

Non-technical summary

Mława wind farm



VOCABULARY

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|---------------|--|
| Project owner | PILEUS ENERGY Sp. z o.o. |
| Investor | PILEUS ENERGY Sp. z o.o. |
| Developer | GEO Renewables S.A. |
| EBOR | European Bank for Reconstruction and Development |
| PWEA | Polish Wind Energy Association |
| Project | Mława wind farm (Mława WF) |
| EIA Act | Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments |
| LSDP | Local Spatial Development Plan |
| EP | Environmental permit |
| EIA procedure | Procedure of the environmental impact assessment of the investment |
| EIA report | Environmental impact assessment report |

1. INTRODUCTION

GEO Renewables, acting on behalf of PILEUS ENERGY, is developing the Mława Wind Farm Project located in the Mazowieckie Province, Mława County, Wieczfnia Kościelna Municipality.

This document is a summary in a non-specialist language of information concerning the Project and the environmental and social impact of its implementation. It was prepared on the basis of the obtained administrative decisions and environmental documentation made for the planned Mława wind farm.

2. PROJECT DESCRIPTION

Mława WF will consist of 17 wind turbines located in the municipality of Wieczfnia Kościelna, in the registry areas of Kulany, Kuklin, Windyki, Grzybowo, Bąki and Uniszki Zawadzkie. The turbines implemented within Mława WF are marked as EW1 - EW18. These are shown in Figure 1.

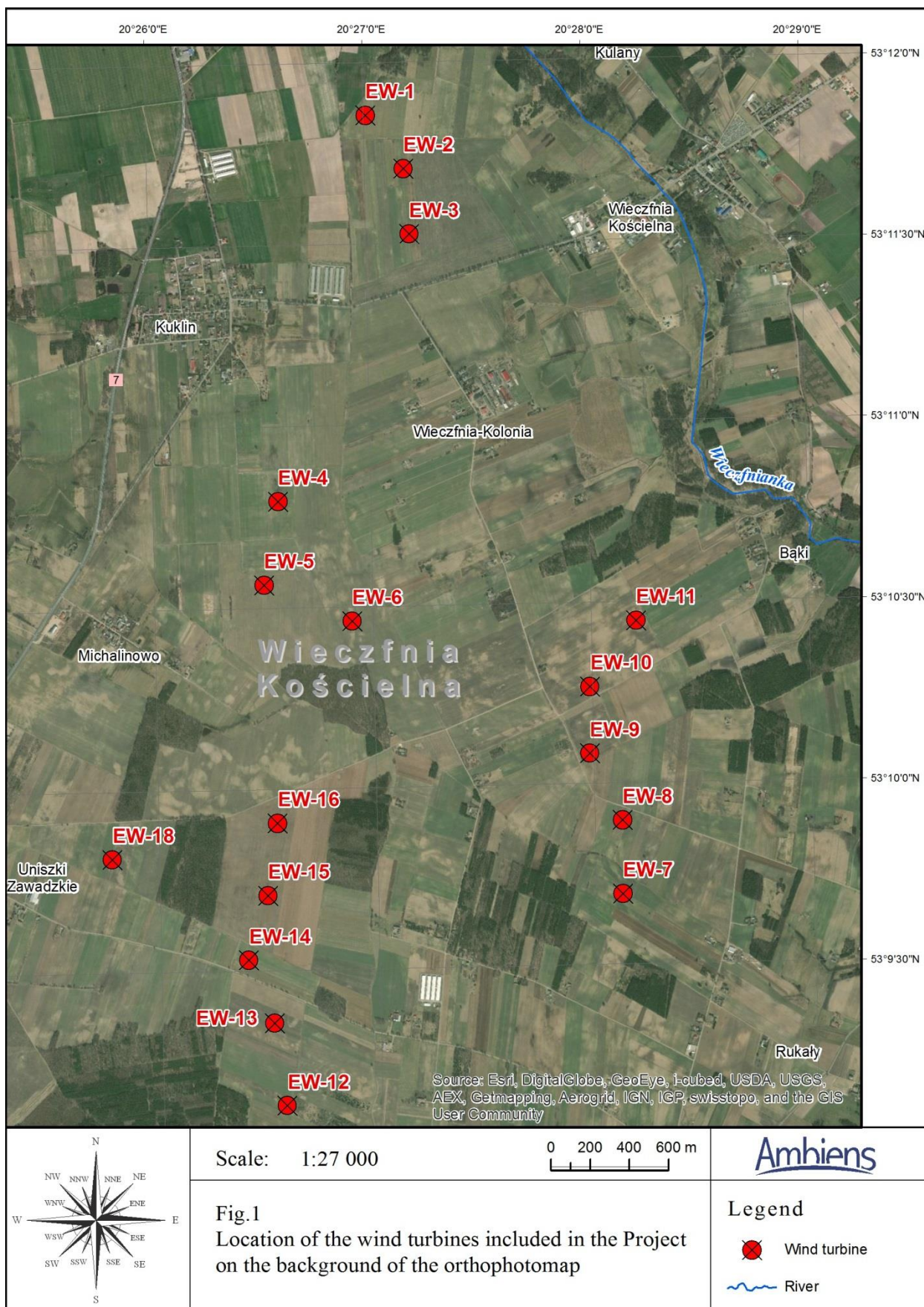


Figure 1 Location of the wind turbines included in Project on the background of the orthophotomap

The turbines are part of a larger project consisting of 18 wind turbines, for which the Mayor of Wieczfnia Kościelna Municipality on 29.04.2013 issued a decision on environmental conditions (decision mark GKiI.6220.1.2012), this was amended by the decision of the Mayor of Wieczfnia Kościelna Municipality of 12 May 2017 (mark GKiI.6220.1.2012). Following further review the developer has decided to remove turbine no. 17 due to lack of lease agreement.

Vestas V110 2.2 turbines (each 2.2MWe) will be used at Mława WF. The total capacity of the Mława wind farm will be 37.4 MW, each turbine will be 180 m total height and 110 m rotor diameter. Apart from the above mentioned turbines, the farm includes internal access roads, underground medium voltage cable connections connecting the turbines with substation (GPZ), maneuvering yards and assembly and storage yards. Mława WF will be connected with underground cable to the power grid by means of 110 kV line between GPZ stations Nidzica-GPZ Mława. All power lines in the Project will be underground cable lines.

The area where the Project is located is used for agricultural purposes. It is not located in any Natura 2000 areas, other forms of nature protection or any designated ecological corridors of national importance. Location of the wind farm in relation to protected and sensitive areas is presented in Figure 2.

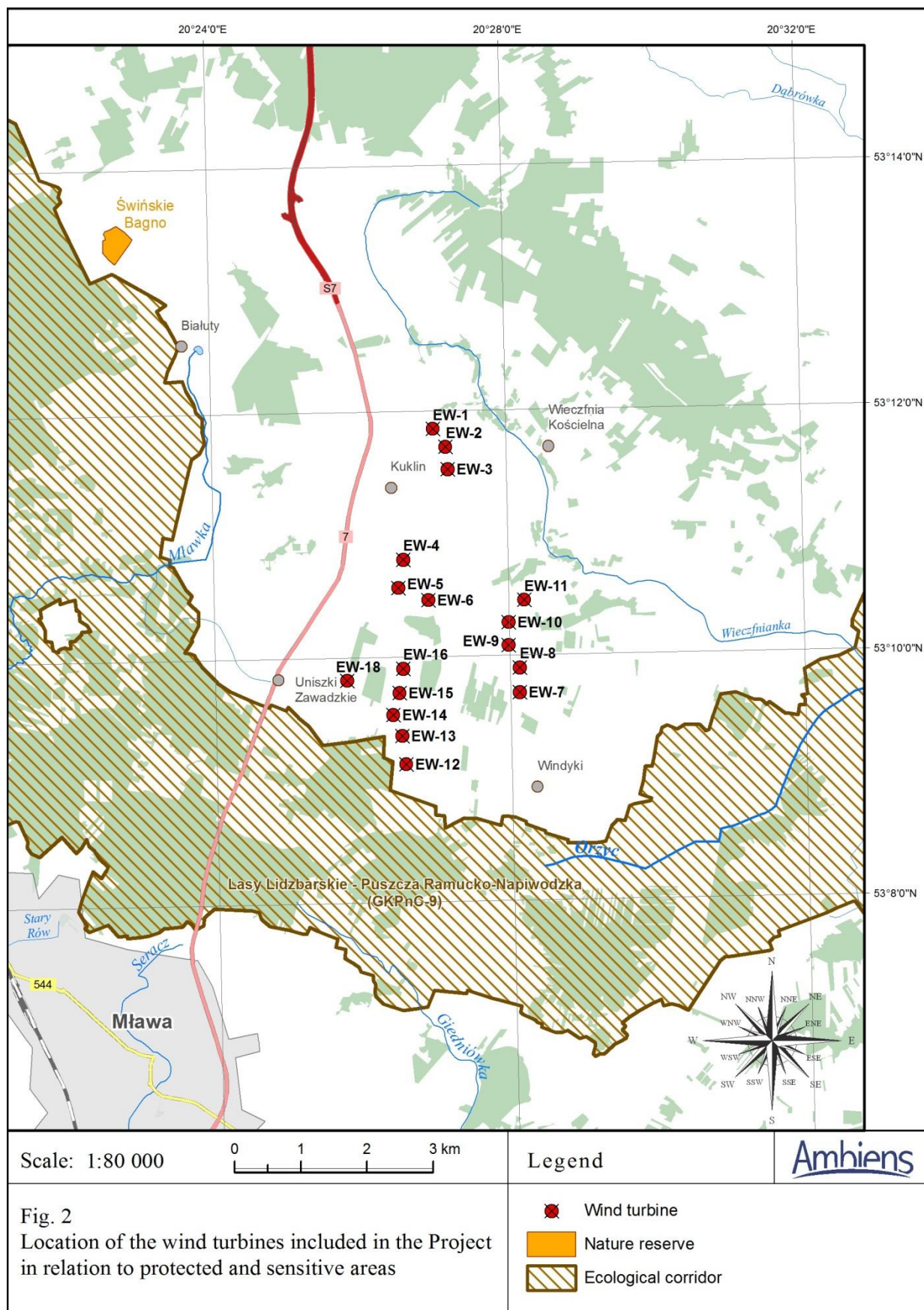


Figure 2 Location of the wind turbines included in the Project in relationship to protected and sensitive areas

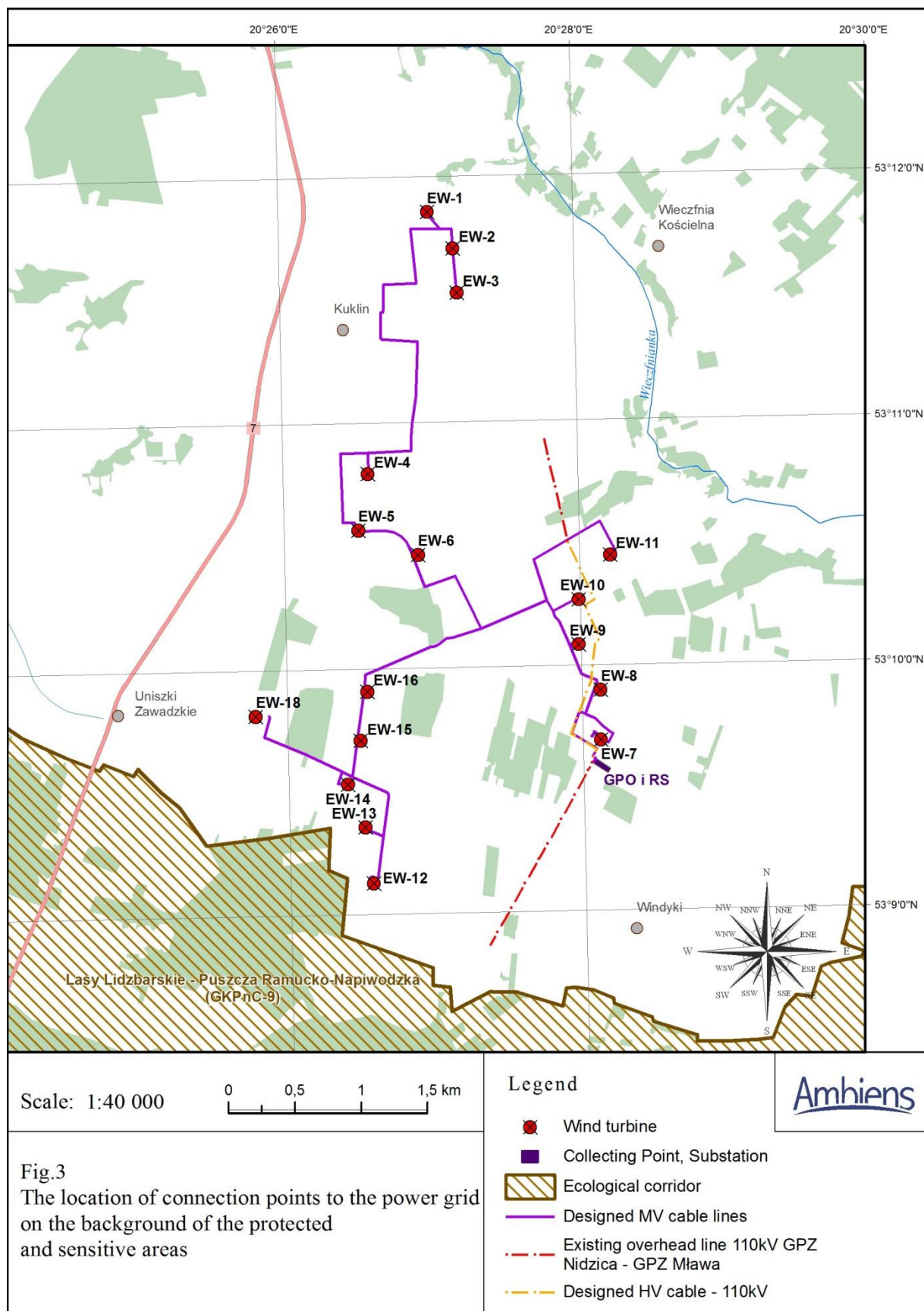


Figure 3 Location of the connection points to the power grid on the background of the protected and sensitive areas

Currently there are wind farms in the vicinity of the Project - in Szydłowo, Stupsk and Nidzica municipalities. There is no such investment in the municipality of Wieczfnia Kościelna.

During the period of operation of the Project, the wind kinetic energy will be converted into mechanical energy on the farm and then into electricity, which will be fed into the grid. Each wind turbine included in the Project will consist of a tower and a nacelle containing a rotor and measuring devices. The rotor is composed of blades connected by a hub. The technological process taking place at the wind farm is based on the production of lifting force by the wind on the rotor blades and setting the rotor in rotary motion, thanks to which kinetic energy of the air is converted into mechanical energy. A generator driven by a rotating rotor converts its mechanical energy into electric energy. The energy generated is then transferred to a transformer, which raises its voltage to the value required by the grid.

The expected lifetime of wind turbines is about 25 years. After that time, two solutions are possible concerning the area occupied by the turbine: the old, decommissioned turbine will be replaced by a new, more modern one; the turbine will be decommissioned and the area occupied by it and the accompanying infrastructure will be recultivated.

Given below is a photo showing a wind turbine (Photo 1).



Photo 1 Wind turbine (*Source: Own materials*)

3. PROJECT CONDITIONS

JUSTIFICATION OF THE PROJECT

The aim of the Project is to produce electricity from a renewable source which is the wind. Thus, the implementation of the Mława wind farm is part of the national strategy and EU energy and

climate policy aimed at reducing greenhouse gas emissions, increase the share of energy from renewable sources and increase energy efficiency.

In the last reported period (CSO data), in 2018 the share of renewable sources in gross final energy consumption in Poland amounted to 11.28%, and 13.03% in the power industry.

Under Directive 2009/27/EC of the European Parliament and of the Council of 23 April 2009 on the promotion and use of energy from renewable sources amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC, the national target for the share of RES in gross final energy consumption for Poland in 2020 was set at 15%. The targets for 2030 are set by Member States themselves.

In order to meet the above obligation, further development of renewable energy production, including wind energy, is necessary. This is particularly important in the context of the EU strategy for 2012-2030, which indicates that the EU is to achieve a share of renewable energy in gross final energy consumption of 32% in 2030 (in 2018 the previous target for this horizon - 27%, was revised upwards).

This project in its present form and after a possible re-powering process is also part of the EU concept of The European Green Deal, which assumes climate neutrality in 2050.

The draft of the updated Polish Energy Policy (PEP 2040) - a key industry document - assumes an increase in the share of energy from renewable sources in gross final consumption to 15% in 2020 (22.1% in the power industry) - which is the implementation of the EU obligations. Further planned assumptions for Poland are currently 21-23% in 2030 (31.8% in the power industry) and 28.5% in 2040 (39.7% in the power industry).

The draft National Energy and Climate Plan for 2021-2030, the second fundamental document conditioning the objectives and paths of energy transformation in the context of reducing greenhouse gas emissions, was submitted to the European Commission on 30.12.2019. It assumes, similarly to PEP 2040, a 21%-23% share of RES in gross final energy consumption in 2030. The, above mentioned, national strategic acts, drafted strategic documents and the EU regulations clearly justify the Mława Wind Farm Project.

According to the Investor's estimates, the expected annual energy production of the Project will be 136.76 GWh/a. Therefore, the Project is environmentally/climatic advantageous as it will avoid carbon dioxide CO₂ emissions of 93.27 tons per year (a rough estimate calculated for the average emission factor of the Polish power industry per unit of energy produced in 2018 - 0.682 tCO₂/MWh).

In addition to the, above mentioned, indirect reduction of greenhouse gas emissions, the Project may also have a positive impact on the reduction of pollutant emissions to air. The increase in generation capacity in renewable energy sources will reduce the need to use conventional power plants based on the combustion of fossil fuels, whose by-products are SO₂, NO_x, heavy metals and PM₁₀ and PM_{2.5} dust.

LEGAL CONTEXT AND PUBLIC CONSULTATIONS

The project of Mława wind farm construction requires an EIA under Polish law and is defined as a project which may potentially significantly affect the environment, for which an environmental permit is required. Due to this fact the Company, following Polish law, obtained an environmental permit in 2013. The environmental permit for the Project was issued by the Mayor of Mława Municipality.

Society participation in the environmental impact procedure of the Mława wind farm investment was ensured basing on the Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments. No comments and objections to the Project were received during the proceedings.

Public consultations of the Project also took place as a part of adopting the local spatial development plan for the area where it was planned. Both, consultations and the process of passing the LSDP were conducted by the Mayor of Wieczfnia Kościelna Municipality. This plan was adopted on 26 February 2013.

The EIA is required prior to issuance of building permit decision. The project consisting in the construction of 17 wind turbines in Mława has 13 decisions approving a replacement building design and granting a building permit for the wind turbines issued by the Starost of Mława.

WHAT IS THE CURRENT STATE OF THE ENVIRONMENT ON THE INVESTMENT SITE?

GEO Renewables is developing the Project acting on behalf of PILEUS ENERGY, commissioned an indent consultant, Ambiens, to undertake additional due diligence and studies and update the documentation.

Ambiens confirmed that the Project conditions have not changed and the original EIA is valid. This was confirmed through decision with local authorities and legal review. Ambiens undertook additional review of the Project.

The Mława WF, as mentioned in the introduction, is a part of a larger project consisting of 18 wind turbines, for which the Wieczfnia Kościelna Municipality Mayor issued an environmental permit on 29.04.2013 (permit mark GKiI.6220.1.2012). As part of the EIA procedure, which included the preparation of the EIA, annual surveys of birds were carried out in the area intended for the location of all 18 turbines in the period from July 2011 to July 2012. In accordance with the provisions included in the EIA Report, during the field research, the following were carried out in the area of the planned WF Mława: point observations, counting on transects, counting in the so-called MPPL square, census of so-called large species (e.g. white stork), night counting. A total of 90 checks were performed in all periods of bird activity. Additionally, in order to detect large species of birds with the status of rare and medium-abundant birds, three inspections were carried out within a radius of 2 km from the area envisaged for the investment. As a result of the inventory 103 bird species were found subject to protection under national law. It was found that the area designated for Mława WF is not important for rare and wintering birds of prey. It is of minor importance during the migration of key species and bird species protected under EU law. It was indicated that the area is not attractive for breeding avifauna, which is typical for open agricultural areas with small bushes and low trees. The authors of the inventory added that in the Mława WF impact assessment special attention should be paid to the breeding colony of Montagu's Harrier and western marsh harrier, as the implementation of the investment may have a potentially negative impact on their breeding success. Bearing the above in mind, the Investor recommended to carry out additional investigation of the colony of

this species before the implementation of the investment - the ornithological inspection was performed in July and August 2019. The aim of the field inspection was to check the nesting and use of air space by birds of prey in the area of the planned investment with particular emphasis on Montagu's Harrier and western marsh harrier. Nesting of these species was not confirmed.

For the purpose of analyses aimed at determining the impact of the Project on bats, prior to the issuance of the environmental permit, the analyses were performed in the period 10.04.2011 - 30.10.2011, monitoring of this group of animals. The monitoring was carried out in the area designated for the farm and in the buffer of about 1 km. One daily inspection was carried out, which consisted of setting up observation routes and 25 inspections during which bat activity was recorded. According to the information contained in the Monitoring Report, the results obtained indicated the presence of bat activity of two species - serotine bat and common pipistrelle. Their activity in the area designated for the investment was assessed in the above-mentioned Report as low and it was found that the investigated area is not an attractive feeding ground for these mammals. Based on the obtained results, the authors of the Report recommended the implementation of measures to minimize the potential negative impact and post-construction monitoring of bats in the area of Mława WF. These recommendations have been considered in the environmental permit issued for the Project.

4. WHAT WILL BE THE IMPACT OF THE WIND FARM ON THE ENVIRONMENT?

The impact of the wind farm on the environment will occur during its construction, operation and decommissioning. This impact will be minimized by means of the available technical and organizational measures and solutions to a level not causing a significant negative environmental impact.

IMPACT DURING THE CONSTRUCTION OF THE INVESTMENT

Impacts at the construction stage will be primarily related to earthworks and car traffic. Noise and pollutant emissions to the air and waste generation will occur.

In order to limit the above-mentioned impacts, the following minimizing measures indicated in the environmental permit will be applied:

- construction work related to the displacement of earth masses, i.e. construction of foundations for power plant masts and excavations for power cables, to be carried out outside the bird breeding season; i.e. from 16 August to the end of February.

Regarding the above statement, in September 2019, the Mayor of Wieczfnia Kościelna Municipality was asked to clarify the above provisions. In the decision of 08.11.2019 (GKiL.6220.1.2012), the authority explained the entry indicated in the EP as follows:

- 1) the time limit, i.e. from 16 August to the end of February, applies to works involving the removal of humus from areas where the construction of foundations for power plant masts and excavations for power cables will be carried out.
- 2) It is possible to carry out other construction work during the bird breeding season under ornithological supervision.
 - during excavations for cable trenches, the removed humus can be collected separately and incorporated as the top layer of the backfilled trench;

- segregate the waste generated during construction and collect it in dedicated containers in a separate place with hardened surface, and after collection of a suitable amount, transfer it to authorized entities for recovery or disposal;
- the construction site should be equipped with sorption materials allowing for quick collection of possible oil derivative substance spills; handle the used sorbents as hazardous waste;
- carry out construction and assembly works during the day (i.e. between 6.00 and 22.00);
- all work should be carried out using equipment in good working order, operated and maintained in a proper manner and with low acoustic nuisance;
- cover the cargo boxes of cars transporting bulk materials with tarpaulins; the construction site should be sprayed with water during dry and windy periods;
- keep the area of the investment at the stage of realization in a proper cleanliness;
- arrange the place for parking, refueling and servicing of vehicles and machines used at the stage of project implementation in the area with hardened surface;
- water supply and storage of domestic sewage at the stage of construction to be implemented through mobile communal containers equipped with water tanks and tanks for domestic sewage, emptied by the servicing company and exported to the sewage treatment plant.

IMPACT DURING THE OPERATION OF THE INVESTMENT

The main impact during the operational stage of the Project will be on the landscape, acoustic climate and on birds and bats.

The Project is located outside the areas covered by the forms of nature protection and at a considerable distance from the afore-mentioned forms. According to the information contained in the environmental permit issued for Mława WF there will be no negative impact of the project on the areas requiring special protection due to the presence of plant and animal species or their habitats or natural habitats under protection, including Natura 2000 areas and other forms of nature protection.

The area where the Project will be implemented is not covered by the legal form of protection of cultural heritage and monuments and contemporary cultural assets. Therefore, there will be no negative impact on historic buildings and archaeological sites.

At this stage there will be no negative impact on the ground surface. The area of investment plots located outside the place of foundation of the Project elements will be able to be used for agriculture.

According to the information contained in the EIA Report for Mława WF there will be no negative impact on the quality and quantity of surface and underground waters. The functioning of the investment will not be connected with the necessity of water intake or sewage disposal. In order to protect water and the ground environment from potential negative impact, the measures indicated in the EP will be applied, i.e. rainwater from the area of the transformer station will be collected by means of a sewage system and treated before being discharged into the ground in the oil-derivative separator; the operation and cleaning of the separator will be entrusted to a specialized company with a permit to collect and transport hazardous waste. Underneath the transformers there will be a tub with a capacity capable of holding the total volume of oil contained in a given transformer.

As far as waste management is concerned, the guidelines indicated in the EP will be applied, i.e.: no waste will be stored on the project site; all waste generated during maintenance, repair and supervision of work will be collected in appropriate containers and removed immediately from the project site and transferred to the authorized entities for management.

The environmental permit issued for the Project did not indicate the possibility of negative impact on the electromagnetic field.

In accordance with the applicable legal regulations, the Project is not a plant with an increased risk of industrial failure or a plant with a high risk of industrial failure.

At the stage of the EIA Report for Mława WF, the possibility of cumulative impacts was also analyzed. In the Project EP, it was stated that, considering the type and characteristics of the project and its connections with other projects, no possibility of cumulative impacts of this project with other projects located outside the area belonging to the Investor was found. Currently, based on information obtained from the developer, it is concluded that there are wind farms in the vicinity of the Project - in Szydłowo, Stupsk and Nidzica municipalities. There are no such investments in the municipality of Wieczfnia Kościelna. Due to the distance between the above-mentioned investments and Mława WF there will be no cumulative impacts.

Considering the nature of the Project and its location in the central part of Poland as well as the extent of the impacts, at the stage of the environmental impact assessment procedure it was not found to be necessary to conduct proceedings on the cross-border environmental impact. The investment will not affect the state of the environment in the areas of the countries neighboring Poland.

NOISE

According to the provisions contained in the EIA Report for Mława WF, the noise impact analysis was performed using a computer software. Its purpose was to determine the conditions which should be met in order to ensure that the impact on the acoustic climate does not exceed the applicable environmental quality standards. The calculations were made for wind turbines of 3.0 MW and maximum acoustic power of 106.5 dB. The results of the analyses indicated that the permissible values of noise provided for the acoustically protected areas located in the vicinity of the investment will not be exceeded. In the EIA Report, it was assessed that the 45dBA isophone indicating the permissible noise level during the nighttime does not cover the buildings of the villages closest to the investment. The figure below (Figure 4) presents a map showing the results of acoustic calculations, on which the authors of the EIA Report have marked the above mentioned 45 dB isophone. Out of the turbines marked on the drawing, turbine no. 17 will not be implemented. The remaining turbines will be constructed under the discussed Project. The calculations were made for wind turbines of 3.0 MW (turbine model Vestas V112, maximum sound power level of 106.5 dB), but according to the construction project all wind turbines will have 2,2 MW (turbine model Vestas V110 maximum sound power level of 106.1 dB). Vestas 110 2,2 MW has lower level of maximum sound power level than Vestas V112 3,0 so impact on the acoustics climate will be lower than showed in EIA Report. It has been stated that, according to prognoses, there will be no places where permissible noise level will be exceeded.

In order to determine the actual noise level in the areas adjacent to the turbines after the commencement of the project operation, noise measurements will be carried out on behalf of the Investor.

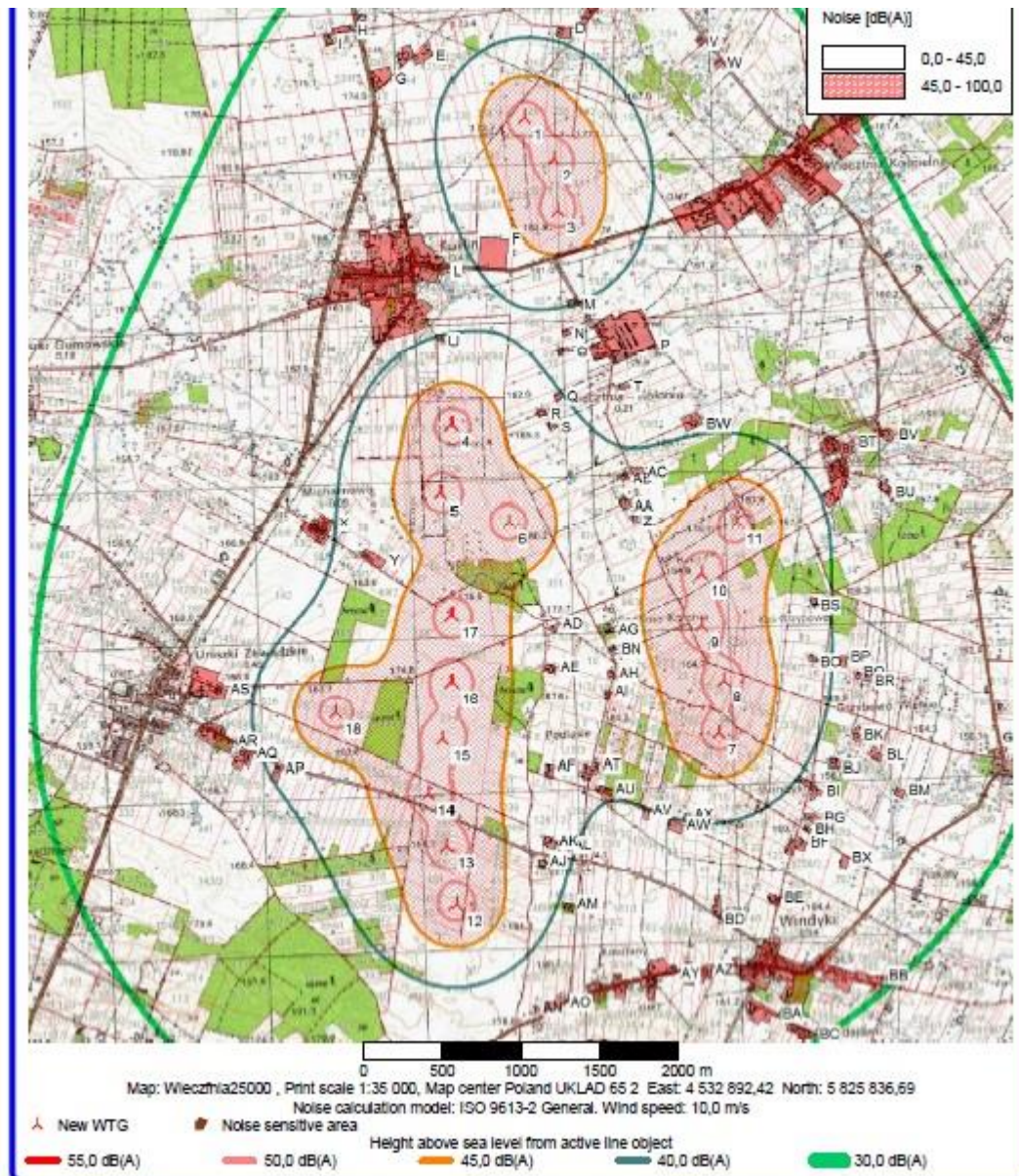


Figure 4 Map showing the results of acoustic calculations, on which the 45 dB isophone is marked (source: *The project Environmental impact report. Project: Mława wind farm - "MŁAWA" Wieczfnia Kościelna municipality*).

LANDSCAPE

The project will be developed in an agricultural area (Photo 2, Photo 3). The vegetation is dominated by areas of low natural value, related to human activity. There are no forests or lakes near turbines.



Photo 2 View of the investment area (Source: Own materials, 2019)



Photo 3 View of the investment area (Source: own materials, 2019)

The wind farm will be a new element in the landscape and will introduce height dominants in the form of wind turbines. Bearing the above in mind, at the stage of the environmental impact assessment procedure, the Investor commissioned a Landscape and View Study, which was to assess the impact on the landscape. Results of this Study are shown on pictures below (Figure 5).

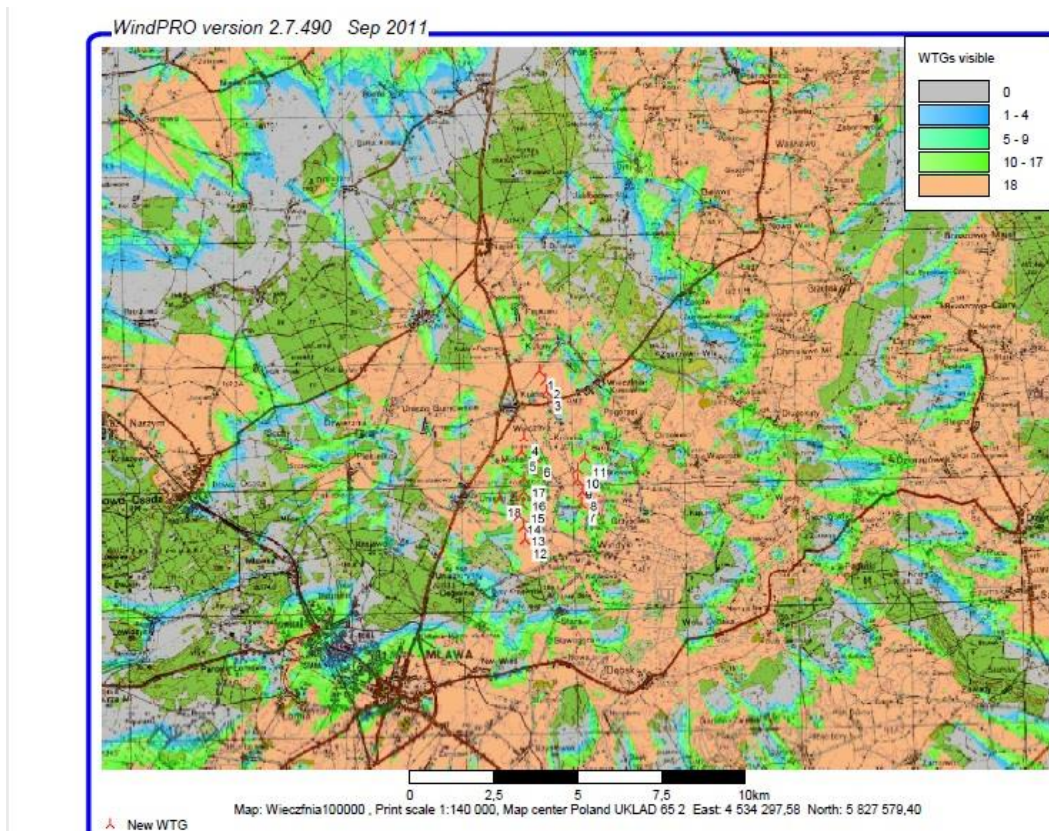


Figure 5 Map showing the results of Landscape and View Study – WTG’s visible. (source: The project Environmental impact report. Project: Mława wind farm - “MŁAWA” Wieczfnia Kościelna municipality”).

The authors of the study stated that within the radius of the impact of Mława WF, apart from Wieczfnia Kościelna, there will be municipalities located within 10 km distance - i.e. Mława, Dzierzgowo, Szydłowo, Janowiec Kościelny, Kozłowo and Iłowo-Osada. It has been indicated, however, that most of the areas located at a distance of more than 5 km will be out of the sight range of the turbines due to obscuring by objects such as buildings and woods.

The impact of the Mława wind farm on the landscape will be minimized by following the EP instructions to paint the rotor blades with light mat paint.

The picture below (Figure 6) shows one of the photomontages made in Landscape and View Study. It presents an investment view near Uniszki Zawadzkie.



Figure 6 View of wind turbines near Uniszki Zawadzkie (source: *The project Environmental impact report. Project: Mława wind farm - "MŁAWA" Wieczfnia Kościelna municipality*).

BIODIVERSITY

There are no areas and objects covered by legal protection under the Act on Nature Conservation and ecological corridors of national importance in the Project implementation area. The area is not located within any of the areas protected under international law, indicated in the Convention on Wetlands of International Importance, especially as a living environment for waterfowl, of February 2, 1971.

The area project is characterized by low biodiversity. The vegetation is dominated by the one of low natural value, related to human activity. It is a poor area in terms of occurrence of animals. On the basis of data presented above it is established that the stage of implementation/liquidation and operation will not have a negative impact on biodiversity.

IMPACT ON BIRDS

For the purpose of analyses aimed at determining the impact of the Project on birds an annual monitoring of birds was performed in the period from July 2011 to July 2012. It was found that the area, where the inventory was carried out, is poor in terms of number of bird species. The most common species were passeridae birds which are popular for agricultural landscape. The skylark was most highly dominating species and the next most abundant species were yellowhammer and starling. Mława FW is not an attractive place for birds feeding, resting and overnight during spring and autumn migrations. It was also found that the area designated for the Mława WF is not important for rare and wintering birds. This area is not an attractive area for breeding avifauna, which is typical for open agricultural areas with small bushes and low trees. It was confirmed by independent expert in ornithology, in additional monitoring in 2019, that the area, where the inventory was carried out, is not interesting from bird perspective.

Based on the results of the annual monitoring, which was mentioned above, and taking into account the location and characteristics of the Project, it was stated in the EIA Report that the implementation of Mława WF will not significantly affect birds. The original EIA together with subsequent review and data gathered by Ambiens noted that at the stage of farm operation it is necessary to verify the presence of montagu's harrier and western marsh harrier breeding. If the above-mentioned nests are found, it could be necessary to take actions to minimize the potential negative impact. Moreover, the necessity to carry out monitoring of birds and bats during the operation stage was indicated.

The Company will undertake actions to minimize potential impact on birds including:

- not constructing during bird breeding season to limit any disturbance to birds,
- 3 years post-investment bird monitoring, which will cover the annual life cycle, constituting a replica of pre-investment studies, and will be repeated three times in the first three years after the farm commissioning. Monitoring will be carried out by an independent specialist in ornithology in line with best practice and provide the results to RDEP. General information on the monitoring and it's results will be provided to public information. The independent specialist mentioned above will be appointed by the Company. The monitoring will be aimed at assessing changes in intensity of land use by birds during operation in comparison to preconstruction monitoring results. Additional bird mortality monitoring will be undertaken, in line with best practice, during the wind turbines operation. If the results indicate potential impacts on birds, the Company will decide on further monitoring or action to minimize negative impact,
- transmission lines connecting the generator to the external power grid will be located underground.

IMPACT ON BATS

For the purpose of analyses aimed at determining impact of the Project on bats an annual bat monitoring was performed in the period from April 2011 to October 2011. A one-day check was performed in order to define observation routes after which 25 checks with bat activity recording were

carried. The pre-investment monitoring was following guidance issued by EUROBAT. Results indicating the activity of bats of two protected, according to the Polish law, species - Serotine bat and Common pipistrelle. Their activity in the area designated for the investment was low. The study area is not an attractive feeding ground for these mammals. Neither breeding colonies nor bats wintering grounds were found.

The impact on bats may occur at the operation stage of the Mława WF. In relation to these possible impacts, the EP indicated that the following should not be done in the area around the planned farm: afforestation of the area adjacent to the turbines, introduction of new rows of trees and creation of new water bodies in the vicinity of the turbines. These measures are aimed at avoiding the land use that would favor the appearance of bats. Furthermore, the EP indicates that the EW-6 and EW-18 turbines should be switched off during the period of bat activity, i.e. from May to October, with winds below 6 m/s.

Assessment of the potential occurrence and scale of impact will be possible in the post-construction period by carrying out bat monitoring and bat mortality studies. Post-investment monitoring will cover the annual life cycle, constituting a replica of pre-investment studies, and will be repeated three times in the 1st, 2nd and 3rd year of the farm operation. Monitoring will be carried out by an independent specialist in chiropterology basing on best practice and the results will be provided to RDOS and publically. The monitoring will be aimed at assessing changes in intensity of land use by bats during operation in comparison to preconstruction monitoring results. Additional bat mortality monitoring will be undertaken, in line with best practice, during the wind turbines operation.

SHADOW FLICKER

The shadow flicker effect occurs when the wind turbine rotor blades cast a shadow on the surrounding areas. At the stage of the EIA, the investor commissioned a forecast of the range of shadow flicker effects in the areas adjacent to the Mława WF. Analyses were carried out for wind turbines model Vestas V112 while model Vestas V110 will be used. According to Polish law there are no standards for shadow flicker.

IMPACT DURING LIQUIDATION OF THE INVESTMENT

The nature of effects during the decommissioning stage involving the disassembly of wind turbines and the associated infrastructure will be similar to those that will occur during the construction stage. These effects will be minimized by applying best practices and environmental protection solutions available at the time of decommissioning.

5. WHAT WILL BE THE IMPACT OF THE WIND FARM ON SOCIETY?

Wind farms can be associated with environmental and social impacts through location and for instance impacts on local landscape, noise and shadow flicker on local communities as well as land use.

Studies undertaken to date and as confirmed by independent consultant, the impacts are mitigated through careful planning and design and optimizing both on location as well as use of modern turbines.

The EIA decision issued for the Project does not introduce an obligation to create a restricted use area, therefore there will be no restrictions in the manner of management of the areas adjacent to the Project.

The Project has been approved by the local community also through the local development plan, which was issued on the 2013. The development plan included a Strategic Environmental Assessment. During the strategic environmental procedure, no comments from local community were submitted. It is indicated in the building permits for turbines that the construction design takes into account the conditions contained in the above-mentioned local development plan.

The project will also have a potentially positive social and economic impact on the development of Wieczfnia Kościelna municipality. This is due to an increase in the municipality's tax revenues and an increase in the annual income of the land tenants on which the Project is located. The land was acquired on the basis of commercial transactions with local owners. Communication with land owners has begun in 2009. Since September 2018, GEO Renewables has been carrying out renegotiation agreements with land owners regarding rights of disposal over the land, annexed lease agreements and signed a contract related to the location of temporary infrastructure. In years 2019-2020 GEO Renewables signed a contract for the provision of transmission services in connection with the reconstruction of the 110 kV line colliding with planned wind turbines and a contract for the provision of transmission services of medium voltage. Negotiation meetings of Energa Operator with land owners took place in 2019-2020.

Under Polish building law each turbine is associated with a building tax based on the value of structure. This is paid irrespective of operations and amount to circa 85 000 PLN/year per turbine. This will therefore provide additional direct revenue of 1 445 000.00 PLN/year to the local community to be used for local process in addition to corporate taxes employment and land use costs.

The Company will ensure safe working environment for staff and contractors as well as local community. The Company will develop procedures to work under CV-19/pandemic conditions, include safety for on-site and local community in adhere to Polish, EU and WHO guidance. Subcontractors employed by the Company will also ensure mentioned above safe working environment.

6. MONITORING OF THE INVESTMENT IMPACT

According to the requirements of the environmental permit, and in line with best practices, at the stage of operation of the Mława WF bird and bat monitoring has to be undertaken. This will be undertaken for 3 years from the moment of commissioning the farm, and in accordance with guidelines recommended by PWEA¹ and the best industry practice based on knowledge and experience of an expert ornithologist and chiropterologist. Post-construction monitoring will cover an annual cycle, constituting a replica of the pre-construction studies. It was added in the EP that it is advisable to conduct impact assessment of the farm on the use of space by birds and bats simultaneously with studies on their mortality due to collision. Moreover, the EP imposes an obligation to present the results of post-construction monitoring annually to the Mayor of Wieczfnia Kościelna Municipality

¹ http://psew.pl/wp-content/uploads/2019/06/PSEW_Kodeks-Dobrych-Praktyk.pdf

and the Regional Director of Environmental Protection in Warsaw. If the results indicate potential impacts on birds or bats, the Company will decide about further monitoring or action to minimize negative impact.

The Company will undertake these review, and in additionally implement carcass monitoring and disclosure the results. Based on the studies the Company will review the operational regimes and maned these to limit any impacts on birds and bats.

The Company will implement and operates an EHS management system. This will include H&S standards to be applied throughout the process of construction and operation, including traffic management.

In terms of EMS, the Company will retain a consultant to advice through the process of operations and undertake the monitoring process.

7. COMPLAINT PROCEDURE

A complaint mechanism will be implemented in GEO Renewables as part of the Project Management System. Current comments, remarks and suggestions regarding the Project will be accepted via the Complaint Form (developed both in Polish and English). This form will be available on the developer's website, in the section concerning the presentation of the Project and in the Grajewo Municipality Office. Specimen of the form is presented below.

Table 1 Complaint form

| Case number (to be completed by the administrator): | |
|---|--|
| Name and surname | |
| Contact information Please select the method of contact with you | <input type="checkbox"/> By letter <input type="checkbox"/> By phone <input type="checkbox"/> E-mail: |
| Preferred correspondence language | <input type="checkbox"/> Polish <input type="checkbox"/> English <input type="checkbox"/> other (please state which)..... |

| | |
|---|---|
| Description of the subject matter of the case or complaint What is the subject matter of the case/complaint, when the case happened, location of the case, people involved in the case, what are the consequences of this situation. | |
| Date of the event/occurrence of the subject matter the complaint/manifestation of the case | <input type="checkbox"/> One time event (date.....) <input type="checkbox"/> The event happened more than once. (How many times...) <input type="checkbox"/> An ongoing event (problem currently being experienced) |
| | |
| What actions would provide a solution to the problem? | |

GEO Renewables will inform the municipality of Mława about the mechanism and place of complaint submission. All submitted comments will be analyzed.

The procedure involves assigning a Coordinator, who will be responsible for responding in case of complaints from Project stakeholders. The contact person at GEO Renewables for public communication in the Project will be the Investment Specialist:

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