

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Introduction

The project consisting of the Baltica 2 Offshore Windfarm (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"), at least one export credit agency ("ECA") and 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".

Issues of non-compliance and partial-compliance against the Project Standards identified during an independently conducted Environmental and Social Due Diligence ("ESDD") and actions to address such identified issues are summarised in tabular format in an Environmental and Social Action Plan ("ESAP") presented in Table 1 below. Where possible, multiple findings identified during the ESDD process which can be addressed via the same action/deliverable e.g. a specific management plan, have been consolidated.

All deliverables outlined 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 applicable Lenders' E&S Standards on an ongoing basis.

Table 1 Environmental and Social Action Plan (August 2024)

ID	Applicable Standard	Subject	Required Action ¹	Time Frame	Deliverable & Evaluation Criteria for Successful Implementation ²
AP1	IFC PS 1 / EBRD PR 1 / GIIP ³	ESMS	Finalise the Project-specific ESMS, including Manual to ensure it is aligned with Applicable Lender Standards.	1 month prior to Financial Close	Project-specific ESMS Manual. ESMS provided to LIESC and Lenders for review.
AP2	IFC PS 1 - 8 / EBRD PR 1 - 8 and 10	E&S Management Plans (Construction phase)	<p>Finalise a comprehensive suite of Project-specific E&S construction management plans ensuring that obligations/measures identified in assessment documents (both the national EIAs and any SLIP assessments) are captured.</p> <p>Ensure each topic-specific Management Plan includes a section on monitoring and review which is aligned with the monitoring and review framework and principles established in the Project's Contractor Management Plan.</p> <p>In addition to management plans specified elsewhere in this ESAP, the suite of Project-specific E&S Management Plans, shall include but not limited to:</p> <ul style="list-style-type: none"> • Environmental Management Plan (including resource efficiency and pollution control measures, water consumption reduction measures, underwater noise limits requirements and mitigations etc (not an exhaustive list)) • Training and Development Plan • Navigation Safety Plan • Waste Management Plan • Onshore Transport Management and Access Plan / Traffic and Road Safety • Onshore Invasive Alien Species (IAS) Management Plan 	<p>1 month prior to Financial Close (for EMP)</p> <p>2 months prior to construction⁴ (other management plans)</p>	A suite of Project-specific E&S Management Plans.

¹ All actions are the responsibility of the Sponsor unless otherwise specified. Were supported by Contractors, the Sponsor retains ultimate responsibility for delivery

² Deliverables to be to the satisfaction of Lenders and signed off by Lenders/IESC

³ GIIP = Good International Industry Practice

⁴ Construction refers to significant construction activities involving mobilisation of significant workforce with potential for E&S impacts. It excludes early works performed to date and activities where there is minimal likelihood of adverse E&S impacts.

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AP3	IFC PS 1 & 2 / EBRD PR 1 & 2 / GIIP	Contractor Management	Finalise the Contractor Management Plan (including a clear and detailed overview of the framework (and operational principles) for monitoring and review of both contractors and primary suppliers and a commitment to comply with specific requirements in the LWC Management Plan, which apply to third-party contracted workers and supply chain workers) defining Company approach to managing the E&S and OHS performance of their contractors, subcontractors, and other third parties during all phases of the Project.	1 month prior to Financial Close	Final Contractor Management Plan.
AP4	IFC PS 1 – 4, 6 and 8 / EBRD PR 1 – 4, 6, 8 and 10 / GIIP	ESMS (Contractors)	Relevant Project E&S standards to be imposed by means of binding contractual agreement on all Contractors and sub-contractors performing work on the Project. To be achieved through the development of a suite of robust HSE and Social management plans that address the requirement of the afore mentioned Lenders’ standards. These plans must include specific reference to the Project Applicable Standards and mitigation measures identified in impact assessments and permits.	1 month prior to Financial Close	HSE and Social management plans delivered to Contractors and sub-contractors with plans and/or mitigation measures therein adopted by Contractors and sub-contractors. The exact list of plans that apply to each Contractor may vary.
AP5	IFC PS 1 / EBRD PR 1	Cumulative Impact Assessment	<ol style="list-style-type: none"> 1) Finalise the dedicated cumulative impact assessment (CIA) for the Project, addressing comments made in the ESDD report by the IESC. 2) PGE shall use its reasonable efforts to establish and participate in a Cumulative Impacts (CI) forum, involving other OWF developers and Government entities, that shall be dedicated to the management of cumulative E&S impacts. PGE will, to the extent reasonable recognising commercial sensitivities, liaise and coordinate with other participating members of the CI forum to share relevant E&S monitoring data, timing of construction activities and mitigation measures adopted in order to understand and then minimise priority cumulative impacts, including impacts to birds, marine mammals, onshore transport and traffic, influx and fishers’ livelihoods. To the extent possible, existing forums shall be used, for example, the environmental working group that was established as part of the current Sector Deal. 	<ol style="list-style-type: none"> 1) 2 months prior to construction 2) 2 months prior to construction and then on an ongoing basis 	<ol style="list-style-type: none"> 1) Final cumulative impact assessment. 2) Demonstration of reasonable efforts to establish a forum and Sponsors commitment to ongoing participation in a CI forum.
AP6	IFC PS 1, 2, 4 and 5 / EBRD PR 1, 2, 4 and 5 / EP4	Human Rights	Prepare: <ol style="list-style-type: none"> 1) A stand-alone Human Rights Assessment report, consistent with EP4 requirements, demonstrating that salient human rights risks have been identified and evaluated; and 2) A Human Rights Risk Management Plan presenting actions to be taken to avoid adverse human rights risks or, where this is not feasible, to reduce such risks levels to acceptable levels. 	1 month prior to Financial Close	<ol style="list-style-type: none"> 1) A Human Rights Assessment report. 2) A Human Rights Risk Management Plan.
AP7	IFC PS 1 / EBRD PR 1	Emergency Response	Update the current suite of ERPs to improve them prior to construction, particularly with respect to preparedness. A diagram should be prepared illustrating how the ERPs interact and which plan(s) has/have primacy over the other/s. ERP updates to include provisions to ensure that PS4/PR4 requirements are met, for example, involvement of affected communities. Extend the assessment, which was included in the EIA, within the ERP to include/refer to oil spill risks to biodiversity/other receptors. Alternatively, this can be included in the Biodiversity Management Plan/standalone Oil Spill Response Plan.	1 month prior to construction	Updated ERPs, including but not limited to: <ul style="list-style-type: none"> • Diagram showing how they interact and which has primacy • Include provisions to ensure that PS4/PR4 requirements are met, for example, involvement of affected communities • Include assessment of oil spill risks

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AP8	IFC PS 2 / EBRD PR 2	Human Resources	<p>Prepare a Human Resources Policy confirming <i>inter alia</i> that all national and PS2/PR2 LWC requirements will be met for all three categories of workers, as appropriate, including provisions regarding treatment of migrant workers. Include all relevant items recommended in the ESDD Report within this policy e.g. workers organisations, non-discrimination, retrenchment, child and forced labour, gender-based violence and harassment, workers engaged by third parties (not an exhaustive list).</p> <p>Aligned with the Human Resources Policy, finalise an Employee Handbook for the contracted employees of the Project Sponsors, working on the Project. The Handbook must include the Workers' Grievance Mechanism and be disseminated to all the aforementioned workers. The Workers' Grievance Mechanism will be disseminated, as a standalone document, to contractors' workers if those contractors do not have an equivalent Worker's Grievance Mechanism in place.</p>	1 month prior to Financial Close	<p>Finalised Human Resources Policy confirming requirements for all Project workers.</p> <p>Employee Handbook must be disclosed to the contracted employees of the Project Sponsors, working on the Project.</p>
AP9	IFC PS 2 / EBRD PR 2	Workforce/ accommodation	<p>Provide workforce profiles (i.e. numbers, country of origin etc) for both construction and operational (if necessary) phases of the Project, accompanied by information on location/s and type of accommodation to be provided for workers employed by the Project in both phases. This can be included within a Temporary Accommodation Provision Plan.</p> <p>Incorporate into the Worker Accommodation Management Plan:</p> <p>Appropriate housing and facilities for workers both onshore and offshore, and include gender-segregated facilities, cognizant of minimizing impacts to tourist operators and their clientele. Implement EBRD and IFC guidance notes and ILO Maritime Labour Convention 2006, as amended (MLC 2006) Title 3, ensuring contractors and subcontractors including agency workers adhere to this.</p> <p>Include in the Worker Accommodation Plan a commitment to update the plan each time the workforce size or composition changes, and report to the Lenders on key changes.</p>	2 months prior to the first onshore/offshore workers arriving to site	Finalised Temporary Accommodation Provision Plan (construction).
AP10	IFC PS 3 / EBRD PR 3	E&S Management Plans (Operations Phase)	Prepare a suite of operations phase Environmental and Social Management Plans. These can be an update of the existing construction environmental and social plans where such plans are applicable to the operations phase.	3 months prior to operations	Suite of operational phase Environmental Management Plans.
AP11	IFC PS 3 / EBRD PR 3	Noise and Vibration Management Plan	<p>The Project will develop a noise monitoring plan and undertake relevant noise monitoring in construction and operations phase near residential premises, identified sensitive receptors and amenity sites.</p> <p>Implement noise mitigation measures including carrying out work in the best possible weather conditions; using quality equipment to reduce the noise levels generated; and employing equipment that provides effective noise protection.</p>	1 month prior to commencement of onshore works	Noise and Vibration Management plan accepted by the Lenders.
AP12	IFC PS 4 / EBRD PR 4	Community Health and Safety – Security Personnel	<p>Prepare onshore and offshore Community Health, Safety and Security Management Plans for the construction phase.</p> <p>The 'Security' components of these Plans to be consistent with the guidance presented in 'Annex B. Guidance for Drafting a Security Management Plan' contained in the IFC document (2017) 'Use of Security Forces: Assessing and Managing Risks and Impacts: Guidance for the Private Sector in Emerging Markets' and compliant, also, with the Voluntary Principles on Security and Human Rights (2000).</p>	1 month prior to Financial Close	Finalised Community Health, Safety and Security Management Plan for the construction phase.

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AP13	IFC PS 5 / EBRD PR 5	Livelihood Restoration	<p>Prepare, disclose and implement an LRP complying with the requirements of PS5 / PR5 (and the LRF) for both onshore and offshore economic displacement resulting from the Project. As necessary, the LRP will include the results of an audit of Project land take/occupancy actions implemented prior to completion of the LRP, against PS5/PR5 requirements, with any needed corrective actions incorporated into the LRP.</p> <p>ToR for LRP preparation to be accepted by Lenders. LRP baseline survey to be completed and include the entitlements already provided or expected for delivery to Project Affected Persons (PAPs) under Sector Deal and other initiatives.</p> <p>Implementation of the LRP to be verified and confirmed via Completion Report submitted and accepted by the Lenders.</p>	<p>Implementation-ready LRP approved by Lenders - 1 month prior to any works starting at any applicable location and enforcement of the exclusion zone in off-shore part of the project</p> <p>LRP Completion Report prior to the end of the project</p>	<p>Livelihood Restoration Plan.</p> <p>LRP Completion Report.</p>
AP14	IFC PS 6 / EBRD PR 6	Biodiversity - Survey data	<p>Collect additional pre-construction field data: seabird survey (OWF area, wintering season 2023-2024), the harbour porpoise monitoring (6 months prior to the start of the construction) and prepare a supplementary biodiversity document summarising the results of the additional data collection to confirm that the conclusions of the ESIA are accurate, i.e. no changes to the predicted level of impacts on the marine biodiversity receptors.</p> <p>Collect additional pre-construction desktop baseline data including field data available from the other neighbouring windfarms: bats (OWF area) and prepare a supplementary biodiversity document to reflect on the results of the baseline collection.</p>	3 months prior to offshore construction	Additional biodiversity information package delivered to inform the BMP.
AP15	IFC PS 6 / EBRD PR 6	Marine Mammals – underwater noise	<ol style="list-style-type: none"> 1) Provide details of the remote Passive Acoustic Monitoring (rPAM) solution for marine mammal real-time monitoring. 2) Develop a standalone Marine Mammal Management Plan (MMMP) to set out the management responses in relation to marine mammals' exposure to underwater noise generated from the piling activities, which includes management zones for real-time monitoring for marine mammals in the mitigation zone prior to the commencement of soft-start, and monitoring and reporting protocols, including definitions of corrective actions. <p>The MMMP must demonstrate to the satisfaction of Lenders that the rPAM approach proposed by the Sponsors to real-time monitoring is feasible, else, provide a combination of trained marine mammal observer (MMO) and PAM operators on board a vessel to monitor for marine mammals who have the authority to delay soft-start until marine mammals are outside of the mitigation zone.</p> <ol style="list-style-type: none"> 3) One more construction noise monitoring station/hydrophone to be included within the marine mammal mitigation zone (<500 m from the foundation location), in addition to other the measurements locations specified in the Permits. 	3 months prior to offshore construction	<ol style="list-style-type: none"> 1) Details of the remote Passive Acoustic Monitoring (rPAM) solution. 2) Standalone Marine Mammals Management Plan (MMMP). 3) Evidence of installation of one additional construction noise monitoring station/hydrophone closer to the piling work, <500 m from the foundation location.
AP16	IFC PS 6 / EBRD PR 6	Biodiversity Management Plan	Finalise the Biodiversity Management Plan to ensure compliance with PS6/PR6 requirements in relation to the demonstration of the application of the Mitigation Hierarchy to manage biodiversity values in natural and critical habitats (include purpose and scope, roles and responsibilities, general description of management actions, and update the tabulated mitigation actions to group measures per subject, remove actions not relevant to biodiversity, detail each specific mitigation action including the detail over the monitoring and adaptation	<p>Version 1 of plan (onshore) to be ready prior to first disbursement</p> <p>Finalised BMP to the LIESC satisfaction - 3 month before construction.</p>	Finalised Biodiversity Management Plan.

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			<p>measures, means of verification and locations). The Plan must outline the actions, requirements, responsibilities and institutional accountabilities for biodiversity management measures established across the project and outline ongoing monitoring and evaluation for its implementation. The Plan must be reviewed and approved by the LIESC.</p> <p>Cover oil spill response for biodiversity in the BMP, or alternatively cover it in the ERP/s and make reference to these plan/s in the BMP.</p> <p>Provide commitment within the BMP to continue the operational monitoring of avifauna if deemed required.</p> <p>Clarify the spatial extent of the post-construction monitoring of avifauna for each of the phases.</p> <p>The BMP should provide the details on the automatic OWF (individual towers) shut-down system to mitigate bird collision risk (the system should be able to provide adequate spatial coverage and be able to operate during adverse weather conditions). The BMP should include details of the technical characteristics of the system: man-activated or completely automatic, triggers to activate (specific species, flock size, bird body size, etc), criteria for the system to shut down (thresholds for allowed collisions), and reporting details (scope of the reports and frequency).</p> <p>The BMP should have the finalised Invasive Alien Species Management Plan as an appendix.</p> <p>The BMP should provide details on the measures for marine mammals protection during the piling activities or make cross-reference to a standalone Marine Mammal Management Plan (MMMP) which sets out the Project's management responses in relation to marine mammals exposure to underwater noise generated from the piling activities.</p> <p>BMP to detail each specific mitigation action including the detail over the monitoring and establishment of baseline data around foundations selected for macro zoobenthos sampling.</p>		
AP17	IFC PS 6 / EBRD PR 6	Biodiversity Action Plan	Develop a full Biodiversity Action Plan (BAP) for the Project to demonstrate the Project strategy towards achievement of No Net Loss (in natural habitats) and Net Gain (in critical habitats) and promote and enhance the conservation aims of the areas of all legally protected/internationally recognised areas located within the Project footprint including but not limited to residual impact assessment, NNL/NG targets calculation, NNL/NG strategy/options, stakeholder engagement, budget for NNL/NG delivery, Biodiversity Monitoring and Evaluation Programme (BMEP) to monitor NNL/NG progress delivery, BAP implementation schedule.	Full BAP – 1 month prior to commencement of the construction works	Biodiversity Action Plan.
AP18	IFC PS 1 / EBRD PR 1	Decommissioning Plan	Decommissioning Plan in line with National and EU requirements and industry best practice. Plan to be updated every 10 years and then 5 years before actual decommissioning.	End of 2029 (first version)	Decommissioning Plan produced and then periodically updated.
AP19	IFC PS10 / EBRD PR 10	Stakeholder Engagement Plan	<p>Prepare, disclose, and implement the Stakeholder Engagement Plan (SEP) on a continuous basis and disclose/report on key engagement activities including the status of grievance handling. SEP should include ESIA disclosure plan and its results.</p> <p>Dedicated Community Liaison Officer assigned to implement SEP and handle grievances from key stakeholders.</p>	SEP confirmed to be up to date by the LIESC on a yearly basis	<p>LIESC monitoring report(s).</p> <p>Organisation Chart.</p>

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				CLO assigned prior to the start of works	

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