



PROJECT GRACE - GRAJEWO

ESDD - Non-Technical Summary

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1 NON-TECHNICAL SUMMARY

1.1 Introduction

OX2 is developing the Grace wind farm portfolio consisting of the two wind farms Grajewo and Sulmierzyce, located in Poland. This non-technical summary summarizes the Grajewo wind farm and provides information related to development, construction and operation that is important from an environmental and social point of view.

The wind farm will comply with Polish and EU requirements and is expected to comply with the EBRD PRs.

1.2 General presentation

DIF Infra 6 Participations B.V. (the “Investor”) has invested in the Grace portfolio, consisting of two wind farms, Grajewo and Sulmierzyce, located in Poland. The wind farms are acquired by OX2 who has entered into a turn-key EPC contract with the respective Project Companies to design and construct the wind farms. In this setup OX2 is responsible for managing the construction process with the Turbine Supplier and the BoP contractors. OX2 holds extensive experience in development and construction management of wind farms in Northern Europe, particularly in Sweden and Finland, with the Grace portfolio being OX2’s second and third wind farm developments in Poland.

The environmental policy declaration of OX2, signed by CEO, contains the ambition to be transparent and to practice a holistic approach and self-evaluation. OX2 aims to implement this policy in all activities, by working with a certified environmental management system in accordance with ISO 14001 and by implementing a regular communication policy, with goals and initiatives in environmental work to OX2’s stakeholders.

OX2 will manage EHS aspects of the project through their corporate Environmental Management Systems and assigned EHS responsibilities at corporate level.

The two wind farms are located in different parts of the country: Grajewo in northeastern and Sulmierzyce in central Poland – see Figure 1-1.

For Grajewo, 12 Vestas V126 3.45 MW turbines with a hub height of 137 m will be installed. In addition, roads, crane pads and cable connections will be constructed. The total capacity is 40 MW for Grajewo (subject to grid capacity limitations for Grajewo). See Fig 1-2.

The wind farm is fully compliant with the Equator Principles, save for principle 8, Covenants.

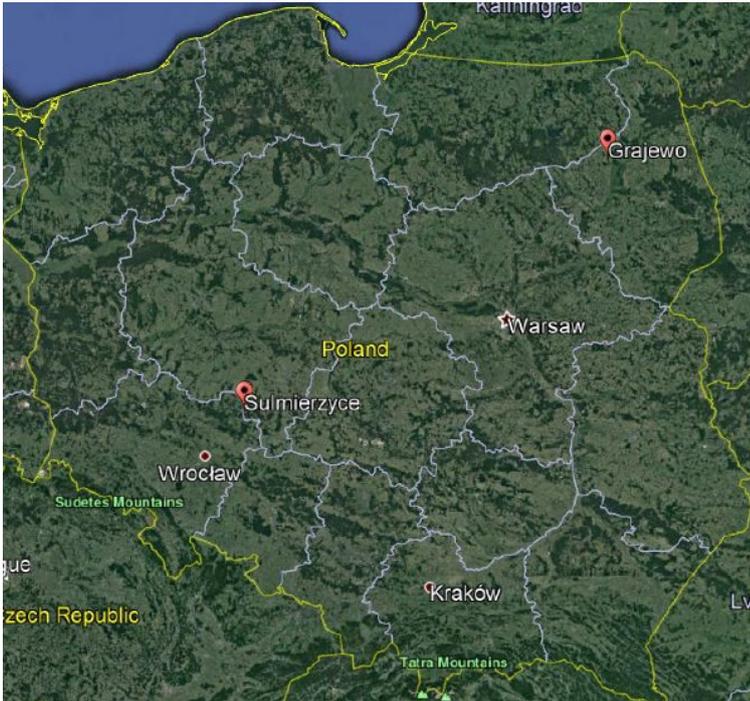


Figure 1-1 Map showing the locations of the two wind farms in the Grace portfolio

1.3 Wind turbine description

A wind turbine typically consists of three blades around a rotor hub, connected to the main shaft which is spinning the generator to generate electricity by converting the wind's kinetic energy into electrical energy which can be fed into the grid. For the Grace portfolio, the turbines have a design lifetime of 20 years and a tip-height of 200 m. The turbine manufacturer, Vestas, is well established in the wind industry and is expected to have the required competence and capacity to supply and maintain turbines in Poland.

1.4 Wind farm location

The Grajewo wind farm is located in north-eastern Poland in the Vovoidship of Podlaskie, Grajewo Municipality, and will consist of 12 turbines, construction has started from January 2021 as per CATA and anticipated to be complete by December 2022. The surrounding area is fairly flat and used for arable farming as well as forestry, with the closest village located approximately 0.6 km from the closest turbine location. The nearest town, Grajewo, is located 4 km northeast of the site. Figure 1-2 below shows the wind farm layout.

No nationally protected areas are located in close vicinity of the Grajewo project area. The closest nature reserve is located 7 km away and the nearest Natura 2000 is approximately 2.5 km away.

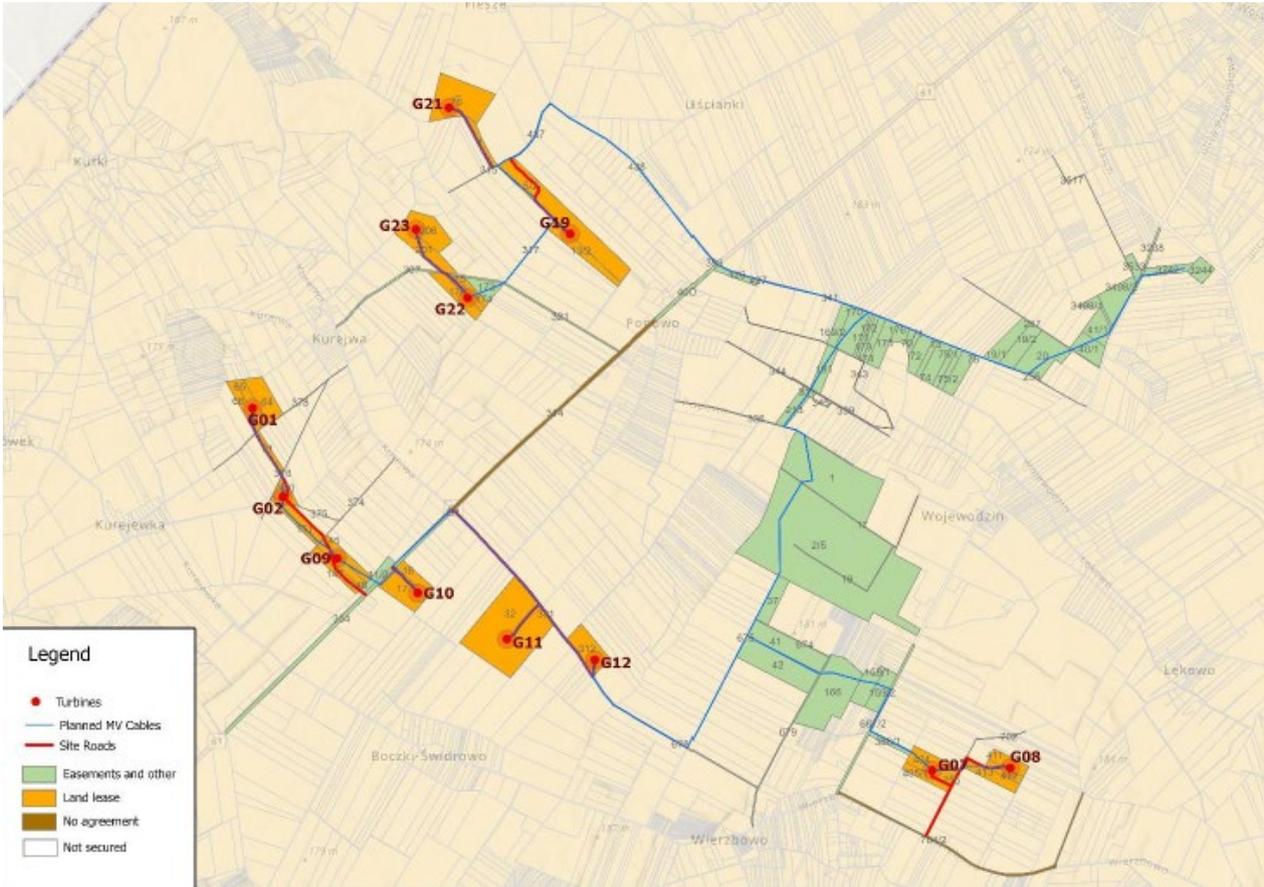


Figure 1-2 Grajewo layout

1.5 Project Background

Over the course of the planning and design stage, the scope has changed. Originally, 22 turbines were planned of 3.5 MW each. The environmental and social impacts which were reviewed in 2015 under national EIA, were assessed for 22 turbines. These 22 turbines were permitted in terms of environment, by the Environmental Decision of 2015. The Environmental Decision is valid until decommissioning has finished. At the Construction Stage permit in 2019, stage the scope of the project has been reduced to 18 turbines due to both social and economic considerations. Currently, the scope is 12 Vestas V126 3.45MW turbines with a hub height of 137.

As the scope has changed from 22 turbines to 12 turbines, the assessed environmental and social impacts in 2014 is deemed to be lower. In June 2021, the ecological consultancy Ambiens has conducted an additional ecological survey to check if the conclusions from the EIA are still valid, any changes in terms of biodiversity and protected areas have taken place, and whether the Project complies with national legislation, EU legislation and EBRD Performance Requirements 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources. The assessment has confirmed that the project has been structured to be compliant with national and EU legislation and EBRD Performance Requirements and IFC Performance Standards. Detailed compliance assessment is presented below.

1.6 Rationale for this Project

Poland has, as many European countries, adopted national goals to reduce greenhouse gas emissions as part of the European Climate Change Programme established by the European Commission. Furthermore, the Polish government approved the Energy Policy of Poland until 2030 (EPP) in 2009, which outlines the direction for Poland's future energy supply. Decreasing greenhouse gas emissions and increasing renewable energy generation are key goals both on a national and on an EU level.

Compared to conventional power plants based on fossil fuels, a wind power plant causes low greenhouse gas emissions throughout its lifecycle. The P50 annual electricity generation as per the Energy Production Assessment is 136.4 GWh for Grajewo.

The Project has valid environmental and construction permits and is included in the local development plan.

1.7 Legislative context, permits and public consultations

Project was approved by relevant Competent Authorities in 2015, following EIA procedures with public engagement. The original permit was for 22 WTGs. Due to both social economic considerations construction permits application in 2019 was made and granted for 18 turbines. Ultimately, 12 WTGs are planned for construction, with a maximum capacity of 3.5MW per turbine. The maximum height of the rotor in the vertical position is 200 meters. The current Project description falls within the scope of the environmental permit. The building permits have been finalized and made irrevocable.

The permit and permission authorization process complies with the Polish national requirements and EU Directives on the sharing of information about the environment and its protection. The process included stakeholder engagement, both in the EIA process as well as during the construction permit application. A Stakeholder Engagement Plan is currently in development and is expected to keep track of community meetings. The permit specifies that impacted communities neither object to the Project, nor proposed any restrictions or conditions for the Project.

The environmental and construction permits clearly outline conditions addressing all required ongoing EHS management requirements.

The Project has an Environmental and Social Action Plan in place, containing requirements and commitments – including mitigating measures - with regards to road networks and foundations, as specified in the respective permits and permissions. In accordance with the Polish Environmental Protection Act of 3 October 2008, the Project has a Control Programme in place to regulate the operation of the wind farm.

1.7.1 EIA procedure

An Environmental Impact Assessment (EIA) was submitted as part of the Environmental Permit. The EIA consists of four sections: the introduction, option investigation, the assessment of the environmental impact, and the testing and consultation permission. The introduction describes inter alia the nature of the Project (technical and electrical), the wind resources in the area, the plans and goals, and other wind power projects in the area. Part 2 discusses the location of the project, and potential alternative options. Part 3 reasonably covers the following: noise, shadow and light, use of chemicals, security, visual impact, outdoor life and tourism, cultural and natural environment, birds, bats and other fauna, energy, air and climate, hunting, general land use, hunting, roads, transport, and materials, and liquidation.

The EIA procedure for the wind farms complies with Art. 72, section 1 of the Act of 3 October 2008 on the provision of information on the environment and its protection, public participation of society and on environmental impact assessments (Journal of Law 2003, item 1235). The preparation of the EIA is part of the obligations of the environmental permit. The permit states the Project does not need to reassess the EIA and is thus deemed sufficient.

Regarding compliance of the EIA process with the applicable standards, the project follows Polish regulations on EIA standards that there are no gaps between the local/Polish environmental law and the OECD common approaches/applicable standards.

1.7.2 Environmental and Social Due Diligence

An independent ESDD was undertaken in 2021 as required by project financiers EBRD and EKF, which confirmed that each of the wind farms is compliant with national legislation and appropriate EIA process was undertaken in compliance with the EU EIA Directive, Habitats and Birds Directives. The Consultant also confirmed that the project and each wind farm is designed to meet EBRD Performance Requirements and IFC Performance Standards.

The ESDD confirmed that, pre-construction inventories and monitoring studies have been done thoroughly and that the methodologies used were in line with current practice. The updated Biodiversity survey undertaken in 2021 covered following topics: vegetation, animals, protected species, birds, bats, habitats, protected areas, and cumulative impact.

1.8 Current condition of existing environment and socio-economic conditions

The EIA concludes the landscape of the area is fairly uniform, with limited natural or human dominance. Therefore, the turbines will be a dominating factor in the landscape. However, the impact of the wind farm on the surrounding landscape decreases with decreasing distance from the respective wind farms.

The closest Special bird protection zone Ostoja Biebrzanska (PLB200006) located 2.5 kilometres to the east from the closest turbine and Protected Landscape Area Wzgorza Dybowski located 1.5 kilometres to the west. The ESDD and the updated biodiversity survey have confirmed that the project complies with EBRD PR6, the EIA was undertaken in line with European and Polish national requirements and the project will not have an impact on the integrity of the Natura 2000 site, there are no Priority Biodiversity Features present on site and no Critical Habitats will be impacted. The Project area is not part of the migration corridor for birds. Despite proximity to the SPA (Special Protection Areas), the concentration of birds occurs at migratory corridor 15 kilometres away from the site. Protected bird species from Annex 1 to Birds Directive appear occasionally and are all species abundantly present in Poland. To reduce the impact on birds in the wind farm area, turbines are not to be built in the northern part of the wind farm area, and the turbines will maintain a minimum distance of 400 meters between each other, and 100 meters from the forest area around the wind

farm area. The current design of the wind farm ensures these measures. Bats present on site are common species observed abundantly in Poland. Some of the amphibians found are rare in Poland, although the sub-project will not impact their population status, mating or migration.

Additionally, no protected habitats were identified. Biodiversity monitoring requirements are identified regarding birds and bats during the operation of the wind farm and described in Section 1.10.4, which are included in the Environmental and Social Action Plan (ESAP). The ESDD has confirmed that the project presents low risk when the monitoring requirements and mitigation requirements as set in the environmental decision are followed.

Moreover, the wind farm area is located outside the recorded archaeological sites and other monuments. These objects are located at a considerable distance from the wind farm area. Therefore, it is not expected the wind farm will have a significant negative impact on monuments and archaeological sites. Nevertheless, if, during the implementation of the Grajewo wind farm, an unrecorded archaeological site is found, it will be necessary to conduct archaeological research.

The Project site is located in agricultural land, predominately used for arable farming. Land has been acquired through a process of voluntary negotiations and all land leases are in place, which also include restrictions on certain future developments by landowners (e.g. construction of residential buildings). The project has been designed to minimise the use of agricultural land and after construction, areas not required for operation will be returned to agricultural use

The closest residential areas are in Kurejwa village located approximately 0.6 km from the closest turbine location and the nearest town, Grajewo, is located 4 km northeast of the site. The turbines are located a minimum of 500m from the nearest residential buildings (isolated houses/farmsteads).

The landscape in the project area is fairly uniform, typical of agricultural areas and with limited natural or human dominating features (see Figure 1-3).



Figure 1-3 Landscape as it occurs in the Grajewo Project area

The ESDD has concluded that there are no known recorded archaeological sites and other monuments within the Project area or in the near vicinity which could be impacted by the Project. A chance finds procedure, will however be implemented during excavations in construction and operation, detailing specific actions to be taken in the event of an unexpected archaeological discovery. This will include consultation and agreement with the appropriate authorities on the further actions required.

The ESDD concludes that due to the sufficient distance between the wind turbines and social receptors the majority of the potential disturbance impacts have been avoided or mitigated (as discussed below).

1.9 Impact during construction

1.9.1 Biodiversity

Potential construction impacts on biodiversity will be short term and will be minimised through adoption of good construction management practices. In addition specific requirements stipulated in the Environmental permit and ESAP will be followed. These include:

- Minimize land occupation and destruction of vegetation during the works.
- Do not introduce trees and greenery near the wind farm.
- Cutting down trees should be avoided when creating access and service roads to the turbines. If necessary, logging should be carried out between September 1st and March 1st (outside the breeding season). However, if the logging will take place during the breeding season, direct ornithological supervision of the works will be necessary.
- No water reservoirs should be created on the project grounds, to avoid an increase in bat activity.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

1.9.2 Dust

Dust emissions will take place mostly during the construction and decommissioning phase resulting from machinery and devices used for earthworks, vehicles operating on the construction site and means of transport. The EIA considers the amount of dust emissions and their range as insignificant to the environment. Additionally, the dust emissions will be short-term. It is expected there will be no exceedance of environmental quality standards.

1.9.3 Soil

During the construction phase, contamination of the soil can occur in several ways, mainly by accidental leakage of harmful substances (e.g. oil, grease) from construction machinery, transport, and the on-site sewage.

No permanent changes in the soil and land use will occur. After the construction of the WTG foundations and underground MV cables, the soil will be brought back to its original function (agriculture). Regarding the construction of roads, they will be constructed made from natural materials (natural aggregate or mixture of soil, concrete and lime).

The ESDD has confirmed that the project is expected have limited adverse effects during the construction phase, but that the overall pollution and impact on natural resources are expected to be low.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

1.9.4 Water

While there are no sensitive water receptors within project site, contamination of the surface water and groundwater may potentially occur during construction in several ways, mainly by accidental leakage of harmful substances (e.g. oil, grease) from construction machinery, transport, and the on-site sewage.

The groundwater can be temporarily affected during the construction phase as the excavation site might be drained for the construction of the turbine foundations. However, the effect will be reversible when construction is finished, as the site will be brought back to its original state and the water level will stabilize.

Additionally, risks are appropriately mitigated as a result of the organization of the Project area, the small scale of the possible accidents and the immediate notification of relevant services in case of an accident to remove and limit the possibility of pollution to spread.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

1.9.5 Waste

Waste generation during construction, operation and decommissioning will occur. The possible types of waste have been mapped in the EIA. Possibilities to reuse/recycle the waste in the Project area, e.g. for backfilling foundations and restoring the agricultural function of the area are considered.

The remaining waste will be transported to a waste landfill or recycling facility. The waste will be temporarily stored on-site, separated and stored in appropriate containers. Hazardous waste will be separated and stored in sealed containers, after which the hazardous waste is transferred to appropriate authorized waste management organizations. The sewage will be collected in non-drain reservoirs and then transferred to an appropriate authorized waste management organization.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential construction impacts and will perform regular monitoring of contractors' performance and adherence to environmental permits conditions.

1.9.6 Construction noise

During the construction phase, noise as a result of machinery, transport, and drilling will be caused. The residents are located at least 500 meters from the Project area. Nevertheless, the noise levels on the border of the Project area will exceed 45 dB. Despite the exceedance of the permitted noise levels, it should be considered that the noise value is safe for people and will not cause health damage. Additionally, the nuisance will be short-term and will stop when construction work is completed. According to the EIA, construction will have a temporary negative impact on the acoustic climate of the area, which is not considered a significant impact. Possible mitigation measures are proposed such as: construction work will take place during the daytime to limit nuisance in the area. An exception is made for concrete work as this should be a continuous process.

ESDD confirmed risk of impact of construction noise to be low as it is temporary of nature. Additionally, the construction permit allows the temporary exceedance of noise levels.

1.9.7 Construction traffic and transport

Delivery of construction materials and equipment will require the use of the national and local roads to access the Project area. This may include large and over-size vehicles such as to deliver parts of the turbines. A Traffic and Transport management plan will be developed and implemented to manage the project related traffic and potential health and safety risk and disturbance impacts. This will include access routes, diversions, exceptional loads, signage,

driver training and consultation with local authorities and sensitive residents or receptors close to access routes (e.g. schools) Road permits will be secured in advance for all necessary activities.

1.9.8 Construction Health Safety and Labour

The construction contractor will be required to implement national and Lenders requirements related to the management of health and safety and labour and working conditions. Construction workforce can be exposed to a number of potential health and safety risks including working at height; working with electricity; heavy lifting operations. The construction contractor will be required to implement a Construction Health and Safety Management Plan which will be monitored by OX2. The Subcontractors have HSE plans (Plan BIOZ) in place. An example of an employee grievance mechanism of a Subcontractor is the following: Employee grievances are arranged following OX2 standards. The grievances will be treated with utmost discretion by two parties (Project management of OX2 and Subcontractor's HSE Coordinator). A grievance box is located at the construction site and a grievance register is maintained. The complaints will be systematically reviewed.

1.10 Impact during operation

1.10.1 Social impact

In addition to visual impact, ice-throw and noise (discussed in section 1.10.6), wind turbines may cause shadow flicker. The EIA concludes that the expected shadow flicker effect is limited, since there are only few hours of shadow flicker per year (maximum 25 hours) during which the shade of the turbines will fall on residential buildings. The expected turbines to cause the most expected shadow in (more than 8h/y) are WTGs 1, 2, 7, 19, and 22. WTGs 8, 9, 10, 11, 12, 21 and 23 are not expected to cause more than 8h/y shadow.

The ESDD has confirmed that the risk of shadow flicker is low but that consultation with potentially affected buildings might be undertaken during operation, to understand actual impacts and a community grievance mechanism is established where people can raise concerns. In case of impacts occurring, mitigations can be implemented which may include a flicker control system for wind turbines is to reduce the amount of flicker in the areas.

1.10.2 Waste

During the maintenance of the wind farm, waste in small amounts will be generated in terms of e.g. oils and filters. These types of waste will not be stored on-site. The waste will be transferred to a specialized organization authorized to collect waste. Moreover, pollution of the soil can occur during the maintenance of the wind farm (e.g. leakage of lubricants or oils) or in the event of a breakdown.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential operational impacts and will perform regular monitoring of the project in line with environmental permits conditions.

1.10.3 Contamination

The EIA states the risks for contamination are low as the construction site will be appropriately organized. Additionally, in case of an accident during the construction or operation phase, the risk is considered to be low as the scale of the accident is small and will not cause a significant negative impact on the environment. Appropriate services will be notified immediately in the event of an accident and measures will be taken to remove and limit the possibility of the pollution to spread. The ESDD confirmed there is low risk of contamination for the project.

The ESDD also confirmed that OX2 has relevant capacity and management systems in place to oversee and manage potential operational impacts and will perform regular monitoring of the project in line with environmental permits conditions.

1.10.4 Birds and bats

In the case that a high bird and bat mortality is confirmed (compared to other projects in Poland and in Europe), mitigating measures (monitoring studies) should be considered to reduce the risk of mortality. A low probability of high mortality rates for the respective wind farms is however expected. The bird monitoring report concludes the impact of the wind farm on protected bird species will be negligible or not occur. Additionally, low or moderate activity regarding bats has been monitored. Moreover, the 2021 ecological survey confirms the findings of no significant negative expected impact for both species. To avoid the increase of bat activity, no water reservoirs should be built in the Project area, as stated in the conditions for environmental permit. The wind farm does not have a transboundary impact.

ESDD confirmed operational risks to birds and bats to be low. However, monitoring and mitigation requirements stipulated in the Environmental Permit and ESAP should be followed. These include specifically for biodiversity:

Conditions stipulated in the Environmental Decision:

Bat monitoring Bat monitoring should be repeated three times within five years after the farm is taken into operation (in years 1,2, and 5, or 1,2, and 4, or 1,2, and 3). Monitoring should include local as well as migrating bat populations and include examine the mortality of bats, as well as the activity of bats around the wind farm. The monitoring should be performed in the same way as the pre-construction bat monitoring. In the event of increased bat mortality, additional measures should be considered to reduce the risk of bat mortality.

Bird monitoring Bird monitoring should be repeated three times within five years after the farm is taken into operation (at least in the first year, the next to monitoring studies should happen within five years after operations have commenced). The monitoring should be performed in the same way as the pre-construction monitoring, extended by searching for bird victims of collisions with the wind turbines. In case of the recording of dead birds of prey during the first year of monitoring, monitoring should be extended to five years.

1.10.5 Electromagnetic fields

Due to the location of the wind turbine, with a hub-height of 137 m above ground level, the generated electromagnetic field will have a negligible impact at ground level.

1.10.6 Noise

A noise assessment has been done to model the expected noise caused by the wind farm and was based on the same turbine model that is to be utilized. The closest receptors are over 500m away and are residential/farmstead buildings with permissible noise limits are 55dB during the daytime (07:00-22:00) and 45dB during night-time (22:00-7:00). One sensitive noise receptor was identified, which a building area associated with permanent or temporary stay of children and youth, which is subject to noise protection during daytime and night-time. The noise limits for this point are 50dB during the day and 40dB during the night. The noise assessment has confirmed that the national noise standards (which are aligned with World Health Organisation noise standards) are not expected to be exceeded.

For Grajewo, cumulative noise from the close by neighbouring wind farm under development (Contino Omicro with 7 turbines) was considered in the noise assessment. 18 noise sensitive points were included in the analysis. The noise assessment concludes that the Grajewo wind farm will not pose a threat to the acoustic climate in relations to areas subject to noise protection in the nearest adjacency of the investment area. The ESDD has confirmed that the noise levels are expected to be below the prescribed noise levels of the Applicable Standards. No curtailment measures are expected.

The ESDD findings will be confirmed via noise monitoring at operational stage, which is covenanted in the ESAP.

1.10.7 Ice-throw

Ice may form on the blades of the WTGs, which can fall off during operation. This is a typical safety risk assessed during planning of the wind farms to protect the neighbouring community. The EIA states that adequate preventative measures have been taken as the WTGs are located at least 500 m from the nearest residential buildings. Additionally, warning signs will be placed on-site and on local roads surrounding the wind farms. Relevant information will be provided to the local communities. The ESDD has confirmed that projects risk for ice throw is low.

1.11 Post-construction monitoring and measures to limit the impact

The respective permits provide that no later than two months after operations have commenced the noise levels should be monitored. If the acoustic levels are exceeded, mitigating measures should be taken to lower the noise levels to the allowed threshold. Monitoring for potential shadow flicker impacts is not required by national law. However, mitigation measures are advised such as adequate stakeholder management and a flicker control system in case of complaints from the surrounding community.

For Grajewo, the permit contains specific regulations with regards the impact of construction on bird and bat populations. The environmental permit further contains a detailed monitoring protocol with regards to bird and bats after the farm has been taken into operation. In the case that a high bird and bat mortality is confirmed (compared to other projects in Poland and in Europe), mitigating measures should be considered to reduce the risk of mortality such as an application of shut down on demand protocol.

The measures are taken up in the ESAP. OX2 will also report to environmental authorities in line with requirements stipulated in the permit.

1.12 Grievance procedure

OX2 will implement a grievance mechanism to manage grievance submitted by the Project stakeholders. The grievance mechanism will be described in the Stakeholder Engagement Plan and include roles and responsibilities of both OX2 and contractors. The mechanism shall be clearly communicated to the stakeholders. The grievance mechanism shall include a public grievance form. The grievance mechanism will be accessible through letter; telephone or internet or directly at the Project site during construction works and be able to receive anonymous grievances and those where the complainant wishes to remain confidential. All grievances will be registered in a community grievance log. OX2 will instruct the local authorities in the commune offices about the grievance mechanism and provide them with the contact details to which grievances can be submitted

The permit and permission authorization processes comply with the Polish General Directorate on the sharing of information about the environment and its protection. The process during the permit application included a grievance mechanism. The Project has a Community Grievance Log in place to keep track of complaints.

1.13 Environmental and Social Management System

For Grajewo, extensive HSE management plans are available. A separate environmental plan which covers the following subjects: roles and responsibilities, environmental alarm, environmental requirements, air pollution and dust, noise, selection and handling of materials and chemical products, hazardous materials and waste, traffic, energy usage, water use, natural values, systemic environmental work (including incident reporting and responsibilities). The environmental coordinator is appointed. The HSE plan (Plan BIOZ) of OX2 includes extensive information on organization, construction, communication and training, communication, HSE meetings, hazardous work, safety instructions, storage and handling of dangerous materials, preventing HSE hazards, non-conformities, site safety inspections, incident management system, grievance system and more. The HSE coordinator, HSE manager and other responsibilities have been accounted for and have been appointed. The ESDD has confirmed that OX2 has relevant capacity to undertake the project in line with EBRD Performance Requirements. Stakeholder Engagement Plan

A Stakeholder Engagement Plan is under development by OX2. The purpose of the SEP is to ensure timely and effective sharing of information and communication with stakeholders related to the Project. The SEP is expected to include an identification of stakeholders including those affected by and those with an interest in the project and defines the stakeholder engagement programme for the project. This includes the information that will be disclosed, its format and timing and consultation activities which will be undertaken during the Project with stakeholders. It is also expected to include a description of the grievance mechanism.

1.14 Environmental Social Action Plan

The ESAP has been developed to address risks related to construction stage impacts and operation stage impacts, including environmental permit requirements, building permit requirements and recommendations from the ESDD with specific actions including:

- Develop noise monitoring plan and undertake a programme of post-construction noise measurements
- Implement environmental protection measures during construction including avoidance of tree cutting where possible, ornithological supervision during any cutting in the breeding season and checking excavations for trapped fauna
- Post-construction biodiversity monitoring including:
 - Bat monitoring - repeated three times within five years after the farm is taken into operation to include local as well as migrating bat populations and include examine the mortality of bats, as well as the activity of bats around the wind farm. In the event of increased bat mortality, additional measures should be developed and implemented to reduce the risk of bat mortality.
 - Bird monitoring - repeated three times within five years after the farm is taken into operation flight and carcass surveys. In case of the recording of dead birds of prey during the first year of monitoring, monitoring should be extended to five years and additional mitigation measures developed and implemented to reduce the risk of bird mortality.
- Implementation of the Stakeholder Engagement Plan and grievance mechanism including stakeholder consultation

1.15 Further information

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