

ANNUAL REPORT

2020

Environment, Health & Safety



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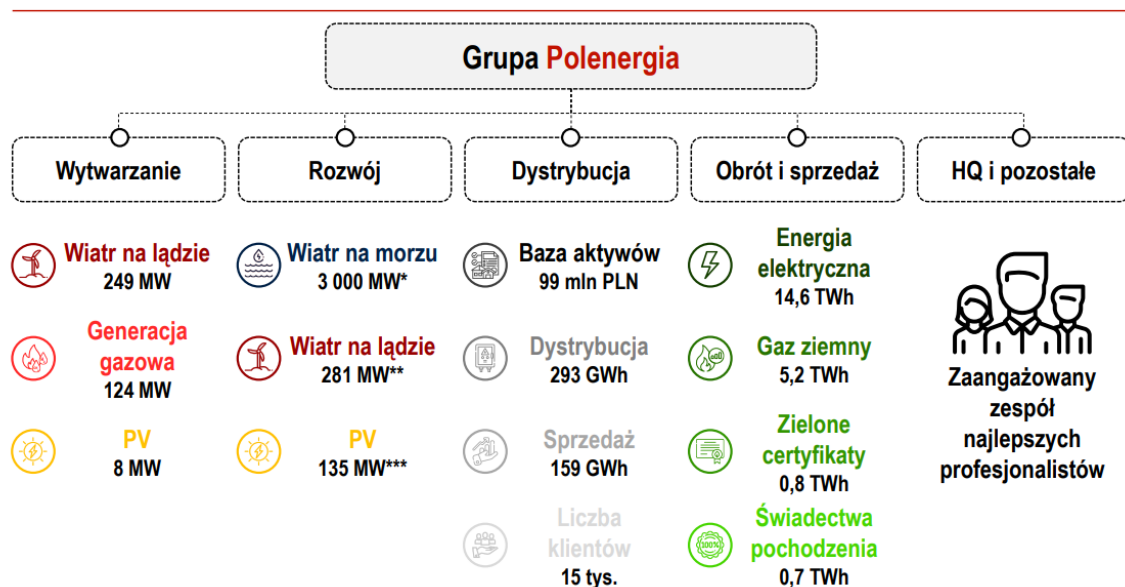
1. INTRODUCTION

1.1 About Polenergia Group

Polenergia S.A. is the largest Polish independent and vertically integrated energy group. It is the Group's ambition and mission to support all efforts related to:

- development of low carbon economy;
- development of clean and renewable energy sources;
- the EU's efforts to achieve climate neutrality.

Figure 1. Polenergia Group.



1.2 Purpose and Scope of the Report

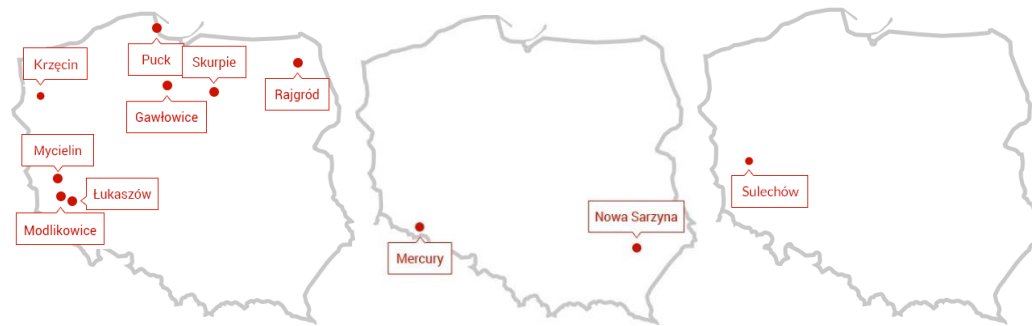
This Report has been prepared to present to Polenergia Management Board and the Creditors the status of projects in operation and under construction and development as well as matters relating to occupational health and safety and the level of completion of tasks set by the Stakeholder Engagement Plans (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 occupational 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 POLENERGIA PROJECTS

Projects in operation:



Projects in development:



2.1 Projects in operation

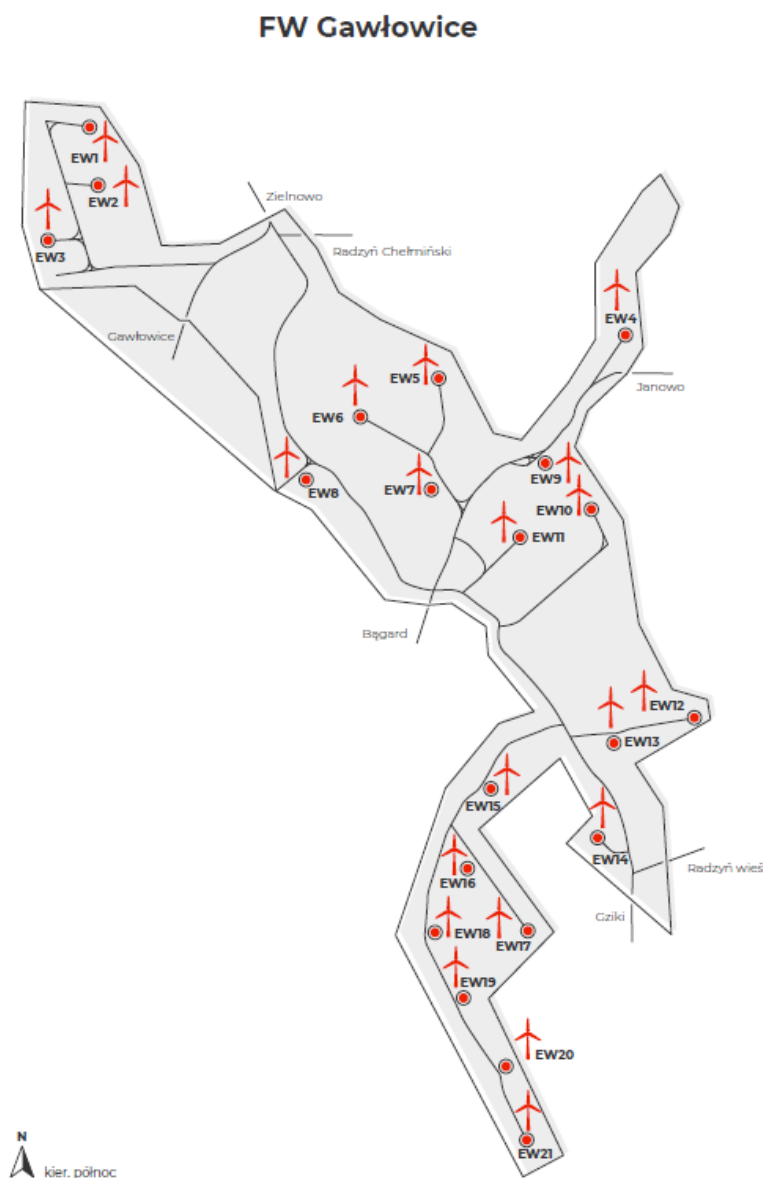
2.1.1 Gawłowice Wind Farm

Location and description of the project

Gawłowice Wind Farm (Polenergia Farma Wiatrowa 1 Sp. z o.o.) is located in Radzyń Chełmiński Gmina, Grudziądz Powiat, Kujawsko-Pomorskie Voivodeship. The first phase of the project was put into operation in 2014, and the next one a year later. 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.

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

Figure 2 Map of Gawłowice WF



Environmental permits

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

Polenergia Farma Wiatrowa 1 Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2020 will be submitted by the end of February 2021.

No penalties were imposed on the company and no inspection was carried out on its premises in 2020.

Table 1. Summary of permits and decision on environmental conditions issued for Gawłowice WF.

Permit/Decision	Issuing authority	Date of issue	Validity date
Decision No. 3/2009 (document ref. No. BPK-7331-S-02/11/2009) on environmental conditions for the implementation of the project "Gawłowice Wind Farm".	Mayor of Radzyń Chełmiński Town and Gmina	30 September 2009	Not applicable.
Decision on environmental conditions for the project consisting in the construction of "Gawłowice" SN/110 kV electrical substation including the reconstruction and possible change of location of pole No. 50 of 110 kV line between Grudziądz Węgrowo – Jabłonowo main electrical substations, on plot No. 792 – Radzyń section, in Radzyń Chełmiński Gmina.	Mayor of Radzyń Chełmiński Town and Gmina	19 July 2012	Not applicable.
Water permit (document ref. No. OS.6341.61.2014) for the directing of rainwater and snowmelt into an absorbing well.	Powiat Starost Office in Grudziądz	3 October 2014	3 October 2024

Post construction monitoring

Studies of birds and bats after the construction of the turbines took place in 2015, 2016 and 2018 and the study reports, after the data were collected and analysed, were submitted to the 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. The mortality taking into account the scavenger test results is 1.28 specimen/MW/year. Local communities (consultation point in the Gmina) 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 studies showed no increase in mortality. In 2019, the final monitoring reports were submitted to the Regional Directorate for Environmental Protection for analysis and acceptance. In July 2019, the Director of the Regional Directorate for Environmental Protection in Bydgoszcz

accepted the submitted documents, stating that the project had no significant negative impact on the ornithofauna and chiropterofauna and that it was compliant with the conditions set out in the decision on environmental conditions and guidelines.

The first phase of Gawłowice WF was put into operation in Q4 2014. In accordance with the decision on environmental conditions, post construction noise measurements were carried out in November 2014 and between February and March 2015. 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. 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., to:

- the Voivodeship Inspectorate for Environmental Protection in Toruń (WIOS);
- the Regional Directorate for Environmental Protection in Bydgoszcz (RDOS);
- the Powiat Sanitary Inspectorate in Grudziądz (SANEPID);
- the Powiat Starost in Grudziądz;
- the Mayor of Radzyń Chełmiński Town and Gmina.

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 to which only authorised persons have access. All hazardous substances are stored on drip trays.

The types and quantities of hazardous substances present at Gawłowice WF are listed below:

- Oil and grease for maintenance works;
- Brushcutter mix – 5 l;
- Mower fuel – 2 x 10 l;
- Diesel oil for the generator – 20 l.

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 regarding 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 stored until it is transferred to specialised units holding the required permits for the disposal of recyclable or disposable waste.

Waste oil and grease is stored in an external storage facility owned by Siemens, secured against soil contamination and precipitation and including equipment or means to collect waste spills.

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

Water and wastewater management

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

Domestic wastewater 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 last inspection took place in November 2020. The above-mentioned works are performed by an authorised company, i.e. Ran - Synchron 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 an absorbing well, in accordance with the provisions of the water permit (document ref. No. OS.6341.61.2014).

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 Gawłowice WF.

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 by 30 June 2010. Considering the above, there is no PCB-containing equipment in Gawłowice WF.

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

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. All of them have been entered in CRO database.

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 on plots No. 47/1, 51/1, 56, 66, 403/1, 404 and 406 in Krzęcin Gmina, Choszczno Powiat, Zachodniopomorskie 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. 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.).

Figure 3 Map of Krzęcin WF

FW Krzęcin

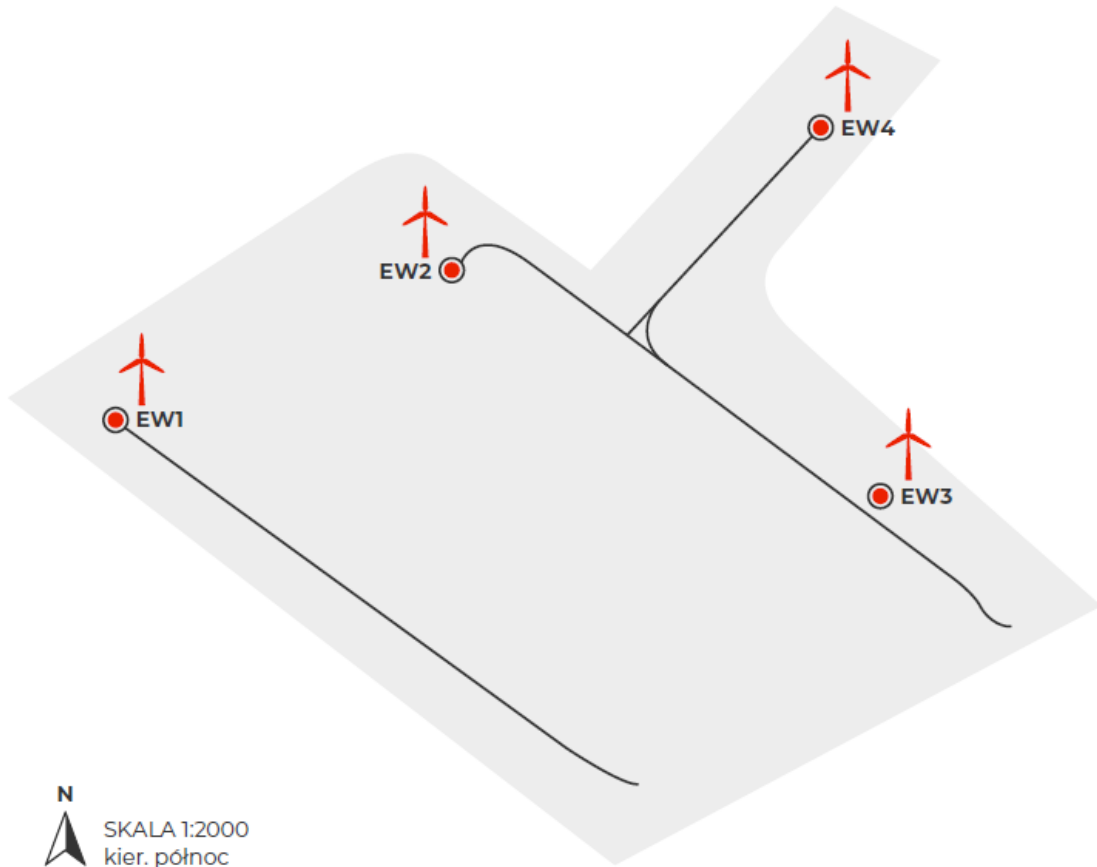


Figure 4 View of Krzęcin WF site.



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 2020.

Table 2. Summary of permits and decision on environmental conditions issued for Krzęcin WF.

Permit/Decision	Issuing authority	Date of issue	Validity date
Decision No. 01/06 (document ref. No. GPKOŚ 7624/06/06) on environmental conditions of "Krzęcin Wind Power Plant" with a total capacity of 6 MW located in the vicinity of Krzęcin Gmina, Choszczno Powiat, Zachodniopomorskie Voivodeship.	Krzęcin Gmina Office	24 July 2006	Not applicable.

Post construction monitoring

In accordance with the decision on environmental conditions, during the operation phase, the facility operator was obliged to carry out post construction monitoring regarding noise measurements and ornithological and chiropterological monitoring:

1. 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;

2. In terms of post construction 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 it is determined that the project has a negative impact on those animals, protective measures should be taken. All collision casualties (birds) should be reported.

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. Based on the conducted measurements, permissible noise levels were not exceeded at any measurement point, therefore the operator did not take any 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 accordance with the decision on environmental conditions regarding nature monitoring, the operator started the post monitoring in 2009. According to the post construction studies, 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, Zachodniopomorskie Voivodeship, Krzęcin Gmina, with regard to birds and bats", Szczecin, October 2011). According to the post construction 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 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). 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 waste storage site. For waste produced in Zachodniopomorskie Voivodeship, Nordex Polska Sp. z o.o. prepares a summarised form presenting data compilation on the types and quantities of waste, 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 wastewater management

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

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 Krzęcin WF.

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. Considering the above, there is no PCB-containing equipment in Krzęcin WF.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent in the form of fluorinated greenhouse gases - or F-gases - must be entered in a central register of operators (CRO), where all inspections and leakage tests are then recorded. There is no equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent at Krzęcin WF.

2.1.3 Łukaszów Wind Farm

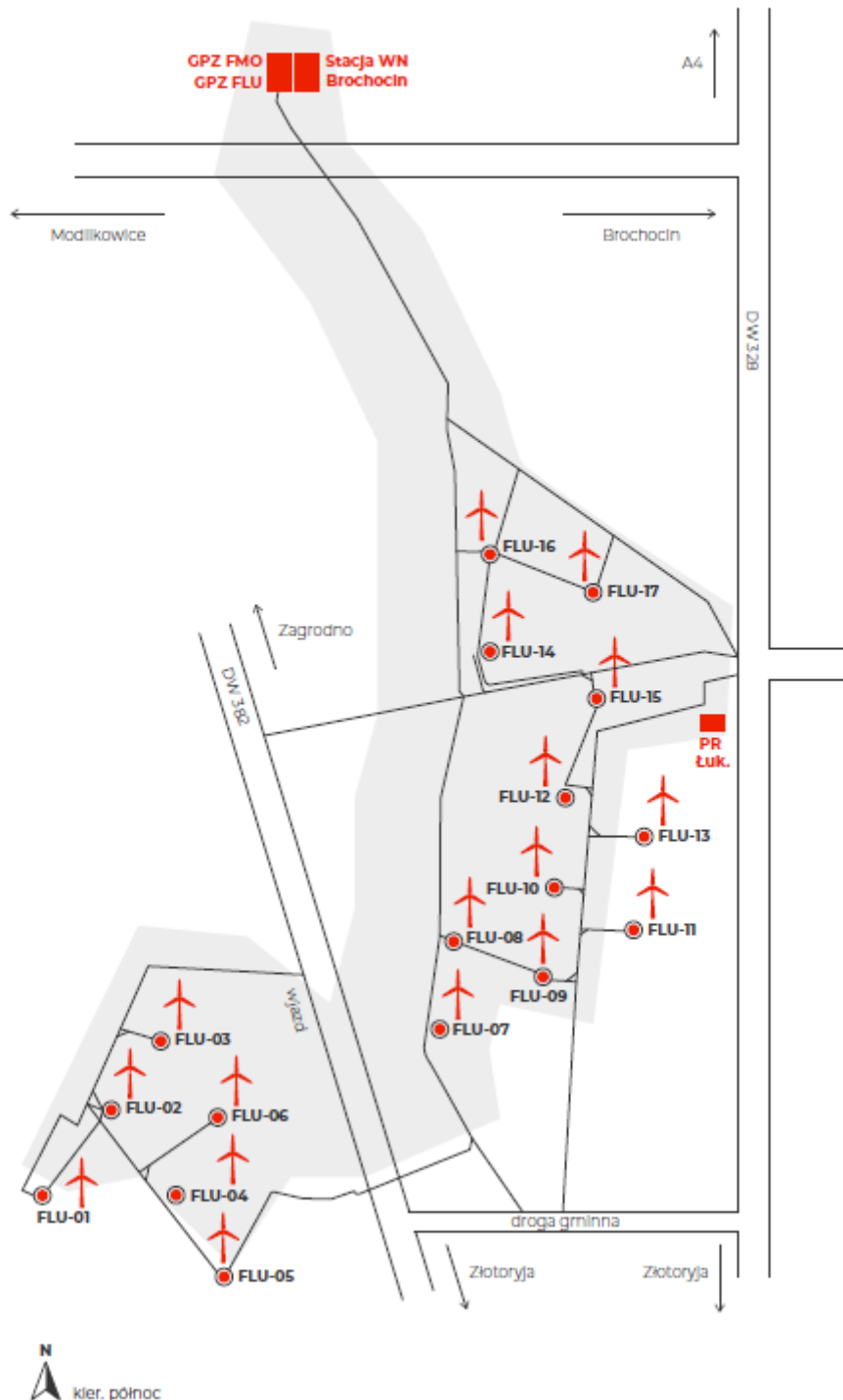
Location and description of the project

Łukaszów Wind Farm is located in Zagrodno Gmina, Złotoryja Powiat, Dolnośląskie Voivodeship. Łukaszów WF was put into operation at the beginning of 2012. Łukaszów WF consists of 17 Vestas V90-2.0 MW turbines, each 105 m high and with rotor diameter of 90 m. Total capacity of Łukaszów WF is 34 MW. Łukaszów WF also includes SN/110 kV transformer station located on plot No. 480, Modlikowice section, Zagrodno Gmina.

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

Figure 5 Map of Łukaszów WF

FW Łukaszów



Environmental permits

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

Amon Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2020 will be submitted by the end of February 2021.

No penalties were imposed on the company and no inspection was carried out on its premises in 2020.

Table 3. Summary of permits and decision on environmental conditions issued for FW Łukaszów.

Permit/Decision	Issuing authority	Date of issue	Validity date
Decision No. 5/08 (document ref. No. OR.7624-2/2008) on environmental conditions for the project "Construction of Łukaszów Wind Farm".	Voit of Zagrodno Gmina	28 August 2008	Not applicable.
Water permit (document ref. No. RS.6341.20.2014) for the specific use of water in terms of directing rainwater and snowmelt into the ground from the area of the power station located on plot No. 480, Modlikowice section, Zagrodno Gmina.	Starost of Złotoryja	4 August 2014	31 July 2024
Permit to produce hazardous and non-hazardous waste (document ref. No. RS.6220.3.2015).	Starost of Złotoryja	2 August 2015	31 July 2025

Post construction monitoring

A three-year study of birds and bats at Łukaszów WF began in March 2012. The farm area is a flat and open landscape dominated by agricultural land. All the land used by the turbines is under large-scale cultivation. On the periphery of the farm, as well as between the turbines, there are landscape features enriching the typically agricultural landscape. These include parts of forests, mid-field trees, avenues of trees and bushes along roads and tracks (not in use), and small wastelands and water holes (increasingly drying up).

In the course of the post construction 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.

Observations were carried out by two persons. The area on which bird observations were conducted in all phenological periods was approx. 25 km². They were conducted similarly to the pre-construction monitoring, i.e. from three observation points (P1-P3) covering the largest possible area of the farm and at four transects (T1-T4) running between the observation points. Each year, monitoring was carried out in accordance with the rules established in 2012, i.e. with slight changes in observation points and in the course and length of transects. Post construction 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 post construction ornithological and chiropterological reports and in the post construction noise analysis report. The results presented below refer to both wind farms.

Total size of bird population in spring was significantly larger in the pre-construction monitoring period (2007: 46,391 specimens, 2008: 50,547 specimens) than in the post construction monitoring period (2012: 11,579 specimens, 2013: 5,434 specimens, 2014: 2,620 specimens). Post construction 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.

In 2014, birdwatching ornithologists as part of post construction 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. As part of the protective measures, the work pattern was maintained in the following years. The nests were fenced in so that agricultural machinery would not threaten the nests during harvesting and other agrotechnical operations. The birds were also protected from predators by applying certified scented repellent, which is completely safe for humans, animals and the environment. Observations showed that young Montagu's harriers from subsequent broods (2014-2020) safely left the nest. Between 2014 and 2020, 60 chicks were rescued and ringed. The above practices were aimed at protecting Montagu's harrier at an early stage of development, which significantly increases the chance of population growth of this species. Thus, Amon joined the action of active protection of this bird in Poland, under the patronage of the Ministry of Climate and the General Directorate for Environmental Protection. It is one of the Polenergia Group's efforts aimed at increasing biodiversity.

Following the construction of Łukaszów WF, a three-year bat study was initiated in March 2012 to assess the impact of the WF on the local chiropterofauna. During the operation of Modlikowice WF in 2012/2013, 2013/2014 and 2014/2015, the identified bat species composition corresponded to the results of studies carried out before project completion. In total, 7 species of bats were found in the first, second and third year of the operation of Łukaszów WF, of which 5 species, i.e.: Daubenton's bat, serotine bat, common pipistrelle, Nathusius's pipistrelle and common noctule, were common for the pre- and post-completion period. Moreover, in 2012 new species were identified: parti-coloured bat and Natterer's bat, whereas the presence of western barbastelle, found once in 2007, was not confirmed. Both new species were present in the following years, i.e. 2013-2015. Estimated bat mortality for Łukaszów WF at 0.24 specimens/turbine/year, which is relatively low, should not cause significant losses in chiropterofauna population.

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 post construction noise measurements were carried out in March 2012. The measurements were carried out by a certified subcontractor, BMT. 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 (WIOS);
- the Powiat Sanitary Inspectorate in Złotoryja (SANEPID);
- the Powiat Starost in Złotoryja;
- the Zagrodno Gmina 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 to which only authorised persons have access. All hazardous substances are stored on drip trays.

The types of hazardous substances present at Łukaszów WF (at the main electrical substation) are listed below:

- Nytro Taurus transformer oil;
- Eurosuper 95 unleaded petrol;
- Orange silica gel;
- Orlen Oil MIXOL 5;
- B&S SAE 30;
- STIHL Superlub FS;
- TENZI block paving cleaning agent;
- STIHL HP;
- WURTH universal remover.

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

Waste management

SGRE is responsible for waste management regarding waste generated from the servicing of turbines at Łukaszów WF based on the servicing agreement with Amon Sp. z o.o. and a permit for the production of hazardous and non-hazardous waste (document ref. No. RS.6220.3.2015). SGRE has a separate facility where waste is selectively stored until it is transferred to specialised units holding the required permits for the disposal of recyclable or disposable waste. The facility is equipped with barrels with drip trays for waste oils.

In accordance with the requirements of the Act on waste, the operator of Łukaszów WF, i.e. Amon, was registered in BDO system.

Waste from maintenance works is not 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 wastewater 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 2020. 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 (in 2020, it was 1.75 t of waste). Based on the information presented in the report (document ref. No. SA/2020), 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)

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 Łukaszów WF.

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. Considering the above, there is no PCB-containing equipment in Łukaszów WF.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent in the form of fluorinated greenhouse gases - or F-gases - 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 power station, each containing 0.78 kg of R410A refrigerant. In addition, there are six CRO-registered units (5 ABB 20 kV switchgear units and an ABB HV circuit breaker) containing more than 3 kg of SF₆ gas.

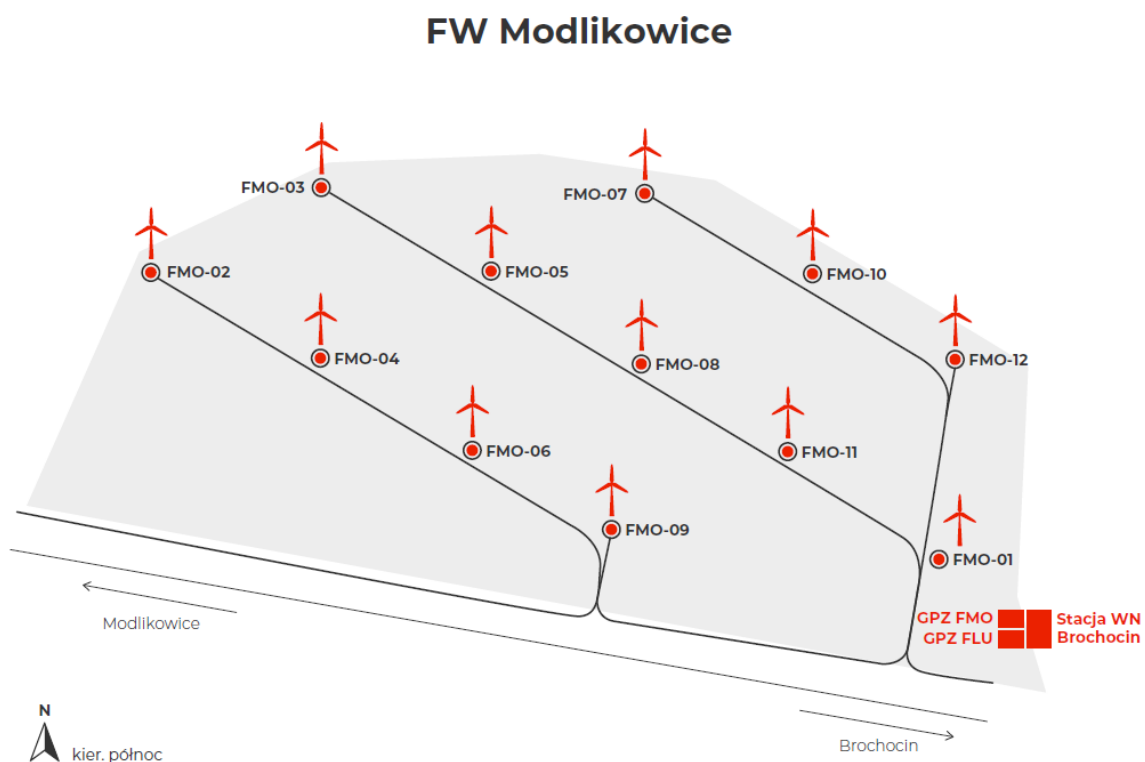
2.1.4 Modlikowice Wind Farm

Location and description of the project

Modlikowice Wind Farm is located in Zagrodno Gmina, Złotoryja Powiat, Dolnośląskie 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 Gmina.

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

Figure 6 Map of Modlikowice WF



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 2020 will be submitted by the end of February 2021.

No penalties were imposed on the company and no inspection was carried out on its premises in 2020.

Table 4. Summary of permits and decision on environmental conditions issued for FW Modlikowice.

Permit/Decision	Issuing authority	Date of issue	Validity date
Decision No. 4/08 (document ref. No. OR.7624-1/2008) on environmental conditions for the project "Construction of Modlikowice Wind Farm".	Voit of Zagrodno Gmina	28 August 2008	Not applicable.
Water permit for the specific use of water in terms of directing rainwater and snowmelt into the ground from the area of the power station located on plot No. 480, Modlikowice section, Zagrodno Gmina.	Starost of Złotoryja	4 August 2014	31 July 2024
Permit for the production of hazardous and non-hazardous waste (document ref. No. RS.6220.4.2015).	Starost of Złotoryja	7 August 2015	31 July 2025

Post construction monitoring

A three-year study of birds at Modlikowice WF began in March 2012. The farm area is a flat and open landscape dominated by agricultural land. All of the land used by the turbines is under large-scale cultivation. On the periphery of the farm, as well as between the turbines, there are landscape features enriching the typically agricultural landscape. These include parts of forests, mid-field trees, avenues of trees and bushes along roads and tracks (not in use), and small wastelands and water holes (increasingly drying up).

In the course of the post construction 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.

Observations were carried out by two persons. The area on which bird observations were conducted in all phenological periods was approx. 25 km². They were conducted similarly to the pre-construction monitoring, i.e. from three observation points (P1-P3) covering the largest possible area of the farm and at four transects (T1-T4) running between the observation points. Each year, monitoring was carried out in accordance with the rules established in 2012, i.e. with slight changes in observation points and in the course and length of transects. **Post construction monitoring was conducted jointly for the Łukaszów and Modlikowice WFs, therefore the results presented below refer to both wind farms.**

Total size of bird population in spring was significantly larger in the pre-construction monitoring period (2007: 46,391 specimens, 2008: 50,547 specimens) than in the post construction monitoring period (2012: 11,579 specimens, 2013: 5,434 specimens, 2014: 2,620 specimens). Post construction 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.

In 2014, birdwatching ornithologists as part of post construction 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. As part of the protective measures, the work pattern was maintained in the following years. The nests were fenced in so that agricultural machinery would not threaten the nests during harvesting and other agrotechnical operations. The birds were also protected from predators by spreading certified scented repellent, which is completely safe for humans, animals and the environment. Observations showed that young marsh harriers from subsequent broods (2014-2020) left the nest safely. Between 2014 and 2020, 60 chicks were rescued and ringed. The above practices were aimed at protecting Montagu's harrier at an early stage of development, which significantly increases the chance of population growth of this species. Thus Talia joined the action of active protection of this bird in Poland, under the patronage of the Ministry of Climate and the General Directorate for Environmental Protection. It is one of the Polenergia Group's efforts aimed at increasing biodiversity.

Following the construction of Modlikowice WF, a three-year bat study was initiated in March 2012 to assess the impact of the WF on the local chiropteroфаuna. During the operation of Modlikowice WF in 2012/2013, 2013/2014 and 2014/2015, the identified bat species composition corresponded to the results of studies carried out before project completion. In total, 7 species of bats were found in the first, second and third year of the operation of Modlikowice WF, of which 5 species, i.e.: Daubenton's bat, serotine bat, common pipistrelle, Nathusius's pipistrelle and common noctule, were common for the pre- and post-completion period. Moreover, in 2012 new species were identified: parti-coloured bat and Natterer's bat, whereas the presence of western barbastelle, found once in 2007, was not confirmed. Both new species were present in the following years, i.e. 2013-2015. Estimated bat mortality for Modlikowice WF at 0.7- 0.8 specimens/turbine/year should not cause significant losses in chiropteroфаuna population.

Modlikowice WF was put into operation in Q1 2012. Pursuant to Decision No. 76/2011 of 29 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 post construction noise measurements were carried out in March 2012. The measurements were carried out by a certified subcontractor, BMT. 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 (WIOS);
- the Powiat Sanitary Inspectorate in Złotoryja (SANEPID);
- the Powiat Starost in Złotoryja;
- the Zagrodno Gmina Office.

Management of hazardous substances

There are small quantities of hazardous substances on the premises of Łukaszów WF. Most of the hazardous substances used at Modlikowice WF are stored at the main electrical substation of Łukaszów WF, in a locked tin container to which only authorised persons have access. All hazardous substances are stored on drip trays.

The types of hazardous substances used at Modlikowice WF are listed below:

- Nytro Taurus transformer oil;
- Eurosuper 95 unleaded petrol;

- Orange silica gel;
- Orlen Oil MIXOL 5;
- B&S SAE 30;
- STIHL Superlub FS;
- TENZI block paving cleaning agent;
- STIHL HP;
- WURTH universal remover.

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

Waste management

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. Moreover, based on the Agreement No. 38, 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. The agreement between the companies operating the facilities has been signed for an indefinite period.

In accordance with the requirements of the Act on waste, the operator of Modlikowice WF, i.e. Talia, was registered in BDO system.

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

Water and wastewater 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 inspection took place in December 2020. 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 (in 2020, it was 1.75 t of waste). Based on the information presented in the report (document ref. No. SA/2020), 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)

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 Modlikowice WF.

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. Considering the above, there is no PCB-containing equipment in Modlikowice WF.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent in the form of fluorinated greenhouse gases - or F-gases - 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 power station, each containing 0.78 kg of R410A refrigerant. In addition, there are six CRO-registered units (5 ABB 20 kV switchgear units and an ABB HV circuit breaker) containing more than 3 kg of SF6 gas.

2.1.5 Mycielin Wind Farm

Location and description of the project

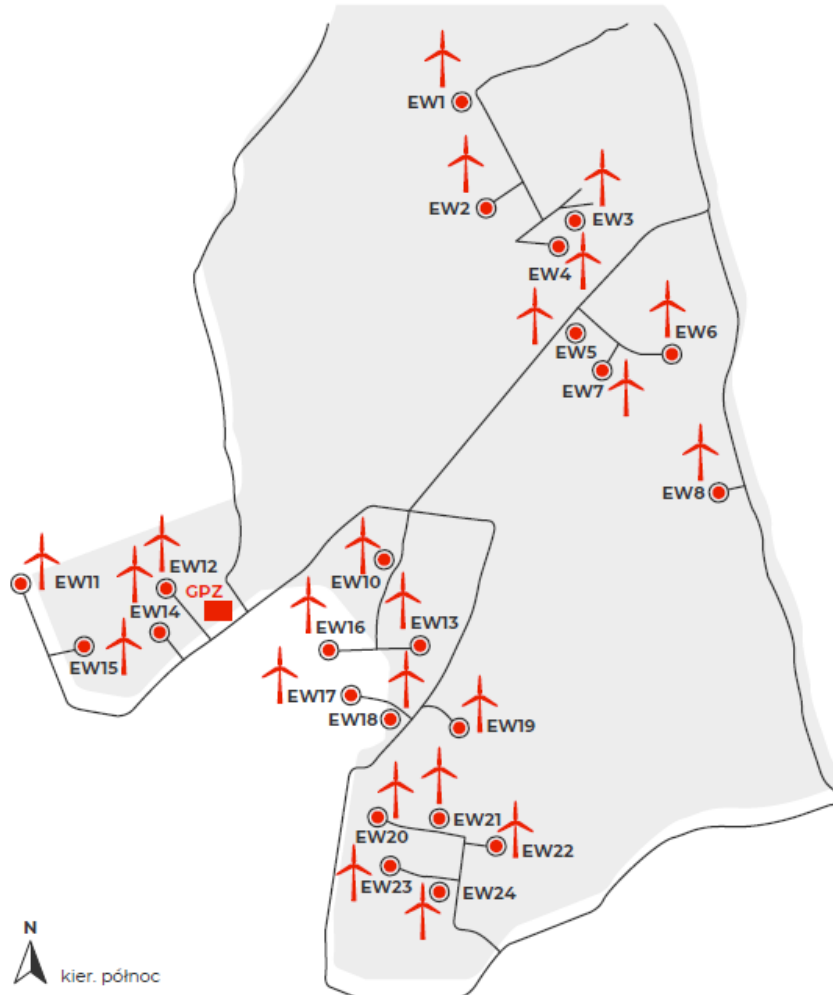
Mycielin Wind Farm (Polenergia Farma Wiatrowa Mycielin Sp. z o.o.) is located in the vicinity of the villages of Mycielin, Gościelin, Gościeszowice, Długie, Dzikowice and Sucha Dolna in the Gminas of Niegosławice and Szprotawa, Żagań Powiat, Lubuskie Voivodeship.

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

Initially, Mycielin WF consisted of 24 turbines, but in April 2017 the tower structure of turbine WTG3 broke and fell over (the turbine is marked on the map below 'EW3').

Figure 7 Map of Mycielin WF

FW Mycielin



Environmental permits

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

Polenergia Farma Wiatrowa Mycielin Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2020 will be submitted by the end of February 2021.

No penalties were imposed on the company and no inspection was carried out on its premises in 2020.

Table 5. Summary of permits and decision on environmental conditions issued for FW Mycielin.

Permit/Decision	Issuing authority	Date of issue	Validity date
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Decision (document ref. No. GR.6220.9.2011) on environmental conditions for the project consisting in the construction of "Mycielin Wind Farm" wind park with auxiliary infrastructure in the Gminas of Niegostawice and Szprotawa.	Mayor of Szprotawa	16 September 2011	Not applicable.
Water permit (document ref. No. ROŚiB.6341.20.2015) for the construction of a water facility - well and for the specific use of water, i.e. extraction of groundwater from Quaternary formations intended for water supply of Mycielín WF main electrical substation.	Starost of Żagań	24 September 2015	24 September 2035
Water permit (document ref. No. ROŚiB.6341.19.2014) for the discharge of wastewater treated in a rainwater and snowmelt separator from the main electrical substation.	Starost of Żagań	16 May 2014	16 May 2024
Pozwolenie (Decision No. ROŚiB.6220.1.2016) for the generation of hazardous waste and non-hazardous waste in connection with the operation of "Mycielin Wind Farm".	Starost of Żagań	9 March 2016	9 March 2026

Post construction monitoring

In 2016, ornithological and chiropterological studies began, in accordance with the scope of post construction 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 it will end 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 (WTG22), an additional analytical module was introduced to the post construction 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). Observations of the red kite will be repeated during the last monitoring cycle (2020/2021).

Mycielin WF was put into operation in Q1 2016. In accordance with the decision on environmental conditions, post construction 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 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 Gmina 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 at Mycielín 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 Mycielín WF under the servicing agreement with Polenergia Farma Wiatrowa Mycielín 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. Waste is not stored on the premises of Mycielín WF.

Municipal waste generated at Mycielín 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.

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

Water and wastewater management

Mycielín 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 wastewater generated at Mycielín 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 Mycielín WF, there is a BundGuard 529724 oil separator with two oil sumps, which is subject to regular technical inspections and cleaning. The last inspection took place in December 2020. 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)

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 Mycielin WF.

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. Considering the above, there is no PCB-containing equipment in Mycielin WF.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent in the form of fluorinated greenhouse gases - or F-gases - 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 power station. 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. The equipment has been registered in CRO.

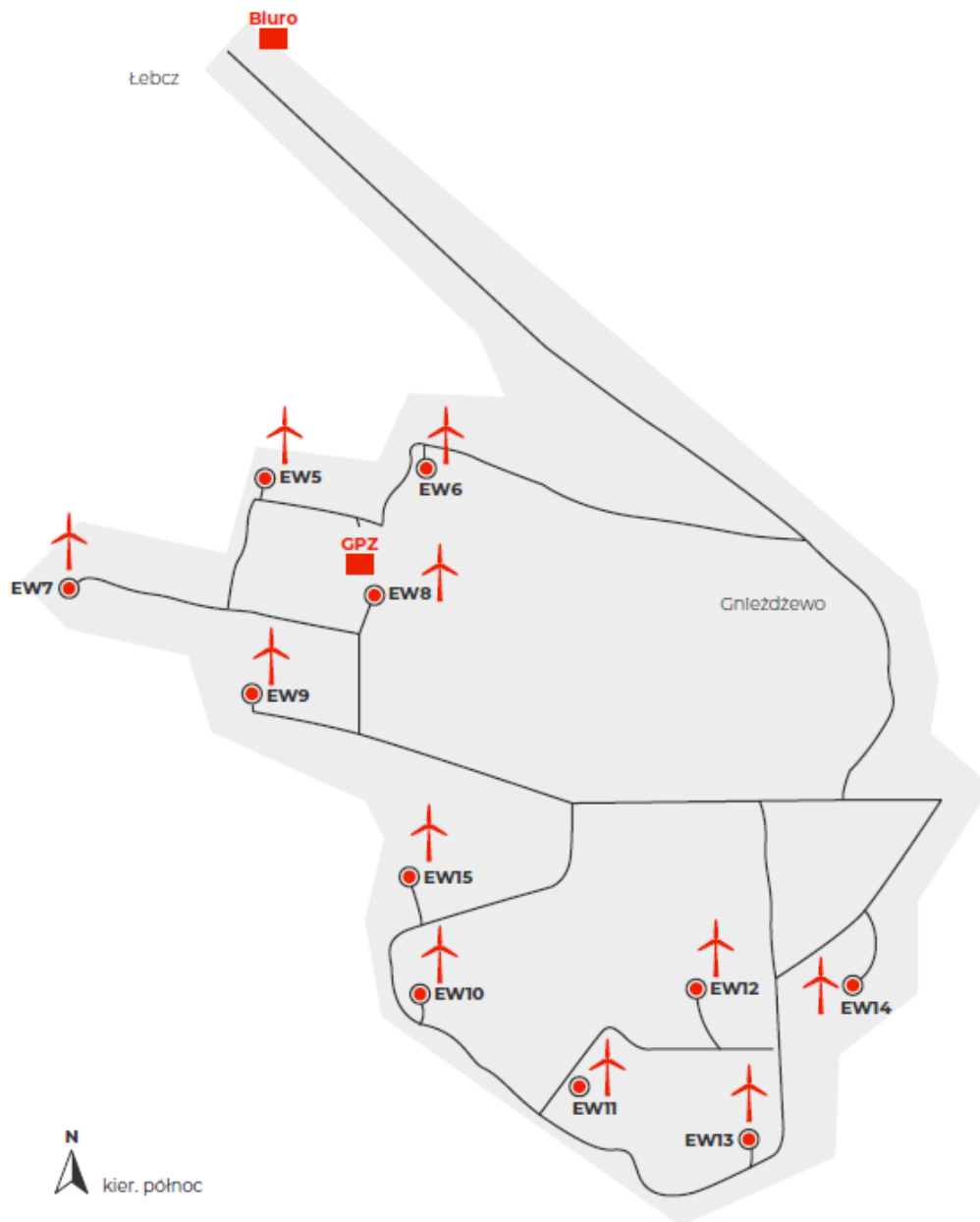
2.1.6 Puck Wind Farm

Location and description of the project

Puck Wind Farm (Dipol Sp. z o.o.) is located in Gnieźdżewo Gmina, Puck Powiat, Pomorskie 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 Polenergia.

Figure 8 Map of Puck WF

FW Puck



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 2020 will be submitted by the end of February 2021.

No penalties were imposed on the company and no inspection was carried out on its premises in 2020.

Table 6. Summary of permits and decision on environmental conditions issued for Puck WF.

Permit/Decision	Issuing authority	Date of issue	Validity date
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Water permit (document ref. No. ROŚ.6341.2.30.2014) for specific water use, i.e. discharge of rainwater and snowmelt from the premises of 15/110 kV transformer station located in Gniezdźewo (plot No. 319, Gniezdźewo section, Puck Gmina, Puck Powiat, Pomorskie Voivodeship) into the ground	Starost of Puck	9 April 2015	9 April 2025
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	Starost of Puck	31 July 2015	5 September 2024

Post construction monitoring

Ornithological and chiropterological observations and noise measurement were carried out from the start of operation in 2007 until 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 to which only authorised persons have access. 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).

Hazardous waste is stored selectively in a locked room to which only authorised persons have access. 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.

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 requirements of the Act on waste, Puck WF was registered in BDO system.

Water and wastewater management

Puck WF is not connected to the municipal water supply or sewage system. Rainwater and snowmelt are 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 inspection took place in November 2020. The above-mentioned works are performed by an authorised company, i.e. ELKOM-BUD. Based on the information presented in the report (document ref. No. 2020/12/020), 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)

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 Puck WF.

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. Considering the above, there is no PCB-containing equipment in Puck WF.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent in the form of fluorinated greenhouse gases - or F-gases - 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 power station, each containing less than 3 kg of R410A and R22 refrigerant. In addition, there are 16 units at Puck WF which contain less than 3 kg of SF₆ gas. Therefore, registration in CRO is not required.

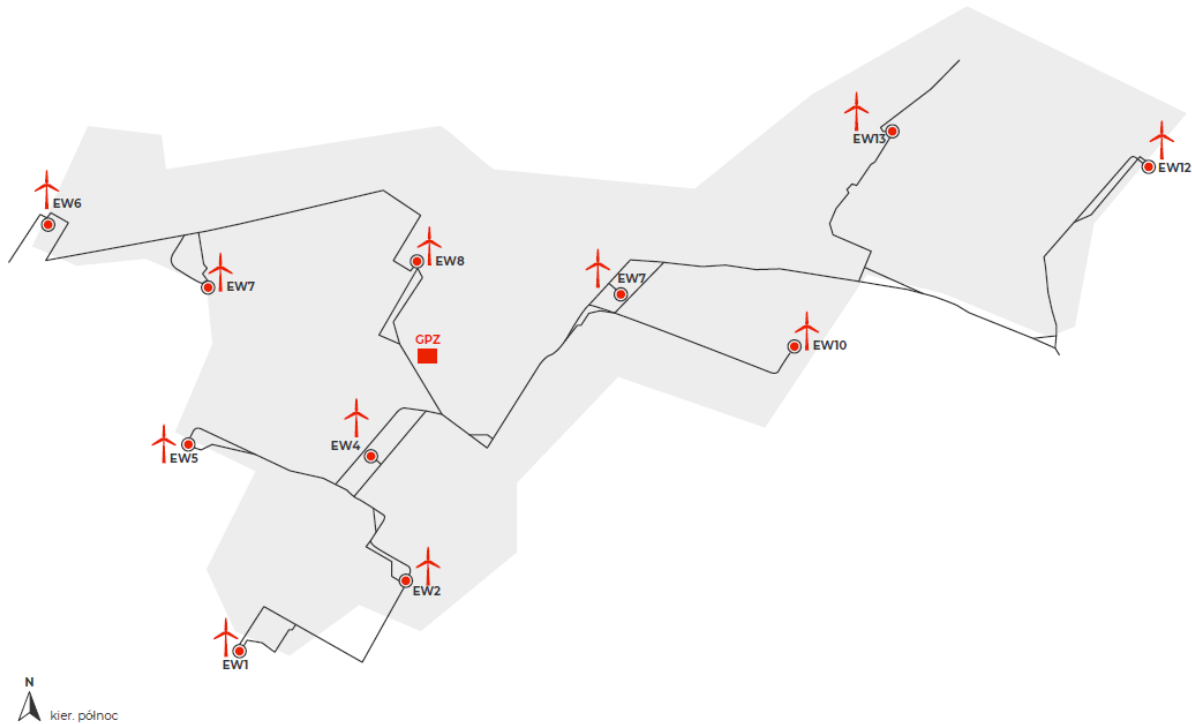
2.1.7 Rajgród Wind Farm

Location and description of the project

Rajgród Wind Farm (Polenergia Farma Wiatrowa 6 Sp. z o.o.) is located in Rajgród Gmina, Grajewo Powiat, Podlaskie 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 Polenergia.

Figure 9 Map of Rajgród WF

FW Rajgród



Environmental permits

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

Polenergia Farma Wiatrowa 6 Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2020 will be submitted by the end of February 2021.

No penalties were imposed on the company and no inspection was carried out on its premises in 2020.

Table 7. Summary of permits and decision on environmental conditions issued for Rajgród WF.

Permit/Decision	Issuing authority	Date of issue	Validity date
Decision (document ref. No. RZP.7624-8/10) on environmental conditions for the implementation of the project "Rajgród FW6 Wind Farm".	Mayor of Rajgród	22 December 2011	Not applicable.
Water permit (document ref. No. WR.6341.29.2012) for the construction of water facilities and for the discharge of rainwater and snowmelt from the main electrical substation into the ground.	Starost of Grajewo	4 January 2013	31 December 2022

Permit for the production of waste from "Rajgród Wind Farm" (document ref. No. WR.6220.1.2015).	Starost of Grajewo	25 April 2018	20 April 2028
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Post construction monitoring

Post construction 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 environmental authorities in 2019. In June, the Regional Directorate for Environmental Protection in Białystok accepted the post construction analysis.

Rajgród WF was put into operation in Q4 2014. In accordance with the decision on environmental conditions, post construction 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 at Rajgród WF and there are no underground or aboveground tanks for hazardous substances.

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) to which only authorised persons have access. SGRE orders the collection of hazardous waste depending on the needs. Such waste is collected by Waster/Oiler. Moreover, Rajgród WF has an agreement contract with MAR-POL (document ref. No. 36 FW6/odpady/15) on hazardous waste collection.

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

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

Water and wastewater 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 wastewater 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 H1400 petroleum products separator, which is subject to regular technical inspections and cleaning. The last inspection took place in November 2020. 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)

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 Rajgród WF.

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. Considering the above, there is no PCB-containing equipment in Rajgród WF.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent in the form of fluorinated greenhouse gases - or F-gases - 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). In addition, there are three air conditioners containing less than 3 kg of refrigerant in the main electrical substation.

The above-mentioned equipment, containing more than 3 kg of SF₆ gas, has been registered in CRO.

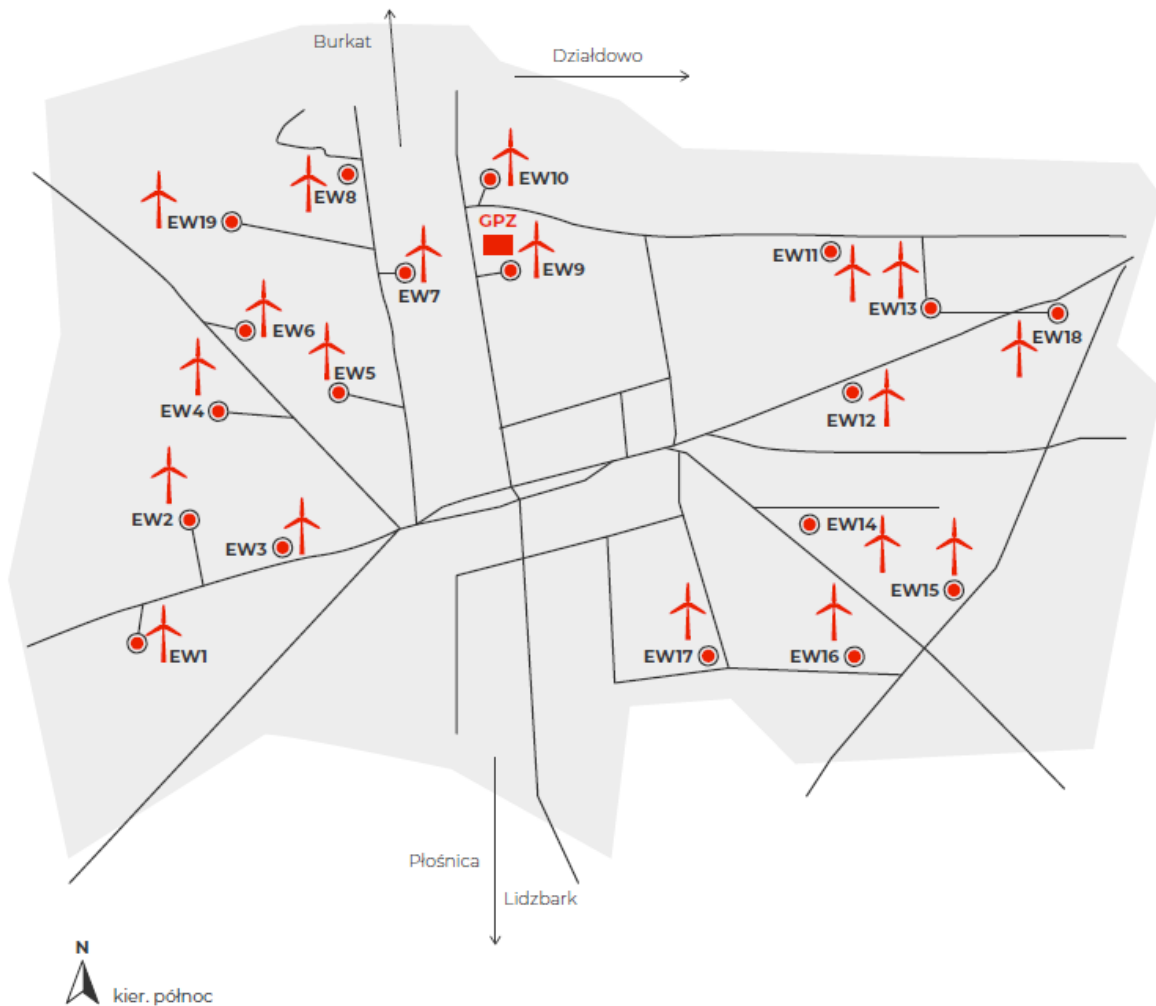
2.1.8 Skurpie Wind Farm

Location and description of the project

Skurpie Wind Farm (Polenergia Farma Wiatrowa 4 Sp. z o.o.) is located in Płońnica Gmina, Działdowo Powiat, Warmińsko-Mazurskie 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 Polenergia.

Figure 10 Map of Skurpie WF.

FW Skurpie



Environmental permits

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

Polenergia Farma Wiatrowa 4 Sp. z o.o. was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2020 will be submitted by the end of February 2021.

No penalties were imposed on the company and no inspection was carried out on its premises in 2020.

Table 8. Summary of permits and decision on environmental conditions issued for FW Skurpie.

Permit/Decision	Issuing authority	Date of issue	Validity date

Decision (document ref. No. 7624-2/10) on environmental conditions for the implementation of the project "Skurpie FW".	Voit of Płońska Gmina	30 November 2010	Not applicable.
Water permit (document ref. No. Ro.6341.23.2011) for the construction of absorbing wells on the premises of Skurpie WF and for the discharge of rainwater and snowmelt from the farm into the absorbing wells.	Starost of Działdowo	5 September 2011	10 years from the date of final acceptance of the stormwater drainage system (25 August 2025)

Post construction 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 decision on environmental conditions, study results were submitted to the administrative bodies (the Gmina Office and the Regional Directorate for Environmental Protection) after the end of each semester of the monitoring. The studies did not determine any negative impact of the project on birds and bats. The next cycle of the monitoring and summary of the 3-year ornithological studies 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 decision on environmental conditions, post construction 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 Voit of Płońska Gmina), who did not submit any comments.

Management of hazardous substances

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

- Karcher RM 81 cleaning agent – approx. 1 l
- Domestos – approx. 0.7 l
- Mower fuel (petrol) in a metal canister - approx. 1 l
- Fuel oil – approx. 0.1 l

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

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

Waste management

SGRE 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. 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 wastewater 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 wastewater 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 H1400 petroleum products separator, which is subject to regular technical inspections and cleaning. The last inspection took place in December 2020. 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 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)

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 Skurpie WF.

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. Considering the above, there is no PCB-containing equipment in Skurpie WF.

In accordance with the law, equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent in the form of fluorinated greenhouse gases - or F-gases - 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 power station that contain less than 3 kg of refrigerant. Therefore, registration in CRO is not required.

2.1.9 Sulechów I Photovoltaic Farms

Location and description of the project

Sulechów I Photovoltaic Farms are located on plots No. 117/16, 117/7, 117/8, 118/2, 152/2, 152/3, 153 and 154/5 in Kruszyna, Sulechów Gmina, Zielona Góra Powiat, Lubuskie Voivodeship. They comprise eight photovoltaic farms, each with approx. 1 MW capacity, including the necessary infrastructure and a 15/110 kV power station.

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 Polenergia.

Figure 11 Map of Sulechów I Photovoltaic Farms.

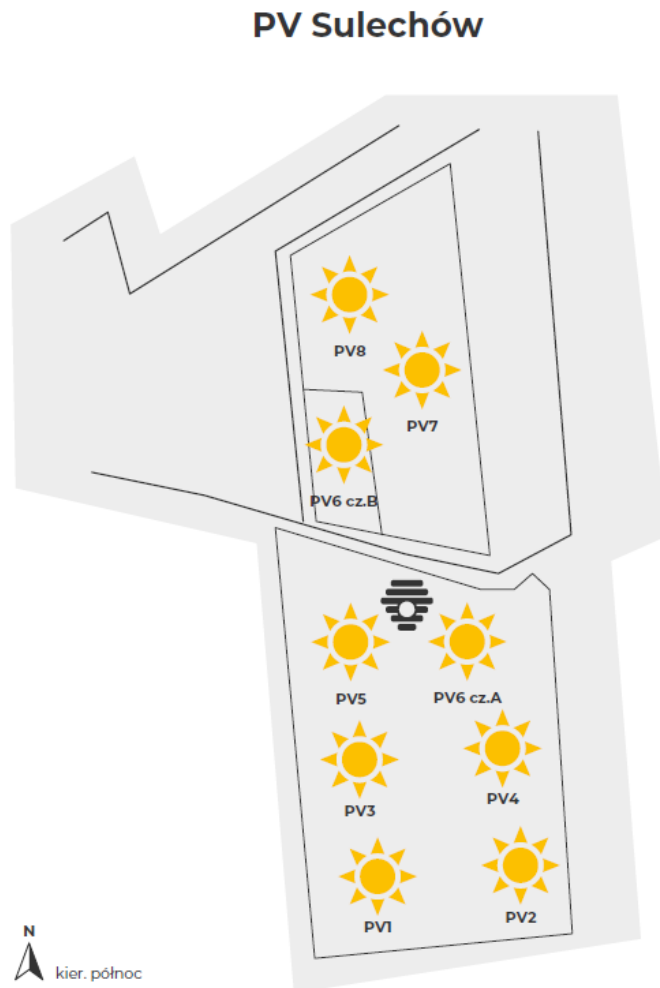


Figure 12 Area of Sulechów I Photovoltaic Farms.



Environmental permits

Sulechów I PVF have 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 2020.

Table 9. Summary of permits and decision on environmental conditions issued for Sulechów PVF.

Permit/Decision	Issuing authority	Date of issue	Validity date
Decision (document ref. No. GKR.6220.17.2018.MG) on environmental conditions for the project "Construction and installation of thirteen photovoltaic farms with a capacity of up to 1 MW each, including the necessary technical infrastructure with staging".	Mayor of Sulechów	15 October 2018	Not applicable.

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, to which only authorised persons have access.

There are no underground or aboveground tanks for hazardous substances on Sulechów PVF site.

Waste management

Waste at Sulechów PVF is only produced 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 wastewater management

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

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 Sulechów PVF.

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. Considering the above, there is no PCB-containing equipment in Sulechów PVF.

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. As there is no equipment containing more than 3 kg of refrigerant or more than 5 tonnes of CO₂ equivalent at Sulechów PVF, registration in CRO is not required.

2.1.10 Pellet fuel plant in Zamość

Pellet fuel plant in Zamość started operation in Q2 2012. The owner of the plant is Polenergia Biomasa Energetyczna Wschód Sp. z o.o. Selection of Zamość economic sub-zone as the location for the plant resulted from the availability of raw materials for production. The pellet fuel produced in Zamość was mainly supplied to Połaniec and Ostrołęka Power Plants. Production volume was approx. 4,000 tonnes per month.

Polenergia Biomasa Energetyczna Wschód Sp. z o.o. was sold on 30 November 2020.

2.1.11 Nowa Sarzyna Cogeneration Plant

Location and description of the plant

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

The company produces electricity and heat. Electricity and heat are produced in cogeneration by combusting 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:

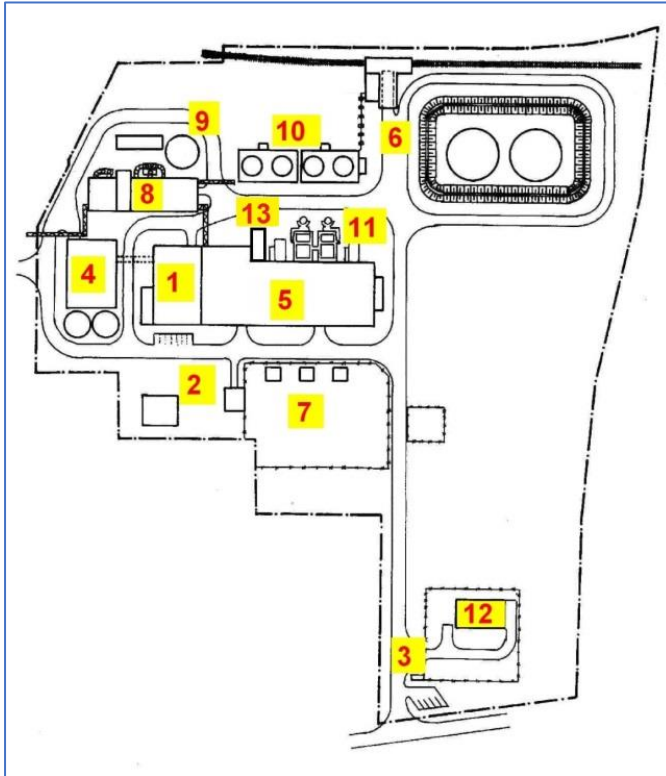
- Polenergia Obrót S.A. – wholesale power buyer.
- Chemical plants (CIECH Sarzyna S.A., CIECH Żywiec Sp. z o.o.) – buyer of heat for technological and heating purposes and of electricity for the needs of chemical plants; and

- Zakład Gospodarki Komunalnej Nowa Sarzyna Sp. z o.o. – buyer of heat for heating purposes.

In 2020, gross electricity production was 816,243 MWh and heat production for sale was approximately 430,000 GJ.

The company has 44 employees.

Figure 13 Type and distribution of facilities at Nowa Sarzyna Cogeneration Plant.



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 ENS began in mid-1998 and the plant started commercial operation on 1 June 2000. In 1997, ENS 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

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

No penalties were imposed on the company in 2020. The last inspection by the Voivodeship Inspectorate for Environmental Protection took place in July/August 2020. No irregularities were detected and no comments were submitted.

Table 10. Summary of permits and decision on environmental conditions issued for ENS.

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
Water permit (document ref. No. RZ.ZUZ.4.421.42.2019.EB) for the directing of industrial wastewater 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
Permit for greenhouse gas emissions from the facility covered by the emissions trading system, amended by Decision No. OŚ.6226.4.2020.	Starost of Leżajsk	25 November 2016, amended by Decision of 30 December 2020	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.

ENS conducts daily measurements of air emissions (online measurements); 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 October 2020.

ENS was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2020 will be submitted by the end of February 2021. In addition, as required, ENS is preparing the annual report on CO₂ emissions for 2020, which will be submitted by 31 March 2021.

Management of hazardous substances

Aboveground tanks located in external areas:

- 2 light heating oil tanks with a capacity of 3,000 m³ 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 m³,
- 2 steel tanks for demineralised water with a capacity of 1,200 m³ 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 m³
- 1 sodium hydroxide tank with a capacity of 40 m³
- 1 hydrochloric acid tank with a capacity of 40 m³

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 ENS include:

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

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

There are no underground reservoirs at ENS.

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, ENF 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 wastewater 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 Trzebońnica 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, wastewater (industrial and sanitary) is discharged in cooperation with the chemical plants, based on the same local services agreement. Wastewater is

pumped into the plants' sewage system and from there discharged to a biological wastewater treatment plant.

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

Wastewater management is also covered by the water permit (document ref. No. RZ.ZUZ.4.421.42.2019.EB) for the directing of industrial wastewater 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 wastewater. In addition, the water permit imposes an obligation to measure substances particularly harmful to the aquatic environment (listed in the water permit) in industrial wastewater at least twice a year.

ENS conducts the above-mentioned measurements in accordance with the provisions of the permits; the last measurements took place in November 2020 and no exceedances of the permissible pollution levels were reported.

Noise

The nearest multi-family residential housing is located approximately 1 km from ENS. 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 2020 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 ENS.

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 ENS (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 May 2020; no leaks were detected on the refrigeration systems.

2.1.12 Mercury Power Plant

Location and description of the plant

Mercury Power Plant (Mercury PP) is located in Wałbrzych, Dolnośląskie Voivodeship, and it is owned by Mercury Energia Sp. z o.o. and Wspólnicy Sp.k..

This project is based on an agreement with Wałbrzyskie Zakłady Koksownicze Victoria S.A. Mercury Power Plant started producing energy at the beginning of July 2006.

The power unit consists of a gas boiler and a steam turbine with a capacity of approximately 8 MWe. Electricity is generated from coke oven gas, which is produced as a by-product of coke production at WZK Victoria S.A. coke plants. Mercury Power Plant receives gas and supplies electricity under an agreement with WZK Victoria SA, valid until December 2023.

The surplus energy is sold to the network of Polenergia Obrót S.A. – wholesale energy buyer.

Figure 14 Facility diagram.

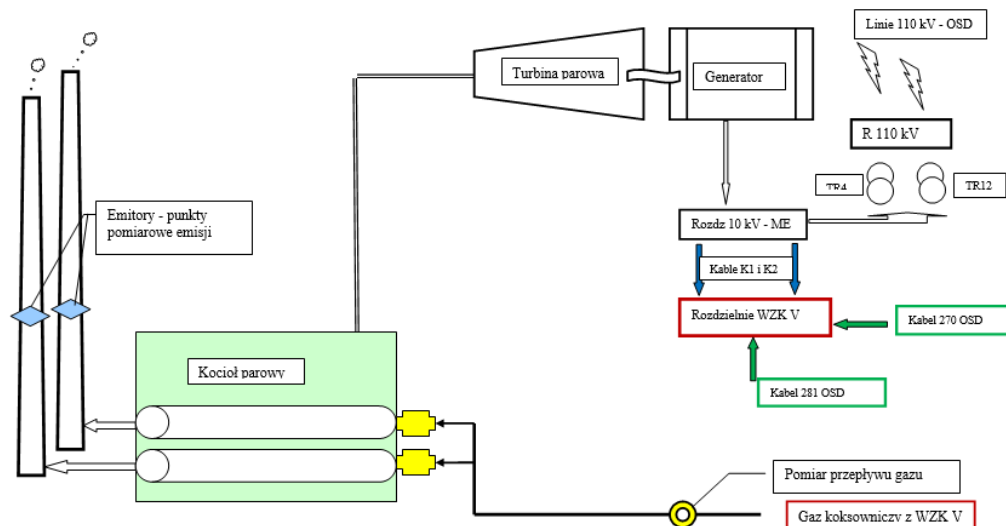
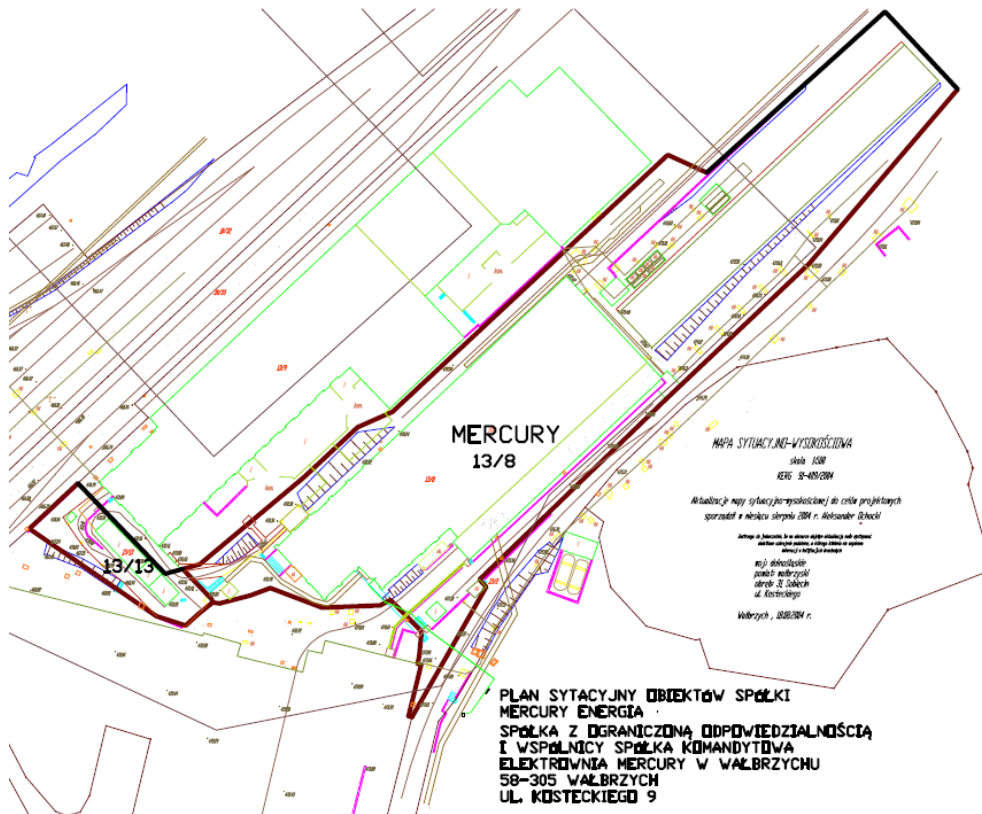


Figure 15 Mercury Power Plant site plan.



History

Mercury PP is located on the site of a former power plant from the early 20th century. The building dates back to the 1940s; after the war, it was the largest power plant in Poland (until the construction of Turów). Mercury PP was located on the premises of Wałbrzyskie Zakłady Koksownicze. In 2004, the idea emerged to use waste coke oven gas, which was no longer collected by the city of Wałbrzych. After the construction of the facility, Mercury PP started its operation in 2006.

Environmental permits

Mercury PP 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 2020.

Table 11. Summary of permits and decision on environmental conditions issued for Mercury PP.

Permit/Decision	Issuing authority	Date of issue	Validity date
Permit for emitting gases and dust into the air (document ref. No. BOŚ.6225.5.2014)	President of the City of Wałbrzych	17 June 2014	17 June 2024
Permit for emitting gases and dust into the air No. BOŚ.6225.8.2015 amending permit No. BOŚ.6225.5.2014)	President of the City of Wałbrzych	12 January 2016	17 June 2024
Permit for greenhouse gas emissions from Mercury Power Plant (document ref. No. BOŚ.6227.1.2019) amending Decision No. BOŚ.6227.1.2016	President of the City of Wałbrzych	17 April 2019	Permit issued for an indefinite period

Air emissions

Air emissions are covered by the permit for emitting gases and dust into the air, which defines the maximum permissible levels of emissions of substances, i.e. total dust, sulphur dioxide and nitrogen dioxide.

The permit requires Mercury PP to measure emissions of the above-mentioned substances twice a year.

In 2020, measurements were carried out in July, August and December. No exceedances of the permissible levels of substance emissions were recorded.

Mercury PP was registered with the National Centre for Emissions Management (KOBiZE) and, as required, the report for 2020 will be submitted by the end of February 2021. In addition, as required, Mercury PP is preparing the annual report on CO₂ emissions for 2020, which will be submitted by 31 March 2021.

Management of hazardous substances

There are small quantities of hazardous substances at Mercury PP, i.e. tanks for sodium hydroxide, which is stored in 25 litre containers. All containers are stored in a locked room to which only authorised persons have access. All hazardous substances are stored on drip trays.

Waste management

Waste management is based on agreements/orders with companies authorised to dispose of waste. Municipal waste is collected by ALBA based on agreement No. PO27004610.

As Mercury PP does not generate more than 1 Mg/year of hazardous waste or 5,000 Mg/year of non-hazardous waste, no waste production permit is required.

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

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

Water and wastewater management

Water is supplied to Mercury PP from the system of the supplier, i.e. PPHU Bem. The internal system located at Mercury PP is owned by the water supplier and wastewater collector.

Wastewater from processes at Mercury PP is treated in a closed loop system. Domestic wastewater is discharged into the municipal sewage system based on a water supply and wastewater disposal agreement.

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 currently seven cells containing asbestos at Mercury PP:

- Cell 1 - 93.149 Mg of asbestos-containing materials in a mechanical draft cooling tower (asbestos and cement pipes and joints, asbestos and cement corrugated sheets);

- Cell 2 – 84.457 Mg of asbestos-containing materials in a mechanical draft cooling tower (asbestos and cement cooling water pipes, asbestos and cement corrugated sheets);
- Cell 3 – 93.075 Mg of asbestos-containing materials in a mechanical draft cooling tower (asbestos and cement cooling water pipes, asbestos and cement corrugated sheets);
- Cell 4 – 90.001 Mg of asbestos-containing materials in a mechanical draft cooling tower (asbestos and cement cooling water pipes, asbestos and cement corrugated sheets);
- Cell 5 - 93.112 Mg of asbestos-containing materials in a mechanical draft cooling tower (asbestos and cement cooling water pipes, asbestos and cement corrugated sheets);
- Cell 6 – 92.891 Mg of asbestos-containing materials in a mechanical draft cooling tower (asbestos and cement cooling water pipes, asbestos and cement corrugated sheets);
- Cell 7 – 92.780 Mg of asbestos-containing materials in a mechanical draft cooling tower (asbestos and cement cooling water pipes, asbestos and cement corrugated sheets);

One of the eight asbestos cells was removed by a specialised third party in 2018. In total, 114.620 Mg of asbestos was removed. The remaining cells are expected to be removed in 2030 (cells 3, 4, 7) and 2031 (cells 1, 2, 5, 6).

In accordance with the applicable regulations, a letter to the Dolnośląskie Marshal's Office with information on asbestos-containing products for 2020 was submitted on 26 January 2020.

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 is no equipment containing PCBs at Mercury PP.

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 is no equipment containing SF₆ gases at Mercury PP.

2.2 Projects in Construction and Development

2.2.1 Szymankowo Wind Farm

Szymankowo Wind Farm project is carried out by Polenergia Farma Wiatrowa Szymankowo Sp. z o.o., a special purpose vehicle owned in 100% by Polenergia.

Szymankowo WF is located in Malbork Powiat, Gmina Miłoradz, 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).

In 2015, Szymankowo WF project underwent the Environmental Impact Assessment (EIA) procedure conducted by the competent authority, i.e. the Voigt of Miłoradz Gmina. 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 20 turbines and the necessary infrastructure. The project also obtained a permit for the construction of 20 turbines and auxiliary infrastructure. However, the company ultimately decided to build only 11 of the 20 turbines for which it obtained a building permit.

For the project, the company selected Siemens Gamesa Renewable Energy G132-3.45 MW turbines with capacity of 3.45 MW each. The parameters of the selected turbines will be as follows:

- hub height: 134 m;

- rotor diameter: 132 m.

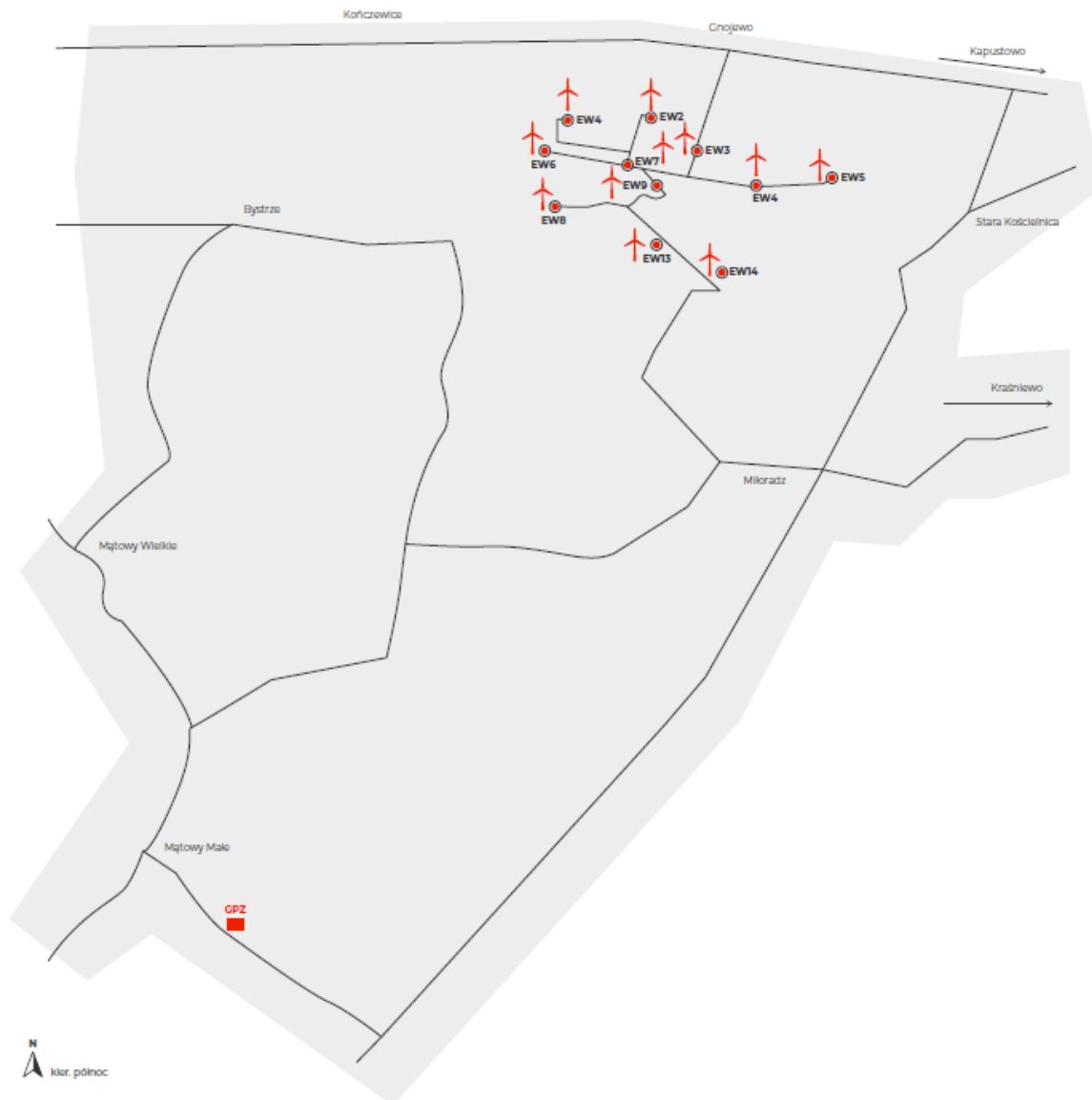
Total installed capacity of the wind farm will be 38.115 MW.

Prior to the start of construction, in January 2020 training was held for all subcontractors involved in the construction process. The training concerned occupational 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). Szymankowo WF is currently under construction. The construction site is regularly monitored by experts (BIO EKSPERT) responsible for the environmental supervision.

By the end of 2020, three turbines were mounted, i.e. EW 8, EW 13, EW 14. In addition, the mounting of EW 6 began. The planned date of completion of construction and installation works related to Szymankowo WF is Q1 2021.

Figure 16 Location of turbines at Szymankowo WF.

FW Szymankowo



2.2.2 Dębisk Wind Farm

Dębisk Wind Farm project is carried out by Polenergia Farma Wiatrowa 3 Sp. z o.o., a special purpose vehicle owned in 100% by Polenergia. Dębisk WF is located in the area delimited by the villages of Zielona (north-western corner), Kuczbork (north-eastern corner), Wólka Kliczewska (eastern corner), Małocin (south-eastern corner), Dębisk (southern corner), Chamsk (south-western corner), in the Gminas of Żuromin and Kuczbork Osada, Żuromin Powiat, Mazowieckie Voivodeship. 14 turbines will be located in Kuczbork-Osada Gmina, and the remaining 41 in Żuromin Gmina.

The environmental impact assessment (EIA) procedure for Dębisk WF was conducted by the competent authorities, i.e. the Mayor of Żuromin Gmina and the Voit of Kuczbork Osada Gmina. 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. The procedure ended with the issuance of two decisions on environmental conditions permitting the construction of up to 62 turbines and the necessary infrastructure:

- Decision on environmental conditions issued by the Voigt of Kuczbork Osada Gmina 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 Gmina 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.

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 areas. 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 Kruszczevo main electrical substation.

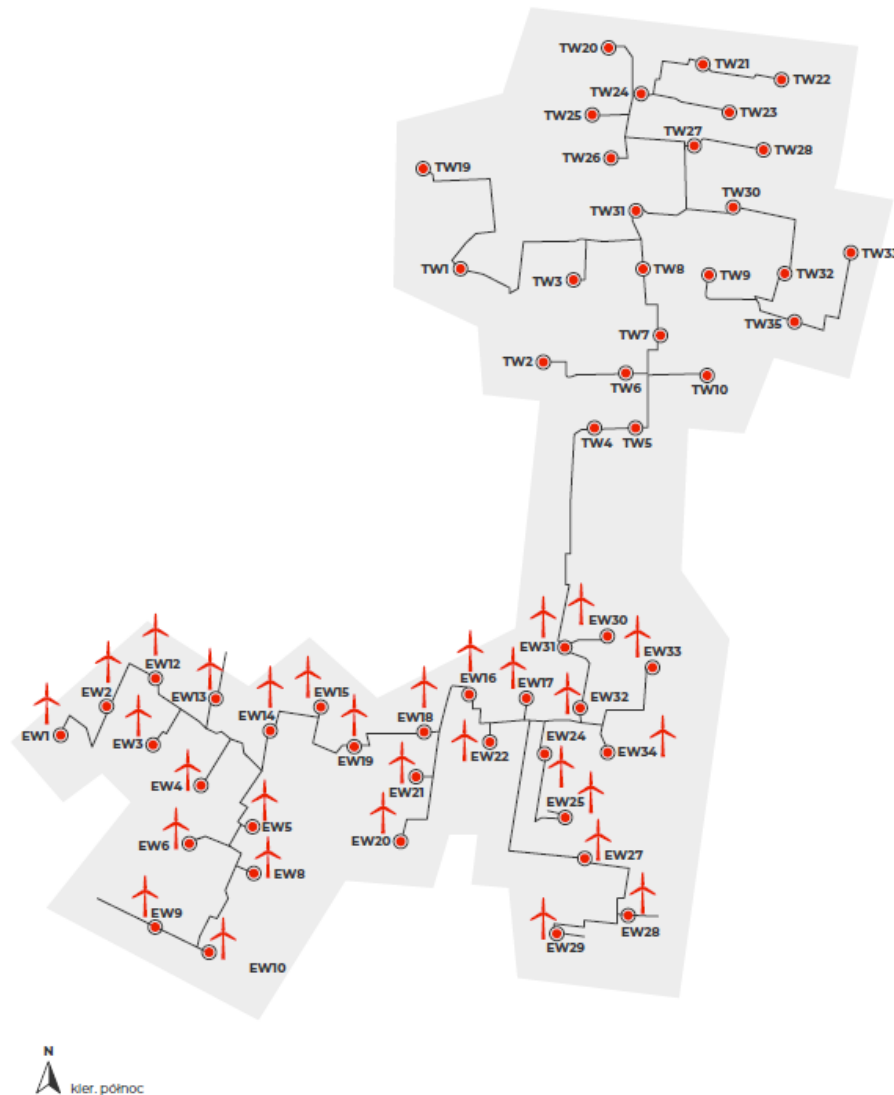
An additional wildlife assessment was carried out in 2019. The study was carried out in May and June to assess whether the results of the 2009 monitoring remained representative, and whether there had been any changes in land use that could affect the attractiveness of the sites to birds and bats. The 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 occupational 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.

By the end of 2020, 8 foundations, each with a diameter of 16.5 to 18.3 m, were completed. The planned completion date for Dębsk WF is mid-2022.

Figure 17 Location of turbines at Dębsk WF.

FW Dębsk



2.2.3 Kostomłoty Wind Farm

Kostomłoty Wind Farm project will be carried out by Polenergia Farma Wiatrowa Dębice/Kostomłoty Sp. z o.o., a special purpose vehicle owned in 100% by Polenergia. The project is located in Kostomłoty Gmina, Środa Śląska Powiat, Dolnośląskie Voivodeship, in southern Poland.

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). In 2016, the company obtained a building permit for the construction of 9 turbines, the main substation, underground infrastructure of power and control cables, access roads to respective turbines and assembly and maintenance areas. The building permits were amended in 2016, 2017 and 2018 to reflect the final selected turbine types and other minor changes.

Currently, the project includes the construction of 9 turbines, which will be located in the area delimited by the villages of Bogdanów, Godków (south-west corner), Paździorno (east corner), Piotrowice (north-east corner) and Wichrów (north-west corner). According to the building permit (amended in 2018), the capacity of the individual Vestas V136 turbines will be 3 MW. The parameters of the turbines will be as follows:

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

Total installed capacity of the wind farm will be 27 MW.

The financing institution for the project will be 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.

As part of the above-mentioned analysis, a project-dedicated Environmental and Social Action Plan (ESAP) was prepared, which covers measures necessary to be implemented already in the construction phase, including:

- Regular supervision of construction works to ensure that they are carried out in accordance with the provisions of the decision on environmental conditions, the provisions of C-ESMP and good industry practice, and that environmental risks are mitigated and adequately controlled;
- Development of an Environmental and Social Management Plan for the construction phase of the project;
- Compliance with the provisions of decision on environmental conditions with regard to nature conservation during construction works;
- Conducting an archaeological survey prior to the construction of the high voltage cable line.

The general contractor for the construction works was selected in late 2020.

The Company is currently selecting a subcontractor who will be responsible for the environmental supervision of the construction works.

Construction works are scheduled to start at the end of Q1 2021 and they will be preceded by an initial training for subcontractors. The training will cover occupational 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 will be monitored by experts from BIO EKSPERT, who will be responsible for environmental supervision.

Figure 18 Planned location of turbines at Kostomłoty WF.

FW Kostomłoty

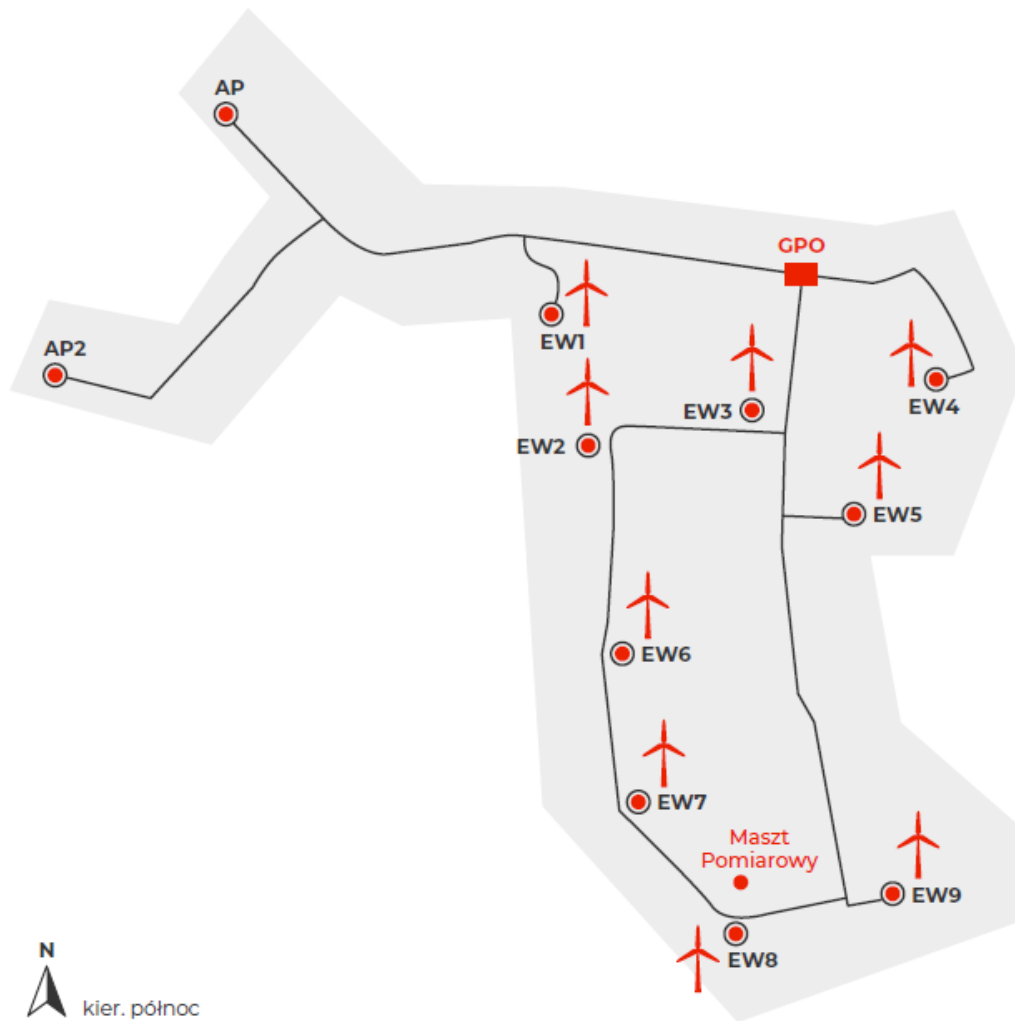


Figure 19 Land selected for the planned Kostomłoty WF.



Figure 20 Land selected for the planned Kostomłoty WF.



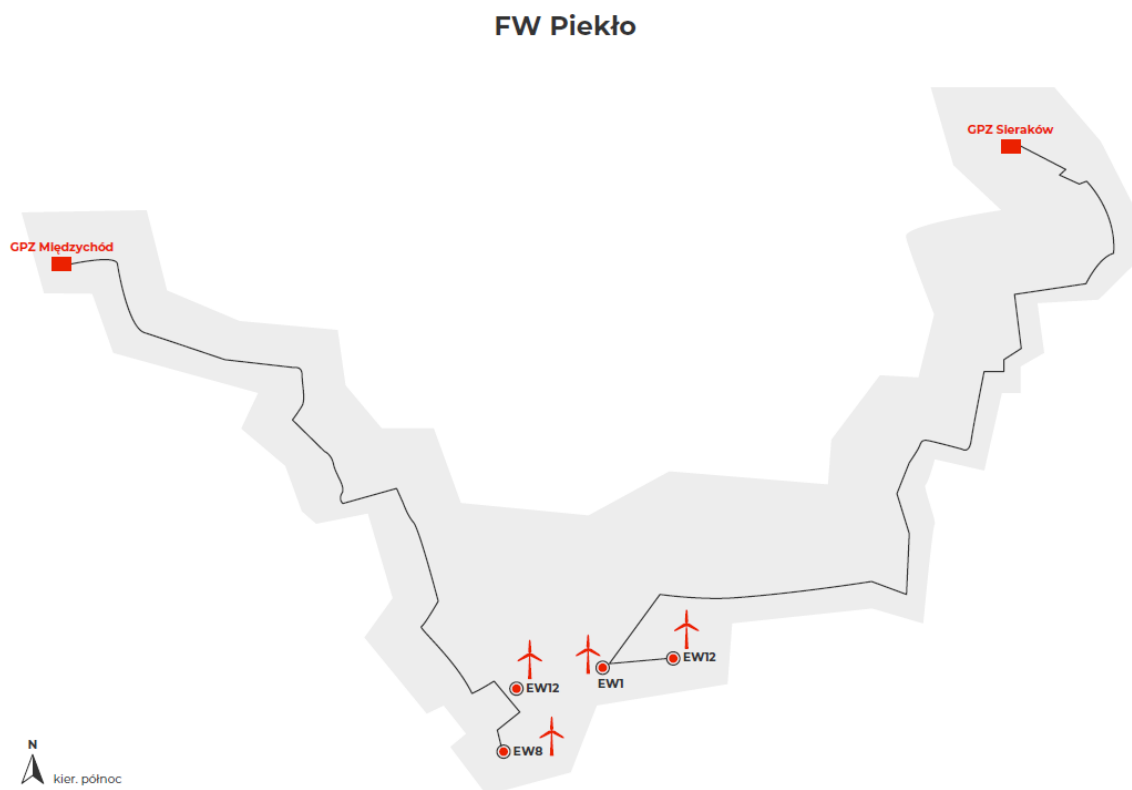
2.2.4 Piekło Wind Farm

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 Polenergia.

Piekło WF is located in the area of Międzzychód Powiat, Międzzychód Gmina, in the cadastral sections of Tuczępy, Mnichy, Kamionna and in Kwilcz Gmina, Mechnacz section. In 2012, Piekło WF project underwent the Environmental Impact Assessment (EIA) procedure conducted by the competent authority, i.e. the Mayor of Międzzychód. 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.

Figure 21 Location of turbines at Piekło WF.



2.2.5 Photovoltaic farm projects

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. All projects submitted by Polenergia S.A. won this year's RES auctions for new photovoltaic power plants. A portfolio of PV projects: Sulechów II, Sulechów III and Buk I with a total capacity of 28 MW will receive 15-year support.

Buk I project

Buk I photovoltaic farm project is being implemented by the special purpose vehicle Polenergia Farma Wiatrowa Rudniki Sp. z o.o. Buk I will be located on plots No. 409/1, 411/2, 729, 732, 733/1, 733/2, 734/1 within the village of Wielka Wieś, Buk Gmina, Poznań Poviast, Wielkopolskie Voivodeship.

Buk I project will consist of seven photovoltaic farms with a capacity of up to 1 MW each, with the necessary technical infrastructure. Total capacity of the farms will be 6.44 MWp.

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 Gmina 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 (RDOS) in Poznań 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.

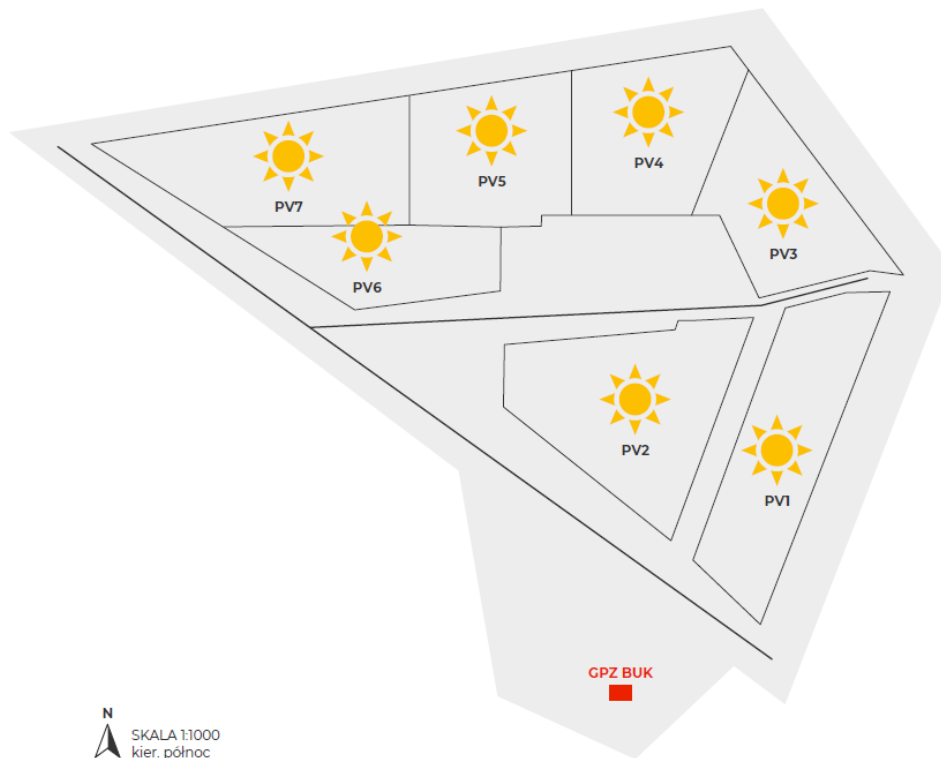
The project also received the following building permits:

- 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.

Construction works are scheduled to start in August 2021.

Figure 22 Map of planned Buk I photovoltaic farms.

Buk 1



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Sulechów II project

Sulechów II photovoltaic farm project is implemented by the special purpose vehicle Polenergia Farma Wiatrowa 17 Sp. z o.o. Sulechów II will be located on plots No. 124/4, 124/3, 142, 141, 8/28, 8/15 and part of plots No. 120/8, 120/5, 121/3, 122/3, 123/3 in Kruszyna section, Sulechów Gmina, Zielona Góra Powiat, Lubuskie Voivodeship.

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

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.

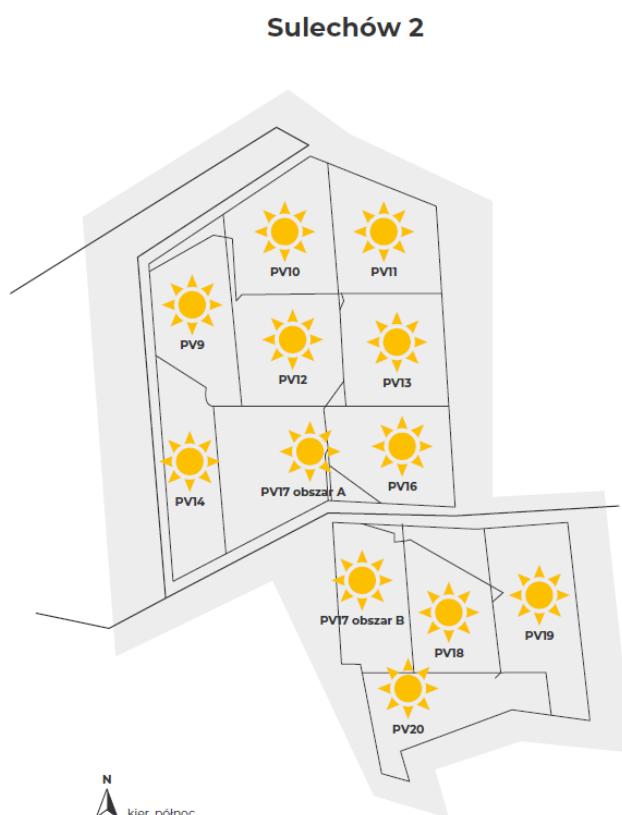
The procedure ended with the issuance of a decision on environmental conditions (document ref. No. GKR.6220.17.2018.MG issued on 18 October 2018) permitting the construction and installation of thirteen photovoltaic farms with a capacity of up to 1 MW each, including the necessary technical infrastructure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

Construction works are scheduled to start in June 2021.

Figure 23 Map of planned Sulechów II photovoltaic farms.



Sulechów III project

Sulechów III photovoltaic farm project is implemented by the special purpose vehicle Polenergia Farma Wiatrowa Rudniki Sp. z o.o. Sulechów III will be located on plots No. 7/30, 7/40, 7/12, 7/83, 7/84 in Kruszyna section, Sulechów Gmina, Zielona Góra Powiat, Lubuskie Voivodeship.

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

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.

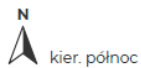
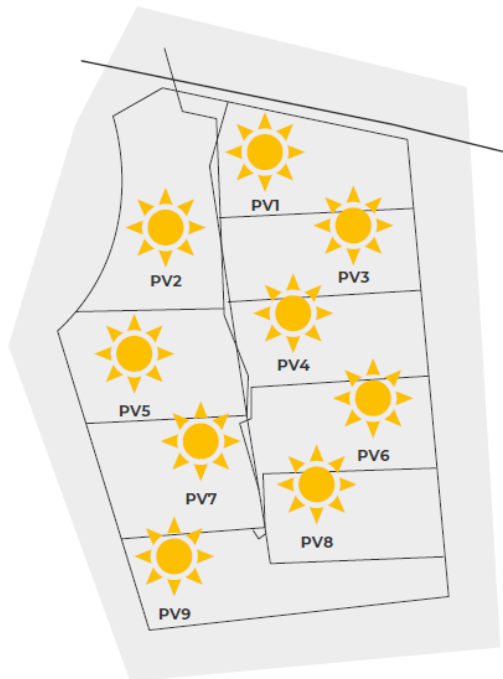
The company will construct nine photovoltaic farms, in accordance with the received building permits:

- 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.

Construction works are scheduled to start in July/August 2021.

Figure 24 Map of planned Sulechów III photovoltaic farms.

Sulechów 3



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 Gmina. 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 received connection conditions for 1,560 MW. The agreement on environmental assessments was signed in December 2020. They will be launched in Q1 2021.

Figure 25. Location of Polenergia Bałtyk II OWF.



BAŁTYK II OWF

Bałtyk II offshore wind farm is to be located approximately 37 km north of the Polish coastline, in Smołdzino Gmina. The project will cover an area of about 122 km², of which the development area will be 95 km² and it will include the following components:

- Up to 120 turbines with a total capacity up to 1,200 MW, each of them with total height of up to 300 m and rotor diameter of up to 250 m;
- Up to 6 internal offshore electrical substations;
- Up to 200 km of onshore and offshore energy transmission and telecommunications cable lines;
- Connection point to the TSO located in Wierzbiecin.

Figure 26. Location of Polenergia Bałtyk II OWF.



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 studies included:

- seabed organisms - sampling and analysis, underwater observations
- fisheries survey and hydroacoustic measurements, underwater observations
- marine mammals - monitoring with porpoise detectors, aerial observations, modelling of underwater noise
- observation of wintering and migratory birds, radar monitoring, night-time sound recording, collision risk analysis, habitat modelling
- acoustic monitoring of bats
- meteorological and hydrological parameters
- seabed - deep-sea structure, formation, physical and chemical properties of sediments, modelling of suspended solids disintegration, underwater noise monitoring.

The environmental impact assessment (EIA) procedure ended with the issuance of a decision on environmental conditions 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. In addition, a decision on environmental conditions for the connection infrastructure was obtained in March 2019.

As the total number of turbines is to be reduced to 60 (instead of 120 turbines under the current decision on environmental conditions), the company is currently amending the decision on

environmental conditions issued in March 2017. The amendment application is planned to be submitted in January 2021.

BAŁTYK III OWF

Bałtyk III offshore wind farm is to be located approximately 37 km north of the Polish coastline, in Smołdzino Gmina. The project will cover an area of about 117 km², of which the development area will be 89 km² and it will include the following components:

- Up to 120 turbines with a total capacity up to 1,200 MW, each of them with total height of up to 300 m and rotor diameter of up to 250 m;
- Up to 6 internal marine electrical substations;
- Up to 200 km of onshore and offshore energy transmission and telecommunications cable lines;
- Connection point to the TSO located in Wierzbiecin.

Figure 27. Location of Polenergia Bałtyk III OWF.



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 studies included:

- seabed organisms - sampling and analysis, underwater observations
- fisheries survey and hydroacoustic measurements, underwater observations
- marine mammals - monitoring with porpoise detectors, aerial observations, modelling of underwater noise
- observation of wintering and migratory birds, radar monitoring, night-time sound recording, collision risk analysis, habitat modelling
- acoustic monitoring of bats
- meteorological and hydrological parameters

- seabed - deep-sea structure, formation, physical and chemical properties of sediments, modelling of suspended solids disintegration, underwater noise monitoring.

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 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 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.

Due to the planned change in turbine parameters, the company is currently obtaining a new decision on environmental conditions. A new EIA report with an application for a new decision on environmental conditions was submitted to the Regional Directorate for Environmental Protection in Gdańsk in September 2019.

3. IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT PLAN AND ENVIRONMENTAL AND SOCIAL ACTION PLAN

3.1 Measures Taken to Meet the Requirements of Stakeholder Engagement Plan

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 Gmina 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 Poviát 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 Gmina 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 Gmina offices, transport plans related to the transport of large project components prepared and consulted with local authorities.

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

3.2.1 Gawłowice Wind Farm

Implementation of the corporate Environmental and Social Action Plan (ESAP) of 2013 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.

Gawłowice WF was put into operation in Q4 2014. In accordance with the decision on environmental conditions, post construction noise measurements were carried out in November 2014 and between February and March 2015. 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. 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 Toruń (WIOS);
- the Regional Directorate for Environmental Protection in Bydgoszcz (RDOS);
- the Powiat Sanitary Inspector in Grudziądz (SANEPID);
- the Powiat Starost Office in Grudziądz;
- the Mayor of Radzyń Chełmiński Town and Gmina.

In 2015, the farm was extended by 3 more turbines; as a result, in March 2016, another round of post construction noise measurements were carried out for all 21 turbines of Gawłowice WF. Based on the 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 (RDOS), which did not submit any comments (document No. WOO.401.16.2016.JM of 22 April 2016).

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

Studies of birds and bats after the construction of the turbines took place in 2015, 2016 and 2018 and the study reports, after the data were collected and analysed, were submitted to the 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 Gmina) 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 studies showed no increase in mortality. In 2019, the final monitoring reports were submitted to the Regional Environment Directorate for analysis and approval. In July 2019, the Director of RDOŚ 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 Voigt of Radzyń Chełmiński Town and Gmina 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 Voigt of Radzyń Chełmiński Town and Gmina and the Powiat 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). Audit results are presented to the creditors in the form of an Annual Report.

Adoption and adaptation of general corporate environmental and occupational health and safety procedures and standards. This includes the implementation of an environmental and occupational health and safety 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 occupational health and safety procedures were developed based on the environmental and occupational health and safety management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. As it is the case with all Polenergia facilities, Gawłowice WF is subject to regular occupational health and safety inspections and audits. During an inspection conducted in 2016, occupational health and safety procedures and guidelines were reviewed. An occupational 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 occupational health and safety (the last inspection at Gawłowice WF was conducted in 2019/2020). 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://www.polenergia.pl/pol/pl/strona/farma-wiatrowa-gawlowice>. 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 occupational 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 Corporate Social Responsibility Reports prepared in 2015-2019 addressed e.g. environmental and social issues related to the annual operations of Gawłowice WF.

Implementation of a grievance procedure in the course of implementation of the Stakeholder Engagement Plan, as required by 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. Information about the project was published on Polenergia Group's website and at the Gmina Offices, where the results of the post construction noise analysis and the results of the post construction ornithological and chiropterological monitoring were also available.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 1, respectively). As a rule, each complaint is addressed within 14 days. No environmental penalties were imposed on Gawłowice WF in 2020. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

Complaint forms have been made available at the Gmina Offices, which also provide the company's contact details. In addition, the forms are available at <https://www.polenergia.pl/pol/pl/strona/farma-wiatrowa-gawlowice>.

3.2.2 Krzęcin Wind Farm

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

- Analysis of data, reports and statements obtained from the Facility Operator (EW Krzęcin) from the period of project development, construction and operation; and the analysis prepared by the law firm SSW Spaczyński, Szczepaniak i Wspólnicy Sp. k. ("SSW") with regard to the provided environmental data;
- On-site visits (August 2017) and interview with a representative of the facility operator and a person from the servicing company (Nordex) dealing with both technical servicing issues and environmental aspects (hazardous waste management at Krzęcin WF).

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

Polenergia Farma Wiatrowa 23 Sp. z o.o. did not prepare a dedicated Environmental and Social Action Plan for Krzęcin WF, which does not change the fact that the company makes all possible efforts to comply with good practices during the operation of Krzęcin WF.

3.2.3 Łukaszów Wind Farm

Amon Sp. z o.o. did not prepare a dedicated Environmental and Social Action Plan for Łukaszów WF, which does not change the fact that the company makes all possible efforts to comply with good practices during the operation of Łukaszów WF.

3.2.4 Modlikowice Wind Farm

Talia Sp. z o.o. did not prepare a dedicated Environmental and Social Action Plan for Modlikowice WF, which does not change the fact that the company makes all possible efforts to comply with good practices during the operation of Modlikowice WF.

3.2.5 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 environmental and occupational health and safety management system and establish a management structure for environmental and occupational health and safety matters at the company level.

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

As it is the case with other Polenergia facilities, Mycielin WF is subject to regular occupational health and safety inspections and audits. During an inspection conducted in 2016, occupational health and safety procedures and guidelines were reviewed. An occupational 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 occupational health and safety (the last inspection at Mycielin WF was conducted in June 2020). It did not reveal any major irregularities. All minor concerns were resolved within a week of the inspection.

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 <https://www.polenergia.pl/pol/en/page/%5Btitle-raw%5D-20>. The Corporate Social Responsibility programme and CSR-compliant GRI reporting were launched in 2015.

Conducting post construction 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, post construction 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 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 Gmina 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 post construction 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 post construction 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 decisions on environmental conditions and indicating that no additional mitigating measures were necessary. The final, third, year of monitoring began in April 2020 and it will end in April 2021, covering the entire phenological cycle.

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

In February 2015, the Voigt of Niegosławice Gmina 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.

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 occupational 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). Audit results are presented in the form of an Annual Report.

The results of the audits are presented to the Creditors in the form of an Annual Report. This includes the implementation of an environmental and occupational health and safety 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 occupational health and safety procedures were developed based on the environmental and occupational health and safety 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://www.polenergia.pl/pol/pl/strona/%5Btitle-raw%5D-21>. 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 occupational 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 e.g. environmental and social issues related to the annual operations of Mycielin WF.

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 Mycielin WF. Information about the project was published on Polenergia Group's website and at the Gmina Offices, where the results of the post construction noise analysis and the results of the post construction ornithological and chiropterological monitoring were also available.

As a rule, each complaint is addressed within 14 days. No environmental penalties were imposed on Mycielin WF in 2020. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

Complaint forms have been made available at the Gmina Offices, which also provide the company's contact details. In addition, the forms are available at <https://www.polenergia.pl/pol/pl/strona/%5Btitle-raw%5D-21>.

3.2.6 Puck Wind Farm

Dipol Sp. z o.o. did not prepare a dedicated Environmental and Social Action Plan for Puck WF, which does not change the fact that the company makes all possible efforts to comply with good practices during the operation of Puck WF.

3.2.7 Rajgród Wind Farm

Implementation of the corporate Environmental and Social Action Plan (ESAP) of 2013 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 post construction noise measurements as required by the decision on environmental conditions.

Rajgród WF was put into operation in Q4 2014. In accordance with the decision on environmental conditions, post construction 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.

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

Post construction 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 environmental authorities in early June 2019. On 30 June 2019, the Regional Directorate for Environmental Protection in Białystok accepted the post construction 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). Audit results are presented as part of the annual Corporate Social Responsibility Report, which is published on the company's website <https://www.polenergia.pl/pol/pl/strona/%5Btitle-raw%5D-104>.

The results of the audits are presented to the Creditors in the form of an Annual Report. This includes the implementation of an environmental and occupational health and safety 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 occupational health and safety procedures were developed based on the environmental and occupational health and safety management systems: ISO 14000 and OHSAS 18000. However, the implemented systems are not certified. All Polenergia facilities are subject to regular occupational

health and safety inspections and audits. During an inspection conducted in 2016, occupational health and safety procedures and guidelines were reviewed. An occupational 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 occupational health and safety (the last inspection at Rajgród WF was conducted in February 2020). 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 Rajgród WF. General environmental information about the project was published online at <https://www.polenergia.pl/pol/en/page/wind-farms-projects-development>. 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 occupational 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 Corporate Social Responsibility Reports prepared in 2015-2019 addressed e.g. environmental and social issues related to the annual operations of Rajgród WF.

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 Rajgród WF. Information about the project was published on Polenergia Group's website and at the Gmina Offices, where the results of the post construction noise analysis and the results of the post construction ornithological and chiropterological monitoring were also available.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 6, respectively). As a rule, each complaint is addressed within 14 days. No environmental penalties were imposed on Rajgród WF in 2020. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

Complaint forms have been made available at the Gmina Offices, which also provide the company's contact details. In addition, the forms are available at <https://www.polenergia.pl/pol/pl/strona/farma-wiatrowa-rajgrod>.

3.2.8 Skurpie Wind Farm

Implementation of the corporate Environmental and Social Action Plan (ESAP) of 2013 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 post construction 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 decision on environmental conditions, post construction 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 Voivod of Płock Gmina, did not submit any comments.

Conducting post construction 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 decision on environmental conditions, study results are submitted to the administrative bodies (the Gmina Office and the Regional Directorate for Environmental Protection) after the end of each semester of the monitoring. The studies did not determine any negative impact of the project on birds and bats. The next cycle of the monitoring and summary of the 3-year ornithological studies 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). Audit results are presented [in](#) the form of an Annual Report.

The results of the audits are presented to the Creditors in the form of an Annual Report. This includes the implementation of an environmental and occupational health and safety 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. Environmental and occupational health and safety procedures were developed based on the environmental and occupational health and safety management systems, such as ISO 14000 and OHSAS 18000. However, the systems are not certified. All Polenergia facilities are subject to regular occupational health and safety inspections and audits. During an inspection conducted in 2016, occupational health and safety procedures and guidelines were reviewed. An occupational 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 occupational health and safety (the last inspection at Skurpie WF was conducted in September 2020). 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 Skurpie WF. General environmental information about the project was published online at <https://www.polenergia.pl/pol/en/page/wind-farms-projects-development>. 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 occupational 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 Corporate Social Responsibility Reports prepared in 2015-2019 addressed e.g. environmental and social issues related to the annual operations of Skurpie WF.

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 Skurpie WF. Information about the project was published on Polenergia Group's website and at the Gmina Offices, where the results of the post construction noise analysis and the results of the post construction ornithological and chiropterological monitoring were also available.

Complaints in the first instance are addressed to the appropriate subsidiary (Polenergia Farma Wiatrowa 4, respectively). As a rule, each complaint is addressed within 14 days. No environmental penalties were imposed on Skurpie WF in 2020. There were not any inspections by the Voivodeship Inspectorate for Environmental Protection at the WF.

Complaint forms have been made available at the Gmina Offices, which also provide the company's contact details. In addition, the forms are available at <https://www.polenergia.pl/pol/pl/strona/farma-wiatrowa-skurpie>.

3.2.9 Sulechów I PVF

Environmental and Social Action Plan (ESAP) was not prepared for the purposes of development of the Sulechów I PVF project, as it was not required by the project financing institutions. This does not change the fact that the company makes all possible efforts to comply with good practices during the operation of Sulechów I PVF.

One example of good practices implemented in connection with the Sulechów PVF project was the company's decision to set up an apiary on the premises of Sulechów PVF.

Moreover, 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, and beautiful colourful flowers will bloom on the farm throughout the growing season.

At the beginning of 2020, Polenergia built an apiary consisting of 10 hives on plots No. 118/2, 152/2, 152/3, 153, 154/5 in Kruszyna section, Sulechów Gmina, Lubuskie Voivodeship. To this end, the company engaged a specialised company, PLON Zaopatrzenie Ogrodniczo - Pszczelarskie, to handle the yearlong maintenance of the Sulechów apiary.

Based on the 2020 PLON report, it is known that the last honey from the apiary was collected in July 2020, followed by the preparation of the bees for winter, i.e. feeding and treatment. The last treatment was carried out in early December. After this process the bees were left to overwinter, i.e. until February 2021.

At the end of 2020, Polenergia Farma Wiatrowa 17 Sp. z o.o. signed a new agreement with PLON on apiary operation in 2021.

Figure 28 Area of honey flower meadows.



Figure 29 The apiary at Sulechów PVF.



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

According to the information posted on the website of the General Directorate for Environmental Protection, "on 31 January 2020, the European Commission issued decisions on the lists of sites of Community importance. These decisions introduce into the EU legal order changes to the boundaries of Natura 2000 habitat sites on the basis of information submitted in 2019 to the European Commission by Member States. Due to the location of Poland in two biogeographical regions, the following decisions are important for the Natura 2000 network in Poland:

- *COMMISSION IMPLEMENTING DECISION (EU) 2020/100 of 28 November 2019 adopting the thirteenth update of the list of sites of Community importance for the Alpine biogeographical region (notified under document C(2019) 8589)*
- *COMMISSION IMPLEMENTING DECISION (EU) 2020/97 of 28 November 2019 adopting the thirteenth update of the list of sites of Community importance for the Continental biogeographical region (notified under document C(2019) 8586)*

Considering the above information, the General Directorate for Environmental Protection developed proposals of new sites and changes of borders of the existing sites. These changes mainly result from Poland's obligations with regard to the requirements of the EU law.

Based on the information presented 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. 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.

Other changes result from provisions of protection mission plans and protection action plans, documentation prepared as part of works on the above-mentioned plans or comments and proposals submitted by supervisors of the Natura 2000 sites."

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_news_image.pdf.

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

5. ENVIRONMENTAL AND OCCUPATIONAL HEALTH AND SAFETY 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 environmental and occupational health and safety 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, ENS has additional support from TARBONUS in the area of environmental protection and occupational health and safety, while in the case of Mercury PP it is EK Polska Group (only occupational health and safety, environmental support is provided by Atmoterm, and in the area of greenhouse gas emissions, by the Environmental and Sustainability Department).

The list of key regulations is presented below.

Environment:

- Act of 27 April 2001 Environmental Law (Dz.U. 2001 No. 62, item 627);
- Act of 14 December 2012 on waste (Dz.U. 2020.0.797);
- Act of 12 June 2015 on greenhouse gas emission allowance trading scheme (Dz.U. 2015, item 1223);

- Act of 17 July 2009 on the system to manage the emissions of greenhouse gases and other substances (Dz.U. 2009 No. 130, item 1070);
- Act of 20 July 2017 Water Law (Dz.U. 2017, item 1566);
- Act of 15 May 2015 on substances that deplete the ozone layer and on some fluorinated greenhouse gases (Dz.U. 2015, item 881);
- Act of 19 August 2011 on the carriage of dangerous goods (Dz.U. 2011 No. 227, item 1367);
- "Offshore Act" - Act on promoting electricity generation in offshore wind farms (signed by the President on 22 January 2021).

occupational health and safety:

- Labour Code (Dz. U. 1974 No. 24, item 141);
- Ordinance of the Minister of Energy of 28 August 2019 on occupational health and safety at work with energy equipment (Dz.U. 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 (Dz.U. 2020, item 568).

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 occupational health and safety regulations or laws occurred in 2020.

All construction contractors regularly monitor occupational 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 occupational health and safety rules by their workers will result in irreversible removal of such workers from the construction site.

No material non-compliance with environmental and occupational health and safety regulations or non-compliance related to social issues occurred in 2020.

6.1.1 Construction of Szymankowo WF

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

By the end of 2020, three turbines were mounted, i.e. EW 8, EW 13, EW 14. In addition, the mounting of EW 6 has started. Completion of construction is scheduled for the end of Q1 2021.

Completion of works of the turbine supplier (SGRE) is scheduled for 15 May 2021. Obtaining the operation permit is planned for June/July, while the concession is planned for August 2021.

Construction of Szymankowo WF began in March 2020. The following steps are being implemented during the construction:

1. Construction of access roads and platforms;
2. Soil reinforcement - piling, foundation laying;
3. Construction of electrical infrastructure, i.e. 110/30 kV WF substation, underground MV (30 kV) medium and high voltage cable lines;
4. Installation of turbine generators;
5. Carrying out trials and tests;
6. Official acceptance of the project.

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

- Bilfinger Tebodin Poland Sp. z o.o. – Contract Engineer;
- Przedsiębiorstwo Budownictwa Drogowo – Inżynieryjnego PBDI S.A. – General Contractor for construction and electrical works;
- Siemens Gamesa Renewable Energy Sp. z o.o. (SGRE), Siemens Gamesa Renewable Energy A/S – turbine supplier.

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

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

1. 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 are published on a platform that can 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 photographs is provided to the company for review.

Logbooks are kept for ongoing occupational 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.

2. 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 occupational health and safety management and site-specific remedial measures for occupational 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 "occupational health and safety Plan" (H&S Plan) for the construction of Szymankowo 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 occupational health and safety and environmental issues.

3. 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 guidance, i.e. it has been communicated to all subcontractors involved in the construction process of Szymankowo WF during the opening meeting and training relating to environmental and occupational health and safety 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.

As a rule, each complaint is addressed within 14 days. Complaint/comment forms are available at the construction site (in the office), at the Gmina Office and on Polenergia's website, in the tab dedicated to Szymankowo WF.

No complaints were lodged in 2020.

4. A traffic and transport management plan should be developed and implemented as part of the C-ESMP.

Polenergia Farma Wiatrowa Szymankowo has developed and implemented a traffic and transport management plan. The plan has been agreed with the Voigt of Miłoradz Gmina 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.

5. Compliance with the provisions of decision on environmental conditions with regard to nature conservation during construction works. Works should be supervised by a naturalist.

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 environmental and occupational health and safety 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. 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 (February 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.

Other inspections took place according to the schedule below:

- March - 4 inspections
- April - 4 inspections
- May - 4 inspections
- June - 3 inspections
- July - 3 inspections
- August - 2 inspections
- September - 2 inspections
- October - 1 inspection
- November - 1 inspection

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

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

Figure 30 White willow saplings before planting near Szymankowo WF.



Figure 31 White willow after planting near Szymankowo WF.



Figure 32 Szymankowo WF substation.



Figure 33 EW No. 8.



Figure 34 EW No. 8.



Figure 35 EW No. 6.



6.1.2 Construction of Dębsk WF

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

By the end of 2020, 8 foundations, each with a diameter of 16.5 to 18.3 m, were completed. In addition, approximately 13 km of 110 kV underground cable line to Kruszczevo main electrical substation was laid (total length is approximately 63 km). The planned completion date for the construction works related to Dębsk WF is Q2 2022.

Construction of Dębsk WF began in Q3 2020. The following steps are being implemented during the construction:

1. Construction of access roads and platforms;
2. Foundation laying;
3. Construction of electrical infrastructure, i.e. underground medium and high voltage cable lines;
4. Installation of turbine generators;
5. Carrying out trials and tests;
6. Official acceptance of the project.

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 institutions 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.

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

1. 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 occupational 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.

2. 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 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 occupational health and safety and environmental issues.

3. 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 environmental and occupational health and safety 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.

As a rule, each complaint is addressed within 14 days. Complaint/comment forms are available at the construction site (in the office), at the Gmina Office and on Polenergia's website, in the tab dedicated to Dębsk WF.

No complaints were lodged in 2020.

4. 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.

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 Gmina and the Voigt of Kuczbork - Osada Gmina 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, Polenergia Farma Wiatrowa 3 has consulted and made arrangements with local authorities.

5. 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 environmental and occupational health and safety requirements. Provisions concerning compliance with environmental regulations were also included in the "H&S Plan", which was signed by the Site Manager.

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

Between August and December 2020, BIO - EKSPERT performed 33 on-site inspections of the construction site and access roads. 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.

Other inspections took place according to the schedule below:

- September - 9 inspections

- October - 13 inspections
- November - 5 inspections
- December - 5 inspections

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.

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.

6. 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 in October, November and December 2020, as well as the quarterly report for Q4 2020. They are carried out as fast as possible.

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.

7. 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 is valid until 23 May 2021.

Figure 36 EW No. 23.



Figure 37 EW No. 20.



7. SOCIAL ISSUES AND HEALTH & SAFETY

ANALYSIS

Due to the state of epidemic, the analysis was mostly carried out online. It should also be mentioned that the declared state of epidemic had an impact on the work organisation of Polenergia Group companies. The impact was distributed proportionally to the risk (largely dependent on the number and specific nature of a given company). All measures taken in this respect were based on the current legal situation which, due to frequent updates, was promptly reviewed.

Key measures to combat the epidemic include e.g.:

- mandatory hand disinfection/hygiene by ensuring the availability of preparations, hygiene products etc.;
- keeping the recommended distance, e.g. administrative and office works were carried out by the minimum number of employees and, if necessary, on a rotational basis (limiting the number of employees working in the office at the same time);
- recommending that business meetings be replaced by teleconferences, phone calls and e-mails;
- recommending covering mouth and nose in common areas;
- implementation of processes and procedures to help manage subcontractors with regard to counteracting the pandemic;
- as part of employee support, the CSR team, through a newsletter, provided useful information and tips to employees (e.g. how to safely remove gloves and masks).

In support of the measures to combat the Covid-19 pandemic, on 18.12.2020, by decision of the Management Board of Polenergia S.A., the possibility of renting an oxygen concentrator for employees and associates of Polenergia Group and their families was introduced. Concentrators should e.g. support patients leaving hospital with significant lung damage and chronic respiratory

failure as a result of a severe coronavirus infection. Detailed rules of use are described in the SOP regarding the use of the oxygen concentrators.

Figure 38 Oxygen concentrator.



Also worth mentioning is the solution applied at the construction site of Szymankowo Wind Farm, where not only additional tests were introduced for all participants of the project implementation process, but also the local Gmina Office was supported with regard to testing. As part of this initiative, over 300 tests were conducted by the end of 2020.

7.1 Medical examinations, occupational health and safety training

Due to social distancing, the pandemic has restricted the provision of occupational health and safety training and the fulfilment of the obligation to carry out health screenings and check-ups.

With regard to medical examinations (by Ordinance of the Minister of Health of 20 March 2020 on the declaration of the state of epidemic on the territory of the Republic of Poland (Dz. U. of 2020, item 491), the obligation to carry out health screenings and check-ups has been suspended until the state of epidemic is lifted. It is still the employer's responsibility to issue a referral for medical examination within the period resulting from the medical opinions received during the previous examinations. Once the state of epidemic has been lifted, the employee will be obliged to immediately see the occupational physician for health screenings and check-ups. The Human Resources Office issues referrals and monitors the situation on an ongoing basis in accordance with the regulations.

occupational health and safety orientation training is conducted online in accordance with the law. Regular training supervised by the Human Resources Office is monitored on an ongoing basis. If possible, it is carried out on an ongoing basis; however, due to the pandemic, new rules in this regard are being considered and the possibility of carrying out training at a later date has been taken into account, i.e. in accordance with the provision stating that if the date of the regular occupational or service occupational health and safety training is due:

1. during the state of epidemic emergency or the state of epidemic; or
2. during the period of 30 days following the date of lifting the state of epidemic emergency, if the state of epidemic has not been declared, or following the date of lifting the state of epidemic;

such period shall be extended to 60 days following the date of lifting the state of epidemic emergency, if the state of epidemic has not been declared, or following the date of lifting the state of epidemic.

7.2 Accidents, near-misses and occupational diseases

No accidents were reported in 2020. Seven (7) near-misses were reported. All near-misses were reported to the responsible persons on an ongoing basis (near-misses are defined as events that did not result in an injury and with potential adverse effects).

- Szymankowo WF construction site - four (4) near-misses were reported. The incidents were related to driving/walking on the construction site. After each incident, the circumstances were discussed and all site participants were reminded about the rules of safe driving / walking on the site.
- Dębask WF construction site - three (3) near-misses were reported. Two of them were caused by persons not involved in the construction process (farmers twice caught on the gantry with agricultural equipment) and one road incident occurred. All incidents were discussed with site participants and the original state of the safety features was restored.
- Nowa Sarzyna Cogeneration Plant - no near-misses were reported, all technical incidents are discussed every morning at the briefings.
- Mercury Power Plant, Wind Farms and Photovoltaic Farm and other companies did not report any near misses.

7.3 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.

In 2020 no inspections were carried out by external bodies, i.e. the National Labour Inspectorate (PIP), the Sanitary Inspectorate, the State Fire Service.

Cooperation with the Office of Technical Inspection took place under regular inspections of equipment subject to the Office's control and it was maintained under a sanitary regime so as to ensure equipment certification while minimising personal contact.

Internal inspections were carried out in selected locations, in compliance with all sanitary requirements in force. In particular, they were conducted in the facilities which were later visited by K2 consulting firm (the visit was related to preparations for the implementation of Polenergia Group's strategy). K2 visit took place between 27.07.2020 and 30.07.2020.

Figure 39 K2 inspection at Szymankowo Wind Farm construction site.



There were no reports of penalties and administrative proceedings or third-party complaints related to occupational health and safety in 2020.

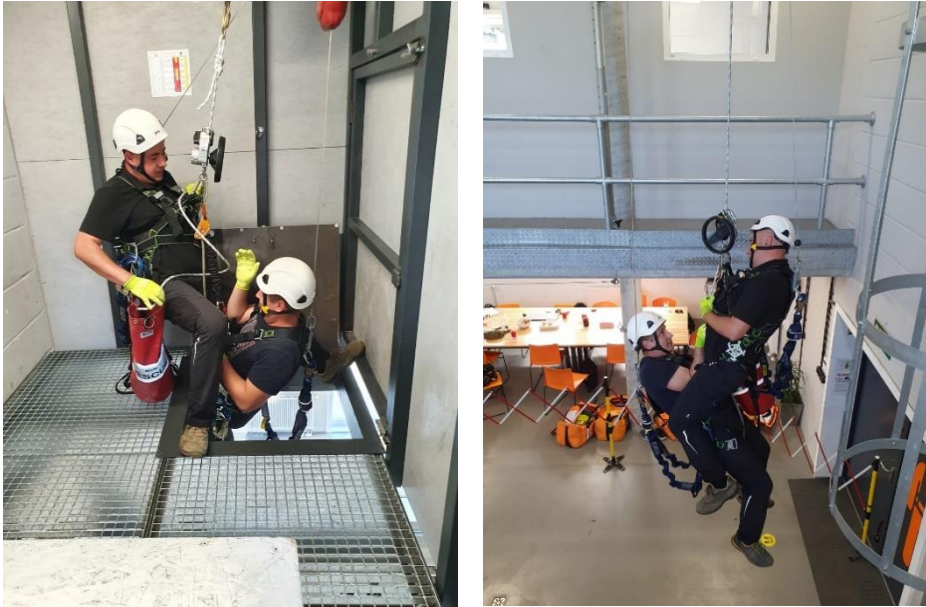
7.4 Provision of personal protective equipment appropriate to the type of hazards to employees, reported problems with the use of required PPE by employees and working gear management

In the inspected facilities (i.e. Nowa Sarzyna Cogeneration Plant, Mercury Power 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.

With regard to the regulation of working gear and personal protective equipment management, as well as records of the issued working gear and personal protective equipment, in 2020 works were carried out by the Occupational Health and Safety Department with the Legal Department to standardise the final documentation and recommendations for all companies with RES projects in operation. Those works will continue in 2021.

In addition, it is worth noting that employees of the Wind Farms and Photovoltaic Farms attended training relating to work at height between 20 and 22 July 2020, during which issues relating to personal protection equipment (harnesses, escape systems etc.) were also covered.

Figure 40 Training at a third-party training centre between 20 and 22 July 2020.



7.5 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 office of Szymankowo WF and construction site and office of Dębisk WF), the obligation to provide first aid measures to employees in case of accident was fulfilled and employees were appointed to provide first aid.

In 2020, the first aid kits in the head office were inspected and it was verified whether the first aid kits had a named list of first aid trained persons, a list of equipment and first aid instructions. First aid kits are appropriately labelled and easily accessible.

For 2021, checks are planned to verify that each company has agreed the number, location and composition of first aid kits with the physician providing preventive health care for employees.

Before the pandemic, six defibrillators were purchased to be placed at the operating Wind Farms and Photovoltaic Farm facilities. As part of the purchase, a series of first aid training sessions for the employees was held both on site and in the Warsaw office. The training in Warsaw was also attended by the office staff of Polenergia S.A.

Figure 41 Training in the Warsaw office (03.03.2020).



7.6 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 Cogeneration 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.

It should be added, however, that due to the state of epidemic, no trial evacuations were carried out at any of the companies in 2020.

7.7 Meeting occupational health and safety requirements at construction projects

In 2020, occupational health and safety measures were reviewed at the projects in construction, Szymankowo Wind Farm and Dębsk Wind Farm.

Health and Safety Plans (H&S Plan) and Safe Work Instructions (SWI) are provided at the construction sites and updated as required. Occupational health and safety issues at both sites are supervised by designated Occupational Health and Safety Coordinators (appointed by the Contract Engineer).

They conduct ongoing occupational 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 - e.g. demonstrations, first aid training, evacuation of accident casualties, safe organisation of tree felling on the construction site etc. - organised in the form of Safety Days - for everyone involved in the project.

Figure 42 Evacuation and first aid training (06–09.10.2020)



