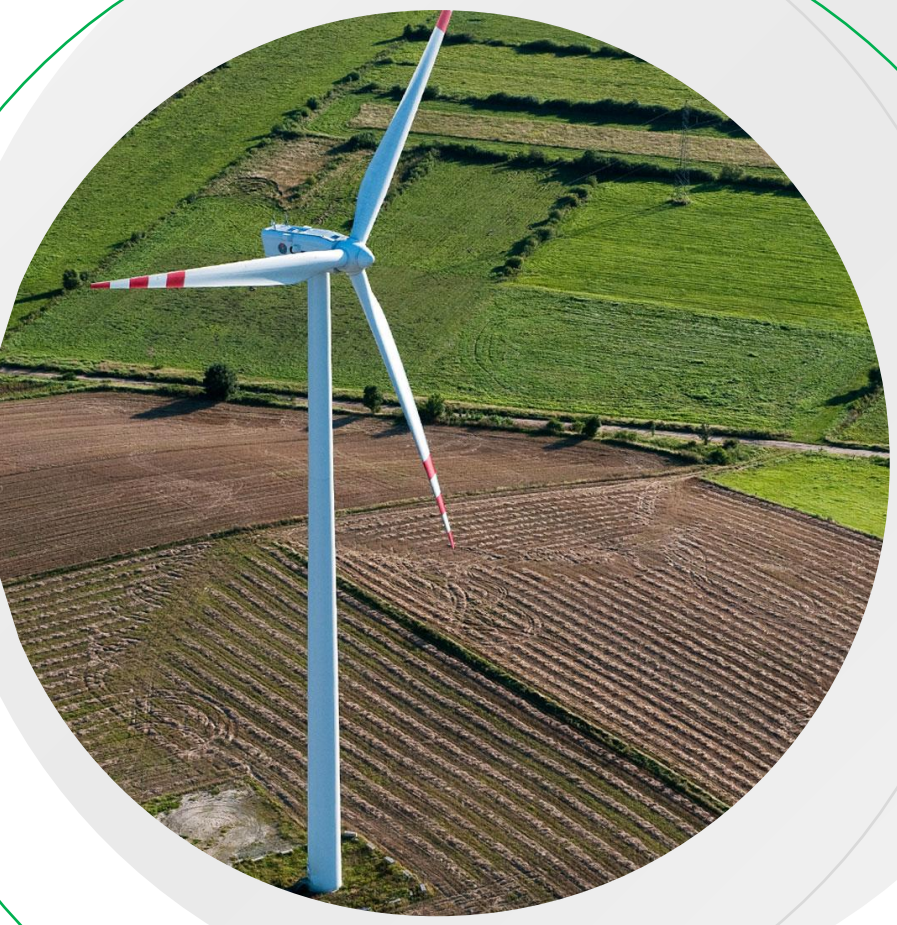
ANNUAL REPORT 2022

Environment, Health & Safety and CSR



Polenergia

TABLE OF CONTENTS

1. INTRODUCTION

1.1 About Polenergia Group

The Group operates in the energy sector. The essence of the Group's operation lies in its holding structure, in which the Company acts as a dominating company, manages the individual special purpose vehicles and provides them with operational, administrative, legal, HR as well as financial and accounting service.

Current operation of the Group includes the following core areas of business:

- energy production by the on-shore wind farms and photovoltaic farms;
- off-shore wind farms;
- gas and clean fuels, including hydrogen technologies;
- distribution and electromobility; and
- trading and sales.

The new directions of strategic development of the Group include development of hydrogen investments, energy recovery from other products, other innovation in the energy sector and potential expansion onto the foreign markets.

At present, the Group's operation covers the entire territory of Poland, with a focus on locations of the highest energy capacity i.e. extraordinary wind load factor (for wind farms) or insolation (for solar farms) conditions and relatively low connection costs as well as, in the field of energy trading, certain foreign markets. The Group's operation is synergistically integrated and optimized, which enables maximization of revenues and reduction of operating expenses.
Mission of the Group involves active support of transformation of the Polish energy market by development of low-carbon economy, clean and renewable energy sources and pursuing towards achievement of climate neutrality in the EU in 2050.

1.2 Purpose and Scope of the Report

This Report has been prepared to present to Polenergia Management Board and the Creditors the status of projects in operation and under construction and development as well as matters relating to health and safety and the level of completion of tasks set by the Stakeholder Engagement Plans (SEP) and Environmental and Social Action Plans (ESAP). In line with the expectations of both Polenergia Management Board and the Creditors, the Report presents:

- General information about the Group's assets;
- Information on the Group's overall environmental performance;
- A summary of all areas of material environmental non-compliance or material breach of permits;
- Information on any significant fines or other penalties or pending proceedings related to environmental and/or health and safety matters;
- General information on the implementation of Environmental and Social Action Plans and on any new projects or changes to planned projects;
- Summary of all significant regulatory changes related to environmental or social aspects;

- Information on all changes to Natura 2000 sites or Important Bird Areas affecting Polenergia wind farms (under development, under construction or at the planning stage);
- Information on new projects, status of environmental impact assessment (EIA) procedures and public consultations;
- Information on the level of implementation of tasks set by Stakeholder Engagement Plans (SEPs) and Environmental and Social Action Plans (ESAPs).

2. CURRENT STATUS OF THE PROJECTS/OPERATION OF THE POLENERGIA GROUP

2.1 PROJECTS IN OPERATION

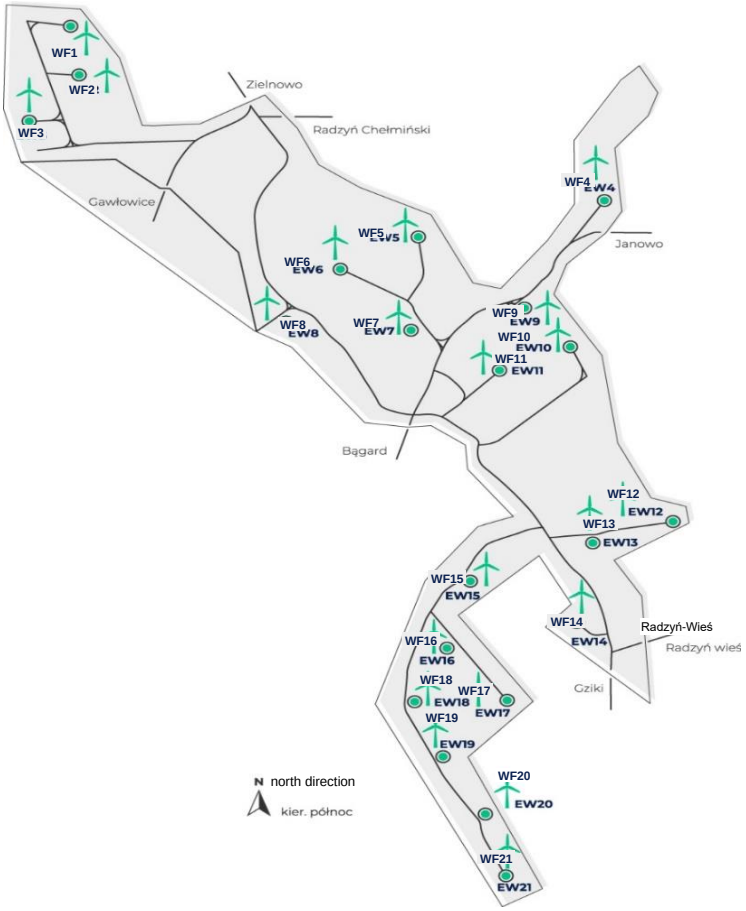
2.1.1 GAWŁOWICE WIND FARM

Location and description of the project

Gawłowice Wind Farm (Polenergia Farma Wiatrowa 1 Sp. z o.o.) is located in Radzyń Chełmiński Town and Municipality, Grudziądz Poviat, Kuyavian-Pomeranian Voivodeship. The construction works carried out in two stages were completed in 2015.

The configuration of Gawłowice WF includes 18 Siemens SWT- 2.3 - 108 wind turbines with tower height of 115 m and rotor diameter of 108 m, a main electrical substation, underground transmission line infrastructure, as well as access roads to each turbine. In 2015, the farm was expanded by 3 more turbines of this type, increasing its capacity to 48.3 MW.

The owner of Gawłowice WF is Polenergia Farma Wiatrowa 1 Sp. z o.o., a special purpose vehicle owned in 100% by Polenergia Group.



Environmental permits

Gawłowice WF has all necessary permits to operate in compliance with environmental regulations.

In effect of the performed EIA procedure , the investor obtained the relevant environmental decision for Gawłowice WF no. 3/2009 issued on 12.11.2009 by the Mayor of Radzyń Chełmiński Town and Municipality.

Polenergia Farma Wiatrowa 1 Sp. z o.o. company was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 was submitted by the end of February 2023.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Ex-post monitoring

Bird and bat surveys after the construction of the turbines took place in 2015, 2016 and 2018 and the survey reports, after the data were collected and analysed, were submitted to the competent administrative authorities each time. The monitoring demonstrated that the wind farm has no negative effects on bats and birds. The mortality taking into account the scavenger test results is 1.28 specimen/MW/year. Local communities (consultation point in the municipality or commune) and the Regional Directorate for Environmental Protection were informed about the performed monitoring activities and their results. In 2019, the final monitoring reports were submitted to the Regional Directorate for Environmental Protection for analysis and approval. In July 2019, the Director of Regional Directorate for Environmental Protection in Bydgoszcz confirmed no significant negative impact of the investment on ornithofauna and chiropterofauna and compliance with the conditions set out in the decision on environmental conditions and guidelines.

Pursuant to the environmental decision, the first ex-post noise measurements were carried out in November 2014 and in the period of February - March 2015. The measurements were performed by the certified contractor, EKO-POMIAR. Based on the results, no exceedances were recorded either during the day or at night. In January 2016 (within the required period of 18 months from the start-up of the WF), the results of the above-mentioned noise analysis were submitted to the competent authorities, i.e.:

- • the Voivodeship Inspectorate for Environmental Protection in Torun (WIOS);
- • the Regional Directorate for Environmental Protection in Bydgoszcz (RDOS);
- • the State Poviat Sanitary Inspectorate in Grudziądz (SANEPID);
- • the Poviat Starost in Grudziądz;
- • the Mayor of Radzyń Chełmiński Town and Municipality.

Management of hazardous substances

There are small quantities of hazardous substances on the premises of Gawłowice WF. All containers and packaging with hazardous substances are stored in a locked room accessible only to authorised persons. All hazardous substances are stored on drip trays.

There are no underground or aboveground tanks for hazardous substances on Gawłowice WF site.

Waste management

Siemens Gamesa Renewable Energy Sp. z o.o. (hereinafter referred to as SGRE) is responsible for waste management with regard to waste generated during turbine servicing on the premises of Gawłowice WF under the servicing agreement with Polenergia Farma Wiatrowa 1 Sp. z o.o. SGRE has its own waste storage facility where waste is pre-stored until it is transferred to specialised units holding the required permits for the disposal of recyclable or disposable waste.

Waste from maintenance works is not stored at the area of Gawłowice WF. It is immediately disposed of in accordance with the regulations in force by the entities servicing the facility.

Water and waste water management

Gawłowice WF is supplied with water from the Municipality water supply system based on a contract with the supplier. Settlements are carried out every six months based on consumption.

Domestic waste water generated at Gawłowice WF is discharged into a septic tank. The tank is emptied, if necessary, by an authorised company.

At Gawłowice WF, there is a petroleum products separator, which is subject to regular technical inspections and cleaning. The above-mentioned works are performed by an authorised company.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Gawłowice WF.

There are four air conditioners in the substation area (three Fujitsu AOYG18LFC air conditioners - switch room one Fujitsu AOYG30LFC air conditioner - control room), and each of them contains less than 3 kg of R410A refrigerant. In addition, there are 21 units containing more than 3 kg of SF6 gas at Gawłowice WF. Installations above 6 kg of SF6 gas have the Records in the CRO system: The installations are controlled and no compromise in their integrity was revealed in 2022.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan

Implementation of the corporate Environmental and Social Action Plan (ESAP) and implementation of the procedure for reviewing environmental impact assessment reports.

The Company implemented the corporate ESAP.

EIA report was prepared by highly qualified and experienced subcontractors. The results were reviewed by Polenergia's internal Environmental and Sustainability Department. In addition, prior to the financing of the project by the creditors, the project was reviewed by an independent consulting firm under the ESDD process for compliance with best practices, both Polish and EU. If any non-compliances are identified, they are listed and further addressed within the action plans dedicated to the project.

Conducting ex post noise measurements as required by the decision on environmental conditions.

The Gawłowice WF was put into operation in the 4Q 2014. Pursuant to the environmental decision, the ex-post noise measurements were carried out in November 2014 and in the period of February - March 2015. The measurements were performed by the certified subcontractor, EKO-POMIAR. Based on the obtained results, no exceedances were recorded either during the day or at night. In January

2016, i.e. within the required period of 18 months from the start-up of the WF, the results of the above-mentioned noise analysis were submitted to the competent authorities, i.e.:

- the Voivodeship Inspector for Environmental Protection in Torun (WIOS);
- the Regional Directorate for Environmental Protection in Bydgoszcz (RDOS);
- the State Poviat Sanitary Inspectorate in Grudziądz (SANEPID);
- the Poviat Starost Office in Grudziądz;
- the Mayor of Radzyń Chełmiński Town and Municipality.

In 2015, the farm was extended by 3 more turbines; as a result, in March 2016, another round of ex post noise measurements was carried out for all 21 turbines of Gawłowice WF. Based on the obtained results, no exceedances were recorded either during the day or at night. On 30 March 2016, the results of the noise analysis were submitted to the Regional Directorate for Environmental Protection in Bydgoszcz (RDOŚ), which did not submit any comments (document No. WOO.401.16.2016.JM of 22 April 2016).

Conducting ex post ornithological and chiropterological monitoring as required by the decision on environmental conditions.

Bird and bat surveys after the construction of the turbines took place in 2015, 2016 and 2018 and the survey reports, after the data were collected and analysed, were submitted to the competent administrative authorities each time. The monitoring showed that the wind farm does not have a negative impact on birds and bats, the breeding avifauna population on its area is medium-sized and the number of breeding bird species has remained at a similar level since the wind farm's construction. Local communities (consultation point in the municipality or commune) and the Regional Directorate for Environmental Protection were informed about each year of the monitoring and its results. The last yearlong monitoring cycle took place in 2018; again, the surveys demonstrated no increase in mortality. In 2019, the final monitoring reports were submitted to the Regional Directorate for Environmental Protection for analysis and approval. In July 2019, the Director of Regional Directorate for Environmental Protection in Bydgoszcz accepted the documents received, stating that there was no significant negative impact of the investment on ornithofauna and chiropterofauna and compliance with the conditions set out in the decision on environmental conditions and guidelines.

Preparation and implementation of a tree planting plan as a compensatory measure.

On 17 June 2013, the Voit of Radzyń Chełmiński Town and Municipality issued the Decision (document ref. No. RGŚ.6131.31.1.2013.JK) permitting to remove trees for the purposes of construction of Gawłowice WF. The Decision required the replacement planting of 121 trees. In order to meet the above-mentioned obligation, in October 2013 the company planted in total 139 trees, which was documented in the final report submitted by the subcontractor (Dekorativ). The report on the replacement plantings was submitted to the Voit of Radzyń Chełmiński Town and Municipality and the Poviat Road Authority.

Conducting regular (every 3 years) environmental audits of wind farms, reporting to creditors.

Polenergia S.A. conducts regular environmental audits (once a year). The implemented corrective measures are presented as a part of an annual report for the financing institutions and in the ESG report published on the official website of the Company: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-gawlowice/

The results of the audits are presented to the Creditors in the form of an Annual Report. This includes the implementation of an health, safety and environment management system such as ISO 14000 and OHSAS 18000 and a stakeholder engagement plan for Gawłowice WF project.

A stakeholder engagement plan was developed and implemented for Gawłowice WF.

Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. As it is the case with all Polenergia Group facilities, Gawłowice WF is subject to regular health and safety inspections and audits. During an inspection conducted in 2016, health and safety procedures and guidelines were reviewed. A health and safety management system audit was carried out in 2018. All follow-up recommendations have been implemented.

In addition, the facilities are regularly inspected in terms of health and safety (the last inspection at Gawłowice WF was conducted in 2022). It did not reveal any major irregularities. All minor concerns were resolved within a week of the inspection.

Implementation of the Stakeholder Engagement Plan and publication of the general environmental information relating to the project and the company, including the non-technical summary, the environmental and social action plan, the stakeholder engagement plan and other project-related documents.

A stakeholder engagement plan was developed and implemented for Gawłowice WF. General environmental information about the project was published online at https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-gawlowice/. In addition, the Project information is published on the official website of EBRD.

Submission of annual environmental, social and health and safety reports to EBRD and other creditors (if the loan was granted by a consortium). Posting a short summary of environmental and social matters on the website.

Annual environmental audits are conducted for both internal and external purposes. Audit results are presented in the form of an Annual Report.

The annual Corporate Social Responsibility Reports prepared in 2015-2019 addressed among others the environmental and social issues related to the annual operations of Gawłowice WF. Since 2020, data are presented in the form of report published on the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-gawlowice/

Implementation of a grievance procedure in the course of implementation of the Stakeholder Engagement Plan, as required by the EBRD.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Gawłowice WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-gawlowice/

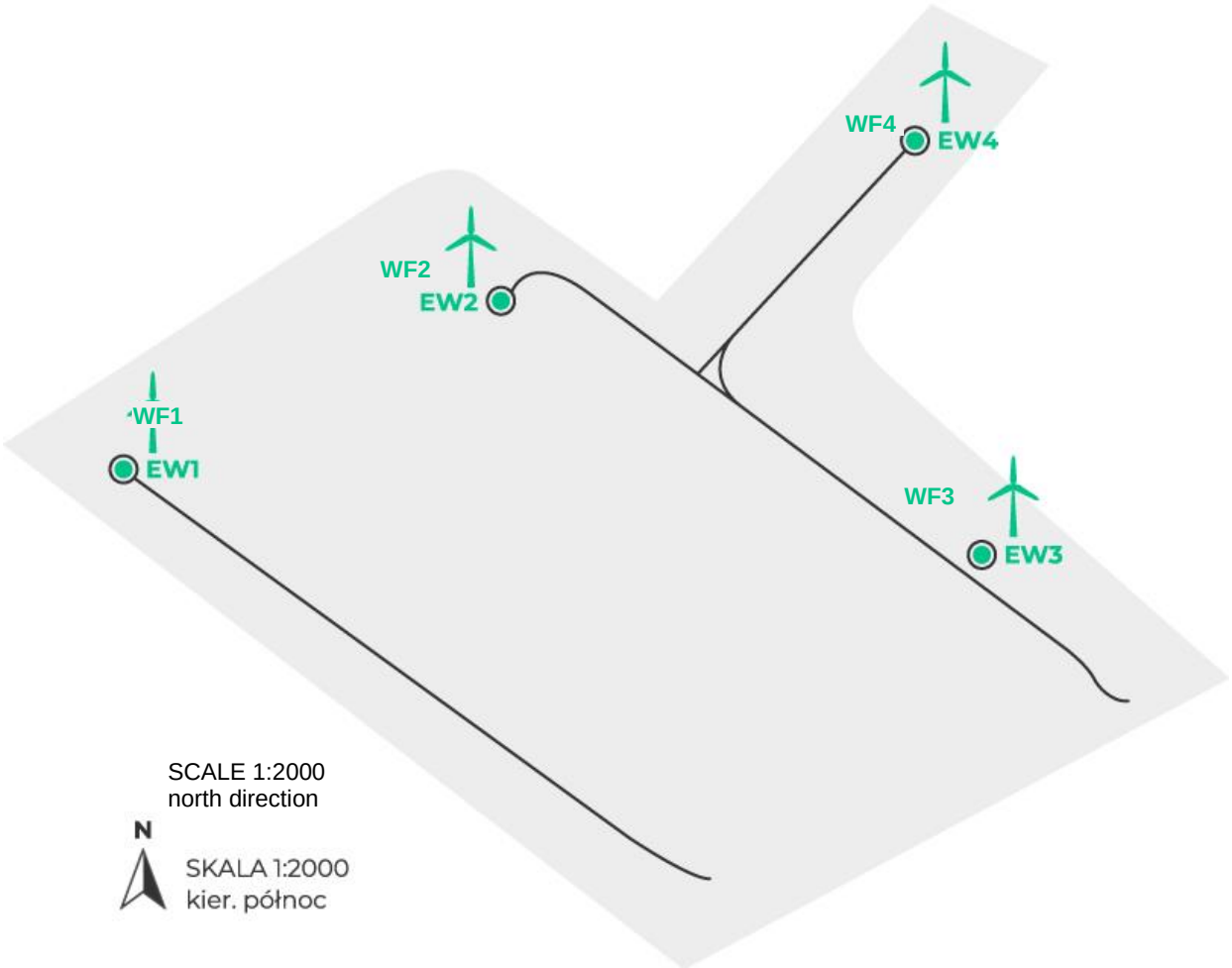
The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

2.1.2 KRZĘCIN WIND FARM

Location and description of the project

Krzęcin Wind Farm (Polenergia Farma Wiatrowa 23 Sp. z o.o.) is located in Krzęcin Commune, Choszczno Poviat, Western Pomeranian Voivodeship. Krzęcin WF consists of 4 Nordex S77 turbines, each 80 m high and with rotor diameter of 77 m. Total capacity of Krzęcin WF is 6 MW.

Krzęcin WF was built in 2010 and since 2018 it is owned by Polenergia Farma Wiatrowa 23 Sp. z o.o., a special purpose vehicle 100% owned by Polenergia Group. Krzęcin WF does not have its own substation; it is connected to the 110/15 kV Krzęcin main electrical substation owned by a third party operator (ENEA Operator Sp. z o.o.).



Environmental permits

Krzęcin WF has all necessary permits to operate in compliance with environmental regulations.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Ex-post monitoring

Pursuant to the environmental decision, during the operation phase, the facility operator was obliged to carry out ex-post monitoring with regard to noise measurements and ornithological and chiropterological monitoring:

In accordance with the decision, noise measurements were to be carried out in the nearest acoustically protected areas (villages of Krzęcin and Słonice). The measurement was to be conducted within 30 days from the date of completion of the start-up of Krzęcin WF, and in the event of exceeding the permissible level, measures were to be taken to limit its emission;

Noise measurements were carried out at the boundaries of the nearest acoustically protected areas in accordance with the Ordinance of the Minister of Environment of 14 June 2007 on permissible noise levels in the environment (executive act in force at the time of the noise measurements) and in accordance with Appendix No. 6 to the Ordinance of the Minister of Environment of 4 November 2008 on the requirements for carrying out measurements of emissions and of the quantity of used water. On the basis of the conducted measurements, permissible noise levels were not exceeded at any measurement point, therefore the operator took no measures to reduce the acoustic power of the facility ("Measurements and analysis of noise from operation of the wind farm near Krzęcin (4 Sudwind S77/77/1500 wind turbines, 1.5 MW each" Laboratorium Eko-Pomiar s.c. Z. Zagubień, R. Ingielewicz, September 2010).

In terms of ex-post monitoring of birds and mammals, the decision sets out the obligations of the operator: in the course of project implementation, as well as after its completion, monitoring of bird and mammal migration should be carried out, and if any negative impact of the investment on this animals is identified, the protective measures should be taken. All collision casualties (birds) should be reported.

In accordance with the environmental decision on environmental monitoring, the operator started the ex post monitoring in 2009. According to the ex-post surveys, the naturalists conducting the environmental inventory did not find any negative impact on birds and bats ("Result of yearlong monitoring within the area of Krzęcin Wind Farm, Western Pomeranian Voivodeship, Krzęcin Commune, with regard to birds and bats", Szczecin, October 2011). According to the ex post studies, naturalists found:

- no collisions of bats and birds with wind turbines during the monitoring period;
- no limitation of natural resources of the analysed Krzęcin WF area in comparison with analyses carried out based on a similar observation pattern with regard to other projects;
- no adverse impact on other observed animals (including amphibians and mammals - wild boars, roe deer, which regularly feed and live near the turbines) and vertebrate fauna;
- Krzęcin WF is not a barrier for ornithofauna migration;
- Krzęcin WF area does not constitute an important breeding site for birds from Annex I of the Birds Directive; such species are rare and the area is sometimes used by numerous and common species.

Management of hazardous substances

No hazardous substances are stored or pre-stored at Krzęcin WF and there are no underground or aboveground tanks for hazardous substances.

Waste management

Waste is managed by a third party provider (Nordex). The waste collecting entity was verified and holds all necessary licences and permits. Waste (including hazardous waste oils and detergents) is not stored on the premises of Krzęcin WF, it is transported by the service provider to a preliminary waste storage site. For waste produced in Western Pomeranian Voivodeship, Nordex Polska Sp. z o.o. prepares a summarised form presenting data compilation on the types and quantities of waste in the Waste Database (BDO) system, which it reports jointly for all produced waste to the competent Marshall Office by 15 March each year for the previous calendar year.

Water and waste water management

Krzęcin WF is not connected to the municipal water supply or sewage system. Rainwater and snowmelt is directed to unpaved areas.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Krzęcin WF.

At the area of Krzęcin WF there is no equipment containing more than 6 kg of SF6 gases.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Krzęcin WF

Krzęcin WF was acquired in 2018 by Polenergia Farma Wiatrowa 23 Sp. z o.o., a special purpose vehicle 100% owned by Polenergia Group. Prior to the acquisition, Krzęcin WF underwent due diligence.

The above-mentioned analysis did not reveal any significant environmental non-compliance.

In addition, the Krzęcin Wind Farm is inspected on annual basis with a view to compliance with health and safety rules. The latest review of compliance with the H&S rules was carried out in 2022 and demonstrated no major non-compliances.

The description of measures taken is published in the annual Corporate Social Responsibility Reports prepared in 2015-2019 addressing among others the environmental and social issues related to the annual operations of Krzęcin WF. Since 2020, data are presented in the form of report published on the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-krzecin/

Implementation of the complaint examination procedure at Krzęcin WF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Krzęcin WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-krzecin/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 23, respectively).

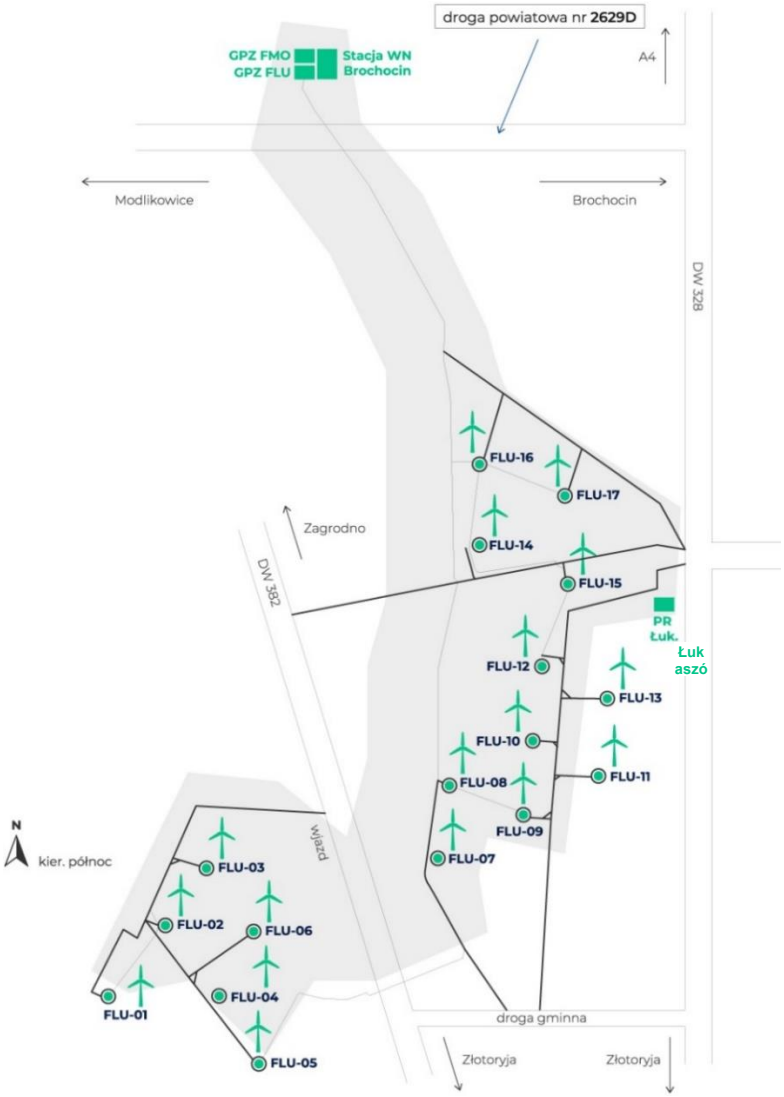
No environmental penalties were imposed on Krzęcin WF in 2022.

2.1.3 ŁUKASZÓW WIND FARM

Location and description of the project

Łukaszów Wind Farm is located in Zagrodno Commune, Złotoryja Poviat, Lower Silesian Voivodeship. The Łukaszów WF was put into operation at the early 2012 . The Łukaszów WF consists in 17 Vestas V90-2.0 MW turbines. Total capacity of Łukaszów WF is 34 MW. The Łukaszów WF has a SN/110 kV transformer station located on plot No. 480, Modlikowice section, Zagrodno Commune.

The farm is owned by Amon Sp. z o.o., a special purpose vehicle 100% owned by Polenergia S.A.



Environmental permits

FW Łukaszów WF has all necessary permits to operate in compliance with environmental regulations. In effect of the performed EIA procedure, the investor obtained the relevant environmental decision for the Łukaszów WF no. 5/08 case ref. no. 7624-2/2008 of 28-08-2008 issued by the Voit of Zagrodno Commune.

Amon Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 was submitted by the end of February 2023.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Ex-post monitoring

A three-year study of birds and bats at Łukaszów WF began in March 2012. In the course of the ex post monitoring, the PWEA guidelines (Guidelines for Assessing the Impact of Wind Farms on Birds, Warsaw 2011) were followed with respect to the number of inspections in respective phenological periods, the distribution of points and transects and the timing of individual inspections at the points.

Monitoring in each year (2012/2013, 2013/2014 and 2014/2015) was carried out in line with the rules established in 2012 that is with minor changes of monitoring points and route and length of transects. Ex post monitoring was conducted jointly for the Łukaszów and Modlikowice WFs due to the cumulative effect of both projects. The cumulative effect was reflected both in the ex post ornithological and chiropterological reports and in the ex post noise analysis report. The results presented below refer to both wind farms.

Ex post monitoring, conducted between 2012 and 2015, did not show any negative impact on birds. Annual reports summarising each stage of research were sent to competent authorities as required by the decision on environmental conditions.

During the ex-ante monitoring, the presence of golden plover *Pluvialis apricaria*, a species previously absent in Lower Silesia, was recorded. With regard to this fact, the contract for three-year species monitoring was signed in order to identify the potential impact of Wind Farm on species flights. The performed monitoring revealed that the golden plover avoids the area of Wind Farm and has no collisions with the wind turbines.

In 2014, birdwatching ornithologists as part of ex post monitoring found Montagu's harrier nests at the wind farm, so Polenergia launched an active protection programme for this rare species of the Accipitridae family. Between 2014 and 2022, 87 chicks that have left the nests were rescued and ringed. Thus Amon joined the action of active protection of this bird in Poland, under the patronage of the Ministry of Climate and Environment and the General Directorate for Environmental Protection. It is one of the Polenergia Group's efforts aimed at increasing biodiversity.

Łukaszów WF was put into operation in Q1 2012. Pursuant to Decision No. 73/2011 of 20 December 2011 (operating permit), the obligation to carry out noise measurements and submit the results to the authorities by 10 October 2012 was imposed. Therefore, the ex post noise measurements were carried out in March 2012. The measurements were carried out by a certified subcontractor, BMT Polska. Based on the results, no exceedances were recorded either during the day or at night. the results of the above-mentioned noise analysis were submitted to the competent authorities, i.e.:

- the Voivodeship Inspectorate for Environmental Protection in Legnica (WIOŚ);
- the Poviat Sanitary Inspectorate in Złotoryja (SANEPID);
- the Poviat Starost in Złotoryja;

- the Zagrodno Commune Office.

Management of hazardous substances

There are small quantities of hazardous substances on the premises of Łukaszów WF. All containers and packaging with hazardous substances are stored in a locked tin container accessible only to authorised persons. All hazardous substances are stored on drip trays.

There are no underground or aboveground tanks for hazardous substances on Łukaszów WF site.

Waste management

Siemens Gamesa Renewable Energy Sp. z o.o. is responsible for waste management with regard to waste generated during turbine servicing on the premises of Łukaszów WF under the servicing agreement with Amon Sp. z o.o. SGRE pre-stores waste its own waste storage facility until it is transferred to specialised units holding the required permits for the disposal of recyclable or disposable waste.

Waste from servicing works is not preliminarily stored at Łukaszów WF and it is immediately disposed of in accordance with the regulations in force by the entities servicing the facility.

Water and waste water management

Łukaszów WF is not connected to the municipal water supply or sewage system.

At Łukaszów WF, there is a PSK Koala II oil separator, which is subject to regular technical inspections and cleaning. The last inspection took place in December 2022. The above-mentioned works are carried out by an authorised company, i.e. PPHU EKOPROD, which is responsible for the disposal and treatment of waste from the separator. Based on the information presented in the report, the equipment is in good technical condition. Rainwater and snowmelt, after being pre-treated in the separator, is discharged into ditches, in accordance with the provisions of the water permit (Decision No. RS.6341.20.2014).

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Łukaszów WF.

In accordance with the law, equipment containing more than 6 kg of SF6 must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are three AUX air conditioners in the substation, each containing 0.78 kg of R410A refrigerant. In addition, there are six units (5 ABB 20 kV switchgear units and an ABB HV circuit breaker) containing more than 3 kg of SF6 gas. None of the units and air conditioners was disintegrated and required adding the refrigerant (air conditioners) during the inspectors.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan

The Amon Sp. z o.o. company managing the Wind Farm is 100% owned by the Polenergia Group. The Company is committed to implement the good practices and their further compliance at the Łukaszów WF operation stage.

The Talia Sp. z o.o. company managing the Wind Farm is 100% owned by the Polenergia Group. The Company is committed to implement the good practices and their further compliance at the Modlikowice WF operation stage.

The Łukaszów Wind Farm is inspected on annual basis with a view to compliance with health and safety rules. The latest review of compliance with the H&S rules was carried out in 2022 and demonstrated no major non-compliances.

Implementation of the complaint examination procedure at Łukaszów WF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Łukaszów WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-lukaszow/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Amon Sp. z o.o.).

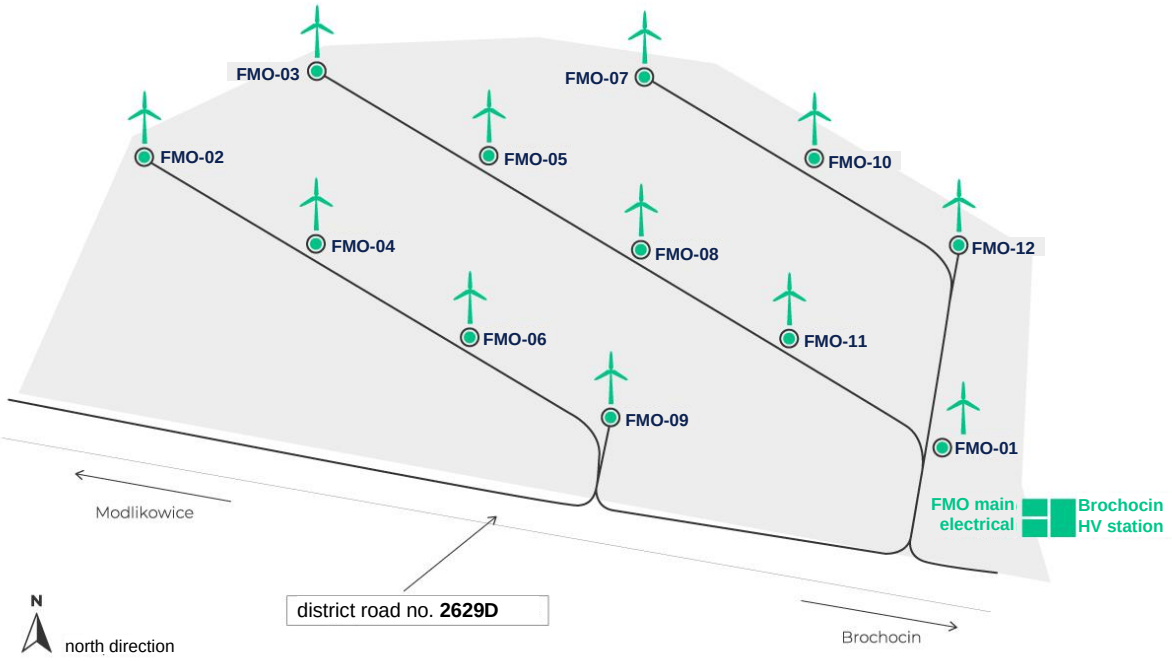
No environmental penalties were imposed on Łukaszów WF in 2022. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

2.1.4 MODLIKOWICE WIND FARM

Location and description of the project

Modlikowice Wind Farm is located in Zagrodno Commune, Złotoryja Poviat, Lower Silesian Voivodeship. Modlikowice WF was put into operation at the beginning of 2012 . Modlikowice WF consists of 12 Vestas V90-2.0 MW turbines, each 105 m high and with rotor diameter of 90 m. Total capacity of Modlikowice WF is 24 MW. Modlikowice WF is connected to the SN/110 kV transformer station located on plot No. 480, Modlikowice section, Zagrodno Commune.

The farm is owned by Talia Sp. z o.o., a special purpose vehicle 100% owned by the Polenergia Group.



Environmental permits

Modlikowice WF has all necessary permits to operate in compliance with environmental regulations.

Talia Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 was submitted by the end of February 2023.

No penalties were imposed on the company and no external inspection by a state administration authority was carried out on its premises in 2022.

Ex-post monitoring:

The Modlikowice Wind Farm has a joint monitoring system with the Łukaszów Wind Farm (joint/cumulative ex-post monitoring).

Management of hazardous substances

Most of the hazardous substances used at Modlikowice WF are stored at the main electrical substation of Łukaszów WF, in a locked tin container accessible only to authorised persons. All hazardous substances are stored on drip trays.

There are no underground or aboveground tanks for hazardous substances on Modlikowice WF site.

Waste management

Siemens Gamesa Renewable Energy Sp. z o.o. (hereinafter referred to as SGRE) is responsible for waste management with regard to waste generated during turbine servicing on the premises of Modlikowice WF under the servicing agreement with Talia Sp. z o.o. company. Moreover, municipal waste from the area of Modlikowice WF is collected free of charge by Amon Sp. z o.o., i.e. the owner of Łukaszów WF located next to it.

Water and waste water management

Modlikowice WF is not connected to the municipal water supply or sewage system.

At Modlikowice WF, there is a PSK Koala II oil separator, which is subject to regular technical inspections and cleaning. The last periodic inspection took place in 2022. The above-mentioned works are carried out by an authorised company, i.e. PPHU EKOPROD, which is responsible for the disposal and treatment of waste from the separator. Based on the information presented in the report, the equipment is in good technicalcondition.

Rainwater and snowmelt, after being pre-treated in the separator, is discharged into ditches, in accordance with the provisions of the water permit (Decision No. RS.6341.20.2014).

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Modlikowice WF.

In accordance with the law, equipment containing more than 6 kg of SF6 must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are three AUX air conditioners in the substation, each containing 0.78 kg of R410A refrigerant. In addition, there are six units (5 ABB 20kV switchgear units and an ABB HV circuit breaker) containing more than 3 kg of SF6 gas. None of the units and air conditioners was disintegrated and required adding the refrigerant (air conditioners) during the inspectors.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan

The Talia Sp. z o.o. company managing the Wind Farm is 100% owned by the Polenergia Group. The Company is committed to implement the good practices and their further compliance at the Modlikowice WF operation stage.

On 31 May 2016, the Modlikowice WF was entered into the Central Registry of Operators.

In 2017, during the ex-ante monitoring, the presence of Montagu's harrier was recorded. With regard to the above, the active protection measures consisting in protection of ground nests of Montagu's harriers have been carried out since 2018 on request of the Modlikowice WF. The activities are performed on an annual basis. The latest nest protection action was carried out in 2022. The Modlikowice WF receives each year a report on breeding success of birds nesting near the investment.

In addition, the Modlikowice Wind Farm is inspected on annual basis with a view to health and safety rules. The latest review of compliance with the H&S rules was carried out in 2022 and demonstrated no major non-compliances.

Implementation of the complaint examination procedure at Modlikowice WF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Modlikowice WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at:

https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-modlikowice/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Talia Sp. z o.o.).

No environmental penalties were imposed on Modlikowice WF in 2022. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

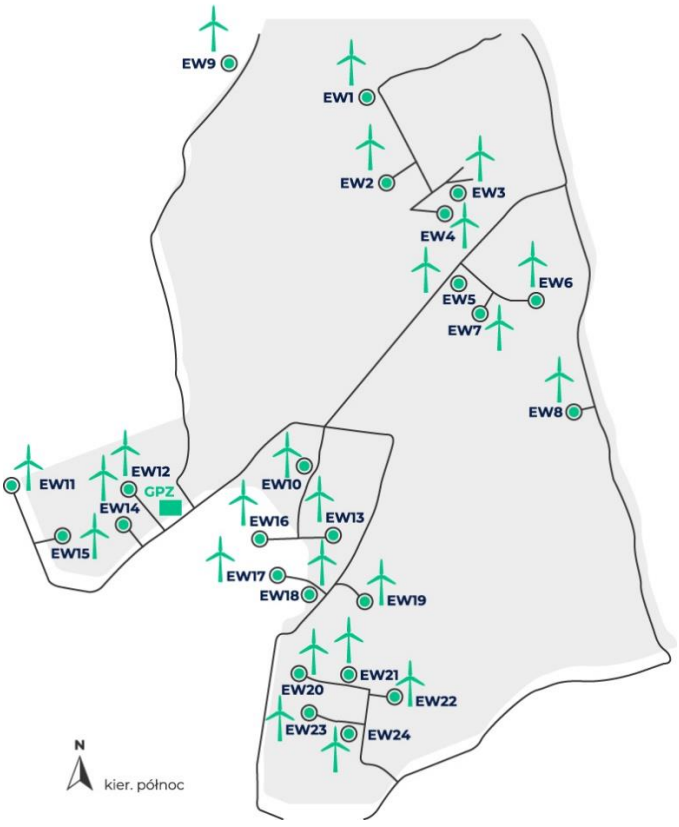
2.1.5 MYCIELIN WIND FARM

Location and description of the project

Mycielin Wind Farm (Polenergia Farma Wiatrowa Mycielin Sp. z o.o.) is located in the vicinity of the villages of Mycielin, Gościelin, Gościeszowice, Długie, Dzikowice and Sucha Dolna in the Communes of Niegosławice and Szprotawa, Żagań Poviat, Lubusz Voivodeship.

Mycielin WF was built in 2015 and received its operating permit in February 2016. It consists of 23 Vestas V110-2.0 MW turbines, each 125 m high and with rotor diameter of 110 m. Total installed capacity of the facility is 46 MW. Initially, Mycielin WF consisted of 24 turbines, but in April 2017 the tower structure of turbine EW3 broke and fell over.

The farm is operated by Polenergia Farma Wiatrowa Mycielin Sp. z o.o., a special purpose vehicle 100% owned by the Polenergia Group.



Environmental permits

TheMycielin WF holds all permits necessary to operate in compliance with the environmental protection laws. In effect of the performed EIA procedure the investor obtained the relevant environmental decision for the Rajgród WF no. WST.II .4242.21.2011.RŚ of 19.09.2011 issued by the Regional Directorate for Environmental Protection in Białystok.

Polenergia Farma Wiatrowa Mycielin Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 was submitted by the end of February 2023.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Ex-post monitoring

In 2016, ornithological and chiropterological surveys began, in accordance with the scope of ex-post monitoring agreed with the Regional Directorate for Environmental Protection in Gorzów Wielkopolski. The annual monitoring report was submitted to the Regional Directorate for Environmental Protection in 2017. The Regional Directorate for Environmental Protection did not submit any comments on the applied methodology and the manner the monitoring was carried out, and while accepting the results obtained in the first monitoring year it emphasised that the observed mortality levels for the Accipitriformes and the whole avifauna complex were relatively low, far from the threshold values determined on the basis of ex-ante monitoring. The next cycle of studies began in April 2018 and continued until the end of March 2019. On 24 July 2019, the Director of the Regional Directorate for Environmental Protection in Gorzów Wielkopolski accepted the submitted monitoring reports, stating compliance with the requirements of the decision on environmental conditions and indicating that no additional mitigating measures were necessary. The final, third year of monitoring began in April 2020 and ended in April 2021, covering the entire phenological cycle.

Taking into account the results of the ornithological inventory carried out in the 2018/2019 season, indicating the nesting of the red kite at a distance of approximately 450 m from the turbine (EW22) (not recorded during the ex-ante inventory and first years of ex-post impact analysis), an additional analytical module was introduced to the ex post monitoring. 2019 showed no red kite re-occupation of the nest found in the 2018/2019 season. Inspections at the wind farm did not reveal any collisions of representatives of that species since the beginning of the monitoring (April 2019). Monitoring of red kite was repeated in the last research cycle (2020/2021) and also neither collision nor direct risk was stated.

Mycielin WF was put into operation in Q1 2016. In accordance with the decision on environmental conditions, ex post noise measurements were carried out in August, September and November 2016. The measurements were carried out by a certified subcontractor, EKO-POMIAR. Based on the obtained results, no exceedances were recorded either during the day or at night. The results of the above-mentioned noise analysis were submitted to the competent authorities, i.e. the Voivodeship Inspectorate for Environmental Protection (WIOŚ) and the Municipality Office in Szprotawa in December 2016. There were no comments on the results from either WIOŚ or the local community, and no complaints from the local community about the noise were submitted. Furthermore, there was no need to implement any additional noise reduction programme.

Management of hazardous substances

No hazardous substances are stored or pre-stored at Mycielin WF and there are no underground or aboveground tanks for hazardous substances.

Waste management

Vestas is responsible for waste management with regard to waste generated during turbine servicing on the premises of Mycielin WF under the servicing agreement with Polenergia Farma Wiatrowa Mycielin Sp. z o.o. Vestas has its own waste storage facility where waste is stored until it is transferred to specialised units holding the required permits for the disposal of recyclable or disposable waste.

Municipal waste generated at Mycielin main electrical substation is collected on the basis of an agreement with an authorised entity. Other waste (e.g. from servicing) is collected directly after the service is provided by subcontractors. Subcontractors have been verified and they have all required permits.

Water and waste water management

Mycielin WF has its water supplied from a deep well based on the provisions of the water permit (document ref. No. ROŚiB.6341.20.2015). In accordance with permit requirements, the extracted water quantity is measured and recorded, and a report is sent to the National Water Management Holding Polish Waters every quarter. The permit imposes an obligation to carry out interim measurements of the water table and well performance. In addition, a water meter was installed in October 2020.

Domestic waste water generated at Mycielin WF is discharged into a septic tank. The tank is emptied, if necessary, by an authorised company.

Rainwater and snowmelt, after being treated in the separator, is discharged into the ground, in accordance with the provisions of the water permit (document ref. no. ROŚiB.6341.19.2014).

At Mycielin WF, there is a BundGuard 529724 oil separator with two oil sumps, which is subject to regular technical inspections and cleaning. In 2022, the separator was subject to periodic technical and construction inspections. The above-mentioned works are performed by an authorised company, i.e. Ekos Poznań Sp. z o.o. Based on the information presented in the report, the equipment is in good technical condition.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Mycielin WF.

In accordance with the law, equipment containing more than 6 kg of refrigerant must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are three LG air conditioners at the substation. In addition, there are 38 units (Schneider 30 kV switchgear units and ABB HV circuit breakers) at Mycielin WF that contain more than 3 kg of SF6 gas. As required, the report for the National Centre for Emissions Management (KOBIZE) National Database for 2022 was submitted by the end of February 2023.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Mycielin Wind Farm.

Implementation of the corporate Environmental and Social Action Plan (ESAP) agreed with Polenergia S.A., which also includes the requirement to develop and maintain an health, safety and environment management system and establish a management structure for health, safety and environment issues at the company level.

The ESAP agreed with Polenergia S.A. was introduced t the investment implementation stage. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified.

As it is the case with other Polenergia Group facilities, Mycielin WF is subject to regular health and safety inspections and audits. During an inspection conducted in 2016, the health and safety procedures and guidelines were reviewed. A health and safety management system audit was carried out in 2018. All follow-up recommendations have been implemented.

In addition, the Mycielin Wind Farm is inspected on annual basis with a view to compliance with health and safety rules. The latest review was carried out in 2022 and demonstrated no major non-compliances.

Development and implementation of a Corporate Social Responsibility programme and presentation of a CSR report in accordance with GRI guidelines.

The Corporate Social Responsibility Report is prepared annually and published on the website. The Corporate Social Responsibility Programme and reporting compliant with the CSR GRI were launched in 20215 and have been continued. Since 2020, data have been presented in the form of report published on the ESG website : https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-mycielin/

Conducting ex post noise measurements in accordance with the corporate ESAP. If possible, scheduling measurements for the winter period with snow cover. Development and implementation of a noise mitigation programme if necessary.

Mycielin WF was put into operation in Q1 2016. In accordance with the decision on environmental conditions, ex-post noise measurements were carried out in August, September and November 2016. The measurements were carried out by a certified subcontractor, EKO-POMIAR. Based on the obtained results, no exceedances were recorded either during the day or at night. The results of the above-mentioned noise analysis were submitted to the competent authorities, i.e. the Voivodeship Inspectorate for Environmental Protection (WIOŚ) and the Municipality Office in Szprotawa in December 2016. The parties, i.e. WIOŚ and the local community, did not submit any complaints or comments regarding the performed noise analysis and its results. Furthermore, there was no need to implement any additional noise reduction programme.

Conducting ex post monitoring of birds and bats. At minimum, application of the methodology set out in the decisions on environmental conditions, as well as the methodology of BirdLife (international non-governmental organisation for the protection of birds and their habitats) /OTOP (Polish Society for the Protection of Birds) and EUROBATS (Agreement on the Conservation of Populations of European Bats).

In 2016, ornithological and chiropterological studies began, in accordance with the scope of ex post monitoring agreed with the Regional Directorate for Environmental Protection in Gorzów Wielkopolski. The annual monitoring report was submitted to the Regional Directorate for Environmental Protection in 2017. The authority did not submit any comments on the applied methodology and the manner the monitoring was carried out. When approving the results obtained in the first monitoring year, the authority emphasised that the observed mortality levels for birds of prey and the whole avifauna were relatively low, far from the threshold values determined on the basis of ex ante monitoring. The next cycle of studies began in April 2018 and continued until the end of March 2019. On 24 July 2019, the Director of the Regional Directorate for Environmental Protection in Gorzów Wielkopolski approved the submitted monitoring reports, stating compliance with the requirements of the environmental decisions and indicating that no additional mitigating measures were necessary. The final, third, year of monitoring began in April 2020 and ended in April 2021, covering the entire phenological cycle. On 16 July 2021, the Regional Directorate for Environmental Protection in Gorzów Wielkopolski approved by the letter no. WPN-I.6011.2.2021.DJ1 the submitted ex-post reports and confirmed the compliance of their performance with the requirements of the decisions on environmental conditions.

Preparation and implementation of a tree planting plan as a compensatory measure.

In February 2015, the Voit of Niegosławice Municipality issued a Decision (document ref. No. RTG.OŚIPP.6131.02.2015) permitting the removal of four trees for the purposes of construction of Mycielin WF. The Decision required the replacement planting of 12 trees. In order to meet the above-mentioned obligation, in April 2015 the company planted in total 12 trees, which was documented in the final report submitted by the subcontractor who carried out the planting.

While implementing the provisions of Article 552 of the Water Law Act, in 2022 the 3 reports on groundwater use were submitted to the Basin Management in Lwówek Śląski.

Placing warning signs at an appropriate distance on the access roads to individual turbines. Placing, in agreement with the road manager, information boards on Dworcowy Przysiółek-Dzikowice and Niegosławice-Mycielin (Mycielin WF) roads.

Following the completion of the construction phase, new warning signs were placed in accordance with ESAP requirements and Polenergia's health and safety Policy. Dedicated warning signs were placed along the road to all Mycielin WF turbines. Below are photos of the signs:

Conducting regular (every 3 years) environmental audits of wind farms, reporting to creditors.

Polenergia S.A. conducts regular environmental audits (once a year). The implemented corrective measures are presented as a part of an annual report for the financing institutions and in the ESG report published on the official website of the Company: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wytworcze/fw-mycielin/

The results of the audits are presented to the Creditors in the form of an Annual Report. This includes the implementation of an health, safety and environment management system such as ISO 14000 and OHSAS 18000 and a stakeholder engagement plan for Mycielin WF project.

A stakeholder engagement plan was developed and implemented for Mycielin WF. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified.

Implementation of the Stakeholder Engagement Plan and publication of the general environmental information relating to the project and the company, including the non-technical summary, the environmental and social action plan, the stakeholder engagement plan and other project-related documents.

A stakeholder engagement plan was developed and implemented for Mycielin WF. General environmental information about the project was published online at https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-mycielin/. In addition, information about the project was published on EBRD website at https://www.ebrd.com/work-with-us/projects/psd/polenergia-wind-portfolio.html**.**

Submission of annual environmental, social and health and safety reports to EBRD and creditors (if the loan was granted by a consortium). Posting a short summary of environmental and social matters on the website.

Annual environmental audits are conducted for both internal and external purposes. Audit results are presented to the creditors in the form of an Annual Report.

The annual Corporate Social Responsibility Reports prepared in 2015-2019 addressed among others the environmental and social issues related to the annual operations of Mycielin WF. Since 2020, data are presented in the form of report published on the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-mycielin/

Implementation of a grievance procedure in the course of implementation of the Stakeholder Engagement Plan, as required by the EBRD.

Implementation of the complaint examination procedure at Mycielin WF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for the operation of Mycielin WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-mycielin/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

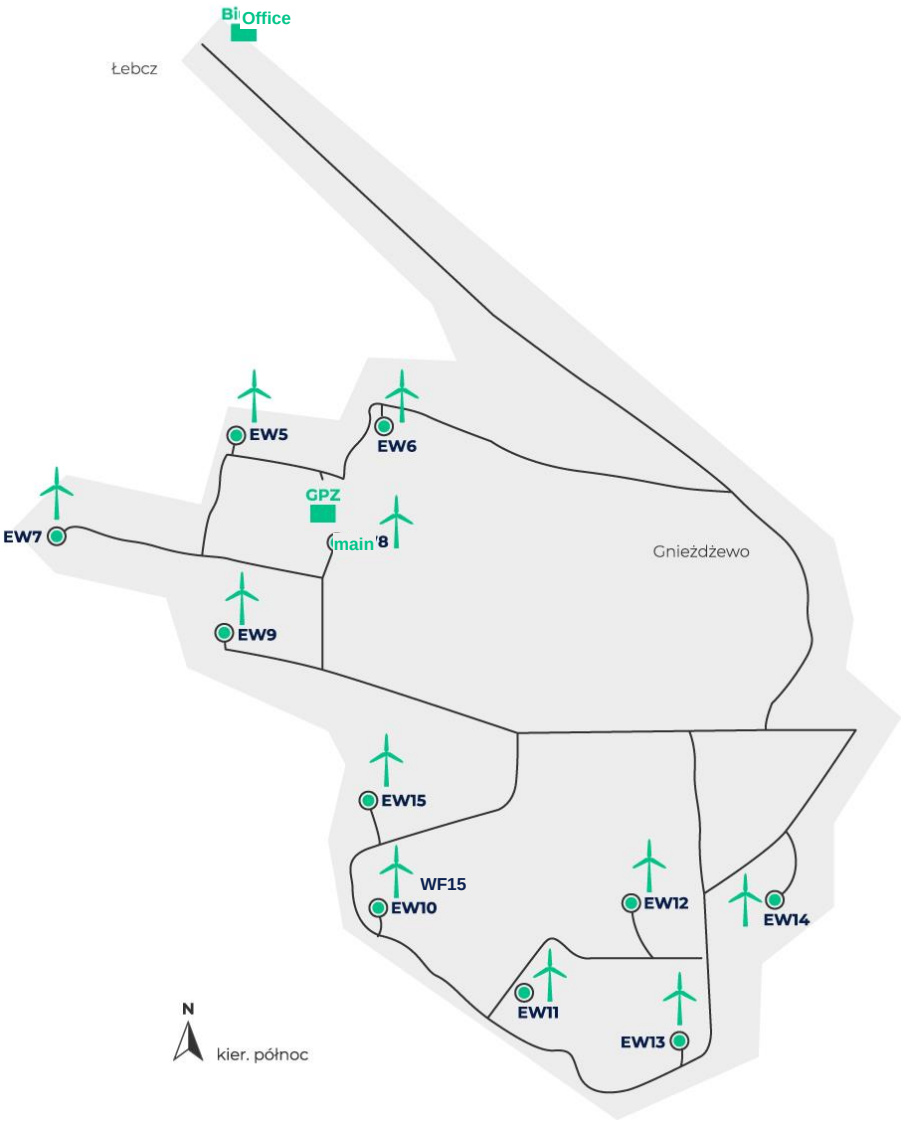
Complaints in the first instance are addressed to the appropriate subsidiary (Farma Wiatrowa Sp. z o.o.).

No environmental penalties were imposed on Mycielin WF in 2022. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

2.1.6 PUCK WIND FARM

Location and description of the project

Puck Wind Farm (Dipol Sp. z o.o.) is located in Gnieżdżewo Commune, Puck Poviat, Pomeranian Voivodeship. Puck WF was put into operation in 2007. The configuration of Puck WF includes 11 Gamesa G87 2 MW turbines, each 78 m high and with rotor diameter of 87 m, main electrical substation, underground transmission line infrastructure and access roads to each turbine. Total capacity of Puck WF is 22 MW. The farm is owned by Dipol Sp. z o.o., a special purpose vehicle 100% owned by the Polenergia Group.



Environmental permits

Puck WF has all necessary permits to operate in compliance with environmental regulations. Dipol Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 was submitted by the end of February 2023.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Ex-post monitoring

Ornithological and chiropterological observations and noise measurement were carried out from the start of operation in the periodfrom 2007 to 2012.

Management of hazardous substances

There are small quantities of hazardous substances on the premises of Puck WF. All containers and packaging with hazardous substances are stored in a locked room accessible only to authorised persons. All hazardous substances are stored on drip trays.

There are no underground or aboveground tanks for hazardous substances on Puck WF site.

Waste management

Waste management at Puck WF is carried out based on the provisions of the permit for the production of hazardous waste (document ref. No. ROŚ.6220.1.2.2015 amending Decision No. ROŚ.6220.3.2014 of 1 October 2014). The servicing works for Puck WF are performed internally i.e. waste from servicing of turbines are registered on the Waste Database (BDO) account of the company.

Hazardous waste is stored selectively in a locked room accessible only to authorised persons. The room is equipped with drip trays.

Hazardous waste is collected by OILER based on the provisions of the agreement between Dipol Sp. z o.o. and OILER S.A. (document ref. No. 0015/2012 of 17 April 2012). The agreement was concluded for an indefinite period. The waste collecting entity was verified and holds all necessary licences and permits. Municipal waste is stored selectively until it is handed over to specialised entities holding the required permits. Dipol Sp. z o.o. has an agreement with Pucka Gospodarka Komunalna Sp. z o.o on municipal waste disposal and lease of containers. In accordance with the Act on waste, Puck WF is registered in the Waste Database (BDO) system and submits the reports on produced service waste from wind turbines.

Water and waste water management

Puck WF is not connected to the municipal water supply or sewage system. Rainwater and snowmelt is discharged into ditches, in accordance with the provisions of the water permit (document ref. No. ROŚ.6341.2.30.2014).

At Puck WF, there is a petroleum products separator, which is subject to regular technical inspections and cleaning. The last periodic inspection took place in August 2022. The above-mentioned works are performed by an authorised company, i.e. ELKOM-BUD. Based on the information presented in the report, the equipment is in good technical condition.

Rainwater and snowmelt, after being pre-treated in the separator, is directed to unpaved areas, in accordance with the provisions of the water permit (document ref. No. ROŚ.6341.2.30.2014).

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials at the area of Puck WF.

In accordance with the law, equipment containing more than 6 kg of SF6 must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are two LG air conditioners in the substation, each containing less than 6 kg of R410A and R22 refrigerant. In addition, there are 16 units at Puck WF which contain less than 6 kg of SF6 gas. Therefore, registration in CRO is not required. In 2021 none of the equipment lost its integrity.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Puck Wind Farm.

The company in charge of Wind Farm management is Dipol Sp. z o.o. 100% owned by the Polenergia Group. Dipol Sp. z o.o. is committed to compliance with the rules and good practices during the Puck WF operation.

Puck Wind Farm is inspected on annual basis with a view to compliance with health and safety rules. The latest inspection took place in 2022. It did not reveal any major irregularities.

Annual inspections are conducted for both internal and external purposes. Audit results are presented to the creditors in the form of an Annual Report. The Corporate Social Responsibility reports have been prepared since 2015. Since 2020, data are presented in the form of report published on the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-puck/

Implementation of the complaint examination procedure at Puck WF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Puck WF .

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-puck/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Dipol Sp. z o.o.).

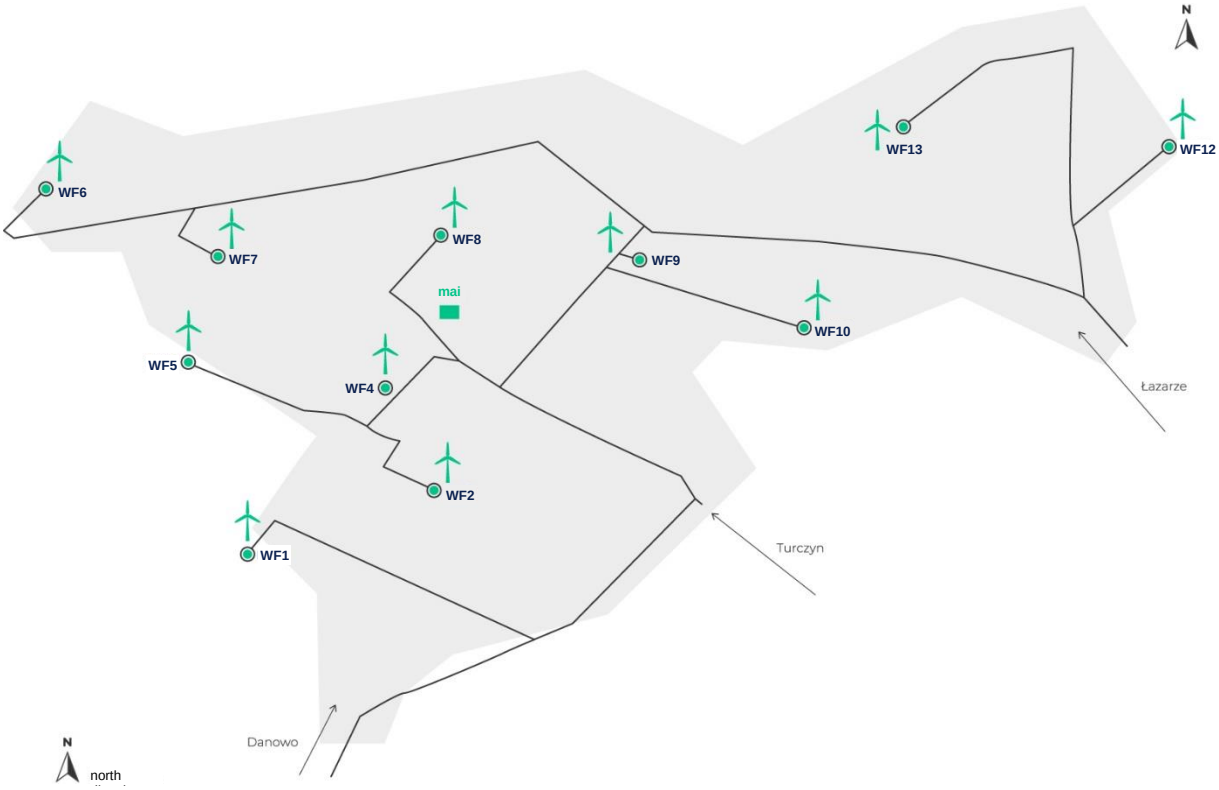
No environmental penalties were imposed on Puck WF in 2022. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

2.1.7 RAJGRÓD WIND FARM

Location and description of the project

Rajgród Wind Farm (Polenergia Farma Wiatrowa 6 Sp. z o.o.) is located in Rajgród Municipality, Grajewo Poviat, Podlassia Voivodeship. Rajgród WF was put into operation in 2014. The configuration of Rajgród WF includes 11 Siemens SWT- 2.3 - 108 wind turbines with tower height of 115 m and rotor diameter of 108 m, a main electrical substation, underground transmission line infrastructure, as well as access roads to each turbine. Total capacity of Rajgród WF is 25.3 MW.

Rajgród WF is owned by Polenergia Farma Wiatrowa 6 Sp. z o.o., a special purpose vehicle 100% owned by the Polenergia Group.



Environmental permits

TheRajgród WF holds all permits necessary to operate in compliance with the environmental protection laws. In effect of the performed EIA procedure the investor obtained the relevant environmental decision for the Rajgród WF no. WST.II.4242.21.2011.RŚ of 19.09.2011 issued by the Regional Directorate for Environmental Protection in Białystok.

Polenergia Farma Wiatrowa 6 Sp. z o.o. company was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 was submitted by the end of February 2023.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Ex-post monitoring

Ex-post ornithological and chiropterological surveys of the farm site began in January 2015 and continued in 2016. The monitoring demonstrated no negative impact of the facility on the Accipitriformes and young white storks flying out of their nests. High mortality among birds or bats was not observed. In 2017, after reviewing the 2016 report, the Regional Directorate for Environmental Protection in Białystok (Local Department in Łomża) did not submit any comments on the proposed solutions regarding the monitoring in the following years. In 2018, the last cycle of studies on the impact of the farm on bats and birds was conducted. Increased mortality in these animal groups was not observed. The final report, summarising the 3 years of monitoring, was submitted to the competent environmental authorities in 2019. In June, the Regional Directorate for Environmental Protection in Białystok accepted the ex post analysis.

Rajgród WF was put into operation in Q4 2014. In accordance with the environmental decision, the ex-post noise measurements were carried out in December 2014. The measurements were carried out by a certified subcontractor, EKO-POMIAR. Based on the results, no exceedances were recorded either during the day or at night. The results of the above-mentioned noise analysis were communicated to the competent authorities, who did not submit any comments.

Management of hazardous substances

No hazardous substances are stored or pre-stored at Rajgród WF and there are no underground or aboveground tanks for hazardous substances. In 2022, the generators used 118 litres of oil, which was reported to the National Centre for Emissions Management (KOBiZE) National Database in accordance with the requirements, while the 2022 report was submitted by the end of 2023, followed by preparation of the environmental use report.

Waste management

Waste management at Rajgród WF is carried out based on the provisions of the permit for the production of waste from "Rajgród Wind Farm" (document ref. No. WR.6220.1.2015) and on the agreement with the servicing company, i.e. Siemens.

Hazardous waste is stored in a locked facility (metal roofed shed) accessible only to authorised persons. Collection of waste produces in the Wind Farm and with regard to the performed service works is carried out by the Waster company. The waste collecting entity was verified and holds all necessary licences and permits.

Municipal waste is pre-stored selectively until it is handed over to specialised entities holding the required permits. Municipal waste is collected by the Municipality.

In accordance with the requirements of the Act on waste, Rajgród WF was registered in BDO system.

Water and waste water management

Rajgród WF is not connected to the municipal water supply or sewage system.

Water for domestic purposes is supplied to a reservoir located on the premises of Rajgród WF.

Domestic waste water generated at Rajgród WF is discharged into a septic tank. The tank is emptied, if necessary, by an authorised company.

At Rajgród WF, there is an AWAS H1900 petroleum products separator, which is subject to regular technical inspections and cleaning. The last periodic inspection took place in 2022. The above-mentioned works are performed by an authorised company, i.e. AWAS – Serwis Sp. z o.o. Based on the information presented in the report on equipment cleaning and waste collection, the equipment is in good technical condition.

Rainwater and snowmelt, after being treated in the separator, is discharged into three ditches, in accordance with the provisions of the water permit (document ref. No. WR.6341.29.2012).

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Rajgród WF.

In accordance with the law, equipment containing more than 6 kg of refrigerant must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are three units containing more than 6 kg of SF6 gas (three ABB LTB 145D1/B overhead circuit breakers) at the area of substation. In addition, there are three air conditioners containing less than 3 kg of refrigerant at the area of main electrical substation. All supplementations of air conditioners or other modifications affecting the consumption of refrigerants are reported to the National Centre for Emissions Management (KOBiZE) National Database. As required, the 2022 report was submitted by the end of February 2023.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Rajgród Wind Farm.

Implementation of the corporate Environmental and Social Action Plan (ESAP) and implementation of the procedure for reviewing environmental impact assessment reports.

The company implemented the corporate ESAP agreed with EBRD in 2013.

EIA reports for future projects are prepared by highly qualified and experienced subcontractors. The results are reviewed by Polenergia's internal Environmental and Sustainability Department. In addition, prior to the financing of the project by the creditors, the project is reviewed by an independent consulting firm under the ESDD process for compliance with best practices, both Polish and EU. If any non-compliances are identified, they are listed and further addressed within the corrective action plans dedicated to the project.

Conducting ex post noise measurements as required by the decision on environmental conditions.
Rajgród WF was put into operation in Q4 2014. In accordance with the environmental decision, the ex-post noise measurements were carried out in December 2014. The measurements were carried out by a certified subcontractor, EKO-POMIAR. Based on the obtained results, no exceedances were recorded either during the day or at night. The results of the above-mentioned noise analysis were communicated to the competent authorities, who did not submit any comments.

Conducting ex post ornithological and chiropterological monitoring as required by the decision on environmental conditions.

Ex post ornithological and chiropterological studies of the farm site began in January 2015 and continued in 2016. The observations showed no negative impact of the facility on the Accipitriformes and young white storks flying out of their nests. High mortality among birds or bats was not observed.

In 2017, after reviewing the 2016 report, the Regional Directorate for Environmental Protection in Białystok (Local Department in Łomża) did not submit any comments on the proposed solutions regarding the monitoring in the following years. In 2018, the last cycle of studies on the impact of the farm on bats and birds was conducted. Increased mortality in these animal groups was not observed. The final report, summarising the 3 years of monitoring, was submitted to the competent environmental authorities in early June 2019. On 30 June 2019, the Regional Directorate for Environmental Protection in Białystok accepted the ex-post analysis.

Preparation and implementation of a tree planting plan as a compensatory measure. On 15 May 2013, the Mayor of Rajgród issued a Decision (document ref. No. UL.6131.97.2012) permitting the removal of 87 trees for the purposes of construction of Rajgród WF. The Decision required the replacement planting of 88 trees. In order to meet the above-mentioned obligation, in April 2014 the Company planted in total 88 trees, which was documented in the final report submitted by the subcontractor. The report on the replacement plantings was submitted to the competent authorities.

Conducting regular (every 3 years) environmental audits of wind farms, reporting to creditors.

Polenergia S.A. conducts regular environmental audits (once a year). The implemented corrective measures are presented as a part of an annual report for the financing institutions and in the ESG report published on the official website of the Company: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-rajgrod/

The results of the audits are presented to the Creditors in the form of an Annual Report. This includes the implementation of an health, safety and environment management system such as ISO 14000 and OHSAS 18000 and a stakeholder engagement plan for Rajgród WF project.

A stakeholder engagement plan was developed and implemented for Rajgród WF. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. All Polenergia Group facilities are subject to regular health and safety inspections and audits. During an inspection conducted in 2016, the health and safety procedures and guidelines were reviewed. A health and safety management system audit was carried out in 2018. All follow-up recommendations have been implemented. In addition, the facilities are regularly inspected in terms of health and safety. The latest inspection considering the H&S rules was carried out in 2022 during the renovation works. It did not reveal any major irregularities.

Implementation of the Stakeholder Engagement Plan and publication of the general environmental information relating to the project and the company, including the non-technical summary, the environmental and social action plan, the stakeholder engagement plan and other project-related documents.

A stakeholder engagement plan was developed and implemented for Rajgród WF. General environmental information about the project was published online at https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-i-projekty/fw-rajgrod/ . In addition, information about the project was published on EBRD website at https://www.ebrd.com/work-with-us/projects/psd/pepsa-wind-portfolio.html

Submission of annual environmental, social and health and safety reports to EBRD and creditors (if the loan was granted by a consortium). Posting a short summary of environmental and social matters on the website.

Annual environmental audits are conducted for both internal and external purposes. Audit results are presented to the creditors in the form of an Annual Report.

The annual Corporate Social Responsibility Reports prepared in 2015-2019 addressed among others the environmental and social issues related to the annual operations of Rajgród WF. Since 2022, data are presented in the form of the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-rajgrod/

Implementation of the complaint examination procedure at Rajgród WF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Rajgród WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-rajgrod/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

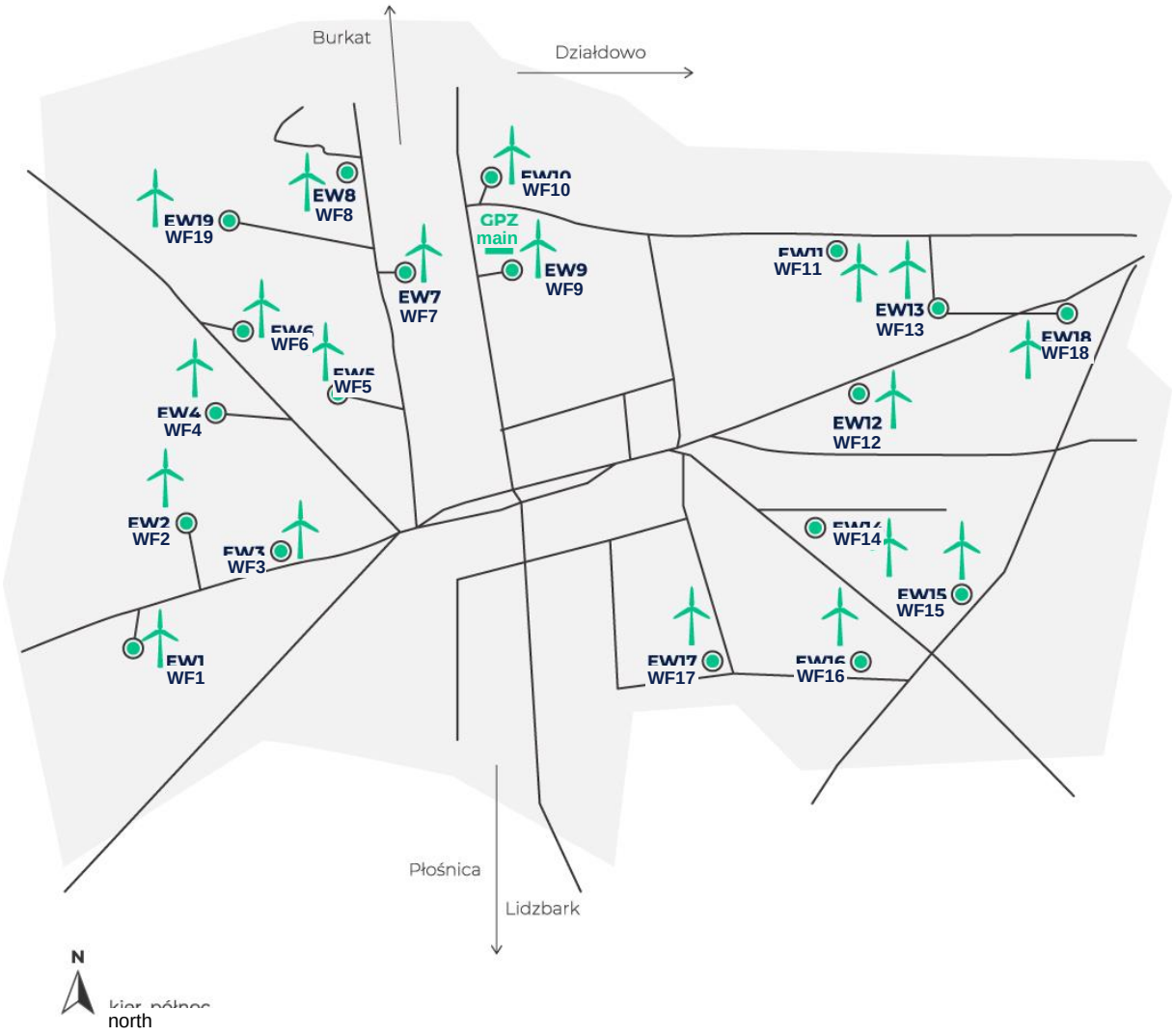
Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 6 Sp. z o.o.). No environmental penalties were imposed on Rajgród WF in 2022. No inspection carried out by any external institution was carried out.

2.1.8 SKURPIE WIND FARM

Location and description of the project

Skurpie Wind Farm (Polenergia Farma Wiatrowa 4 Sp. z o.o.) is located in Płośnica Commune, Działdowo Poviat, Warmia and Masuria Voivodeship. Skurpie WF was put into operation in Q3 and Q4 2015. The configuration of Skurpie WF includes 19 Siemens SWT- 2.3 - 108 wind turbines with tower height of 115 m and rotor diameter of 108 m, a main electrical substation, underground transmission line infrastructure, as well as access roads to each turbine. Total capacity of Skurpie WF is 43.7 MW.

Skurpie WF is operated by Polenergia Farma Wiatrowa 4 Sp. z o.o., a special purpose vehicle 100% owned by the Polenergia Group.



Environmental permits

Skurpie WF has all necessary permits to operate in compliance with environmental regulations.

Polenergia Farma Wiatrowa 4 Sp. z o.o. company was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 was submitted by the end of February 2023.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Ex-post monitoring

Monitoring of the impact of the project on birds and bats was carried out in 2016 and 2017. In accordance with the provisions of the environmental decision, the survey results were submitted to the competent administrative bodies (the Municipality Office and the Regional Directorate for Environmental Protection) after the end of each semester of the monitoring. The surveys

demonstrated no negative impact of the project on birds and bats. The next cycle of the monitoring and summary of the 3-year ornithological surveys took place in 2019. The final report was sent to the administrative bodies and made available to the local community at the information point after the completion of the studies and preparation of the analysis, i.e. in May 2020 .

Skurpie WF was put into operation in Q3 and Q4 2015. In accordance with the environmental decision, the ex-post noise measurements were carried out in November 2015 and between April and May 2016. The measurements were carried out by a certified subcontractor, EKO-POMIAR. Based on the obtained results, no exceedances were recorded either during the day or at night. The results of the above-mentioned noise analysis were communicated to the competent authorities (the Voit of Płośnica Commune), who did not submit any comments.

Management of hazardous substances

There are small quantities of hazardous substances on the premises of Skurpie WF.

All containers and packaging with hazardous substances are stored in a locked room accessible only to authorised persons. All hazardous substances are stored on drip trays.

There are no underground or aboveground tanks for hazardous substances on Skurpie WF site.

In 2022, the generators used heating oil - submitted to the National Centre for Emissions Management (KOBiZE) National Database and reported in the annual report on air emission. As required, the 2022 report was submitted by the end of February 2023.

Waste management

Siemens Gamesa Renewable Energy Sp. z o.o. is responsible for waste management with regard to waste generated during turbine servicing on the premises of Skurpie WF under the servicing agreement with Polenergia Farma Wiatrowa 4 Sp. z o.o. The waste collecting entity was verified and holds all necessary licences and permits. Waste is not stored on the premises of Skurpie WF.

Waste from maintenance works is not stored at Skurpie WF and it is immediately disposed of in accordance with the regulations in force by the entities servicing the facility.

Water and waste water management

Skurpie WF is not connected to the municipal water supply or sewage system. Water for domestic purposes is supplied to a reservoir located on the premises of Skurpie WF.

Domestic waste water generated at Skurpie WF is discharged into a septic tank. The tank is emptied, if necessary, by an authorised company.

At Skurpie WF, there is an AWAS H1900 NG6 petroleum products separator, which is subject to regular technical inspections and cleaning. The last periodic inspection took place in 2022. The above-mentioned works are performed by an authorised company, i.e. AWAS – Serwis Sp. z o.o. Based on the information presented in the report on equipment cleaning and waste collection, the equipment is in good technical condition. The inspection took place on 16 December 2022.

Rainwater and snowmelt, after being treated in the separator, is discharged into absorbing wells, in accordance with the provisions of the water permit (document ref. No. Ro.6341.23.2011).

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Skurpie WF.

In accordance with the law, equipment containing more than 6 kg of refrigerant must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are six air conditioners (three Mitsubishi Heavy SRK and three Mitsubishi Heavy SRC) at the substation that contain less than 3 kg of refrigerant. Therefore, registration in CRO is not required.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Rajgród Wind Farm.

Implementation of the corporate Environmental and Social Action Plan (ESAP) and implementation of the procedure for reviewing environmental impact assessment reports.

The company implemented the corporate ESAP agreed with EBRD in 2013.

EIA report was prepared by highly qualified and experienced subcontractors. The results were reviewed by Polenergia's internal Environmental and Sustainability Department. In addition, prior to the financing of the project by the creditors, the project was reviewed by an independent consulting firm under the ESDD process for compliance with best practices, both Polish and EU. If any non-compliances are identified, they are listed and further addressed within the action plans dedicated to the project.

Conducting ex post noise measurements as required by the decision on environmental conditions.

Skurpie WF was put into operation in Q3 and Q4 2015. In accordance with the environmental decision, the ex-post noise measurements were carried out in November 2015 and between April and May 2016. The measurements were carried out by a certified subcontractor, EKO-POMIAR. Based on the results, no exceedances were recorded either during the day or at night. The results of the above-mentioned noise analysis were communicated to the competent authorities. The authorities, i.e. the Voit of Płośnica Commune, did not submit any comments.

Conducting ex post ornithological and chiropterological monitoring as required by the decision on environmental conditions.

Monitoring of the impact of the project on birds and bats was carried out in 2016 and 2017. In accordance with the provisions of the environmental decision, the survey results are submitted to the competent administrative bodies (the Municipality Office and the Regional Directorate for Environmental Protection) after the end of each semester of the monitoring. The surveys demonstrated no negative impact of the project on birds and bats. The next cycle of the monitoring and summary of the 3-year ornithological surveys took place in 2019. The final report was sent to the administrative bodies and made available to the local community at the information point after the completion of the studies and preparation of the analysis, i.e. in May 2020.

Preparation and implementation of a tree planting plan as a compensatory measure.

Not applicable.

Conducting regular (every 3 years) environmental audits of wind farms, reporting to creditors.

Polenergia S.A. conducts regular environmental audits (once a year). The implemented corrective measures are presented as a part of an annual report for the financing institutions and in the ESG report published on the official website of the Company: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-skurpie/

The results of the audits are presented to the Creditors in the form of an Annual Report. This includes the implementation of an health, safety and environment management system such as ISO 14000 and OHSAS 18000 and a stakeholder engagement plan for Skurpie WF project.

A stakeholder engagement plan was developed and implemented for Skurpie WF. health, safety and environment procedures were developed based on the health, safety and environment management systems, such as ISO 14000 and OHSAS 18000. However, the systems are not certified. All Polenergia Group facilities are subject to regular health and safety inspections and audits. During an inspection conducted in 2016, the health and safety procedures and guidelines were reviewed. A health and safety management system audit was carried out in 2018. All recommendations were implemented. In addition, the facilities are regularly inspected in terms of health and safety. The latest review, which was carried out in 2022, demonstrated no major non-compliances.

In 2022, an accident occurred at the Wind Farm area. The vehicle travelling on a public road running in the vicinity of the Farm had an accidents and hit the fencing of Skurpie WF from unknown reasons. The fencing was repaired.

Implementation of the Stakeholder Engagement Plan and publication of the general environmental information relating to the project and the company, including the non-technical summary, the environmental and social action plan, the stakeholder engagement plan and other project-related documents.

A stakeholder engagement plan was developed and implemented for Skurpie WF. General environmental information about the project was published online at https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-i-projekty/fw-skurpie/ In addition, the Project information is published at the EBRD website at: https://www.ebrd.com/work-with-us/projects/psd/pepsa-wind-portfolio.html

Submission of annual environmental, social and health and safety reports to EBRD and creditors (if the loan was granted by a consortium). Posting a short summary of environmental and social matters on the website.

The annual Corporate Social Responsibility Reports prepared in 2015-2019 addressed among others the environmental and social issues related to the annual operations of Skurpie WF. Since 2022, data are presented in the form of the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-skurpie/

Implementation of the complaint examination procedure at Skurpie WF.

As part of the **implementation of the stakeholder engagement plan and** as part of the facility management system, the company implemented a grievance mechanism for Skurpie WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at:

https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-skurpie/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

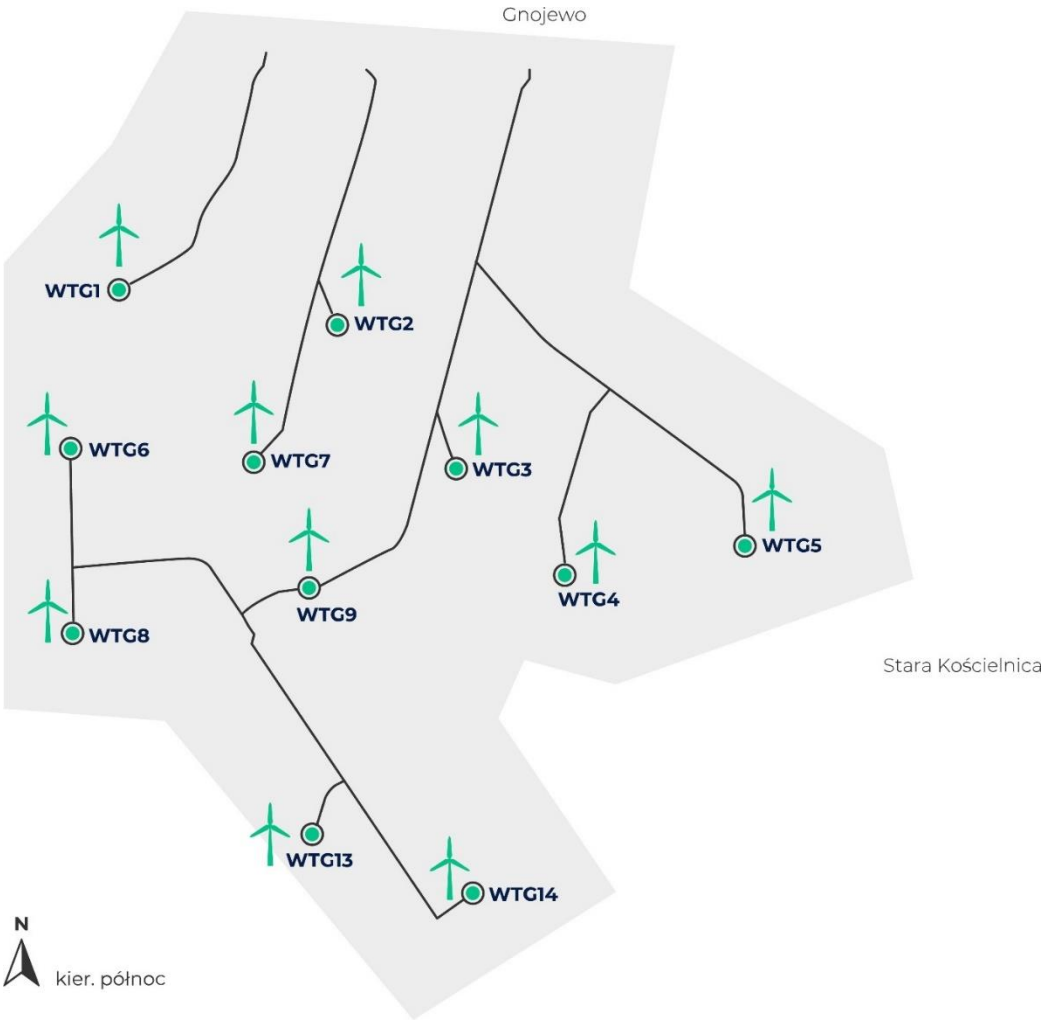
Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 4 Sp. z o.o.).

No environmental penalties were imposed on Skurpie WF in 2022. No inspection carried out by any external institution was carried out.

2.1.9 SZYMANKOWO WIND FARM

Location and description of the project

Szymankowo WF is located in Malbork Poviat, Miłoradz Commune, in the area between the villages of Gnojewo (to the north), Stara Kościelnica (to the east), Miłoradz (to the south-east), and Bystrze (to the west). Szymankowo Wind Farm was constructed by Polenergia Farma Wiatrowa Szymankowo Sp. z o.o., the special purpose vehicle owned in 100% by the Polenergia Group. The farm consists in Siemens Gamesa Renewable Energy G132-3.45 MW turbines with capacity of 3.45 MW each. Total installed capacity of the wind farm is 38.115 MW. 49



north

Environmental permits

Szymankowo WF has all necessary permits to operate in compliance with environmental regulations. Upon performing the environmental impact assessment procedure, the investment received the Environmental Decision no. R.1.6220/2015 of 2.02.2015 issued by the Voit of the Miłoradz Commune.

With regard to commissioning of the Szymankowo Wind Farm on 19.08.2021, the site was inspected by the Regional Inspectorate for Environmental Protection (within the environmental permit procedure).

Following the legal requirements, the company was entered into the Central Registry of Operators (CRO).

Since the day of its putting into operation, no penalties were imposed on the Wind Farm.

Ex-post monitoring

After commissioning of Szymankowo WF, the ex-post monitoring was commenced. Surveys in the impact area of the Szymankowo Wind Farm on birds and bats is carried out by AGRO-TRADE company. Following the results of monitoring report (August 2021 - July 2022) the statements of the authors that: current mortality rate is low and the collisions are highly incidental can be confirmed. Mortality in the group of birds was 0.7 animal/turbine, which is a low value comparable with the regional reference data and typical for the dominating mosaic-like agricultural environments of Pomerania. Mortality for bats was 0.5 animal/turbine, which according to the report author's is a low result, imposing no need to apply ad-hoc measures mitigating the negative impact on the bat populations. No concentration of events for a single turbine or a group of turbines and for a narrow phenological stage. The surveys will be continued in 2023 and following the requirements of the environmental decision and good industry practices the subsequent annual survey cycles are scheduled for 2022/23 and 2023/24. The survey results for the first year were submitted to the Miłoradz Commune Office and are available in the information point. Survey results shall be then each time (on annual basis) submitted to the Miłoradz Commune Office and to the Regional Directorate for Environmental Protection in Gdansk (following the requirements of the decision on environmental conditions).

The Szymankowo WF was put into exploitation in August 2021. Pursuant to the environmental decision, the ex-post noise measurements commenced in September. The measurements were carried out by a certified subcontractor, EKO-POMIAR. The results of the a/m noise analysis were submitted to the Miłoradz Commune Office, Regional Directorate for Environmental Protection in Gdansk and Regional Inspectorate for Environmental Protection upon completion of surveys (29.03.2022). The measurements demonstrated no exceedances of the permitted levels. On 19.09.2022, the Regional Directorate Environmental Protection issued the opinion on no reservations to the methodology and results of analysis. The ex-post monitoring report was also submitted in the consultation point in the Miłoradz Commune along with information on the competent contact person. While implementing the recommendations laid down in ESAP in 2022, the representative of the Environmental Protection department and the facility Manager organised a meeting with local community.

Management of hazardous substances

No hazardous substances are stored or pre-stored at Szymankowo WF and there are no underground or aboveground tanks for hazardous substances.

Waste management

Waste Management at the area of Szymankowo WF is carried out in line with the Act on waste by the service company i.e. Siemens (waste producer from wind turbine servicing) and other entities servicing the equipment (main electrical substation, oil collecting pans, servicing the equipment containing SF6 gases or air conditioners).

Hazardous waste and other waste from the service are temporarily stored by Siemens Gamesa Renewable Energy Sp. z o.o. (turbine servicing entity) outside the installation area. Waste from service of other equipment is each time collected by their producer (servicing entity) upon servicing. The waste collecting entity was verified and holds all necessary licences and permits.

Municipal waste is stored selectively until it is handed over to specialised entities holding the required permits. Municipal waste is collected by the Municipality.

Water and waste water management

Szymankowo WF is currently not connected to the municipal water supply or sewage system. The application for connection permit was submitted to the Starost of Malbork in January 2022 and the connection shall be made by the end of 2022.

At Szymankowo WF, there is a Bun Guard petroleum products separator, which is subject to regular technical inspections and cleaning. The last periodic inspection took place on 23.11.2022. The above-mentioned works are performed by an authorised company, i.e. ANDEL Sp. z o.o. Based on the information presented in the report on equipment cleaning and waste collection, the equipment is in good technical condition.

Precipitation and thawing water is managed under the issued water-law permit of 28 October 2019 (GD.ZUZ.2.421.241.2019.MM. This permit allows for discharge of precipitation water from the substation area to soil and drainage ditch RF 17 and construction of drain well and concrete outlets to the drainage ditch located at the area of the plots no. 121/3 i 240 o. Mątowy Małe, Miłoradz Commune.

On the basis of the permit the water equipment - drain well SCh1 and drain well SCh 1 were constructed, both of diameter of 1.2 m on plot no. 121.3 o. Mątowy Małe, Miłoradz Commune. The permit covers also the water service - drainage of precipitation and thawing water to soil from the area of 110/30kV substation of Szymankowo WF. The catchment area and volume of thawing water with limit values of total suspension and oil-derivative hydrocarbons were determined. Permit for water discharge is valid by 27 October 2049.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Szymankowo WF.

In accordance with the law, equipment containing more than 6 kg of refrigerant must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are three units containing more than 6 kg of SF6 gas (three ABB LTB 145D1/B overhead circuit breakers) at the area of substation. In addition, there are three air conditioners containing less than 3 kg of refrigerant at the area of main electrical substation. The equipment containing SF6 gases in quantity above 6 kg were recorded in the newly established CRO register dedicated to Szymankowo WF installation (October 2021).

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Szymankowo Wind Farm.

Adoption and adaptation of general health and safety procedures and standards for the Project enterprises. This includes implementation of the H&S management system, such as ISO 14000 and OHSAS 18000

health, safety and environment procedures were developed based on the health, safety and environment management systems, such as ISO 14000 and OHSAS 18000. However, the systems are not certified. All Polenergia Group facilities are subject to regular health and safety inspections and audits. The latest review, which was carried out in 2022, demonstrated no major non-compliances.

The company implementing the Szymankowo WF project obtained the operation permit on 19 August 2021.

The financing authorities for the Szymankowo WF project are the European Bank for Reconstruction and Development (EBRD), mBank S.A. and ING. Consequently, in 2019, the project was subject to an Environmental and Social Due Diligence (ESDD) conducted by an independent consultant, which showed that the completed Polish environmental impact assessment procedure was in line with the EIA Directive and met EBRD requirements.

Regular supervision of construction works to ensure that they are carried out in accordance with the provisions of the decision on environmental conditions, C-ESMP and good industrial practice, and that environmental risks are mitigated and adequately managed.

Part of the analysis was the preparation of an Environmental and Social Action Plan (ESAP). The above-mentioned plan contains measures required at all stages of project development.

Regular supervision of construction works to ensure that they are carried out in accordance with the provisions of the decision on environmental conditions, C-ESMP and good practices, and that environmental risks are mitigated and adequately managed.

Polenergia Farma Wiatrowa Szymankowo has a documented C-ESMP. All documents relating to the construction of Szymankowo WF were published on a platform that could be accessed by all company employees involved in the process and by all subcontractors.

Contract Engineer, i.e. Bilfinger Tebodin Poland Sp. z o.o., is responsible for regular supervision of the construction works, in accordance with the provisions of the agreement with the company. The report on each inspection with photo documentation is provided to the company for review.

Logbooks were kept for ongoing health and safety inspections. Prior to the commencement of construction, each subcontractor has prepared a Construction Safety Manual and submitted it to the Site Manager for approval.

Supervision of the construction works and their compliance with the provisions of the decision on environmental conditions and verification that environmental risks were mitigated and appropriately managed was carried out by BIO – EKSPERT, which was responsible for the environmental supervision of the construction works. Environmental supervision covered the entire period of construction works in 2020 and 2021, when the assembly yards were deconstructed (which could affect disturbance of protected species).

Polenergia Farma Wiatrowa Szymankowo has developed and implemented a traffic and transport management plan. The plan has been agreed with the Voit of Miłoradz Municipality and published in the areas exposed to negative impact of bulky transport. All subcontractors were informed about the

plan and its requirements during the opening meeting. The plan was available on a platform that could be accessed by all company employees involved in the process and by all subcontractors and was updated and adapted to the progress of works.

Development of an Environmental and Social Management System for the construction phase of the project. Ensuring that the contractor develops and implements an Environmental and Social Management Plan (C-ESMP) to define an approach to health and safety management and site-specific remedial measures for health and safety issues including traffic management, noise, dust and vibration; waste management and pollution prevention;

An Environmental and Social Management System for the construction phase of the Szymankowo WF project has been developed and accepted. The "health and Safety Plan" (H&S Plan) for the construction of Szymankowo WF has been prepared and was updated as required. All subcontractors have been informed about the H&S Plan. The plan defines the approach to managing both health and safety and environmental issues.

Formalisation of the employee grievance procedure in accordance with good practices described in the EBRD grievance management guidance, so that it is communicated and available to contractor's staff.

Polenergia Farma Wiatrowa Szymankowo has developed and implemented a grievance mechanism for employees. The mechanism complies with the EBRD.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Szymankowo WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/fw-szymankowo/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa Szymankowo Sp. z o.o.).

In line with the ethical standards for subcontractors, complaints/comments can also be sent to the dedicated e-mail address: komisja.etyki@polenergia.pl. Complaints addressed to the Ethics Committee are considered anonymously.

The environmental protection requirements imposed by the provisions of the decision on environmental conditions were communicated to all subcontractors involved in Szymankowo WF construction process during the opening meeting and training relating to health, safety and environment requirements. Provisions concerning compliance with environmental regulations were also included in the "H&S Plan", which was signed by the Site Manager.

In January 2020, the company signed an agreement with BIO - EKSPERT, which provides environmental supervision at the Szymankowo WF construction site.

between February and November 2020, BIO - EKSPERT performed 25 on-site inspections of the construction site and access roads.

Supervision was continued in 2021 - the inspections were planned in cooperation with the Contractor and their scope was adapted to the planned and conducted works. The Contractor reported the

planned works to the supervisor duly in advance, in effect of which their commencement in the new location was preceded with ornithological monitoring. Verification of these sites with a view to the potential breeding sites of birds was carried out by crossing the area by feet and monitoring enabling detection of ground-nesting species.

Furthermore, in accordance with the provisions of the following agreements concluded between the Voit of Miłoradz Municipality and Polenergia Farma Wiatrowa Szymankowo Sp. z o.o.:

- Agreement with Miłoradz Municipality Office of 27.04.2020 (R.6131.P.2020.1.AW, R.6131.61.S2.11.3.2019/2020AW);
- Agreement with Miłoradz Municipality Office of 14.05.2020 (R.6131.P.2020.2.AW, R.6131.61.S2.10.6.2019/2020AW);
- Agreement with Miłoradz Municipality Office of 29.07.2020 (R.6131.P.2020.3.AW, R.6131.S.5.1.1.2020AW);
- Agreement with Miłoradz Municipality Office of 27.08.2020 (R.6131.P.2020.3.AW, R.6131.S.4.1.3.2020AW);

On 13 and 14 November 2020, Polenergia Farma Wiatrowa Szymankowo Sp. z o.o. planted 42 trees of native species with covered and correctly shaped root systems, i.e. white willow, staked, with a circumference of 8 cm at the height of 100 cm. The planting was carried out by a qualified subcontractor, i.e. Gardnroses. BIO – EKSPERT supervised the replacement plantings. A letter of confirmation was sent to Miłoradz Municipality Office.

In April 2021, the environmental supervision assessed the substitute planting made as environmental compensation. The condition of trees was satisfactory, since all trees survived the winter period and were at the stage of budding. Further supervision over the trees planted as environmental compensation was performed in early spring 2022. Due to poor condition found or death of 10 trees, substitute planting was commissioned. The new trees were planted by PHU Wasko company. In addition, tree care and maintenance of the remaining 32 trees planted in 2020, additional tying of all trees and performance of chemical analysis of soil were commissioned in order to eliminate any risks to trees related to excessive use of chemicals at agricultural fields. The PHU Wasko company performed the commissioned works on 4-5 May 2022. The performed chemical analysis confirmed high phosphorus and potassium levels, however of a value posing no risk to tree growth.

Noise measurement upon completion of construction works in line with corporate ESAP, with particular focus on residential areas and consultations with local inhabitants. Scheduling the measurements in winter in presence of snow cover, if possible. If the noise level exceeds the applicable standards in force, preparation and implementation of noise mitigation measures.

The ex-post monitoring was commenced at the Szymankowo Wind Farm:

Pursuant to the Environmental Decision issued by the Void of Miłoradz Commune no. R.1.6220/2015 of 2 February 2015, ref. no. R.6220.V.24.2015 the ornithological and chiropterological monitoring is under way. The first year of monitoring scheduled for August 2021 - July 2022 was completed and the final report was submitted to the Regional Directorate for Environmental Protection and Commune Office (on 16.09.2022). In 2022, further monitoring was commissioned. The activities will end in 2023.

Chiropterological analysis of the material collected in the first season of ex-post surveys, demonstrates no need to take any additional (exceeding the scope of environmental decision) dedicated measures mitigating or reducing the risk of collision with reference to the scope or operation time of the individual turbines with a view to bat protection.

Ornithological analysis of date from the first monitoring season demonstrates that no significant changes to the local and supra-regional structure of avifauna, in the way of surrounding land use and moderate significance of this areas for birds occurred. Low actual mortality rate and only single cases of collisions of common bird species were established.

Noise surveys started in September 2021 and ended in March 2022. The measurements demonstrated that the permissible noise levels for single-family residential development are kept. The results of ex-post analysis were sent to the Regional Directorate for Environmental Protection in Gdansk and to the Voit of Miłoradz Commune. On 19.09.2022, the Regional Directorate Environmental Protection issued the opinion on no reservations to the methodology and results of analysis.

On 3.11.2022, consultations with the residents of development adjoining the Wind Farm were carried out. Consultations were carried out in line with the provisions of ESAP by the employee from the Environmental Protection Department and the Investment Manager and covered the potential nuisances related to wind farm operation.

With regard to the submitted negative opinion on noise nuisance from the Szymankowo WF, in 2022 an additional noise analysis was commissioned to Eko- Pomiar pracownia akustyczno- środowiskowa. The measurements results will be available in 2023.

The reports for the first year of the ornithological, chiropterological and noise monitoring was submitted to the Commune Office and is available in the information point.

The measurement of magnetic fields was carried out. On 17.06.2021 the GPO 110/30 kV (main receiving substation) was reported as the installation producing magnetic field to the Starosty in Malbork, the State Voivodeship Sanitary Inspector - SVSI in Gdansk and Regional Inspectorate of Environmental Protection in Gdansk.

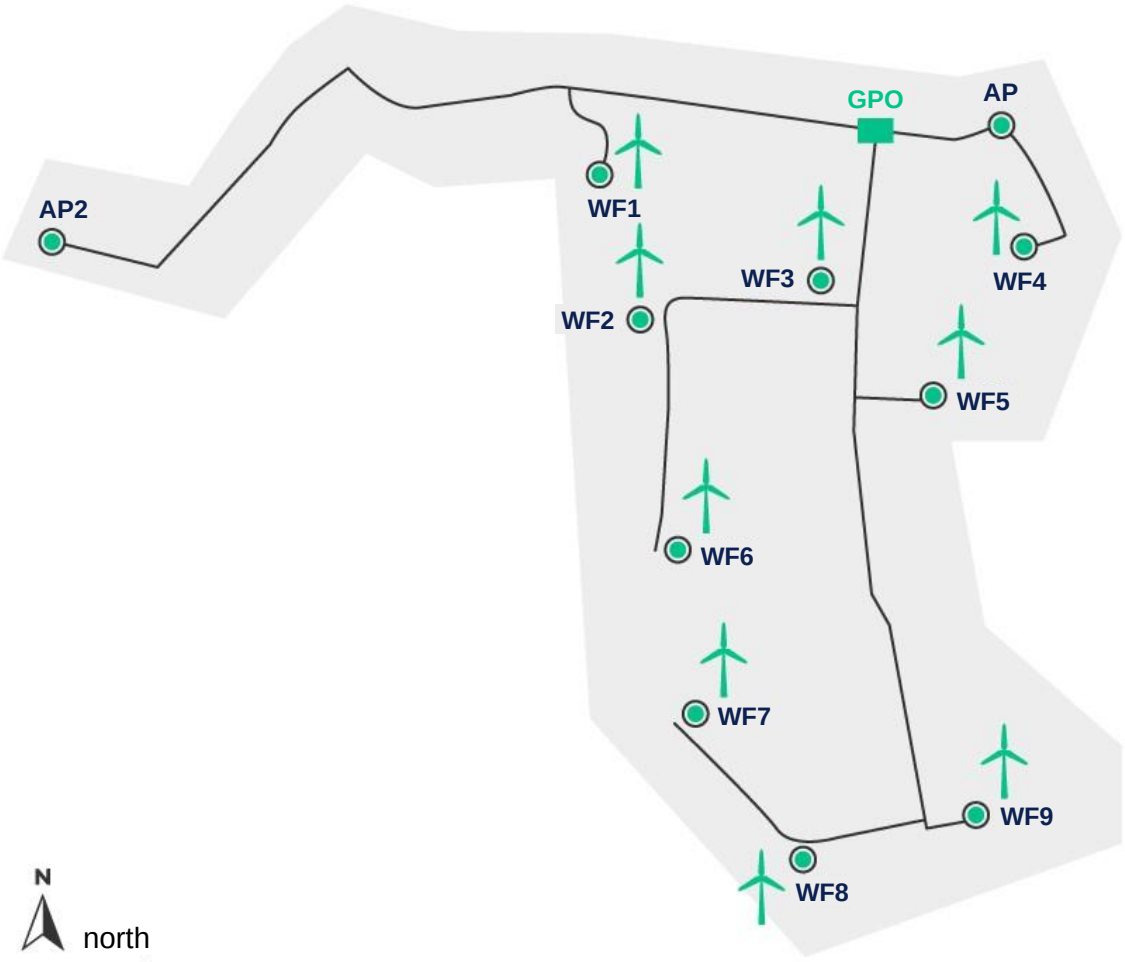
Regular (every 3 years) environmental audit of wind farms Contacting the lenders.

Polenergia S.A. conducts regular environmental audits (once a year). The implemented corrective measures are presented as a part of an annual report for the financing institutions and in the ESG report published on the official website of the Company**: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wytworcze/fw-szymankowo/**

2.1.10 KOSTOMŁOTY WIND FARM

Location of the investment

Kostomłoty Wind Farm project was implemented by Polenergia Farma Wiatrowa Dębice/Kostomłoty Sp. z o.o., a special purpose vehicle owned in 100% by the Polenergia Group. The Wind Farm is located in Kostomłoty Commune, Środa Śląska Poviat, Lower Silesian Voivodeship, in southern Poland.



The investment covers 9 turbines which are located at the area delineated by the Bogdanów, Godków, Październorno, Piotrowice and Wichrów villages. The following necessary building permits were obtained for the investment:

- Decision of the Starost of Środa Śląska no. 429/2016 of 12.07.2016 approving the construction design and granting the building permit.
- Decision of the Starost of Środa Śląska no. 521/2016 of 09.08.2016 approving the substitute construction design and amending the permit no. 154/2016 of 25.03.2016.

- Decision of the Starost of Środa Śląska no. 506/2018 of 08.06.2018 approving the substitute construction design and amending the permit no. 154/2016 of 25.03.2016 and decision no. 521/2016 of 09.08.2016.
- Decision of the Starost of Środa Śląska no. 879/2018 of 01.10.2018 approving the substitute construction design.
- Decision of the Starost of Środa Śląska no. 880/2018 of 01.10.2018r. approving the substitute construction design.

According to the building permit, the capacity of the individual Vestas V136 turbines will be 3 MW. The parameters of wind turbines are as follows:

- hub height: 122 m;
- rotor diameter: 136 m.

Total installed capacity of the wind farm is 27 MW.

Construction of wind farm ended in mid-2022 and the company obtained the following use permit:

- Decision of the Lower Silesian Voivodeship Building Supervision Inspector no. 829/2022 of 16.08.2022. (WF1-WF6).
- Decision of the Lower Silesian Voivodeship Building Supervision Inspector no. 828/2022 of 16.08.2022 (WF7-WF9).

Environmental permits

The project has undergone a full Environmental Impact Assessment (EIA) procedure based on an EIA report prepared for a wind farm configuration comprising 13 turbines in the preferred option and 17 turbines in the alternative option. The EIA procedure was preceded by a yearlong monitoring of birds and bats in the area of the planned project. The EIA procedure was concluded in July 2013 with the issuance of the decision on environmental conditions (document ref. No. RITGNROŚGP.6220.2.21.2013.TB).

The financing institution for the project is mBank S.A. At the end of 2020, the project was subject to an Environmental and Social Due Diligence (ESDD) conducted by an independent consultant, which showed that the completed environmental impact assessment procedure was in line with the EIA Directive. In addition, as a matter of good practice, the project was assessed in terms of the Performance Requirements (PRs) of the European Bank for Reconstruction and Development (EBRD). The ESDD showed that the project meets the above-mentioned requirements.

Construction works are commenced at the end of Q1 2021 and preceded by an initial training for subcontractors. The training will cover health and safety and environmental protection issues, as well as ethical matters (Polenergia Group's environmental and social policy and the standards of conduct for Partners (suppliers and subcontractors)). Moreover, the construction stage is monitored by experts from BIO EKSPERT, who are responsible for environmental supervision, for the entire duration of construction works.

Construction and disassembly of wind farm was covered by environmental supervision by Bioekspert company. Between March and end of October 2021 there were 22 field inspections performed. The area of investment was inspected with a view to presence and potential sites of protected fauna species - in particular amphibians, birds and mammals. At the disassembly stage, between April and July 2022 the temporary area was subject to 12 field inspections with a view to measures in the field of protection of local biodiversity to be taken by the Investor at the Kostomłoty WF.

On 11.07.2022 the installation producing electromagnetic field - substation 110/20kV GPO Kostomłoty was reported to the Starosty in Środa Śląska, Voivodeship Sanitary and Epidemiological Station in Wroclaw and the report from measurements of electromagnetic field produced by the GPO 110/20kV substation was submitted to the Voivodeship Inspectorate of Environmental Protection in Wroclaw and the Voivodeship Sanitary and Epidemiological Station in Wroclaw.

Ex-post monitoring

In line with the requirements of the decision on environmental conditions, the 3-year ex-post monitoring of birds and bats commenced in November 2022. Monitoring is carried out by BFA Paweł Gębski company, following the contract of 28.10.2022.

By the letter of the Regional Directorate for Environmental Protection in Wroclaw of 5.10.2022 the exceptions from the terms and conditions of bat monitoring laid down in the decision on environmental conditions were obtained, consisting in changing the manner of recording bat activity from automatic to conventional method (surface), provided that the number of controls is doubled.

By February 2022, the ex-post noise analysis will be performed in line with the requirements of the decision on environmental conditions - on the basis of contract with EkoPomiar Jacek Szulczyk of 24.05.2022.

Under the additional biodiversity protection measures active protection of Montagu's harrier breeding near Kostomłoty WF was introduced. Montagu's harriers are one of the smallest predatory birds in Europe. They usually nest inside the fields grown with cereals or other high-growing crops. This species is strictly protected and included in the red list of species with the indication on the necessary active protection measures. In the Kostomłoty Commune, 3 harrier nests are protected with net. 8 birds reached maturity. All young birds were leg-banded by the ornithologists in order to enable tracing their further life and journeys.

Management of hazardous substances

No hazardous substances are stored or pre-stored at Kostomłoty WF and there are no underground or aboveground tanks for hazardous substances.

Waste management

Waste management at Kostomłoty WF is performed in compliance with the Act on waste by the service company: ALBA S.A. (company's name). The process of signing the contract for waste disposal is in progress.

Hazardous waste and other waste from the service are temporarily stored by Vestas company (company's name) (turbine servicing entity) outside the installation area. Waste from service of other equipment is each time collected by their producer (servicing entity) upon servicing.

Municipal waste is stored selectively until it is handed over to specialised entities holding the required permits. Municipal waste is collected by ALBA S.A. company.

Water and waste water management

Kostomłoty WF is currently not connected to the municipal water supply or sewage system.

At the Kostomłoty WF, there is a ESK-EH petroleum products separator by Ecol-Unicon, which is subject to regular technical inspections and cleaning. The last periodic inspection took place in 2022.

Rainwater and snowmelt are managed under the issued water-law permit.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials at the area of Kostomłoty WF.

In accordance with the law, equipment containing more than 6 kg of refrigerant must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

There are units containing more than 6 kg of gas at the area of substation, i.e. LTB MSD1 overhead circuit breaker. In addition, there are six air conditioners containing less than 3 kg of refrigerant in the main power reception unit. The equipment containing SF6 gases in quantity above 6 kg were recorded in the newly established CRO register dedicated to Kostomłoty WF installation.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Kostomłoty Wind Farm.

Adaptation of general corporate procedures and H&S standards to the Project. The above includes implementation of the H&S management system, such as ISO 14000 and OHSAS 18000

A stakeholder engagement plan was developed and implemented for Kostomłoty WF. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. All Polenergia facilities are subject to regular health and safety inspections and audits. During the H&S inspection in 2022 no discrepancies were identified.

Regular supervision of construction works to ensure that they are carried out in accordance with the provisions of the decision on environmental conditions, provisions of C-ESMP) and good industry practice, and that environmental risks are mitigated and adequately controlled.

The company implementing the project holds documented C-ESMP. The Contract Engineer was responsible for regular supervision of the construction works, in accordance with the provisions of the agreement with the company. The report on each inspection with photographs is provided to the company for review.

Logbooks were kept for ongoing health and safety inspections. Prior to the commencement of construction, each subcontractor has prepared a Construction Safety Manual and submitted it to the Site Manager for approval.

Supervision of the construction works and their compliance with the provisions of the decision on environmental conditions and verification that environmental risks are mitigated and appropriately managed is carried out by BIO – EKSPERT, which is responsible for the environmental supervision of the construction works. The environmental supervision carried out 22 inspections at the investment implementation stage and additional 12 inspections during disassembly of the construction site.

Development of an Environmental and Social Management Plan for the construction phase of the project.

An Environmental and Social Management System for the construction phase of the project has been developed and accepted. The "Occupational Health and Safety Plan" (H&S Plan) for the construction of Kostomłoty WF has been prepared and was updated as required. All subcontractors have been informed about the H&S Plan. The plan defined the approach to managing both health and safety and environmental issues.

Formalisation of the employee grievance procedure in accordance with good practices described in the EBRD grievance management guidance, so that it is implemented, communicated and available to contractor's staff.

The Polenergia Farma Wiatrowa Kostomłoty company has developed and implemented a grievance mechanism for employees. The mechanism complies with the EBRD guidance, i.e. it has been communicated to all subcontractors involved in the construction process of Kostomłoty WF during the opening meeting and training relating to health, safety and environment requirements, involves the management, complaints can be submitted anonymously. In line with the ethical standards for subcontractors, complaints/comments can also be sent to the dedicated e-mail address: komisja.etyki@polenergia.pl. Complaints addressed to the Ethics Committee are considered anonymously.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/projekty-w-fazie-rozwoju/farmy-wiatrowe-na-ladzie/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

The complaints are firstly submitted to the relevant subsidiary. In 2020 and 2021 no complaints were lodged.

Development and implementation of a transport and traffic management plan covering turbine and material delivery and access, transport routes, detours, overload, driver training and consultations with local authorities.

The company implementing the project has developed and implemented a traffic and transport management plan. The plan has been agreed with the commune authorities and published in the areas exposed to negative impact of bulky transport. All subcontractors were informed about the plan and its requirements during the opening meeting. The plan is available on a platform that can be accessed by all company employees involved in the process and by all subcontractors and it is updated as necessary.

Prior to commencement of construction, the company implementing the project has consulted and made arrangements with local authorities.

Compliance with the provisions of decision on environmental conditions with regard to nature conservation during construction works.

The environmental protection requirements imposed by the provisions of the decision on environmental conditions were communicated to all subcontractors involved in Kostomłoty WF construction process during the opening meeting and training relating to health, safety and environment requirements (February 2021). Provisions concerning compliance with environmental regulations were also included in the "H&S Plan", which was signed by the Site Manager.

On 3 February 2021, the company signed an agreement with BIO - EKSPERT, which provides environmental supervision at the Kostomłoty WF construction site. The contract provided for supervision between March 2021 and 31 December 2021. The environmental supervision covered 22 visits of environmental supervision staff.

Carry out the regular (every 3 years) environmental audit of wind farm.

Polenergia S.A. conducts regular environmental audits (once a year). The implemented corrective measures are presented as a part of an annual report for the financing institutions and in the ESG report published on the official website of the Company: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/projekty-w-fazie-rozwoju/farmy-wiatrowe-na-ladzie/

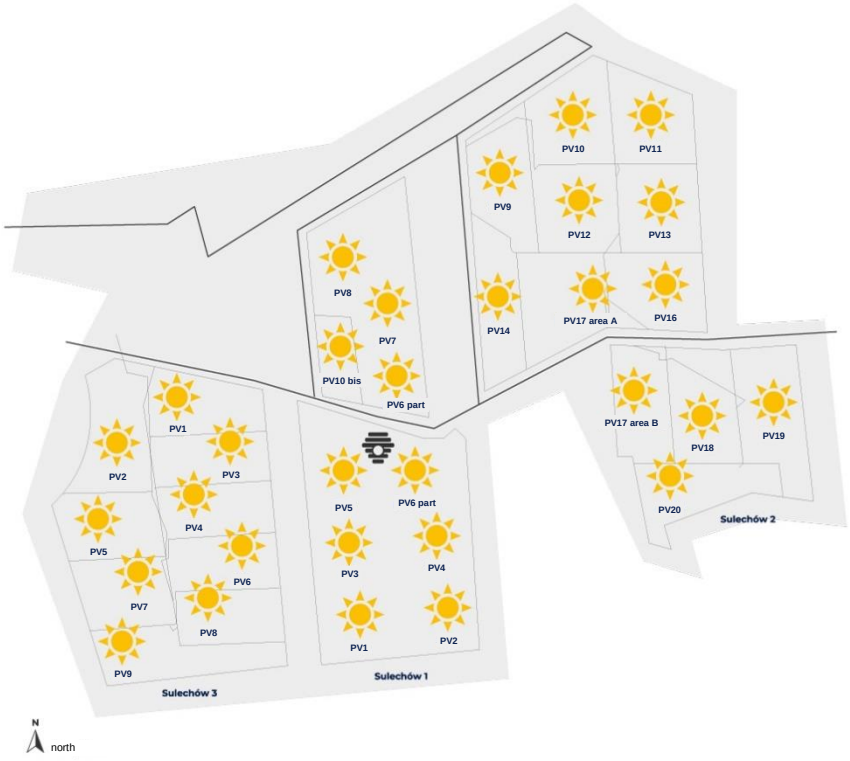
In line with the requirements of the decision on environmental conditions, the ex-post monitoring of birds and bats commenced in November 2022. Monitoring is carried out on the basis of contract signed on 28.10.2022 by the BFA Paweł Gębski company.

2.1.11 SULECHÓW I PHOTOVOLTAIC FARMS

Location and description of the project

Sulechów I Photovoltaic Farms are located in Kruszyna, Sulechów Municipality, Zielona Góra Poviat, Lubusz Voivodeship. They comprise eight photovoltaic farms, each with approx. 1 MW capacity, including the necessary infrastructure and a 15/110 kV substation.

Fig. Complex of Sulechów I II and III Photovoltaic Farms



Total area of the farm is approx. 16.5 ha. Total annual energy production is about 8,200 MWh (in the first year of operation). This allows for carbon dioxide emission reduction by approx. 6,500 Mg per year. The operation time of the facility is estimated for 25 years, which corresponds to a cumulative production of approx. 200,000 MWh.

Construction of Sulechów Photovoltaic Farms lasted from April to September 2019. The farms received the operation permit in October 2019 and started producing electricity in November. Since the beginning of 2020, they have been producing energy in the auction system.

Sulechów I Photovoltaic Farms are owned by Polenergia Farma Wiatrowa 17 Sp. z o.o., a special purpose vehicle 100% owned by the Polenergia Group.

Environmental permits

Sulechów I PVF has all necessary permits to operate in compliance with environmental regulations.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022.

Management of hazardous substances

On the premises of Sulechów PVF, apart from one tank with electroplating oil, no hazardous substances are stored. The above-mentioned tank is stored on a drip tray, in a free-standing storage and office container, accessible only to authorised persons. There are no underground or aboveground tanks for hazardous substances on Sulechów PVF site.

Waste management

Waste at Sulechów PVF is produced only during maintenance works. Waste from maintenance works is not stored at Sulechów PVF and it is immediately disposed of in accordance with the regulations in force by the entities servicing the facility.

Water and waste water management

Sulechów I PVF is not connected to the municipal water supply or sewage system. Rainwater and snowmelt is directed to unpaved areas.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Sulechów I PVF.

In accordance with the law, equipment containing more than 6 kg of SF6 must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded. As there is no equipment containing more than 6 kg of refrigerant at Sulechów PVF, registration in CRO is not required.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Sulechów I Photovoltaic Farm.

Sulechów I Photovoltaic Farm is committed to comply with and implement the good practices during the operation of Sulechów I PVF.

Polenergia S.A. conducts regular environmental audits (once a year). Wyniki audytów przedstawiane są jako część rocznego Raportu Społecznej Odpowiedzialności Biznesu, który jest publikowany na stronie internetowej w serwisie ESG: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/ff-sulechow-i/

For technological reasons (spacing between rows, access roads), the structures comprising 30,000 PV panels with a total capacity of 8 MW cover only half of the entire 16-hectare Sulechów I project area. Polenergia has decided to return the undeveloped land to nature and to create so-called honey flower meadows in the area of the farms to be used by insect pollinators, including bees. This has helped to increase the biodiversity of the monoculture farming areas surrounding the project. Analysis of land use by pollinating insects was published in 2022 and is publicly available in the ESG service (link below).

One of the examples of good practices implemented with regard to the Sulechów PVF was the company's decision on establishing the apiary at the area of Sulechów PVF and sowing a flower meadow: https://esg.polenergia.pl/dobre-praktyki/polenergia-na-rzecz-bioroznorodnosci-laki-kwietne-ff-sulechow-i-i-jej-pozytywny-wplyw-na-srodowisko-naturalne/. At the beginning of 2020, Polenergia built an apiary consisting of 10 hives in Kruszyna precinct, Sulechów Municipality, Lubusz Voivodeship. To this end, the company engaged a specialised company, PLON Zaopatrzenie Ogrodniczo - Pszczelarskie, to handle the yearlong maintenance of the Sulechów apiary. The apiary has been operating since 2020. Since 2022 the apiary has been managed by local bee keeper from Sulechów, which supports local small entrepreneurs.

In order to monitor biodiversity level, the monitoring of use of space by birds, including predatory birds, as well as mammals and insects, has been carried out. Monitoring was performed at the turn of 2021/22 and its summary report was published at: https://esg.polenergia.pl/dobre-praktyki/dbamy-o-bioroznorodnosc-na-farmach-fotowoltaicznych/

Implementation of the complaint examination procedure at Sulechów I PVF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Sulechów I PVF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/ff-sulechow-i/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Photovoltaic Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 17 Sp. z o.o.).

No environmental penalties were imposed on Sulechów I PVF in 2022. No inspection carried out by any external institution was carried out.

.

Figure Area of honey flower meadows.

Figure 1 The apiary at Sulechów PVF.

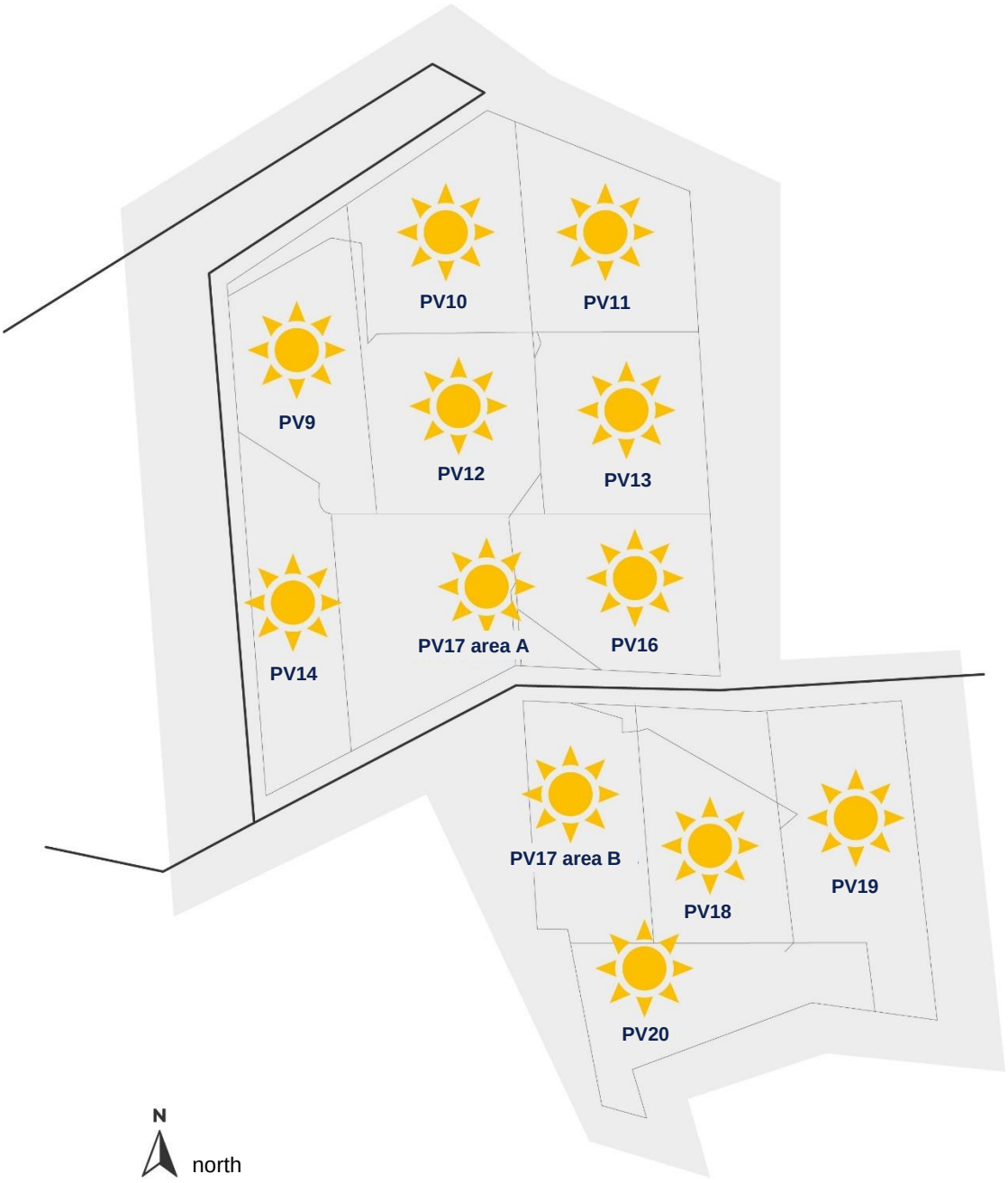
2.1.12 SULECHÓW II PHOTOVOLTAIC FARM

Location and description of the project

Sulechów II photovoltaic farm project was implemented by the special purpose vehicle Polenergia Farma Wiatrowa 17 Sp. z o.o. Sulechów II. Sulechów II PVF is located in the Kruszyna precinct, Sulechów Municipality, Zielona Góra Poviat, Lubusz Voivodeship.

Sulechów II project consists of twelve photovoltaic farms with a capacity of up to 1 MW each, with the necessary technical infrastructure. Total capacity of the farms is 11.714 MWp.

The construction works started in June 2021 and ended in April 2022.



Environmental permits

Sulechów II PVF has all necessary permits to operate in compliance with environmental regulations.

The administrative procedure for issuing the decision on environmental conditions for Sulechów II was conducted by the competent authorities, i.e. the Mayor of Sulechów. In the course of the administrative procedure, the State Sanitary Inspector, the National Water Management Holding Polish Waters and the Regional Directorate for Environmental Protection (RDOŚ) in Gorzów Wielkopolski were consulted. It was determined that there was no need to carry out environmental impact assessment for the planned project.

The procedure ended with the issuance of a decision on environmental conditions (document ref. No. GKR.6220.17.2018.MG issued on 18 October 2018) permitting the construction and installation of thirteen photovoltaic farms with a capacity of up to 1 MW each, including the necessary technical infrastructure and staging.

The company constructed nine photovoltaic farms, in accordance with the received building permits:

- Decision No. 902/2019 of 4 November 2019 for PV9 photovoltaic farm;
- Decision No. 903/2019 of 4 November 2019 for PV10 photovoltaic farm;
- Decision No. 904/2019 of 4 November 2019 for PV11 photovoltaic farm;
- Decision No. 905/2019 of 4 November 2019 for PV12 photovoltaic farm;
- Decision No. 906/2019 of 4 November 2019 for PV13 photovoltaic farm;
- Decision No. 907/2019 of 4 November 2019 for PV14 photovoltaic farm;
- Decision No. 908/2019 of 4 November 2019 for PV15 photovoltaic farm;
- Decision No. 909/2019 of 4 November 2019 for PV16 photovoltaic farm;
- Decision No. 910/2019 of 4 November 2019 for PV17 photovoltaic farm;
- Decision No. 911/2019 of 4 November 2019 for PV18 photovoltaic farm;
- Decision No. 912/2019 of 4 November 2019 for PV19 photovoltaic farm;
- Decision No. 913/2019 of 4 November 2019 for PV20 photovoltaic farm.

No penalties were imposed on the company and no inspection was carried out on its premises in 2022
.

Management of hazardous substances

No hazardous substances are stored or preliminarily stored at Sulechów II PVF. There are no underground or aboveground tanks for hazardous substances on Sulechów II PVF site.

Waste management

Waste at Sulechów II PVF is produced only during maintenance works. Waste from maintenance works is not stored at Sulechów II PVF and it is immediately disposed of in accordance with the regulations in force by the entities servicing the facility.

Water and waste water management

Sulechów II PVF is not connected to the municipal water supply or sewage system. Rainwater and snowmelt is directed to unpaved areas.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Sulechów II PVF.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Sulechów II Photovoltaic Farm.

Sulechów II Photovoltaic Farm is committed to comply with and implement the good practices during its operation.

Polenergia S.A. conducts regular environmental audits (once a year). Wyniki audytów przedstawiane są jako część rocznego Raportu Społecznej Odpowiedzialności Biznesu, który jest publikowany na stronie internetowej w serwisie ESG: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/ff-sulechow-i/

A stakeholder engagement plan was developed and implemented for Sulechów II PVF. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified.

During the construction of photovoltaic farms, the on-going and documented health and safety inspections were performed. Prior to the commencement of construction, each subcontractor has prepared a Construction Safety Manual and submitted it to the Site Manager for approval.

As it is the case with all Polenergia Group facilities, Sulechów II PVF is subject to regular health and safety inspections and audits. During the inspections, the health and safety procedures and instructions are reviewed.

During the construction of Sulechów II PVF the permanent information point was maintained and the documents describing the construction process and terms and conditions of implementation of the investment were generally available in the dedicated information points located at the project area and in the Commune Office.

At the area of Sulechów II PVF a good practice of establishing flower meadows and pastures has been continued. To this end, in April 2022 the area of the farm was sown with a dedicated mixture of melliferous plants enhancing biodiversity of the region.

Implementation of the complaint examination procedure at Sulechów II PVF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Sulechów II PVF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/ff-sulechow-i/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Photovoltaic Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 17 Sp. z o.o.).

No environmental penalties were imposed on Sulechów II PVF in 2022. No inspection carried out by any external institution was carried out.

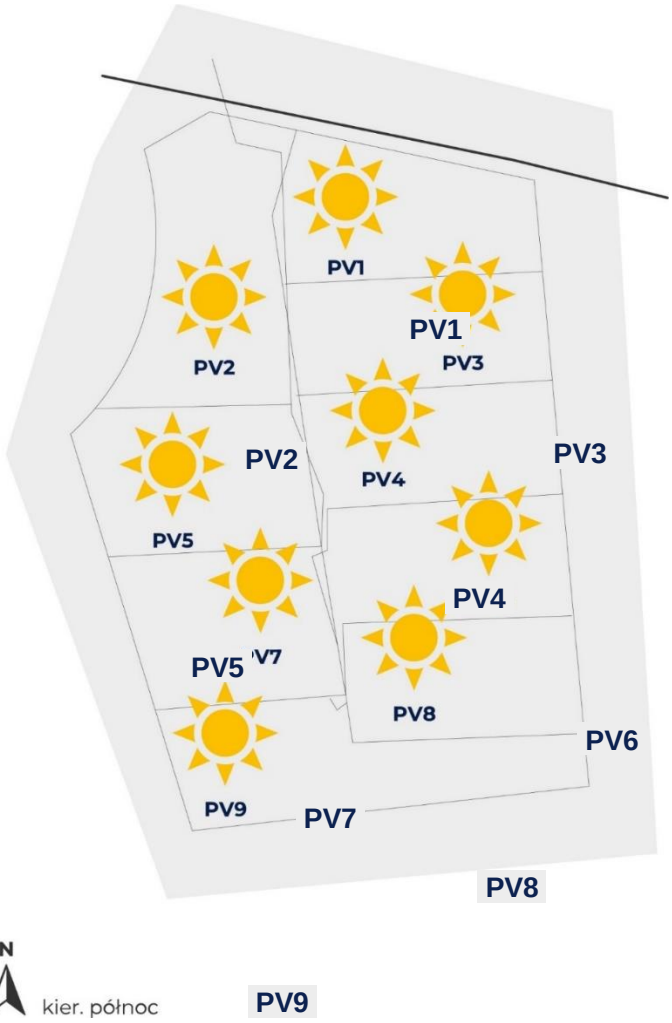
2.1.13 SULECHÓW III PHOTOVOLTAIC FARM

Location and description of the project

Sulechów III photovoltaic farms were constructed by the special purpose vehicle Polenergia Farma Wiatrowa Grabowo Sp. z o.o. Sulechów III is located in the Kruszyna precinct, Sulechów Municipality, Zielona Góra Poviat, Lubusz Voivodeship.

Sulechów III photovoltaic farms consist of nine photovoltaic farms with a capacity of up to 1 MW each, with the necessary technical infrastructure. Total capacity of the farms is 9.835 MWp.

The construction works started in July 2021 and ended in April 2022.



north

Environmental permits

The administrative procedure for issuing the decision on environmental conditions for Sulechów III was conducted by the competent authorities, i.e. the Mayor of Sulechów. In the course of the administrative procedure, the State Sanitary Inspector, the National Water Management Holding Polish Waters and the Regional Directorate for Environmental Protection (RDOŚ) in Gorzów Wielkopolski were consulted. It was determined that there was no need to carry out environmental impact assessment for the planned project.

The procedure ended with the issuance of a decision on environmental conditions (document ref. No. GKR.6220.9.2019.MG issued on 28 November 2018) permitting the construction and installation of ten photovoltaic farms with a capacity of up to 1 MW each, including the necessary technical infrastructure and staging. The company constructed nine photovoltaic farms, in accordance with the received building permits:

- • Decision No. 943/2019 of 12 November 2019 for PV1 photovoltaic farm;
- • Decision No. 944/2019 of 12 November 2019 for PV2 photovoltaic farm;
- • Decision No. 945/2019 of 12 November 2019 for PV3 photovoltaic farm;
- • Decision No. 946/2019 of 12 November 2019 for PV4 photovoltaic farm;
- • Decision No. 947/2019 of 12 November 2019 for PV5 photovoltaic farm;
- • Decision No. 948/2019 of 12 November 2019 for PV6 photovoltaic farm;
- • Decision No. 949/2019 of 12 November 2019 for PV7 photovoltaic farm;
- • Decision No. 950/2019 of 12 November 2019 for PV8 photovoltaic farm;
- • Decision No. 951/2019 of 12 November 2019 for PV9 photovoltaic farm.

Management of hazardous substances

No hazardous substances are stored or preliminarily stored at Sulechów III PVF. There are no underground or aboveground tanks for hazardous substances on Sulechów III PVF site.

Waste management

Waste at Sulechów III PVF is produced only during maintenance works. Waste from maintenance works is not stored at Sulechów III PVF and it is immediately disposed of in accordance with the regulations in force by the entities servicing the facility.

Water and waste water management

Sulechów III PVF is not connected to the municipal water supply or sewage system. Rainwater and snowmelt is directed to unpaved areas.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Sulechów III PVF.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Sulechów III Photovoltaic Farm.

Sulechów III Photovoltaic Farm is committed to comply with and implement the good practices during its operation.

Polenergia S.A. conducts regular environmental audits (once a year). Audit results are presented as part of the annual Corporate Social Responsibility Report, which is published on the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/ff-sulechow-i/

A stakeholder engagement plan was developed and implemented for Sulechów III PVF. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified.

During the construction of photovoltaic farms, the on-going and documented health and safety inspections were performed. Prior to the commencement of construction, each subcontractor has prepared a Construction Safety Manual and submitted it to the Site Manager for approval.

As it is the case with all Polenergia Group facilities, Sulechów III PVF is subject to regular health and safety inspections and audits. During the inspections, the health and safety procedures and instructions are reviewed.

At the area of Sulechów III PVF a good practice of establishing flower meadows and pastures at the areas of the photovoltaic farms has been continued. To this end, in April 2022 the area of the farm was sown with a dedicated mixture of melliferous plants enhancing biodiversity of the region.

Implementation of the complaint examination procedure at Sulechów III PVF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Sulechów III PVF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/aktywa-wyWTorcze/ff-sulechow-i/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Photovoltaic Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa Grabowo Sp. z o.o.).

No environmental penalties were imposed on Sulechów III PVF in 2022. No inspection carried out by any external institution was carried out.

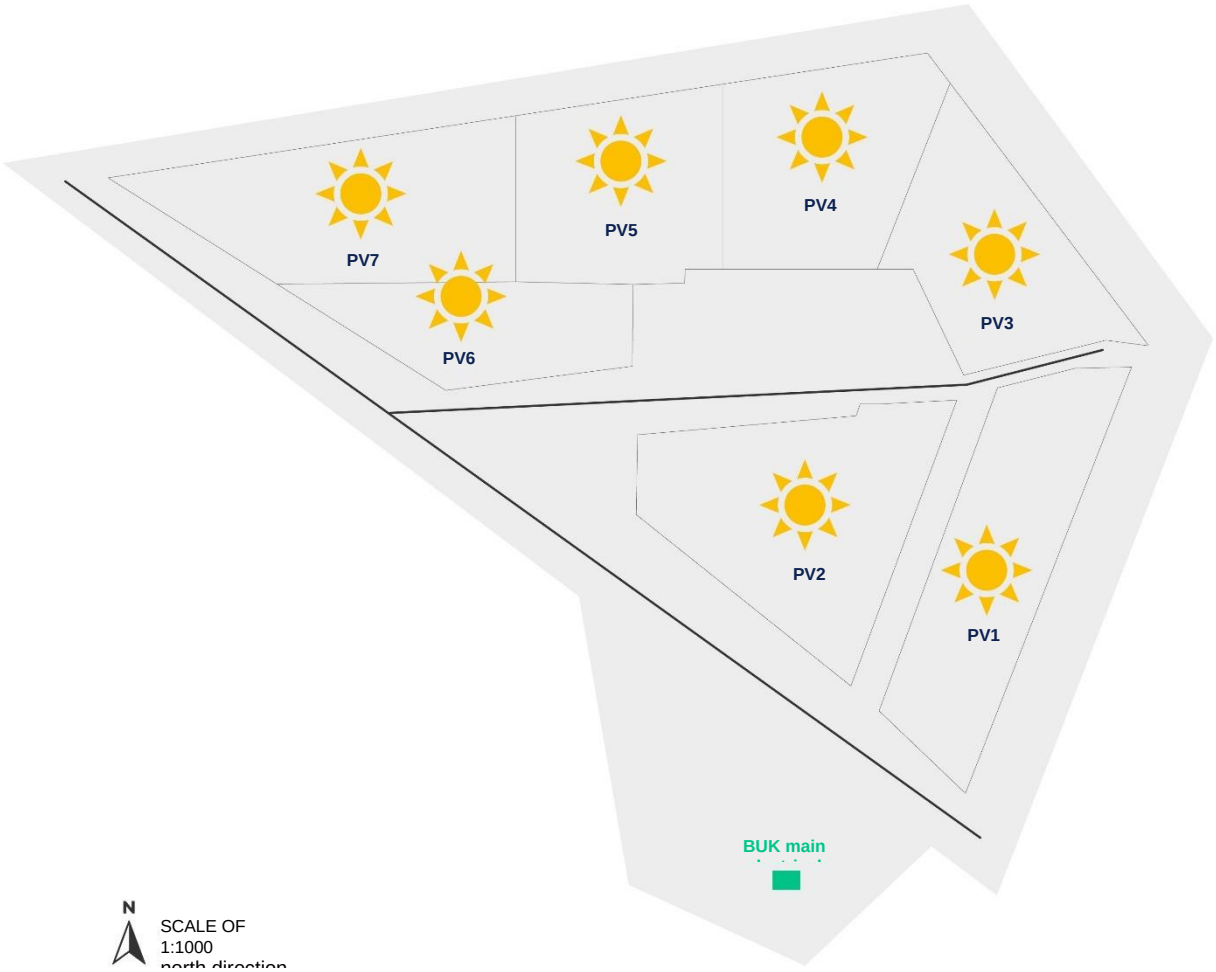
2.1.14 BUK I PHOTOVOLTAIC FARM

Location and description of the project

Buk I photovoltaic farms were implemented by the special purpose vehicle Polenergia Farma Wiatrowa Rudniki Sp. z o.o. Buk I is located in the Wielka Wieś village precinct, Buk Municipality, Poznan Poviat, Greater Poland Voivodeship.

Buk I PVF consists of seven photovoltaic farms with a capacity of up to 1 MW each, with the necessary technical infrastructure. Total capacity of the farms is 6.44 MWp.

The construction works started in August 2021 and ended in April 2022.



Environmental permits

The administrative procedure for issuing the decision on environmental conditions for Buk I was conducted by the competent authorities, i.e. the Mayor of Buk Municipality and Town. In the course of the administrative procedure, the State Sanitary Inspector, the National Water Management Holding Polish Waters and the Regional Directorate for Environmental Protection (RDOŚ) in Poznan were consulted. It was determined that there was no need to carry out environmental impact assessment for the planned project.

The procedure ended with the issuance of a decision on environmental conditions (document ref. No. IP.6220.24.2018 issued on 28 November 2018) permitting the construction and installation of nine photovoltaic farms with a capacity of up to 1 MW each, including the necessary technical infrastructure and staging.

The farms construction received also the following building permits:

- • Decision No. 2734/20 of 2 June 2020 for PV1 photovoltaic farm;
- • Decision No. 2776/20 of 3 June 2020 for PV2 photovoltaic farm;
- • Decision No. 2775/20 of 3 June 2020 for PV3 photovoltaic farm;
- • Decision No. 2742/20 of 2 June 2020 for PV4 photovoltaic farm;
- • Decision No. 668/20 of 5 February 2020 for PV5 photovoltaic farm;
- • Decision No. 2726/20 of 2 June 2020 for PV6 photovoltaic farm;
- • Decision No. 2724/20 of 2 June 2020 for PV7 photovoltaic farm.

Management of hazardous substances

No hazardous substances are stored or preliminarily stored at Buk I PVF. There are no underground or aboveground tanks for hazardous substances on Buk I PVF site.

Waste management

Waste at Buk I PVF is produced only during maintenance works. Waste from maintenance works is not stored at Buk I PVF and it is immediately disposed of in accordance with the regulations in force by the entities servicing the facility.

Water and waste water management

Buk I PVF is not connected to the municipal water supply or sewage system. Rainwater and snowmelt is directed to unpaved areas.

Hazardous materials (asbestos, PCB, ozone depleting substances)

There are no asbestos-containing materials in Buk I PVF.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Buk I Photovoltaic Farm.

The company constructing the Buk I photovoltaic farm is committed to implement good practices at the operation stage.

Polenergia S.A. conducts regular environmental audits (once a year). Audit results are presented as part of the annual Corporate Social Responsibility Report, which is published on the ESG website: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/projekty-w-fazie-rozwoju/farmy-fotowoltaiczne/

A stakeholder engagement plan was developed and implemented for Buk I PVF. Environmental and health and safety procedures were developed based on the health, safety and environment

management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified.

During the construction of photovoltaic farms, the on-going and documented health and safety inspections were performed. Prior to the commencement of construction, each subcontractor has prepared a Construction Safety Manual and submitted it to the Site Manager for approval.

As it is the case with all Polenergia Group facilities, Buk I PVF is subject to regular health and safety inspections and audits. During the inspections, the health and safety procedures and instructions are reviewed.

During the construction of Buk I PVF the permanent information point was maintained and the documents describing the construction process and terms and conditions of implementation of the investment were generally available in the dedicated information points located at the project area and in the Commune Office.

At the area of Buk I PVF a good practice of establishing flower meadows and pastures has been continued. To this end, in May 2022 the area of the farm was sown with a dedicated mixture of melliferous plants enhancing biodiversity of the region.

Implementation of the complaint examination procedure at Buk I PVF.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Buk I PVF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/projekty-w-fazie-rozwoju/farmy-fotowoltaiczne/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Photovoltaic Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa Rudniki Sp. z o.o.).
No environmental penalties were imposed on Buk I PVF in 2022. No inspection carried out by any external institution was carried out.

2.1.15 Nowa Sarzyna CHP Plant

Location and description of the plant

Polenergia Elektrociepłownia Nowa Sarzyna Sp. z o.o. ("Nowa Sarzyna CHP Plant") is located approximately 1 km north-west of the town of Nowa Sarzyna, at ul. ks. J. Popiełuszki 2. The area of Nowa Sarzyna CHP Plant is approximately 6 hectares.

The company produces electricity and heat. Electricity and heat are produced in cogeneration by combustion of natural gas (or reserve fuel - light heating oil) in a gas-steam unit. Production of heat is also possible without cogeneration in a reserve source - an auxiliary boiler room using natural gas or light heating oil.

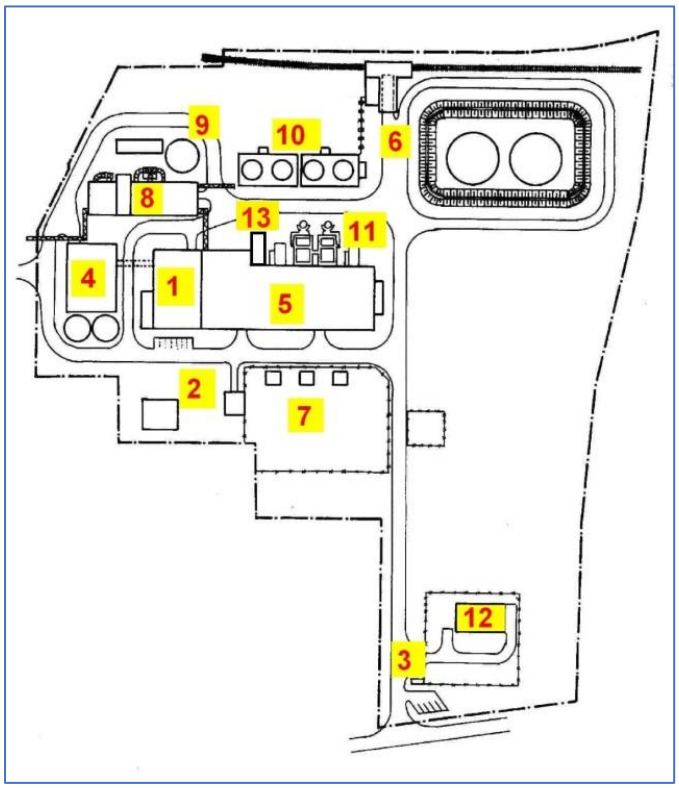
The company has 3 customers for its products:

- Polenergia Obrót S.A. – wholesale power buyer.
- Chemical plants (Sarzyna Chemical Sp. z o.o., CIECH SARZYNA S.A.) – buyer of heat for technological and heating purposes and of electricity for the needs of chemical plants; and
- Zakład Gospodarki Komunalnej Nowa Sarzyna Sp. z o.o. – buyer of heat for heating purposes.

In 2022, gross electricity production was 80,956 MWh and heat production for sale was approximately 415,723 GJ.

The company has 48 employees.

Fig. 2 Type and location of Nowa Sarzyna CHP Plant facilities.



1. Administration building
2. Accounting building
3. Gatehouse at the entrance gate
4. Water treatment plant building
5. Main building - machinery hall
6. Unloading station and tray with heating oil tanks
7. 110kV switchgear
8. Auxiliary boiler building
9. Fire water tank
10. Mechanical draft cooling towers of the cooling circuit
11. HRSG boilers
12. Gas station (owned by Gaz System S.A.)
13. Jenbacher gas engine building

History

The construction and financing project under the "project-finance" formula was developed and supervised by the company's first owner, US corporation Enron (Houston, Texas). Construction of Nowa Sarzyna CHP Plant began in mid-1998 and the plant started commercial operation on 1 June 2000. In 1997, Nowa Sarzyna CHP Plant entered into a long-term power sales agreement with Polskie Sieci Elektroenergetyczne ("PSE"), and in 1998 it concluded a 20-year heat supply agreement with the nearby "Organika-Sarzyna" Chemical Plant. In addition, since 2000 ENS has been selling heat to the residents of the town of Nowa Sarzyna. Gas was supplied for 20 years by the Polskie Górnictwo Naftowe i Gazownictwo Commercial Branch in Warsaw under a sale and purchase agreement for high-methane natural gas, and in 2020 it was supplied by a gas trading company from PGNiG Group and, additionally, by a company from Polenergia Group (Polenergia Obrót SA.).

In 2011, ENS was acquired by Kulczyk Investment. Currently, the company is part of Polenergia S.A. Group seated in Warsaw. Since 2020, ENS has been selling electricity to a trading company from Polenergia Group. Heat is still sold to the nearby chemical plants and to the local utility plant. The company also provides electric power system self-start and restoration services under a renewed 3-year agreement with Polskie Sieci Elektroenergetyczne (the previous 4-year agreement expired in May 2020).

Environmental permits

Nowa Sarzyna CHP Plant has all necessary permits to operate in compliance with environmental regulations.

In 2022, the inspection of the Poviat Sanitary and Epidemiological Station was carried out. No irregularities were detected and no comments were submitted. No penalties were imposed on the company in 2022.

Table 1. Summary of permits and decision on environmental conditions issued for Nowa Sarzyna CHP Plant.

Permit/Decision	Issuing authority	Date of issue	Validity date
Integrated permit No. OŚ.6222.4.2019	Starost of Leżajsk	10 July 2019	Permit issued for an indefinite period (*request for issuing a new permit in progress)
Water permit (document ref. No. RZ.ZUZ.4.421.42.2019.EB) for the directing of industrial waste water produced in the plant, containing substances particularly harmful to the aquatic environment, into the sewage systems owned by CIECH Sarzyna S.A.	National Water Management Holding Polish Waters	26 February 2019	27 February 2023 (*request for issuing a new permit in progress)
Permit for greenhouse gas emissions from the facility covered by the emissions trading system.	Starost of Leżajsk	25 November 2016 (last change of 22 December 2022)	Permit issued for an indefinite period

Air emissions
Air emissions are covered by the integrated permit, which defines the maximum allowable emission level under normal operating conditions of the facility.

Nowa Sarzyna CHP Plant conducts measurements of air emissions (online measurements) on main generating equipment; in addition, interim measurements are also conducted. The last report on the measurements of concentrations and emissions of sulphur dioxide to the air from the two gas turbines E6 and E7 was prepared in December 2021.

Nowa Sarzyna CHP Plant was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2022 will be submitted by the end of February 2023. In addition, as required, ENS is preparing the annual report on CO_2 emissions for 2022, which will be submitted by 31 March 2023.

Management of hazardous substances
Aboveground tanks located in external areas:

- 2 light heating oil tanks with a capacity of 3,000 m^3 each. The tanks are located in an embankment, equipped with a geomembrane and placed in large capacity sumps.
- 1 steel tank for filtered water and fire water with a capacity of 1,800 m^3,
- 2 steel tanks for demineralised water with a capacity of 1,200 m^3 each.

Aboveground, double-walled tanks located inside the building, i.e. in the area of the water treatment plant:

- 1 sulphuric acid tank with a capacity of 5 m^3
- 1 sodium hydroxide tank with a capacity of 40 m^3
- 1 hydrochloric acid tank with a capacity of 40 m^3

All the above-mentioned tanks are located in confined spaces with access restricted to authorised persons only. All hazardous substances are stored on paved ground, equipped with sump trays.

Other chemicals at Nowa Sarzyna CHP Plant include:

- Production chemicals
- Laboratory chemicals
- Fuels, oils and gases
- Other chemicals (e.g. cleaning agents, absorbents, salts)
- Workshop chemicals

All substances have up-to-date safety data sheets.

There are no underground reservoirs at Nowa Sarzyna CHP Plant.

Waste management
Waste management is based on agreements/orders with companies authorised to dispose of waste. This activity is fully covered by the integrated permit.

In accordance with the requirements of the Act on waste, Nowa Sarzyna CHP Plant was registered in BDO system.

Hazardous waste, i.e. turbine oils and transformer oils, are stored at the place of generation in dedicated tanks and collected when replaced, while other oils are stored in leak-proof labelled drums placed under a roof on a sump tray.

Non-hazardous waste is selectively collected and stored in leak-proof labelled containers which are placed under a roof or at the place of generation.

Water and waste water management

Water for technological purposes (industrial water) is supplied based on a long-term agreement on local services concluded with Ciech Sarzyna S.A. Ciech Sarzyna has two independent water intakes: the basic one on the Trzebośnica River and a reserve one on the San River.

Water management is covered by the integrated permit, which defines the quantity of water used for technological purposes (surface water), i.e. 220 m3/h.

Similarly to the industrial water supply, waste water (industrial and sanitary) is discharged in cooperation with the chemical plants, based on the same local services agreement. waste water is pumped into the plants' sewage system and from there discharged to a biological waste water treatment plant.

waste water management is covered by the integrated permit, which defines the volume of industrial waste water discharged to the sewage systems of Ciech Sarzyna S.A., i.e. 438,000 m3/year.

waste water management is also covered by the water permit (document ref. No. RZ.ZUZ.4.421.42.2019.EB) for the directing of industrial waste water produced in the plant, containing substances particularly harmful to the aquatic environment, into the sewage systems owned by CIECH Sarzyna S.A.

Both the integrated permit and the water permit define the permissible pollution levels in industrial waste water. In addition, the water permit imposes an obligation to measure substances particularly harmful to the aquatic environment (listed in the water permit) in industrial waste water at least twice a year.

Nowa Sarzyna CHP Plant conducts the above-mentioned measurements in accordance with the provisions of the permits; the last measurements took place in November 2022 and no exceedances of the permissible pollution levels were reported.

Noise

The nearest multi-family residential housing is located approximately 1 km from Nowa Sarzyna CHP Plant. The integrated permit defines the permissible levels of noise emissions from the facility in relation to multi-family residential and collective residential housing depending on the time of day:

- Daytime (6 AM to 10 PM) – 55 dB;
- night-time (10 PM to 6 AM) – 45 dB

The last noise measurements were carried out in 2022 and showed no exceedances of the acceptable limits.

Hazardous materials (asbestos, PCB, ozone depleting substances)

In Poland, the manufacture and distribution of asbestos-containing materials (ACMs) was banned in 1998. According to the multiannual programme for phasing out asbestos from the economy, as well as the current state of the law, it is allowed to use asbestos in facilities (including buildings) or no later than 31 December 2032. There are no asbestos-containing materials in Nowa Sarzyna CHP Plant.

Manufacturing of equipment containing PCBs was banned in Poland in the early 1980s. In accordance with Polish law, substances and facilities containing PCBs had to be disposed of before 30 June 2010.

There are seven transformers at Nowa Sarzyna CHP Plant (made in 1998/1999), each mounted on dedicated sump trays connected to the separator. The above-mentioned transformers do not contain PCBs.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO2 equivalent must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded.

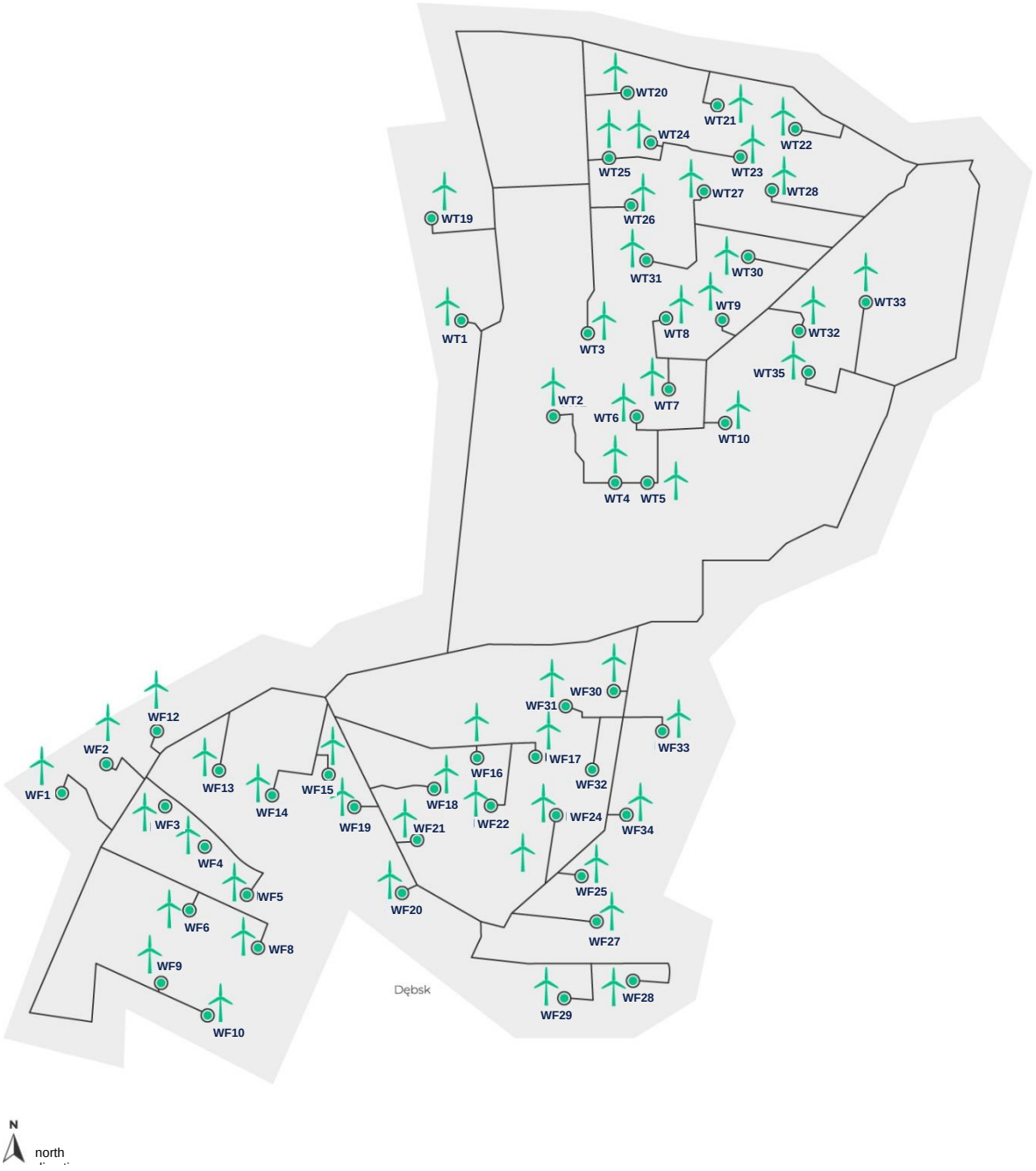
There are two air conditioning units at ENS - TRANE No. 1 and TRANE No. 2. Each unit contains two circuits of R404A refrigerant, with 7 kg of refrigerant in each circuit. The units are registered in CRO. The last inspection of the above-mentioned units took place in April 2022; no leaks were detected on the refrigeration systems.

2.2 Projects in Construction and Development

2.2.1 Dębsk Wind Farm

Location and description of the project

Dębsk Wind Farm project is carried out by Polenergia Farma Wiatrowa 3 Sp. z o.o., a special purpose vehicle owned in 100% by the Polenergia Group. Dębsk WF is located at the area delineated by the location of Zielona, Kuczbork, Dębsk, Chamsk, Olszewo, Olszewko, Kliczewo Duże, Kliczewo Małe and Kosewo villages in Żuromin Municipality and Kuczbork Osada Commune, Żuromin Poviat, Mazovian Voivodeship. 15 wind turbines will be located in the Kuczbork-Osada Commune, while the remaining 40 in the Żuromin Municipality.



Environmental permits

The environmental impact assessment (EIA) procedure for Dębsk WF was conducted by the competent authorities, i.e. the Mayor of Żuromin Municipality and the Voit of Kuczbork Osada Municipality. In accordance with the requirements of the Act on sharing information about the environment and its protection, public participation in environmental protection and environmental impact assessment (EIA), in the course of the EIA procedure, the competent authorities (the State Sanitary Inspector and the Regional Directorate for Environmental Protection (RDOŚ)) approved the project. As part of the EIA procedure, public consultations were carried out which allowed for the participation of project stakeholders. Two decisions were issued in effect of the procedure:

- Decision on environmental conditions issued by the Voit of Kuczbork Osada Municipality for the project consisting in the construction of "Żuromin FW2" wind farm with a total maximum

capacity of 87 MW, which will consist of up to 29 units with a capacity of 3 MW each, underground connections to the main electrical substation, internal access roads (document ref. No. GKB 7624-6/09/10/11 issued on 4 January 2011);

- Decision on environmental conditions issued by the Mayor of Żuromin Municipality and Town for the project consisting in the construction of "Żuromin FW3" wind farm with a total maximum capacity of 99 MW, which will consist of up to 33 units with acoustic power not exceeding 106.5 dB each and capacity of up to 3 MW each (document ref. No. IBGKiOŚ 7624-48/09/10 issued on 7 January 2011).

The project also obtained a permit for the construction of turbines and auxiliary infrastructure. The company ultimately decided to build 55 turbines.

The capacity of the individual Vestas V110 - 2.2MW turbines will be 2.2 MW. The parameters of the turbines will be as follows:

- hub height: 120 m;
- rotor diameter: 110 m.

On 12.09.2022, the complex of facilities was commissioned i.e. the complex of 30 wind turbines of 2.2 MW capacity and the complex of 24 wind turbines of 2.2 MW capacity, MV overhead power line, substation – Dębsk Wind Farm, Żuromin Poviat. Total installed capacity of the wind farm will be 121 MW.

The project also includes the main electrical substation, underground power and control cable infrastructure, as well as access roads to respective turbines and maintenance and assembly works. The energy generated by the turbines will be transmitted via underground cable lines to the main electrical substation. After the transformation to high voltage, electricity will be transmitted via underground 110 kV cable line with a length of approximately 63 km to Kruszczewo main electrical substation.

On 15.06.2022, the GPO 110/30kV substation was reported as the installation generating electromagnetic fields to the Poviat Starosty in Żuromin, Voivodeship Inspectorate of Environmental Protection and the Voivodeship Sanitary and Epidemiological Station in Warsaw.

Environmental monitoring

An additional environmental valuation was carried out in 2019. The survey was carried out in May and June to assess whether the results of the 2009 monitoring remained representative, and whether there had been any changes in land use that could affect the attractiveness of the sites to birds and bats. The results of bird and bat observations confirmed the conclusions of the 2009 monitoring. No new important habitats were identified at the wind farm.

Prior to the start of construction, in August 2020 training was held for all subcontractors involved in the construction process. The training concerned health and safety and environmental protection issues. It was also aimed at informing the subcontractors about the requirements of the institutions financing the project, as well as about Polenergia Group's environmental and social policy and the standards of conduct for Partners (suppliers and subcontractors). Dębsk WF is currently under construction. The construction site is regularly monitored by experts (BIO EKSPERT) responsible for the environmental supervision.

Pursuant to the decision on environmental conditions, the 3-year ornithological and chiropterological monitoring was scheduled upon obtaining the licence. Bat and bird monitoring will be carried out by BioEkspert company.

Management of hazardous substances

On 17.11.2022 the Dębsk WF was entered into the CRO system. 3 devices were recorded i.e. pole mounted switch disconnector with SF6 gas insulation LTB 145 D1/B located at the main power reception point (GPO).

Waste management

At the construction stage, responsibility for the produced waste rested upon the works contractors, thus, the Spółka Farma Wiatrowa 3 made no entry into the Waste Database (BDO) in 2022.

Water and waste water management

Rainwater from the substation area are pre-treated in the petroleum product separator ESK-EH 3/900 by Ecol-Unicon sp. z o.o. and discharged to a drainage ditch located at the plot no. 1/2, Dębsk precinct, Żuromin Municipality, according to the water-law permit of the Starost of Żuromin of 25.11.2014 case ref. no.: RiŚ.6341.48.2014. for discharging rainwater from the area of substation of Dębsk WF to the specific drainage ditch located at the plot no. 1/2, Dębsk precinct, Żuromin Municipality, and construction of storm water sewage outlet to the specific drainage ditch located at the plot no. 1/2, Dębsk precinct, Żuromin Municipality.

All turbines of Dębsk WF, including auxiliary infrastructure, have obtained all necessary building permits.

In order to carry out the construction works, Polenergia Farma Wiatrowa 3 Sp. z o.o. selected and signed the relevant agreements with the following subcontractors:

- J.S. Hamilton Poland Sp. z o.o. (Consortium Leader) and IDOM Inżynieria, Architektura, Doradztwo Sp. z o.o. (Member of Consortium) – Contract Engineer (Consortium);
- Electrum sp. z o.o. and P.U. JAREX Sp. z o.o. – EBoP Contractor (Consortium);
- PBDI S.A. and ERBUD S.A. – CBoP Contractor (Consortium);
- Vestas – turbine supplier.

The financing authorities for the Dębsk WF project are the European Bank for Reconstruction and Development (EBRD), mBank S.A., ING and Santander. Consequently, in 2014, the project was subject to an Environmental and Social Due Diligence (ESDD) conducted by an independent consultant, which showed that the completed Polish environmental impact assessment procedure was in line with the EIA Directive and met EBRD requirements. Part of the analysis was the preparation of an Environmental and Social Action Plan (ESAP). The above-mentioned plan contains measures required at all stages of project development. The 2014 analysis was updated between May and October 2019.

Measures Taken to Meet the Requirements of Environmental and Social Action Plan for Dębsk Wind Farm.

The following list presents the requirements for Dębsk WF at the project preparation and construction stages, with a description of their implementation in the period of 2020 - 2022:

1. Adaptation of general corporate procedures and H&S standards to the Project. The above includes implementation of the H&S management system, such as ISO 14000 and OHSAS 18000

A stakeholder engagement plan was developed and implemented for Dębsk WF. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. All Polenergia facilities are subject to regular health and safety inspections and audits. During the H&S inspection in 2022 no discrepancies were identified.

2. Regular supervision of construction works to ensure that they are carried out in accordance with the provisions of the decision on environmental conditions and good industry practice, and that environmental risks are mitigated and adequately controlled.

Polenergia Farma Wiatrowa 3 has a documented C-ESMP. All documents relating to the construction of Dębsk WF are published on a platform that can be accessed by all company employees involved in the process and by all subcontractors.

Contract Engineer is responsible for regular supervision of the construction works, in accordance with the provisions of the agreement with the company. The report on each inspection with photographs is provided to the company for review.

Logbooks are kept for ongoing health and safety inspections. Prior to the commencement of construction, each subcontractor has prepared a Construction Safety Manual and submitted it to the Site Manager for approval.

Supervision of the construction works and their compliance with the provisions of the decision on environmental conditions and verification that environmental risks are mitigated and appropriately managed is carried out by BIO – EKSPERT, which is responsible for the environmental supervision of the construction works.

In addition, the Contract Engineer prepares weekly ESAP reports, i.e. reports summarising the measure aimed at implementation of the requirements of the Environmental and Social Action Plan (ESAP). The report also includes notifications and corrective measures, if applicable.

3. Development of an Environmental and Social Management Plan for the construction phase of the project.

An Environmental and Social Management System for the construction phase of the project has been developed and accepted. The "health and safety Plan" (H&S Plan) for the construction of Dębsk WF has been prepared and it is updated as required. All subcontractors have been informed about the H&S Plan. The plan defines the approach to managing both health and safety and environmental issues.

4. Formalisation of the employee grievance procedure in accordance with good practices described in the EBRD grievance management guidance, so that it is implemented, communicated and available to contractor's staff.

Polenergia Farma Wiatrowa 3 has developed and implemented a grievance mechanism for employees. The mechanism complies with the EBRD guidance, i.e. it has been communicated to all subcontractors involved in the construction process of Dębsk WF during the opening meeting and training relating to health, safety and environment requirements, involves the management, complaints can be submitted anonymously.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/projekty-w-fazie-rozwoju/farmy-wiatrowe-na-ladzie/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 3 Sp. z o.o).

No complaints were lodged in 2022.

5. Development and implementation of a transport and traffic management plan covering turbine and material delivery and access, transport routes, detours, overload, driver training and consultations with local authorities.

Prior to commencement of construction, Polenergia Farma Wiatrowa 3 has consulted and made arrangements with local authorities. Polenergia Farma Wiatrowa 3 has developed and implemented a traffic and transport management plan. The plan has been agreed with the Mayor of Żuromin Town and Municipality and the Voit of Kuczbork - Osada Municipality and published in the areas exposed to negative impact of bulky transport. All subcontractors were informed about the plan and its requirements during the opening meeting. The plan is available on a platform that can be accessed by all company employees involved in the process and by all subcontractors and it is updated as necessary.

6. Compliance with the provisions of decision on environmental conditions with regard to nature conservation during construction works.

The environmental protection requirements imposed by the provisions of the decision on environmental conditions were communicated to all subcontractors involved in Dębsk WF construction process during the opening meeting and training relating to health, safety and environment requirements. Provisions concerning compliance with environmental regulations were also included in the "H&S Plan", which was signed by the Site Manager.

Pursuant to the environmental decision, the 3-year ornithological and chiropterological monitoring was scheduled upon obtaining the licence. Bat and bird monitoring will be carried out by BioEkspert company.

In September 2020, the company signed an agreement with BIO - EKSPERT, which provides environmental supervision at the Dębsk WF construction site.

Between 2020 and 2021, BIO - EKSPERT performed 108 on-site inspections of the construction site and access roads, which were carried out between August and December 2020. Inspection dates resulted from the construction work schedule and environmental conditions (mainly humidity during earthworks), intensity of migration and occurrence of amphibians in the impacted area, as well as the bird breeding season. The first inspection was related to environmental supervision of tree felling (August 2020) and designation of sites and habitats of high natural value (wetlands, drainage ditches, depressions and water holes), for which the requirements of environmental supervision and proposed protection methods (nets, fencing) were proposed, analysis of potential prohibited activities and application submission deadlines.

In 2022, the contract for environmental supervision with BIO-EXPERT was signed for covering the temporary surface disassembly stage with supervision in the period from March to September 2022. All works colliding with reptile, amphibian and bird habitats were carried out in cooperation with the Regional Directorate for Environmental Protection. There were 27 inspections performed at the temporary surface disassembly state and 3 derogation decisions of the Regional Directorate for Environmental Protection for damaging the habitats of periwinkle, lark, yellow wagtail, meadowlark and wheatear were obtained. Following the decisions, 4 substitute habitats for periwinkle were established, subject to monitoring for 2 years from establishment.

The infringement of the species protection regulations took place at the construction stage. These infringements were identified and described in the inspection report by Bio-Expert. The environmental supervision enabled implementation of corrective measures and environmental compensations. In

effect, the contractor of the construction works, Onde company, performed additional tree and shrub plantings, assembled 65 nest boxes and performed the casts for hymenoptera insects. In addition, within good cooperation with the local community, the contractor ordered planting of 466 trees and shrubs in the city park in Żuromin.

After each inspection, BIO - EKSPERT prepares a report and provides it to the Project Manager and Polenergia S.A. Environmental and Sustainability Department for review.

7. Mitigation of impact on birds and their habitats during construction of the TL (transmission line) by implementing measures defined in the ESAP.

In accordance with ESAP requirements, construction works are carried out under the supervision of a naturalist (in particular if the works are carried out during the breeding season - from March to August) in order to mitigate the risk in case of presence of bird species other than those inventoried in the area during the works.

Construction works on marshlands or crossing a river (in particular on Natura 2000 sites) are carried out using trenchless technology to avoid disruption of ground and water conditions, destruction of breeding sites and disturbance of nesting birds, as confirmed by the ESAP reports prepared by the Contract Engineer. Works are performed in the possibly shortest time frame. At the stage of jacking aiming to protect the Natura 2000 network habitats included in the Habitats Directive the passage of the total length of 5390 m was performed.

During environmental supervision, naturalists discovered the presence of the little owl (Strigidae family). It is a very rare breeding bird in Poland, therefore Polenergia decided to put up nest boxes in the area, which will increase the local population. The residents and the Offices of Kuczbork Osada and Żuromin were involved in this activity. The boxes will be placed on public buildings, private houses and old trees.Part of the boxes were hung at the end of 2020.

Chemical substances used in the construction works (petrol, oils etc.) are stored in a manner that ensures protection against groundwater contamination, as documented in the H&S Plan.

8. In order to reduce adverse impact on reptiles and amphibians, measures defined in the ESAP should be implemented during TL construction.

In accordance with ESAP requirements, construction works are carried out under the supervision of a naturalist (also between March and October).

Protective measures have been implemented, i.e. amphibian capture and removal from excavations, control of excavations before backfilling, as confirmed by the ESAP reports prepared by the Contract Engineer in October, November and December 2020.

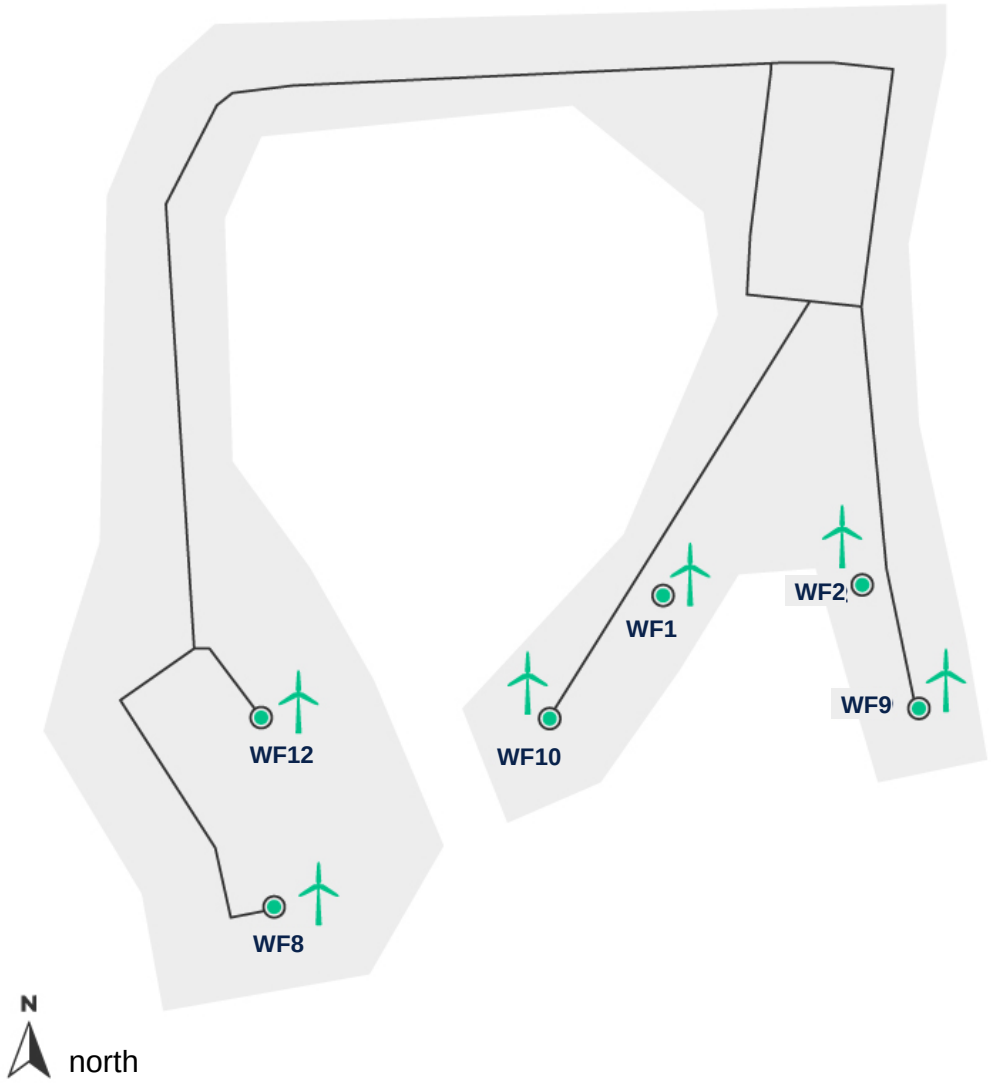
In addition, on 29 October 2020 the company received from the Regional Directorate for Environmental Protection in Warsaw a permit for derogation from prohibitions applicable to protected species, i.e. intentional capture, transport, holding of specimens, destruction of habitats that are their breeding, rearing, resting, migration or feeding areas, intentional transfer from regular sites to other sites (the list of species forms part of Decision No. WSTC – P.6401.40.2020.AK of 29 October 2020). The Decision also lays down the conditions that must be met and it was valid until 23 May 2021.

2.2.2 Piekło Wind Farm

Location of the investment

Piekło Wind Farm project is carried out by Polenergia Farma Wiatrowa 16 Sp. z o.o. and Polenergia Farma Wiatrowa Piekło Sp. z o.o., special purpose vehicles owned in 100% by the Polenergia Group.

Piekło WF is located in the area of Międzychód Poviat, Międzychód Municipality, in the cadastral sections of Tuczępy, Mnichy, Kamionna and in Kwilcz Municipality, Mechnacz section.



In 2012, Piekło WF project underwent the Environmental Impact Assessment (EIA) procedure conducted by the competent authority, i.e. the Mayor of Międzychód. During the EIA procedure the State Sanitary Inspector and the Regional Directorate for Environmental Protection (RDOŚ) were consulted in accordance with the requirements of the environmental law. The consultation procedure also allowed for the participation of project stakeholders. The procedure ended with the issuance of a decision on environmental conditions permitting the construction of up to 14 turbines and the necessary infrastructure. The project also obtained a permit for the construction of 6 turbines and

auxiliary infrastructure. The company ultimately decided to build 6 turbines. The capacity of the individual turbines will be 2.2 MW. Total installed capacity of the wind farm will be 13,2 MW.

On 26 November 2020, based on the auction announcement of 1 October 2020, "AZ/7/2020" auction for the sale of electricity from renewable energy sources was held. As a result of winning "AZ/7/2020" auction, Piekło project with a capacity of 13.2 MW received 15-year support. The works related to Piekło WF project are currently at the stage of preparing the schedule, selecting a turbine supplier and updating the already held arrangements. Piekło Wind Farm project is carried out by Polenergia Farma Wiatrowa 16 Sp. z o.o. and Polenergia Farma Wiatrowa Piekło Sp. z o.o. special purpose vehicles.

The construction stage started in the second half of 2021. Similarly as in the case of the currently constructed Szymankowo and Dębsk wind farms, all construction works will e covered by independent environmental supervision in line with good practice of the Group.

Supervision over the construction works and their compliance with the provisions of the decision on environmental conditions and verification that environmental risks were mitigated and appropriately managed is carried out by BIO – EXPERT, which was responsible for the environmental supervision of the construction works. The contract with BIO-EXPERT was signed on 1 March 2020. The environmental supervision covers the entire construction period.

During the investment, BIO-EXPERT has been carrying out regular inspections of the project implementation with a view to compliance with the environmental protection and nature conservation regulations. It provides support in preparation of requests for derogation from the prohibitions related to protected species, if necessary. In 2022, the project obtained two decisions:

- Decyzja no. WST.6401.285.2022.MT of the Regional Director for Environmental Protection in Poznan of 27 July 2022.

- Decyzja no. WST.6401.309.2022.MT.2 of the Regional Director for Environmental Protection in Poznan of 2 September 2022.

Environmental compensations

At the construction stage, the Company applied for issuing the permit for tree removal and obtained the following consents:

- Decision no. RRG.6131.84.2020.OŚ of the Voit of Kwilcz Commune of 9 September 2022
- Decision no. RRG.6131.73.2020.OŚ of the Voit of Kwilcz Commune of 2 September 2022
- Decision no. OS.613.1.18.2022 of 6 July 2022 of the Starost of Międzychód

Plantings made under this decision will be performed in 2023 before completion of the investment.

The project was subject to an Environmental and Social Due Diligence (ESDD) conducted by an independent consultant. As part of the analysis, a project-dedicated Environmental and Social Action Plan (ESAP) was prepared, which lists the measures necessary to be implemented.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Piekło WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/projekty-w-fazie-rozwoju/farmy-wiatrowe-na-ladzie/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa Piekło).

Description of implementation of measures listed in the ESAP for the Piekło Wind Farm is provided below.

Adoption and adaptation of general corporate procedures and standards to the Project in the field of HSE. This includes implementation of the HSE management system, such as ISO 14000 and OHSAS 18000

Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. All Polenergia facilities are subject to regular health and safety inspections and audits. During the H&S inspection in 2022 no discrepancies were identified.

Regular supervision over the construction works to ensure that they are carried out in accordance with the provisions of the decision on environmental conditions and good industry practice, and that environmental risk is mitigated and adequately managed.

Supervision over the construction works and their compliance with the provisions of the decision on environmental conditions and verification that environmental risks were mitigated and appropriately managed is carried out by BIO – EXPERT, which was responsible for the environmental supervision of the construction works. The contract with BIO-EXPERT was signed on 1 March 2020. The environmental supervision covers the entire construction period.

During the investment, BIO-EXPERT has been carrying out regular inspections of the project implementation with a view to compliance with the environmental protection and nature conservation regulations. It provides support in preparation of requests for derogation from the prohibitions related to protected species, if necessary.

Development of an Environmental and Social Management System (ESMP) at the construction phase of the Project.

The dedicated Environmental and Social Action Plan (ESAP) was prepared for the investment.

Perform the noise measurement upon completion of construction works in line with corporate ESAP, with particular focus on residential areas in consultation with local inhabitants. Schedule the measurements in winter in presence of snow cover, if possible. If the noise level exceed the existing standards in force, prepare and implement adequate noise mitigating measures.

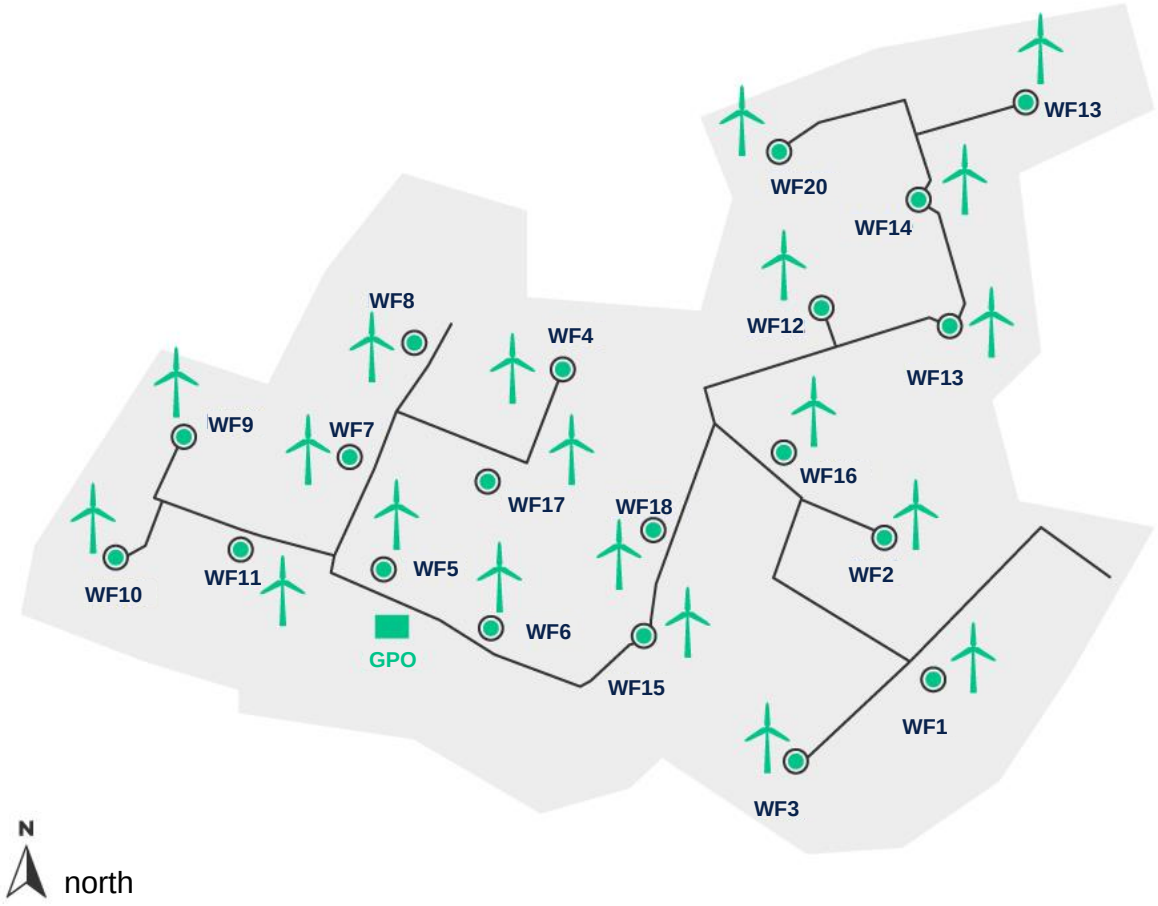
Implementation of measures will be commissioned upon completion of the construction works

Carry out the regular (every 3 years) environmental audit of wind farms.
Implementation of task will be commenced after the farm reaches its full operating capacity.

2.2.3 Grabowo Wind Farm

Location of the investment

Grabowo Wind Farm is located in the north-eastern part of Poland in the Podlassia Voivodeship. Grabowo WF is developed by Polenergia Farma Wiatrowa Grabowo Sp. z o.o., a company established by Polenergia S.A. and will consist of 20 turbines. Grabowo WF will be located in the Grabowo Commune at the geodetic areas of Konopoki-Monety, Konopki-Białystok, Grabowskie and Grabowo. The estimated annual production of clean energy is 129 GWh.



Grabowo WF is at the implementation stage. Total maximum capacity of wind farm is 40.4 MW and it consists in 20 turbines, underground medium-voltage cable lines, transformer station, telecommunications line connecting the turbines with transformer station, internal roads and maneuver yards.

Capacity of a single turbine is 2.2 MW, maximum mast height is 125 m, while maximum total height is 185 m. Noise power of a single turbine shall not exceed 106.1 dB. Land development area is 8.8 ha.

In December 2021, the project won the RES auction. The construction stage started in the first half of 2022.

In effect of the EIA procedure, the investor obtained the applicable environmental decision for Grabowo WF no. FW-8 no. DŚ.6220.03.11 issued on 8 February 2012 by the Voit of Grabowo Commune.

Supervision over the construction works and their compliance with the provisions of the decision on environmental conditions and verification that environmental risks were mitigated and appropriately managed is carried out by BIO – EXPERT, which was responsible for the environmental supervision of the construction works. The contract with BIO-EXPERT was signed on 31 March 2022. The environmental supervision covers the entire construction period.

During the investment, BIO-EXPERT has been carrying out regular inspections of the project implementation with a view to compliance with the environmental protection and nature conservation regulations. It provides support in preparation of requests for derogation from the prohibitions related to protected species, if necessary. In 2022, the project obtained two decisions:

- Decision no. WPN.6401.92.2022.KP of the Regional Director for Environmental Protection in Bialystok of 27 April 2022.

- Decision no. WPN.6401.140.2022.DO of the Regional Director for Environmental Protection in Bialystok of 4 July 2022.

As part of the implementation of the stakeholder engagement plan and as part of the facility management system, the company implemented a grievance mechanism for Grabowo WF.

The complaint forms and project information are made available in the commune office in the "consultation point" and in the office at the area of the facility. In addition, the forms are available at: https://esg.polenergia.pl/grupa-polenergia/dzialalnosc-grupy-polenergia/projekty-w-fazie-rozwoju/farmy-wiatrowe-na-ladzie/

The representative of the Polenergia Group in charge of contacts with the inhabitants and local government representatives is present at the Wind Farm area.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa Grabowo).

The dedicated Environmental and Social Action Plan (ESAP) listing the necessary measures to be implemented was prepared for the investment.

Description of implementation of measures listed in the ESAP for the Grabowo WF is provided below.

Adoption and adaptation of general corporate procedures and standards to the Project in the field of HSE. This includes implementation of the HSE management system, such as ISO 14000 and OHSAS 18000

A stakeholder engagement plan was developed and implemented for Grabowo WF. Environmental and health and safety procedures were developed based on the health, safety and environment management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. All Polenergia facilities are subject to regular health and safety inspections and audits. During the H&S inspection in 2022 no discrepancies were identified.

Regular supervision over the construction works to ensure that they are carried out in accordance with the provisions of the decision on environmental conditions and good industry practice, and that environmental risk is mitigated and adequately managed.

Supervision over the construction works and their compliance with the provisions of the decision on environmental conditions and verification that environmental risks were mitigated and appropriately managed is carried out by BIO – EXPERT, which was responsible for the environmental supervision of the construction works. The contract with BIO-EXPERT was signed on 31 March 2022. The environmental supervision covers the entire construction period.

Development of an Environmental and Social Management System (ESMP) at the construction phase of the Project.

The Environmental and Social Action Plan (ESAP), which is fully implemented at the construction stage and will be continued upon completion of the investment, was prepared for the project.

Perform the noise measurement upon completion of construction works in line with corporate ESAP, with particular focus on residential areas in consultation with local inhabitants. Schedule the measurements in winter in presence of snow cover, if possible. If the noise level exceed the existing standards in force, prepare and implement adequate noise mitigating measures.

Implementation of task will be commenced after the farm reaches its full operating capacity.

Carry out the regular (every 3 years) environmental audit of wind farms.

Implementation of task will be commenced after the farm reaches its full operating capacity.

2.2.4 Szprotawa Photovoltaic Farms

The new investment by Polenergia won an ordinary auction for sales of energy from the Renewable Energy Sources for the produces in the installations of total installed capacity above 1 MW."

Szprotawa photovoltaic farm project will be implemented by the Polenergia Farma Wiatrowa Namysłów Sp. z o.o. company.

The project consists in the investment composed of four installations of total capacity of 47 MWp. The estimated annual production of clean energy by Szprotawa PVF is 51 GWh.

The Szprotawa Photovoltaic Farms project is located in the Lubusz Voivodeship. poviat żagański, Szprotawa Municipality, precinct Sucha Dolna and Cieciszów plots 258/22, 258/42, 258/41, 261/19, 261/20 173/15.

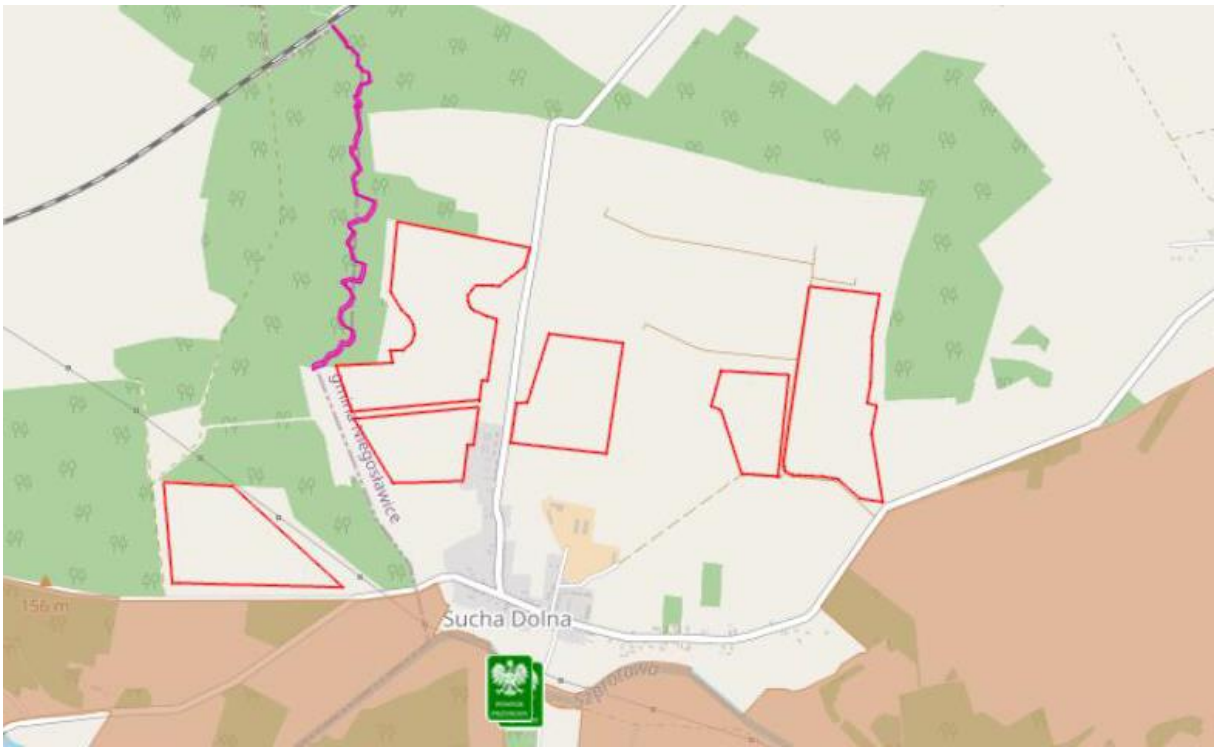
Upon making the final investment decision, the project winning the December auction may start in the 3Q 2023.

The construction stage will be continued by the end of 2024.

The administrative procedure for issuing the decision on environmental conditions for the investment was conducted by the competent authority, i.e. the Voit of Niegosławice Commune. During the procedure, the opinions of the Poviat Sanitary and Epidemiological Station in Żagań and of the Regional

Directorate for Environmental Protection in Gorzów Wielkopolski were obtained. The farm obtained the decision of the Regional Directorate for Environmental Protection of 14 June 2021 (case ref. no. WZŚ.4221.101.2021.DB) on the need to obtain the decision on environmental conditions for the project consisting in the construction and assembly of photovoltaic farms with the necessary technical infrastructure.

On 7 September 202, the Voit of Niegosławice Commune issued the Decision (case ref. no. RTG.OŚ.6220.8.2020) on the environmental conditions with the development consent. Szprotawa Photovoltaic Farm has acquired also the development and connection conditions. In May 2022, the project obtained the necessary building permits issued by the Starost of Żagań.



2.2.5 Strzelino Photovoltaic Farms

The new investment by Polenergia won an ordinary auction for sales of energy from the Renewable Energy Sources for the produces in the installations of total installed capacity above 1 MW."

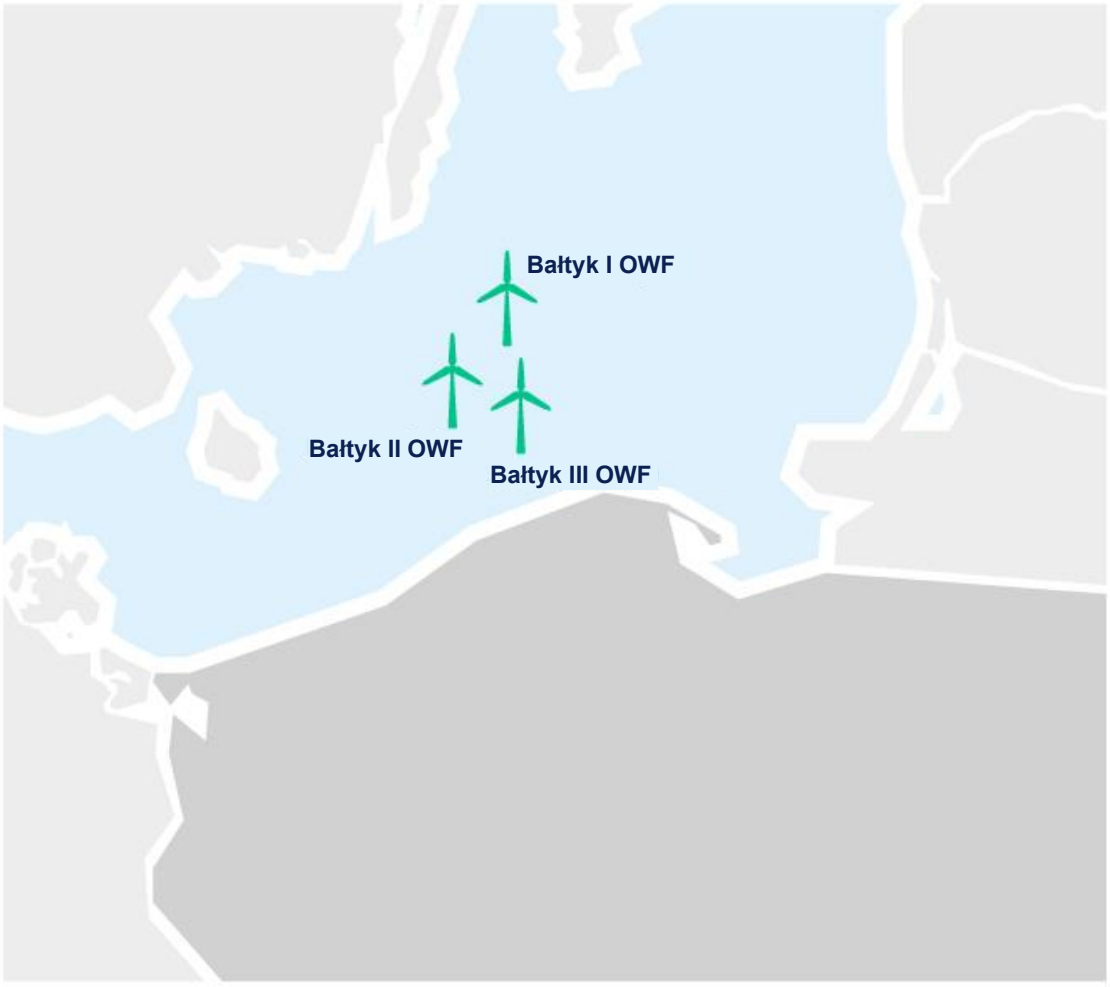
Strzelino photovoltaic farm project will be implemented by the Polenergia Obrót 2 Sp. z o. o. company.

The project consists in the investment composed of four installations of total capacity of 50 MWp. The Strzelino Photovoltaic Farms project is located in the Pomorskie Voivodeship, poviat Słupski, gmina Słupsk, precinct Strzelino, plot No. 181/2, 186/1, 189/17.

Upon making the final investment decision, the project start in the 1 half of 2023.

December 31, 2020. The Head of Słupsk Municipality has issued a decision on environmental conditions for the construction of a photovoltaic farm. The construction stage will be continued by the end of 2023.

2.2.6 Offshore projects



BAŁTYK I OWF

Bałtyk I offshore wind farm will be located on the border of the Polish Exclusive Economic Zone at the level of Łeba Municipality. The project is located 81 km from the port of Łeba, in waters 25-35 metres deep. The project will cover an area of about 128.5 km2, and the power of all turbines will not exceed 1,560 MW.

In January 2019, the project obtained the connection conditions for 1560 MW, and in January 2021 obtained the connection agreement from the distribution system operator. Between December 2020 and March 2022 the comprehensive ex-ante maritime environment survey programme was carried out for the purposes of the maritime environmental impact assessment of the Bałtyk I OWF project and connection infrastructure used for transmission of energy from the installation. The application for issuing the decision on environmental conditions for Bałtyk I OWF was submitted on 18.05.2022 to the Regional Directorate for Environmental Protection in Gdansk. The procedures is in progress.

The Bałtyk I OWF will consist in:

- maximum 104 offshore wind turbines composed of: foundation, tower and nacelle and rotor unit,
- maximum 2 offshore substations (OS),
- maximum 250 km of internal power and telecommunications cables connecting:
  - individual wind turbines with each other (cable circuits),
  - groups of wind turbines with offshore substations,
  - offshore substations with each other.

  Connection point of Bałtyk I OWF to the National Power System will be located in the PSE Krzemienica station.

Information on the Offshore WInd Farm I is available at: Main page (mfwbaltyk1.pl)

BAŁTYK II OWF

Bałtyk II offshore wind farm is to be located approximately 37 km north of the Polish coastline, in Smołdzino Municipality. The project will cover an area of about 122 km2 and it will include the following components:

- maximum 60 wind turbines ("WT"), composed mainly of foundation, tower, nacelle with power generator and rotor,
- 1 internal offshore substation (OS),
- maximum 200 km of offshore power and telecommunications cables connecting:
  - WT between each other (cable circuits),
  - WT groups with the internal offshore substation,
  - internal OS with the external offshore substation (being a part of another project) (optionally).

Between June 2012 and September 2014, marine environmental surveys were carried out covering the area of the planned wind farm and its immediate vicinity.

The environmental impact assessment (EIA) procedure ended with the issuance of an environmental decision on 27 March 2017 permitting the construction of up to 120 turbines with a total capacity of up to 1,200 MW, each with a total height of up to 300 m and rotor diameter of 250 m with auxiliary infrastructure, e.g. up to 6 internal offshore substations and up to 200 km of onshore and offshore transmission and telecommunications cable lines. The decision of 27 March 2017, upon performing the environmental impact assessment, was amended by the decision of 26 October 2021. The decision became final on 09.12.2021. On 15 September 2022 the decision of the Regional Directorate for Environmental Protection was issued stating that the conditions of issued decisions remain valid and therefore the validity period of the decisions is 10 years.

In addition, in March 2019 the environmental decision for the connection infrastructure covering the connection infrastructure of Bałtyk II and III OWFs was obtained. Due to project development, certain components of the Project were significantly modified, including primarily in the onshore section (including spatial). Therefore, on 2.06.2022 the application for environmental decision for the connection infrastructure was submitted to the Regional Directorate for Environmental Protection.

The application covers the connection infrastructure of Bałtyk II and III OWFs. The procedures is in progress.

Connection point of Bałtyk II OWF to the National Power System will be located in the PSE Wierzbięcino station.

Information on the Offshore Wind Farm I is available at: Main page (baltyk2.pl)

BAŁTYK III OWF

Bałtyk III offshore wind farm is to be located approximately 37 km north of the Polish coastline, in Smołdzino Municipality. The project will cover an area of about 117 km2 and it will include the following components:

- maximum 60 wind turbines ("WT"), composed mainly of foundation, tower, nacelle with power generator and rotor,
- 1 internal offshore substation (OS),
- maximum 200 km of offshore power and telecommunications cables connecting:
  - WT between each other (cable circuits),
  - WT groups with the internal offshore substation,
  - internal OS with the external offshore substation (being a part of another project) (optionally).

between June 2012 and September 2014, marine environmental studies were carried out covering the area of the planned wind farm and its immediate vicinity.

The environmental impact assessment (EIA) procedure for Bałtyk III OWF project ended with the issuance of a decision on environmental conditions on 7 July 2016 permittingthe construction of up to 120 turbines with a total capacity of up to 1,200 MW, each with a total height of up to 275 m and rotor diameter of 200 m with auxiliary infrastructure, e.g. up to 6 internal offshore substations and up to 200 km of onshore and offshore transmission and telecommunications cable lines.

On 4 January 2022 the decision of the Regional Directorate for Environmental Protection was issued stating that the conditions of issued decision remain valid and therefore the validity period of the decision is 10 years.

With regard to the change in turbine parameters, the company applied for issuing a new environmental decision. A new EIA report with an application for a new decision on environmental conditions was submitted to the Regional Directorate for Environmental Protection in Gdansk in September 2019. With regard to the above, the company applied for amending the 2017 decision on 13.06.2022. The amended decision was issued on 8.11.2022 and became final as of 29.11.2022.

In addition, in March 2019 the environmental decision for the connection infrastructure covering the connection infrastructure of Bałtyk II and III OWFs was obtained. Due to project development, certain components of the Project were significantly modified, including primarily in the onshore section (including spatial). Therefore, on 2.06.2022 the application for environmental decision for the connection infrastructure was submitted to the Regional Directorate for Environmental Protection. The application covers the connection infrastructure of Bałtyk II and III OWFs. The procedures is in progress.

Information on the Offshore Wind Farm I is available at: Main page (baltyk3.pl)

2.2.7 Hydrogen investments in the Polenergia Group

H2 Silesia

The H2 Silesia project is implemented by Polenergia S.A. The project consists in the construction of large-scale plant producing green hydrogen of 105 MW capacity for heavy industry located in the Upper Silesia. The planned installation will be able to produce approx. 13,000 tonnes of hydrogen per annum.

In 2022, the project definition was completed in the form of comprehensive feasibility study and technical concept by Bilfinger Tebodin.

In 2022, the H2 Silesia project was pre-notified in the IPCEI (Important Projects of Common European Interest) process at the national level. The aim of IPCEI scheme is to strengthen the capacity of the European industry in context of global competition faced by the EU economy. The overall objective of using the IPCEI scheme is to build Europe's independence in the value chains of strategic importance for its development by developing innovative products. H2 Silesia project awaits notification of the European Commission under the 3rd call for proposals. Launching the production of green hydrogen is scheduled for 2027.

H2 Hub Nowa Sarzyna

The H2 Hub Nowa Sarzyna project is implemented by Polenergia S.A. The project consists in construction of a pilot plant for green hydrogen production of the nominal capacity of approx. 5 MW, which will enable maximum production of approx. 720 tonnes per annum. The plant will be located in Nowa Sarzyna at the area of Nowa Sarzyna CHP Plant.

The scope of investment covers the construction of the hydrogen production unit, compressor and high pressure store with hydrogen distribution hub.

In 2022, the conceptual works consisting in preparation by Bioproraf S.A. of feasibility study and technological concept. The design works in the form of basic design, construction design and permit documentation have commenced.

On the basis of Environmental Report prepared by Eko-Konsult, the application for issuing the Decision on environmental conditions for project implementation was submitted on 2.12.2022.

Co-financing for the construction of public hydrogen loading station of the National Fund of Environmental Protection and Water Management in Nowa Sarzyna and Rzeszów of PLN 20,000,000 was obtained. The final investment decision is scheduled for the mid-2023. The production will start at the end of 2024.

2.2.8 Gas investments in the Polenergia Group

While implementing its strategy for natural gas segment, Polenergia aims primarily at supporting the energy transformation. It analyses the gas projects in the scope of peak units ensuring energy security and balancing the energy production from renewable sources. In addition, it analyses participation in the CHP projects being a part of local energy management and contributing to development of distributed energy system. Polenergia believes that development of gas segment is a long-term strategy, which means that the gas projects are understood as a platform for future transition from fossil fuel (natural gas) to renewable fuel i.e. green hydrogen. With regard to the above, the projects have been already developed as "Hydrogen ready" to enable their quick and easy modernisation for hydrogen combustion in future.

On 29 June 2020, the Company and Siemens Energy signed the letter of intent on cooperation in the area of industrial use of highly-efficient CHP (combined heat and power) as well as introduction of solutions enabling sustainable production and use of hydrogen. Both parties declared long-term cooperation focused on the Polish market, which needs the effective and efficient solutions mitigating the negative impact of economic activity on climate and environment.

2022 will be certainly remembered in the history as the year of war. This event caused mass political and military turbulence at the international arena, but acted also as a kind of earthquake in the energy resources sector. The existing system of resources flow in the global economy was destructed in an unprecedented way, which caused panic on the markets and dramatic surge of resource prices, including among others natural gas. We believe that there will be no return to the previous system and the new one will be established, stemming from the new perspective of the aspects of geopolitical stability and security of supplies. This process will require however several years, during which relatively high prices of natural gas can be expected. We have been observing and make all efforts to assess the macroeconomic situation in a matter-of-fact way, in particular with a view to investment projects in the gas segment, preparation, implementation and operation of which involve the multi-annual (~20 years) rather then one or a few years perspective. Therefore, and also with consideration to the available projections of independent advisors, we believe that the natural gas sector should remain a part of the Polenergia Group strategy, the more that it is understood as an element of transition towards full use of green hydrogen in future.

In addition, the current events will force the highly energy-consuming Polish industry more intensively to seek the solutions, which will reduce the costs of fuels and heat and power used in technological processes and at the same time decrease carbon footprint of their products. Stabilization of RES production requires implementation of highly advanced low-carbon projects based on natural gas. Very high flexibility of this technology will be the key and make gas installations the basis to increase installed capacity in the domestic power and energy system in the next few years.

The Group holds the Nowa Sarzyna CHP Plant in the field of energy production with the use of gas. The CHP Plant fuelled with natural gas, active since 2000, is operated by the Group company - Polenergia Elektrociepłownia Nowa Sarzyna sp. z o.o. (hereinafter NS CHP Plant) and is located in Nowa Sarzyna (Nowa Sarzyna Commune, Leżajsk Poviat, Subcarpathian Voivodeship). Capacity of the Nowa Sarzyna CHP Plant is 116 MW of power capacity and 70 MW of heat capacity. The plant uses the technologically

advanced solutions and equipment and the entire production process is fully automated. The CHP Plant has two gas turbines with heat recovery boilers (43.4 MW each) and one steam turbine (44,8 MW), operating as the combined gas and steam system. NS CHP Plant plays an important role in the energy system as a stable source of power. It provides systemic services to PSE (energy system operator) such as forced generation or blackstart and actively participates on the capacity market strongly contributing to the available capacity of the region.

Gas project – ENS Peaker

The ENS Peaker project consists in the construction of peak gas unit located at the area owned by Polenergia Elektrociepłownia Nowa Sarzyna sp. z o.o. The unit will perform the peak and balance function for energy production. Planned capacity of the unit is of approx. 65 MW.

The scope of investments covers the construction of unit, supplying natural gas, distribution of energy and numerous auxiliary systems necessary for safe and proper operation.

The investment holds the Feasibility Study (Q1'22), conditions for connection to the gas system (Q2'22) and power system (Q4'22), while obtaining of the environmental decision for the investment is in progress (scheduled for Q1'23). In addition, the project will be submitted to the capacity market auctions in 2023, which requires numerous qualifying procedures. The construction works will start in 2024. Launching the plant and production is scheduled for 2028.

All works related to the Feasibility Study and preparation of environmental documentation (for the purposes of environmental decision) were performed by Ramboll.

3. Implementation of Stakeholder Engagement Plan and Environmental and Social Action Plan

3.1 Measures Taken to Meet the Requirements of Stakeholder Engagement Plan

The Polenergia group is not legally bound to publish any environmental or social reports on environmental and social performance. This information is published in the annual reports for the shareholders. The Company implemented the corporate social responsibility policy (CSR 2019-2022). The CSR reports were published on the official Company's website on regular basis, while since 2021 the CSR Reports for 2015-2019 were transferred to the newly-deployed ESG service, where non-financial data for the subsequent year (2020) were presented in the form of ESG service (www.esg.polenergia.pl), data for 2020 will be archived as pdf, and data for 2021 will be presented on-line in the interactive form. The ESG service publishes also the annual report in line with the requirements of the financing authorities.

Publishing project-related information is required for the newly-established projects as early as at the stage of EIA procedure. The scope of revealed information covers among others the general project presentation, its expected environmental and social effects - including at Natura 2000 protected areas and measures necessary to mitigate these effects. Revealing such information and ensuring public participation in the environmental impact assessment process rests upon the authorities responsible for initiation of the EIA procedure. The authorities are bound by law to ensure public access to all resolutions and decisions made under the EIA procedure and examine the comments and complaints submitted by the entities concerned. The EIA procedure for the projects of similar nature to the project in question is carried out at least once before the environmental decision is made.

Stakeholder Engagement Plans were developed to formalise Polenergia and Polenergia Group companies' communication with project stakeholders and to develop a grievance mechanism.

As required by SEP, during the development and operation of each project, Polenergia has conducted internal and external dialogue with stakeholders. The internal dialogue is based on the routine exchange of information between the various organisational units of the company and those involved in the development and operation of the project. Exchanging e-mails, organisation of regular meetings and notifications on notice boards in Municipality offices were commonly used to ensure a smooth flow of information between staff. Detailed description of the frequency and forms of contact with certain stakeholders and the purpose of these contacts is presented below:

- The National Labour Inspectorate is always notified of the start of construction;
- The Poviat Construction Supervision Inspectorate is always notified of the start of construction works;
- The Voivodeship Construction Supervision Inspectorate is always notified of the start of construction works;
- Regular communication with municipality or commune offices, e.g. at the stage of issuing building permits and throughout the construction process;
- Regular communication with suppliers and subcontractors to coordinate construction works. All possible forms of contact are implemented;
- Communication with distribution system operators;
- Contact with Creditors (including EBRD) and other financial institutions operating under the Equator Principles (EPFI);
- Regular communication with local communities and residents (residents of surrounding areas, owners of properties leased for turbines etc.), consultation points organised at the construction site and at municipality or commune offices, transport plans related to the transport of large project components prepared and consulted with local authorities.

4. INFORMATION ABOUT CHANGES RELATED TO NATURA 2000 SITES OR OTHER IMPORTANT PROTECTED AREAS THAT MAY AFFECT POLENERGIA SITES

According to information published on the website of the General Directorate for Environmental Protection, "In 2019, the European Commission presented a number of objections regarding the completeness of the Natura 2000 network in Poland, including the need to complete the network by designating new sites and enlarging the existing sites. The Polish Government considered some of these objections justified and agreed with the need to propose new Natura 2000 sites or to enlarge the existing sites.The proposed list of changes was presented to the communes for consultation. Subsequently, on 25 January 2022, the Council of Ministers adopted the Resolution no. 9 on granting consent for submission of the "List of changes to the Natura 2000 network" document to the European Commission. On the basis of this resolution, the agreed list of sites with changed area was submitted to the European Commission.

In 2022, the European Commission made another request to Poland to supplement the list of Natura 2000 sites and supplement the list with additional areas under the compensation measures for the linear projects implemented by Poland. With regard to the above, the General Directorate for Environmental Protection, in the period from 14 to 29 July 2022, consulted with the communes on changing the area of 100 Natura 2000 sites. The agreed list of changes will be re-submitted to the European Commission upon approval by the Council of Ministers.

The Natura 2000 sites consulted by the General Directorate for Environmental Protection generate no direct impact on the Polenergia Group facilities.
Until 31 July 2020, comments and proposals of changes to the Polish Natura 2000 network could be submitted. After completion of the consultations, the proposals were submitted to the Council of Ministers for approval, and then to the European Commission.

A table of all changes is available on the website of the General Directorate for Environmental Protection: http://natura2000.gdos.gov.pl/files/aktualnosci/166529/pismo-GDO%C5%9A-do-gmin---za%C5%82%C4%85cznik_nWFs_image.pdf.

The changes included in the table above do not have any direct impact on Polenergia sites.

5. HEALTH, SAFETY AND ENVIRONMENT REGULATIONS AFFECTING THE PROJECTS

Polenergia S.A. Environmental and Sustainability Department, in close cooperation with Project Managers and subcontractors, keeps track of the changes in the health, safety and environment regulations which may have an impact on the projects, both in operation and in development.

Atmoterm S.A., based on cooperation agreements with companies from Polenergia Group, provides monthly summaries of changes in regulations and support to Group companies in the area of environmental protection.

In addition, the ENS company is additionally supported in the area of health, safety and environment, which is provided by TARBONUS company.

The list of key regulations is presented below.

Environment:

- Act of 27 April 2001 Environmental Law (Journal of Laws of 2022, item 2556),
- Act of 14 December 2012 on waste (Journal of Laws of 2013, item 21),
- Act of 12 June 2015 on greenhouse gas emission allowance trading scheme (Journal of Laws of 2015, item 1223);
- Act of 17 July 2009 on the system to manage the emissions of greenhouse gases and other substances (Journal of Laws of 2009 No. 130, item 1070);
- Act of 20 July 2017 Water Law (Journal of Laws of 2017, item 1566);
- Act of 15 May 2015 on substances that deplete the ozone layer and on some fluorinated greenhouse gases (Journal of Laws of 2015, item 881);
- Act of 19 August 2011 on the carriage of dangerous goods (Journal of Laws of 2011 No. 227, item 1367);
- Act on promoting electricity generation in offshore wind farms (signed by the President on 22 January 2021).

Health and safety:

- ACT of 7 July 1994, Construction Law (uniform text in: Journal of Laws of 2021, item 2351, uniform text of 2021.12.20)
- ACT OF 26 June 1974, Labour Code (uniform text in: Journal of Laws of 1998 No. 21, item 94 as amended)
- Ordinance of the Minister of Economy and Labour of 27 July 2004 on the health and safety trainings (Journal of Laws No. 180, item 1860 as amended)
- Ordinance of the Minister of Infrastructure of 6 February 2003 on health and safety during the construction works. (Journal of Laws No. 47, item 401)
- Ordinance of the Minister of Economy of 20 September 2001 on health and safety during operation of machinery and other technical equipment for earth, construction and road works. (Journal of Laws No. 118, item 1263313 as amended)
- Ordinance of the Minister of Entrepreneurship and Technology of 22 October 2018 on health and safety when operating tower and quick-assembly cranes.
- Ordinance of the Minister of Labour and Social Policy of 14 March 2000 on health and safety during manual transport works. (Journal of Laws No. 26, item 313 as amended)
- Ordinance of the Minister of Climate of 24 September 2020 amending the ordinance on health and safety at work with energy equipment (Journal of Laws of 2020, item 1649)
- Ordinance of the Minister of Labour and Social Policy of 26 September 1997 on general health and safety regulations (uniform text in: Journal of Laws of 2003, No. 169, item 1650 as amended)

6. PROJECT COMPLIANCE WITH ENVIRONMENTAL, SOCIAL AND HEALTH & SAFETY REGULATIONS

Polenergia S.A., as well as other Group companies, operate in compliance with all applicable laws in force on the territory of Poland. No other material non-compliance with environmental, social and health and safety regulations or laws occurred in 2022.

All construction contractors regularly monitor health and safety issues on construction sites. Construction sites are also monitored by Polenergia S.A. Health, Safety and Site Analysis Expert.

Before construction begins, all subcontractors, engineers and contractors are informed about Polenergia S.A.'s policy related to environmental and social management on the construction site. As a result, they are aware of their responsibilities and the standards they must adhere to. Subcontractors have also been informed that breach of health and safety rules by their workers will result in irreversible removal of such workers from the construction site.

7. GROUP ACTIVITIES FOCUSED ON SUPPORTING BIODIVERSITY - GOOD PRACTICES

Apart from compliance with the national and EU law and the requirements of the financing authorities, the Group is committed to deliver the ESG Strategy and implement good practices such as:

- In the area of the investment (wind farms under construction) of the Polenergia Group companies, obligatory environmental supervision is carried out both during construction and after the wind farms are put into operation. The constant presence and supervision of naturalists during construction is a unique good practice of the Group, which means that our investments are carried out with the utmost care for the environment and the preservation of biological diversity. By implementing the recommendations of environmental supervision experts, we not only minimize the negative impact of investments, but also strengthen the conservation status of endangered species and habitats. Additionally, environmental monitoring reduces the risk of interruptions in the construction works.
- Implementing the recommendations of environmental monitoring, protective measures for amphibians are carried out by transferring amphibians (frogs and newts) and insects (ground beetles and beetles) from excavations, and securing earth piles, where sandworms or red-backed swallows breed. In accordance with the arrangements with naturalists, drilling is carried out under trees and excavations are made at a distance from the avenues of trees, thanks to which the negative impact of the works is minimized. Part of the work is also carried out in trenchless technology (laying cables on Dębsk WF and Grabowo WF).

- Implementation of long-term activities in the area of environmental education and development of biodiversity projects. The former are aimed at developing sensitivity and making residents aware of the importance of the natural environment and taking care of our Planet, while the latter are aimed not only at supporting the natural environment, but also at creating common spaces for local communities, thus allowing for greater integration and

bonding of people. Such initiatives make residents more aware of how important a role the environment plays in their lives.

- Involvement in partnerships for the protection of biodiversity and climate. The example is continuation of participation in the "Green Ribbon #ForThePlanet" initiative implemented by UNEP/GRID-Warszawa. The aim of the campaign organised every year is to educate the society on the most important environmental challenges. In accordance with the UN resolution, the main theme of this year's edition is "Restoring our Ecosystems". The years 2021 - 2030 have been announced by the UN as the UN Decade on Ecosystem Restoration.

The involvement of the Polenergia Group in activities related to the protection of biodiversity in wind and solar farms is directly related to the implementation of the Sustainable Development Goals and the EU Biodiversity Strategy. Minimizing the impact of the Polenergia Group's operations on the environment and monitoring the investment's impact on the environment is also the goal of the Polenergia Group's Corporate Social Responsibility Strategy for 2019-2022. The exemplary activities focused on preservation and increase in biodiversity and ecological education in the area of investments carried out by the Polenergia Group companies are presented below.

In 2022, plantings of trees and shrubs in the City Park in Żuromin was completed. In order to improve biodiversity and availability of green areas in the park, 5 large horse-chestnuts were planted. 3 stages of plantings in the park in Żuromin included 466 trees and shrubs.

Trees were also planted in the Kostomłoty Commune at the area of the educational facilities in order to increase availability of green and related benefits to the inhabitants, including in particular children. In 2022, 8 large trees supplementing the green areas and improving the conditions for children by providing them with more shadow, lower temperature in summer and cleaner air were planted near the nursery and primary school in Kostomłoty.

One of the longest implemented programs is the active protection of the Montagu's harrier. Montagu's harrier is one of the rarest birds of prey in Poland, which nests in the vicinity of constructed and existing wind farms. The first protective measures for the harriers were carried out at the Łukaszów WF and Modlikowice WF even in 2014. This activity is continued, among others, in the area of the Kostomłoty WF, where the harrier's nests are also protected in 2022. In 2022, the additional nest protection allowed growth and leaving the nest by 12 young birds. Since the beginning of harrier protection activities, our support resulted in rescuing 87 young harriers.

In the first half of 2022, the long-term project to increase biodiversity was continued in the complex of photovoltaic farms in Sulechów. In 2022, the area on which flower meadows were sown with seeds and pasture meadows mixtures with the seeds of honey plants was enlarged to 50 hectares. Sowing was carried out at the beginning of April. In the area of Buk Photovoltaic Farm, following the example of Sulechów PVF, the first sowing was carried out using the seeds of a pasture meadow mixture on an area of 8 ha. Thanks to the implemented activities, the attractiveness of the area of photovoltaic farms increases for insects, birds and small mammals. A summary of activities increasing biodiversity on photovoltaic farms is described on the website: https://esg.polenergia.pl/dobre-praktyki/dbamy-o-bioroznorodnosc-na-farmach-fotowoltaicznych/

In the area of FF Sulechów I, the project of running an apiary is being continued. In March 2022, an agreement was signed with a bee-keeper from the local community who operates the apiary, performs inspections, protective and hygienic treatments, and carries out honey picking. In the first half of 2022, two honey harvests were carried out, from which 90 litres of honey were obtained. The benefits of

running an apiary and activities supporting pollinating insects are described on the website: https://esg.polenergia.pl/dobre-praktyki/fotowoltaiczna-pasieka-pelna-miodu/

In order to increase biodiversity and the richness of pollinating insect species, there are 8 so-called hotels for pollinating insects in Sulechów and 2 in Buk FF. Thanks to this, insects whose populations are considered declining and endangered on a national and European scale will find a new habitat.

At the farm complex in Sulechów, there is an environmental monitoring, thanks to which it is possible to observe the positive impact of photovoltaic farms on the increase in biodiversity compared to areas subject to intensive agricultural management. This 3-cycle monitoring operating from the construction of the Sulechów I PVF complex. The performed monitoring was summarised in the form of a report, results of which demonstrate the increase in biodiversity at the area of the constructed wind farm compared to the pre-investment period.

In addition, as a result of the nature supervision carried out in the area of Sulechów I PVF, there appeared a publication on the impact of photovoltaic farms on the populations of birds of prey. The author of the publication is Mr Piotr Tryjanowski, Professor, PhD, Head of the Institute of Zoology at the University of Life Sciences in Poznan.

Activities related to increasing biodiversity and communication outside the Group are aimed at showing the real, positive impacts of large-scale PV. Only proper communication directed at private persons, industry journalists and bodies issuing environmental decisions will allow for the effective implementation of new PVF projects.

8. CHARITY ACTIVITIES IN THE AREA OF THE IMPLEMENTED INVESTMENTS

2022 has been the year of many challenges for the energy sector brought by changes to the regulations and associated with the outbreak of military conflict in Ukraine. Despite these fluctuations, the Polenergia Group managed to keep up to its corporate social responsibility priorities. We responded positively to the requests of local communities, caring of good and development of our staff and with a continuous focus on natural environment. The entire 2022 abounded with biodiversity, charity, educational and voluntary activities as well as the actions aiming at strengthening the Partnerships for implementation of these activities.

From the very beginning of the war in Ukraine, thousands of people from the endangered areas came to Poland looking for support. The Polenergia Group has immediately joined the aid organisation activities for the Refugees. I In March 2022, the Supervisory Board allocated an additional budget for this purpose (supported in August 2022 by a special additional resolution of the Supervisory Board) to enable financial aid where it is the most desired.

The activities of individual Group companies implemented from January to December 2022 are primarily local initiatives that are implemented within the existing or developed facilities. These include the activities supporting local initiatives, non-governmental organisations or education points struggling with various needs. Our support is projected in a manner to bring long-term benefits to these most in need. We are aware that only by well-organised actions will be able to support the

greatest possible number of people. Therefore our support has been and continues to be planned on many fronts.

As one of the areas of the Group's charity activities is pro-ecological education, an educational project Play green with us!® was launched in May 2022. It consists of specially developed lesson plans concerning the education of younger generations in such important matters as environmental protection and ecology. The materials were prepared together with the Kulczyk Foundation and the content partner UNEP / GRID - Warsaw.

The scenarios are in the form of books and are directed to teachers and educators involved in conducting classes for primary school children in three age categories: for grades 1-3, 4-6 and 7-8. They aim to raise awareness of the energy transformation. They speak about the need to protect the surface of the earth and water, show the principles of waste management, and introduce the functioning of the closed-loop economy. By the end of December 2022, 70 educational facilities, i.e. Primary Schools, Kindergartens and School Complexes commenced or declared the will to cooperate at the areas of our projects in development, construction and operation as well as the off-shore projects. Detailed list of these facilities is provided in the tables below.

More information on charity and education activities is available at www.esg.polenergia.pl

9. H&S ANALYSIS AND SOCIAL AFFAIRS

9.1 Introduction

The analysis of health and safety condition (hereinafter: H&S analysis) fulfils the obligation of the H&S service and persons performing the H&S duties, including the external specialists performing the H&S service duties. The legal basis of H&S analysis is § 2(1)(3) of the Ordinance of the Council of Ministers of 2.09.1997 on the health and safety service (Journal of Laws of 1997 No. 109, item 704 as amended).

Notwithstanding the above, the employer is informed on the on-going basis on any identified occupational risks and on the conclusions aiming at elimination of these risks.

In 2022, the provisions introduced both the "pandemic status" and "pandemic risk status". On the basis of the regulations monitored on the on-going basis, the workflow was performed in the remote mode. Any and all guidelines on the remote working remained in force, while, in particular, when working and moving around the office, all employees were obliged to use masks covering mouth and nose (common areas - corridors, conference rooms, kitchens and bathrooms).

These rules were revised starting from 01.06.2022 by the Resolution of the Management Board and described in details in the procedure on the working mode in force.

9.2 Legal status

Key legal acts forming the basis for the Polenergia Group operation:

- Labour Code (Journal of Laws of 1974 No. 24, item 141),

- Ordinance of the Minister of Energy of 28 August 2019 on health and safety at work with energy equipment (Journal of Laws of 2019, item 1830),
- Act of 31 March 2020 amending the Act on special solutions related to preventing, counteracting and combating COVID-19, other infectious diseases and emergencies caused by them and certain other acts (Journal of Laws of 2020, item 568),
- Ordinance of the Minister of Labour and Social Policy of 26 September 1997 on general health and safety regulations (uniform text in: Journal of Laws of 2003, No. 169, item 1650 as amended),
- Ordinance of the Minister of Energy of 28 August 2019 on health and safety at work with energy equipment (Journal of Laws of 2019, item 1830),
- Ordinance of the Minister of Infrastructure of 12 April 2022 on the technical conditions applicable for the buildings and their location (uniform text in: Journal of Laws of 2015, item 1422, as amended),
- Ordinance of the Minister of Labour and Social Policy of 1 December 1998 on health and safety at the workplaces with display screen equipment (Journal of Laws of 1998 No. 148, item 973),
- Ordinance of the Minister of Health and Social Aid of 30 May 1996 on medical examination of the employees, scope of prophylactic employee healthcare and medical certificates issued for the purposes laid down in the Labour Code (uniform text in: Journal of Laws of 2016, item 2067 as amended),
- Ordinance of the Minister of Economy and Labour of 27 July 2004 on the health and safety trainings (Journal of Laws of 2004 No. 180, item 1860 as amended),
- Ordinance of the Council of Ministers of 2 September 1997 on the health and safety service (Journal of Laws of 1997 No. 109, item 704 as amended).

9.3 Medical examinations, health and safety training

Until May 2022, the system of H&S trainings and medical examinations has not been changed.

The personnel continued to be entitled to suspend the obligation of periodic and control medical examinations. The employer's responsibility was still to issue a referral for medical examination within the period resulting from the medical opinions received during the previous examinations.

Upon cancelling the pandemic status i.e. in May 2022, the employer and employee were obliged to immediately resume the suspended duties and perform them in the period not exceeding 60 days from the date of cancellation of specific status. The task was performed by the HR Department.

The introductory and periodic trainings supervised by the Human Resources Office is monitored on an ongoing basis. As in the case of medical examinations, these were performed in line with the rules laid down in the pandemic period (i.e. limited contact/on-line mode) by May 2022. Since May 2022, the stationary form of introductory trainings has been resumed.

9.4 Accidents, near-misses and occupational diseases

In 2022, there was one (1) accident reported[1] treated equally to the accident at work in the **Polenergia S.A. Company.** During the business trip, in effect of improper movement/step of a victim, the employee suffered a knee joint injury.

In the **Nowa Sarzyna CHP Plant** no accidents or near-misses were recorded.

I**n the wind and photovoltaic farms** in operation one (1) potential near-miss was recorded. In effect of road collision, a vehicle driven by a third-party went off the road, rammed the fencing of the Skurpie main substation and, rolling over, stopped in a drainage ditch. Apart from loss of property in the form of damaged fencing and partially destroyed facility safeguards, no direct losses of health or life of the accident participants were recorded.

Any accidents and near-misses at the construction sites of the Polenergia Group are monitored, however the reporting obligation and further activities rest upon the competent employer - Contractor/Subcontractor.

At the construction stage of the **Dębsk Wind Farm** project there were 7 potential near-misses recorded. The most severe ones included:

- Two road collisions - failure to adjust speed to winter weather conditions.
- Single damage of wind turbine component (blade) during the transport on public roads.
- Falling down of a shielding component from the nacelle height on the ground. Failure to duly secure the component by the assemblers was a mistake caused by frequent evacuations of the employees from their workplace on this day - poor weather conditions (very strong wind).

At the construction stage of the **Grabowo Wind Farm** project there were 2 potential near-misses recorded:

- When clearing the components of main crane truss of snow, an employee slipped and fell on the truss structural element. According to the event notification made by the crane company, the employee was secured by safety harness.
- When removing an item from the pallet, a pipe slipped out of the technician's hands and hit his foot in the place, where it was not protected by the steel toe. Due to the probable bone injury, the victim was transported to the hospital in Kolno for medical consultation. X-ray of the victim's foot performed in the hospital revealed no bone injuries.

At the construction stage of **Piekło Wind Farm, Buk Photovoltaic Farm and Sulechów II and III Photovoltaic Farm projects,** no accidents or near-misses were recorded in 2022.

In addition, one (1) near-miss for the **onshore wind farms was reported.** An employee reported sudden deterioration of health (pain in chest, severe dizziness, balance disorders). A decision to call medical assistance and immediate return to the nearest port was made. After communicating via satellite telephone with the Polish Rescue Radio, the rescue services decided to transport the victim to the hospital in Słupsk by helicopter.

9.5 External and internal inspections

Keeping the Employer Inspection Logbook in accordance with Article 57(1) of the Act of 6 March 2018 - Entrepreneurs' Law was verified and confirmed.

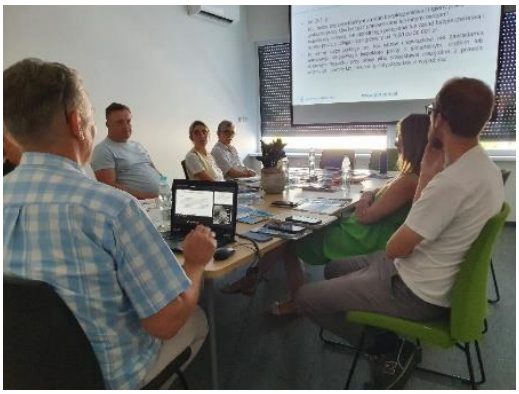
With regard to the performed inspections:

- On 2022, one (1) inspection of the State Labour Inspection (PIP) at the construction of Grabowo WF was carried out.

  The inspection checked compliance with the labour regulations, including H&S regulations when performing the construction works and legal employment.

  the inspection recommendations included supplementing the general markings and delineate the two-way pedestrian routes at the area of the construction site background facilities and main substation (GPO). Both orders were fulfilled immediately and the PIP was notified on performance thereof.

- At the construction site of Piekło WF, the State Labour Inspection suggested a training for the construction process participants (including in particular construction site manager, investor and work managers). The training carried out by the labour inspector was held on 04.07.2022.



- The State Poviat Sanitary Inspection inspected the Nowa Sarzyna CHP Plant (in November 2022) to assess the sanitary, hygienic and health conditions of the working environment. No ex-post comments.
- Cooperation with the Office of Technical Supervision took place during the periodic inspections of equipment subject to regulatory inspections.=
- Internal inspections were carried out in selected locations, in compliance with all sanitary requirements in force.

  There were 14 inspections carried out with regard to the construction sites and Wind Farms under operation. All irregularities were monitored/eliminated on the on-going basis.

  The inspections in the **Nowa Sarzyna CHP Plant** take place in cooperation with the external company - Tarbonus.

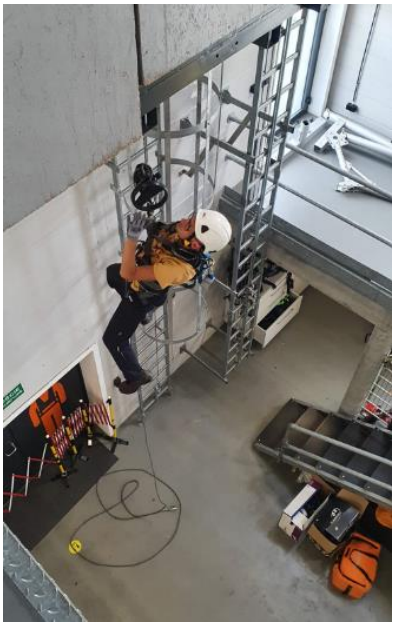
The internal inspection included also a comprehensive inspection of the H&S conditions in the **Polenergia Fotowoltaika S.A.** The inspection was carried out by an external company. The inspection revealed 8 non-compliances related to first aid, supplementing the working environment measurements, risk assessment at the workplaces with identified absence of such assessment and fire protection issues. The corrective plan was established and non-compliances are successively eliminated.

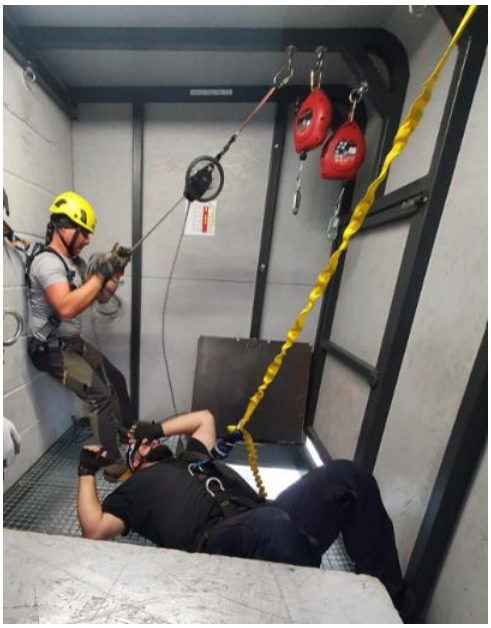
- There were no reports of penalties and administrative proceedings or third party complaints related to health and safety in 2022.

9.6 Provision of personal protective equipment appropriate to the type of hazards to employees, reported problems with the use of required PPE by employees and working gear management

In the inspected facilities (i.e. Nowa Sarzyna CHP Plant, Wind Farms, Photovoltaic Farms, the office of Polenergia S.A.), appropriate PPE was provided and no problems were reported with the use of the required PPE by the employees.

In addition, it is worth noting that employees of the Wind Farms and Photovoltaic Farms attended - just like every year - training relating to work at height between 25-29 July 2022, during which issues relating to personal protection equipment (harnesses, escape systems etc.) were also covered.





9.7 health and Safety Instructions, Safe Work Organisation Instructions

In 2022, equipping of workplaces with H&S Instructions of used devices in accordance with Article 2374 of the Labour Code and Ordinance of the Minister of Labour and Social Policy of 26 September 1997 on the general occupational health and safety regulations was verified.

The Nowa Sarzyna CHP Plant ensured valid Occupational Health and Safety (H&S) Instructions, Safe Work Organisation Instructions.

In the wind farms and photovoltaic farms under operation, the H&S and Safe Work Organisation Instructions documentation was updated. Despite the Safe Work Organisation Instructions are approved, the process of their specification with a view to one of the key turbine suppliers, who made comments to the documentation, was commenced.

With regard to H&S documentation, one should note that the **Polenergia Emobility Sp z o.o.** implemented the document "H&S guidelines for the contractors" governing the health, safety and environment issues applicable to all employees and contractors performing works in the facilities in the scope of the Polenergia eMobility Sp. z o.o. responsibilities (construction and operation).

Polenergia Dystrubucja Sp. Zo.o. implemented the instruction package, including the Safe Work Organisation Instructions, instructions for the contractors, etc.

9.8 First aid

In the inspected facilities (i.e. Nowa Sarzyna Cogeneration Plant, Mercury Power Plant, Wind Farms, Photovoltaic Farms, the office of Polenergia S.A., construction site and offices), the obligation to provide first aid measures to employees in case of accident was fulfilled and employees were appointed to provide first aid.

In 2022, the verified first aid kits and equipment were duly signed and easily accessible.

In addition, the entire Polenergia Group commenced a cycle of trainings and webinars (scheduled as below).

No.	Type of training	Title	Scope	Date
1	Webinar	How to survive the winter	First aid in frostbite and hypothermia about how to behave when the ice breaks below us and what to do and what not to do when a rescue helicopter lands on a ski slope. We also talked about what to pack in the first aid kit and whether to bandage broken ribs.	27.01
2	Training	Full first aid training	Description below the table.	14.02
3	Training	Full first aid training	Description below the table.	15.02
4	Training	Full first aid training	Description below the table.	16.02
5.	Webinar	First Aid for children and babies	Everything you need to know about choking, apnea, drowning, allergic reaction and AED use in children. It will also be about if you can give your child adrenaline.	22.03
6	Training	Full first aid training	Description below the table	24.03
7	Webinar	First Aid on the road	Electric cars, scooters, bicycles and motorcycles. Whether to take off the helmet, what about the orthopaedic collar and who to move after an accident and who not.	27.04
8	Webinar	What and how to talk at the scene of an accident	We talked about psychological support and questions worth asking in a life-threatening situation. What to say, how to speak, and when is it better to bite your tongue.	27.05
9	Webinar	How to survive your vacation - sea currents, help for drowning people, a storm in the mountains	All the necessary information on how to prepare for the upcoming vacation. How to react in contact with wild animals, how to save a drowning person and call for first aid in the mountains.	14.06
10	Training	OHS, first aid, fire protection, work at heights	Updating knowledge resulting from the implementation of legal requirements	July 2022
11	Webinar	"Heart attack and brain stroke - how to survive?"	During the webinar we bust some myths and answer the questions - among others what happens in both conditions and when to start worrying and what are	07.10

			untypical symptoms and how to not get deceived. We also learnt whether we can defibrillate a person with a pacemaker, or whether a person with brain stroke should be persuaded to smile and what questions to ask when someone has stomach ache. All this is associated with first aid in the emergency circulatory conditions.	

The first aid training program includes:

- calling for help, why the dispatcher does not answer the phone
- assessment of consciousness and breathing, and what to do when under stress you cannot hear the breathe
- how to compress the chest and when to stop
- facts and myths about defibrillation
- why 90% of resuscitation is fatal
- step by step what to do in the event of an accident in the company
- how to help with a heart attack, stroke, convulsions, choking, burns and falls from a height.

At the end of the first aid training cycle, all employees received first aid kits and a leaflet reminding of the key rules in order to thank the training participants and encourage the others to join the next ones.

9.9 Fire safety

With regard to fire safety in facilities that are subject to the requirement to provide a Fire Safety Manual, such a document has been prepared and presented to the employees.

In all facilities it was guaranteed that:

- fire extinguishers are properly located, labelled and in good working condition
- regular inspections of fire extinguishers and hydrants are carried out
- adequate accessibility and width of escape routes and exits is maintained
- escape routes and exits are marked
- fire safety manuals and emergency telephone numbers are available in the buildings

It was also confirmed that the requirements for a high-risk facility, which apply to Nowa Sarzyna CHP Plant, are also met. Explosion Risk Assessment and documentation of explosion protection of respective zones is also provided. The zones are marked, antistatic clothing is required in the zones and detection of potentially dangerous substances is ensured.

State Fire Brigade and Voluntary Fire Brigade in Osina trained in the Kostomłoty WF. Upon discussing the individual components of Kostomłoty main substation (GPO), the participants received information on the Vestas V136 turbine. The practical training included lifting an unconscious person from the basement and ladder level and evacuation from nacelle via maintenance shaft. These activities enabled the Fire Brigade gaining better knowledge on the facility and checking the access roads.

9.10 Meeting health and safety requirements at construction projects

Throughout 2022, the occupational health and safety measures were reviewed at the projects under construction: Dębsk Wind Farm and Kostomłoty Wind Farm, Grabowo Wind Farm, Piekło Wind Farm and Sulechów II and III Photovoltaic Farms as well as Buk Photovoltaic Farm.

Health and Safety Plans (H&S Plan) and Safe Work Instructions (SWI) are provided at the construction sites and updated as required. health and safety issues are supervised by designated health and Safety Coordinators (appointed by the Contract Engineer) or as in the case of Sulechów 2 and 3 sites by the Construction Site Manager.

They conduct ongoing health and safety inspections, report on the status of works in progress and cooperate with all subcontractors. Any non-compliance determined by them is corrected on an ongoing basis or, if necessary, collectively resolved at Site Board meetings.

Adequate sanitary and hygienic conditions are provided at construction sites.

Proactive measures reported by the sites:

- Joint inspections, arrangements according to the division of OHS responsibilities between the General Contractor - the Contract Engineer - the Investor - the main subcontractors. Both during the preparation for a given phase of construction and during that phase;
- Orientation training, additional training (in particular for local subcontractors);
- Providing an opinion on safe work instructions (SWI), subcontractor work instructions and proposing/imposing solutions to improve work safety - over and above the standards applied/proposed by the subcontractor in question;
- Educational and training initiatives - organised in the form of Safety Days for all investment stakeholders.

- First aid training, correct absorbent use and demonstration of evacuation of a victim from a vehicle were organised in Dębsk WF. Fire extinguisher use training.
- The Kostomłoty Wind Farm organised among others the "H&S quarter", first aid refreshing training, review of procedures and additional verification with a view to visibility of machinery for earth and road works during operation.
- The Piekło WF carried out practical training in the area of fire extinguishing using hand-held fire extinguishing equipment and demonstration of safe evacuation of an employee from excavations and at height.

9.11 Promoting activities related to health and Safety and activities scheduled for the next year

The following is scheduled for 2022:

- Update of risk assessment for the Polenergia Group The update need will consider the amendments to the Labour Code in the area of remote working.
- Continued series of first aid trainings
- Repeated safe driving trainings
- Continued H&S prevention activities and ensuring safe working conditions and standards of Polenergia at the construction sites in progress i.e. among others Piekło WF, Grabowo WF
- The trainings with the State and Voluntary Fire Brigades at the area of wind and photovoltaic farms will be organised. As of the day of preparation of report, the discussions with the State Fire Brigade on the Kostomłoty and Szymankowo Wind Farms are under way.