ornithologist during the period from the beginning of August to the end of March - during the operation of the OWF, a system of temporary shutdowns of the wind turbines will be installed for the duration of migration of birds migrating - during the construction phase, strong upward positioned lighting should not be used from dusk to dawn, subject to lighting required by health and safety standards, - the rotor tips of offshore wind turbines should be painted in bright colours, that reflect or absorb UV radiation. - a prohibition on tree clearing during bird breeding seasons without the ornithologist supervision - Bird mortality monitoring will be carried out according to the environmental decision during the second and fifth year after COD along the 400kV line. 	<p>particular, impacts to Critically Endangered, Endemic, Migratory and Protected species.</p>				<p>annually during construction and annually during operations.</p>
6.2	<p>Implement recommendations of Marine Mammals Mitigation Review.</p> <p>Ensure Contractors to adopt Marine Mammal Mitigation Protocol during all piling operations, including:</p> <ol style="list-style-type: none"> i) Contracting a teriologist and an underwater noise specialist ii) Introducing a noise reduction system (double big bubble curtain and Hydro Sound Dumpers system, etc.) iii) Implement 'soft start' noise mitigation protocols for marine mammals. iv) Using pingers two hours prior to piling and sonar work v) Undertaking noise monitoring during initial piling (at least five C-POD devices for porpoise monitoring; an 	<p>To minimise Project impacts to critically endangered, endemic, migratory and protected marine mammals (i.e., the Baltic Sea Harbour Porpoise, Baltic Sea Grey Seal and Harbour Seal).</p>	<ul style="list-style-type: none"> • IFC PS6 • PS6 Habitats Directive, Birds Directive • EBRD PR6 • Underwater noise monitoring shall be carried out taking into account the current guidelines of the Bundesamt für Seeschiffahrt und HydrographieEnvironmental Decision • Compliance with the prevention and foresight principle required by Article 	<ul style="list-style-type: none"> • Contractors • Internal Resources 	<ol style="list-style-type: none"> 1. Deliverables as outlined in the Piling Programme and Marine Mammal Mitigation Review. 2. Resourcing to be reviewed by the LIESC. 	<ol style="list-style-type: none"> 1. 6 weeks prior to Offshore scope of works commencement. 2. Semi-annual basis during construction; annual basis during operations.

	<p>additional five devices in the area up to 20 km from the OWF area in locations agreed with the teriologist and underwater noise specialist from the environmental surveillance;</p> <p>start porpoise monitoring no later than 6 months before the start of construction works and continue throughout the construction phase; conducting underwater noise monitoring during piling in order to not exceed maximum underwater noise levels at a distance of 11 km from the piling site: 140 dB re 1 mPa2s SELcum and HF-weighted (HF-weighting function for marine mammals with high sensitivity to high frequency noise – porpoises), 170 dB re 1 mPa2s SELcum and PW-weighted (PW-weighting function for pinniped marine mammals – seals), 186 dB re 1 mPa2s SELcum unweighted for fish;”</p> <p>Perform the measurement on the border of the PLH220023 Ostoja Słowińska Natura 2000 site. Underwater noise measurements shall be performed using calibrated hydrophones in the frequency range from 10 Hz to 20 kHz</p> <p>vi) Ensure environmental supervision over the project implementation specialist supervising the implementation of the provisions of the decision on environmental conditions in the scope of underwater noise emission;</p> <p>vii) Providing effective resourcing and positioning of PAM to enable effective observation of the Mitigation Zone.</p>		6 of the Environment Protection Act 2001 (Polish Journal of Laws 2021, Item 1973, as amended).			
6.3	<p>Contract an independent ornithological expert (IOE) to carry out bird and bat assessment and monitoring during the operations phase (in years 1 and 3 after COD) of the Project in line with OWF environmental decision and the Lenders’ Environmental and Social Requirements. The IOE will review and further develop the Biodiversity Management Plan (BMP) for bird and bat mitigation and monitoring measures. Following the results of monitoring in years 1 and 3 of birds</p>	<p>To minimise Project impacts to critically endangered, endemic, migratory and protected bird and bat species.</p>	<ul style="list-style-type: none"> • IFC PS6 • EBRD PR6 • Legal requirements under Polish and EU legislation • Environmental Decision 	<ul style="list-style-type: none"> • External ornithological expert with marine/coastal biodiversity management experience for Cat A projects. 	<ol style="list-style-type: none"> 1. Monitoring report and IOE recommendations. 2. Updated Biodiversity Management Plan. 	<ol style="list-style-type: none"> 1. In 1 and 3 years after COD. 2. In 1 and 3 years after COD.

	<p>and bats, the BMP will be updated to include the results and conclusion of the IOE.</p> <p>The results of monitoring survey for birds and bats after 1 and 3 year of COD will be submitted to the Polish Environmental Protection Authority to review issue environmental disposition for the Project (i.e., outlining any additional monitoring deemed necessary to meet host country requirements). The LIESC shall review the IOE results and conclusions against the outcomes of the disposition to verify the disposition's alignment with IFC PS 6 regarding the adequacy of post-construction monitoring.</p>					
PR 8 / PS8. Cultural Heritage						
8.1	<p>If the Project identifies a chance cultural heritage find, inform the Voivodeship Conservator of Monuments and National Maritime Museum in Gdansk. The client will not disturb any chance find further until an assessment by competent professionals is made and actions consistent with the requirements of IFC PS 8 are identified (e.g., requisite buffer zones). If a site is determined to be an element of cultural heritage, the Project shall prepare and submit a Cultural Heritage Management Plan (CHMP).</p> <p><u>Maintain the avoidance measures agreed with the competent authorities to protect previously identified marine cultural heritage (i.e., shipwrecks)</u> The Project will not work in the area where a shipwreck or wreck already identified has been located and maintain a 50 m buffer zone around the shipwreck or wreck as agreed with the NMM in Gdańsk.</p>	<p>To identify and protect archaeological and cultural heritage resources, as relevant.</p>	<ul style="list-style-type: none"> • IFC PS8 • EBRD PR8 • Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with marine archaeological experience for Cat A projects • National Maritime Museum or other responsible authority per Polish Law 	<ol style="list-style-type: none"> 1. Confirmation of shipwrecks finding to the National Maritime Museum or any other responsible authority 2. (If deemed necessary following the verification process) CHMP for LIESC verification. 	<ul style="list-style-type: none"> • One quarter prior to imposing exclusion zones.
8.2	<p>As referenced in Action 1.2, embed the requirements of the Chance Find Procedures into contractors' and subcontractors' management systems. This is relevant for all firms engaging in groundworks and offshore construction. Chance Find Procedures shall form part of the introductory training programme for all onshore and offshore construction staff, contractors and subcontractors.</p>	<p>To preserve potentially unidentified cultural heritage items and sites. To manage Project schedule risks.</p>	<ul style="list-style-type: none"> • IFC PS8 • EBRD PR8 • Legal requirements under Polish and EU legislation 	<ul style="list-style-type: none"> • Internal resources of the Project 	<ol style="list-style-type: none"> 1. Training registers showing disclosure of the Chance Find Procedure to the onshore and offshore Project workforce. 2. Contractual requirement for contractors mandating adherence to Chance Find Procedures for all 	<ol style="list-style-type: none"> 1. Items 1-3: February 29, 2024 and on an ongoing basis thereafter.

					<p>construction works for the length of engagement.</p> <p>3. No cultural heritage removed or lost without appropriate conservation.</p>	
PR 10. Information Disclosure and Stakeholder Engagement / PS 1. Assessment and Management of Environmental and Social Risks and Impacts						
10.1	Implement the SEP. Revise as a 'living document' on an ongoing basis.	To identify the expectations and concerns of local communities and manage them transparently and effectively. To foster communication with key stakeholders and ensure broad public awareness of the Project. To maintain social license to operate.	<ul style="list-style-type: none"> • IFC PS1 • EBRD PR10 • GIP from offshore wind projects and infrastructure investments 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with social/stakeholder engagement experience on Cat A projects 	<ol style="list-style-type: none"> 1. Evidence of meetings and information dissemination (e.g., community advertisement, meeting minutes, stakeholder comment records, etc.). 2. Summaries of key events, communication activities and the effects of ongoing engagement. 3. Updated SEP. 	<ul style="list-style-type: none"> • Items 1-3: Provided on a semi-annual basis for LIESC review.
10.2	Engage directly with Project-affected local communities, PAPs and other key stakeholders throughout the construction phase (i.e., prior to the initiation of new work streams, changes in access and key construction milestones). Conduct information dissemination with PAPs and Project-affected communities to increase awareness of construction in their vicinity and educate stakeholders about potential impacts, mitigation measures, and the availability of the Project-level grievance mechanism.	To maintain the social license to operate. To avoid schedule delays or issues.	<ul style="list-style-type: none"> • IFC PS1 • EBRD PR10 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with social/stakeholder engagement experience on Cat A projects 	<ol style="list-style-type: none"> 1. Provide LIESC with a summary of stakeholder feedback and concerns for each engagement activity. 	<ul style="list-style-type: none"> • Engagement activities undertaken on an ongoing basis. • Documentation provided to LIESC on a semi-annual basis.
10.3	Hold annual meetings with Project-affected local communities and key stakeholders to provide information on Project activities throughout the operations phase.	To maintain social license to operate. To avoid schedule delays or issues.	<ul style="list-style-type: none"> • IFC PS1 • EBRD PR10 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with social/stakeholder 	<ol style="list-style-type: none"> 1. Provide LIESC with meeting summaries identifying key stakeholder feedback and concerns for each engagement activity. 	<ol style="list-style-type: none"> 1. On an annual basis.

				engagement experience on Cat A projects		
10.4	Implement a good practice Project-level Grievance mechanism for external stakeholders.	To ensure all external stakeholders (e.g., PAPs) have meaningful access to a grievance mechanism through which to raise concerns with the Project.	<ul style="list-style-type: none"> • IFC PS1 • EBRD PR10 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with social/stakeholder engagement experience 	<ol style="list-style-type: none"> 1. Provision of Project-level grievance mechanism procedures and template grievance log; confirmation grievance mechanism is active. 2. Public communications materials developed to advise stakeholders of the existence of the Project-level grievance mechanism. 3. Circulation of public communication materials. 	<ul style="list-style-type: none"> • Items 1 and 2: September 30, 2023. • Item 3: Activities undertaken on an ongoing basis.
10.5	<p>Implement LRF stakeholder engagement requirements namely:</p> <ol style="list-style-type: none"> i) Publish temporary unanticipated or additional exclusions or restrictions in ports (via port captains) and notified to local fishers' associations with a prior notice of at least one week. ii) Prior to commencement of construction, organize information meetings in each of the three affected ports regarding restrictions and exclusions applicable to fishing and recreational vessels, inclusive of informational brochures. Disseminate according to the LRF. iii) Hold quarterly engagement meetings with fishers and recreational fishers in each of the three ports to register, address and monitor specific concerns and provide information on the status of construction. Hold annual engagement meetings of the same purpose during operations. 	To maintain the social license to operate. To avoid schedule delays or issues.	<ul style="list-style-type: none"> • IFC PS1 • EBRD PR5 and PR10 	<ul style="list-style-type: none"> • Internal resources of the Project • External consultant with social/stakeholder engagement experience on Cat A projects 	<ol style="list-style-type: none"> 1. Notices published. 2. Meeting minutes identifying key stakeholder feedback and concerns for each engagement activity. 3. Informational brochure 	<ul style="list-style-type: none"> • Activities undertaken on an ongoing basis as outlined and additionally, where identified as needed. • Documentation provided to LIESC on a semi-annual basis.