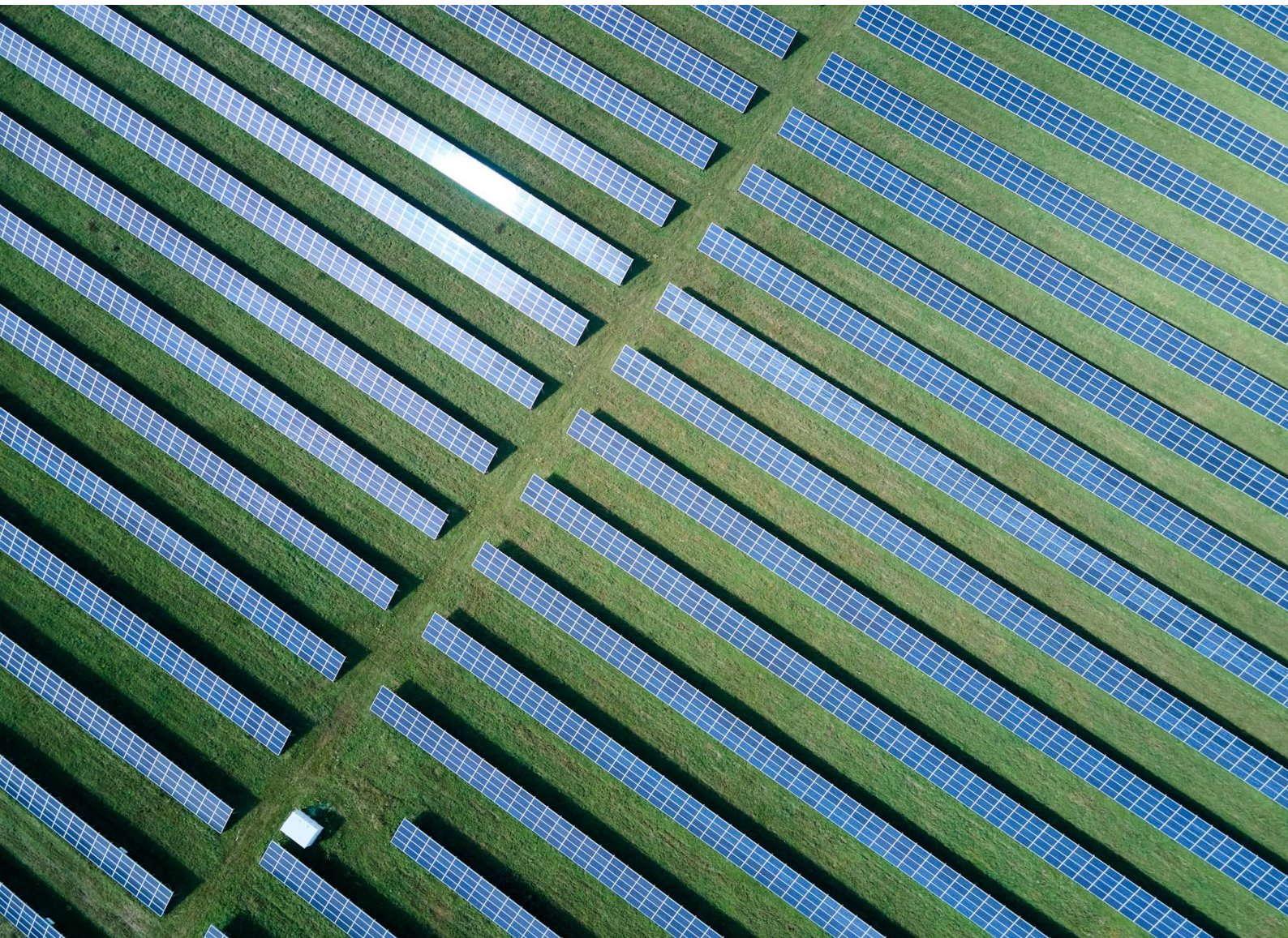


Environmental and Social Non- Technical Summary

Danube Solar Five 60 MW PV Project,
Romania

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CONTENTS

1.	ABOUT THE PROJECT	1
2.	HOW ARE THE ENVIRONMENTAL AND SOCIAL ASPECTS ADDRESSED DURING PROJECT CONSTRUCTION AND OPERATION?	2
2.1	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL IMPACTS	2
2.2	POLLUTION PREVENTION AND CONTROL	3
2.3	LABOUR AND WORKING CONDITIONS	4
2.4	HEALTH, SAFETY AND SECURITY	4
2.5	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT	6
2.6	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES	6
2.7	CULTURAL HERITAGE	7
2.8	INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT	7
LIST OF FIGURES		
FIGURE 3-1	PROJECT LOCATION	1

1. ABOUT THE PROJECT

The Project is developed by Danube Solar Five SRL¹ (the "Company"), a company incorporated in Romania.

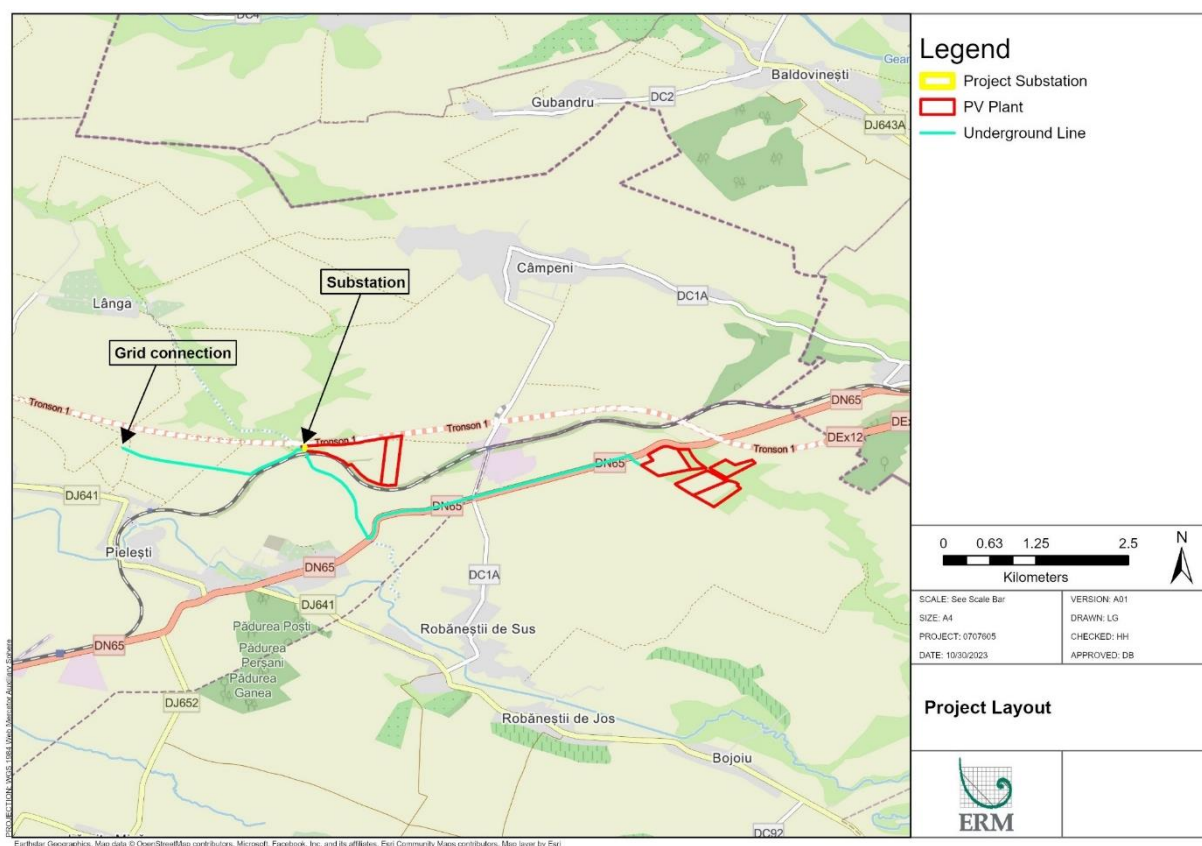
The Project is located in southern Romania, approximately 20 km east of Craiova City, Dolj County. The Project components and their location are represented in Figure 1 below.

The PV Plant Project covers a 71.2 ha site split in two smaller areas: the "northern" Project area located in Pielești commune and the "southern" Project area located in Robanesti commune. The Project location and layout is represented in Figure 1 below.

The Project includes, in addition to the PV Plant, an approximately 4 km-long 33kV underground powerline (connecting the Robanesti transformer to Pielești substation) and a 110 kV underground transmission line (connecting the Project substation to the national grid via the existing 110 KV Craiova Est – Bals line) following an approximately 2.3 km-long route.

The grid connection line follows a route along an existing dirt road between agricultural plots. The underground line connecting the two PV plant areas follows a route along National Road 65.

FIGURE 1-1 PROJECT LOCATION



¹ Danube Solar Five SRL is owned by Lithuanian investment fund INVL Renewable Energy Fund I (INVL), an investment management and life insurance group founded in 1991.

2. HOW ARE THE ENVIRONMENTAL AND SOCIAL ASPECTS ADDRESSED DURING PROJECT CONSTRUCTION AND OPERATION?

2.1 ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL IMPACTS

The Project's environmental impacts were analyzed in line with the Romanian regulations' provisions and all permits required for construction were obtained.

As part of the Project permitting procedure, authorities with responsibilities related to the environmental aspects have issued permit conditions included in authority approvals, part of the Project construction permitting package.

The authority review process, as indicated above, resulted in the identification of the Project potential impacts and of the mitigation measures to be implemented during Project construction to address these potential impacts.

On this basis, the Company and the construction contractors defined required management processes and allocated resources needed to ensure the potential environmental and social impacts associated with the Project construction are adequately handled at all times.

In practice, this will be ensured through the implementation of a package of environmental and social management planning (ESMP) procedures and provision of associated resources and staffing addressing all aspects of the Project including:

- Environmental Management (e.g. spill prevention and control, wastes management, biodiversity protection including management of invasive species, topsoil management etc.);
- Labour and Working Conditions;
- Health and Safety including
 - Occupational Health and Safety, i.e. aspects pertaining to Project staff safety during construction and operation, and
 - Community Health and Safety, i.e. arrangements made to address the safety risks to communities and people resulting from Project execution e.g. from construction traffic on public roads, from works execution on public domain and private properties, aspects pertaining to construction workforce accommodation in local communities e.g. prevention of communicable diseases (COVID-19 and other communicable diseases), foreign workforce code of conduct in interactions with local people etc.;
- Cultural Heritage safeguard measures enforced in case of incidental finds during construction earthworks execution; and
- Social e.g. public disclosure of relevant Project information, engagement with Project-affected people (e.g. land owners/users and residents along the grid connection route) and general public, and provision of means to raise any concerns or complaints in relation to the Project (i.e. implementation of a Grievance Mechanism).

The responsibility for the implementation of the above-indicated measures and for the management of Project's environmental, health and safety and social impacts lies with the Company.

For construction, the Company has commissioned the services of a reputable company to act as the Owner's Engineer (EPCM10, an engineering and project management company) for the management of the Project construction on the Company's behalf including supervision of required environmental and social mitigation measures implementation by the construction contractors mandated by the Company.

During the operational stage of the Project, the responsibility for implementation of the required environmental and social mitigation measures lies with the operations and management contractors.

The below sections provide highlights on how the above-indicated Project aspects are handled during the Project construction and operation.

2.2 POLLUTION PREVENTION AND CONTROL

As indicated above, a complete set of measures aimed at ensuring that Project impacts on environment are at all times managed and mitigated are put in place during the Project construction and operation stages.

This includes procedures, allocation of responsibilities, resources and staffing ensured by the Company and their contractors and addressing all potential environmental aspects, as informed by the environmental assessment performed for the Project.

Of these, the most relevant environmental aspects associated with the Project implementation are summarised below.

Pollution Prevention and Control

The only potential contamination source during construction could be from accidental leaks of fuel from vehicles used to deliver equipment and execute works at the PV plant site or from the equipment used to upgrade existing access road and install the underground cable trenches.

In the event of an accident, strict spill prevention and response measures will be executed in line with the spill prevention and control planning measures defined in the Project Environmental and Social Management Plan (ESMP) and implemented by the contractor under the supervision of the Owner's Engineer .

Topsoil Management

Topsoil represents a valuable resource requiring adequate management during Project execution in line with applicable regulatory requirements and good industry practice.

To ensure these are effectively implemented during the construction of the PV Plant and particularly during the grid connection works execution, specific topsoil management requirements and mitigation measures will be implemented by the contractors. These measures are defined in Project ESMP and their implementation will be supervised by the Owner's Engineer.

Waste Management

Wastes generated during the Project construction will be recorded by the contractors in Construction Waste Registers, as required under the Romanian law.

Additionally, in line with the international best practices and as required in line with the national regulatory requirements, a Construction Wastes Management Plan will be defined and implemented by the contractors.

2.3 LABOUR AND WORKING CONDITIONS

Throughout the life cycle of the Project, the construction stage is the most labour intensive, and involves construction workers both local and non-local potentially including construction staff from abroad. Maximum construction staff needs are estimated to approximately 100 construction workers during the most intensive construction phases.

This workforce may include local staff as well as foreign workforce, as available. The non-local construction workforce will be accommodated within the nearby settlements and the use of a temporary construction staff accommodation camp is not envisaged for the Project.

During operations the workforce needs are rather limited and comprise limited number of contracted personnel in charge of operating and maintaining the PV Plant.

In addition to complying with the provisions of the Romanian Labour Code, the Project is committed to implement measures aligned with best industry practices in terms of labour and working conditions provided to the staff in charge of Project construction and operation.

This includes measures and processes in place to ensure contractors and subcontractors provide their workforce accommodation conditions that meet specific requirements set forth in international best practice guidelines.

Furthermore, a procedure allowing any person engaged in the Project construction and operation, including the staff employed by contractors and subcontractors, can raise any workplace-related concerns and have them addressed in line with best practice (i.e. a Worker Grievance Mechanism) is defined and implemented.

2.4 HEALTH, SAFETY AND SECURITY

Occupational Health and Safety

The occupational health and safety aspects are strictly regulated in Romania. In addition to these, international best practices developed over time to address health and safety risks associated with projects construction and operation are enforced during the Project execution.

On this basis, adequate resources, staff training, supervision staffing and work procedures are ensured during the construction stage, as guided by a Health and Safety Plan supported by a series of specific work procedures addressing the risks associated with each type of works performed.

All staff is trained in overall health and safety rules applicable during Project implementation as well as on the job and tasks-specific health and safety requirements as applicable to each role and position.

The supervision of the compliance with the -above indicated will be ensured by dedicated staff at all levels including subcontractors, general contractor and overall by the Owner's Engineer specialists mandated for this purpose by the Company.

The performance is tracked based on a pre-defined set of key-performance indicators and any corrective measures required in response to deviations from procedures or in case of incidents are enforced in line with specific non-conformance tracking and reporting processes.

Similar planning work practices addressing specific operational risks will be put in place later on at the during Project's operation stage.

Community Health and Safety

In addition to managing the occupational health and safety aspects, the Project is committed to addressing any potential health and safety risks from Project implementation on general public and communities.

Given the relatively isolated PV Plant site location, potential community health and safety risks associated with the Project are expected to be limited.

Therefore, in addition to the Project construction traffic on the public roads, the construction-related community health and safety risks are expected to be associated primarily with the grid connection works execution as the route is located on public domain and also crosses agricultural land.

Also, the accommodation of the construction workforce in rented spaces within the nearby communities triggers the need for enforcing a set of preventive measures and rules of conduct for the non-local construction staff accommodated in communities.

To address the above-indicated, specific health and safety management arrangements will be put in place during the construction stage of the Project.

This will include Community Health and Safety Planning measures addressing aspects including:

- Management of health and safety aspects associated with works execution on public domain;
- Construction equipment and vehicles traffic and public roads use safety aspects;
- Prevention of communicable diseases (e.g. COVID-19 and other communicable diseases) and of any forms of gender-based violence;
- Security arrangements (e.g. security personnel code of conducts, use of force etc.) guided by The Voluntary Principles on security and Human Rights²;
- Construction workforce Code of Conduct including (but may not be limited to):
 - no tolerance to any form of violence and harassment;
 - including gender-based violence (GBVH) in subcontractors contracting documents;
 - including GBVH aspects in training delivered to non-local subcontractor staff (including workers formally acknowledging Project code of conduct);

² The Voluntary Principles on security and Human Rights: <https://www.voluntaryprinciples.org/the-principles/>

- grievance mechanism accessible to local communities' members allowing anonymous reporting and provisions for confidential handling of complaints.

Emergency Preparedness and Response

Adequate Emergency Preparedness and Response planning defining the course of action in case of potential emergency situations that may occur during the implementation of the Project will be defined and implemented.

All staff involved in the Project implementation and operation will be trained in the emergency response implementation, their duties in case such emergencies occur, and drills simulating the various types of emergencies periodically performed.

2.5 LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

Land and land rights required for the Project have been secured through superficies lease agreements for the PV Plant sites. The underground powerlines installation along the public roads will be executed based on a specific Approval issued by the National Road Infrastructure Company.

The Project is not associated with physical displacement or with economic displacement. The affected land plots include agricultural land. The affected state and municipality-owned land plots include public roads and a water course (brook) crossing.

A Stakeholder Engagement Plan defining the communication process and ensuring among others meaningful consultation with affected landowners during the Project implementation was developed and will be implemented (see Section 2.8).

2.6 BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

The PV Plant will be built on former agricultural land. Some remaining untransformed vegetated areas including a large, vegetated valley with wetland and forested area representing habitats that could potentially support protected and threatened species are however located in the vicinity of the site.

. To avoid or otherwise mitigate potential biodiversity impacts during the construction works execution, the Company will define and implement a Construction Biodiversity Management Plan (Construction BMP). This management plan will outline the required measures to mitigate potential construction impacts on habitats and species, monitor construction activities, and restore affected areas after construction.

Before construction begins at each worksite, the Company will ensure that specialist pre-construction biodiversity surveys are performed guided by a pre-defined protocol and checklist to inform on the mitigation measures required to be implemented in line with the BMP.

Furthermore, in line with the best international practices, before initiation of the construction work the Company will ensure that a rapid screening to determine if the Project may impact on

any critical habitat³. In case any potential impacts are determined specific measures to protect and restore such critical habitats will be implemented based on a Biodiversity Action Plan (BAP) aligned with best international practice.

2.7 CULTURAL HERITAGE

The Project will not affect any known cultural heritage as closest registered cultural heritage site is located approximately 2 km from the Project site.

However, in line with the national regulatory requirements and good international practice, measures to avoid potential impacts on any unknown cultural heritage will be enforced during construction works execution. In line with the regulations and Project Building Permit conditions, in case archaeological remains are incidentally uncovered during the construction stage, the construction works at the area are to be stopped. Further, security and protection measures are to be enforced at the area and notify both the permit issuer and the County Directorate for Culture for their intervention in line with the applicable regulations.

To ensure the above-indicated are implemented by the relevant construction contractors, a so-called Chance Finds Procedure defining the course of action and implementation responsibilities is developed and will be implemented in line with good international industry practice.

2.8 INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT

A Stakeholder Engagement Plan (SEP) including a Grievance Mechanism was developed for the Project and is publicly available at [Please insert here link to the SEP location on the relevant Project/INVL website and/or otherwise in case SEP published locally indicate where it can be accessed].

The SEP provides a framework for the communication and engagement with the local community and external stakeholders in general in relation to the Project. The SEP will be updated and further developed as needed as the Project progresses with the aim of ensuring meaningful consultation with stakeholders and communities throughout the Project life cycle.

The SEP includes a Grievance Mechanism. The Grievance Mechanism can be accessed by anyone willing to raise complaints or provide comments in relation with the Project, and ensures that any complaints or comments are timely addressed and responded.

To ensure facile access to the Grievance Mechanism, a number of interfaces have been established including a Grievance Form that can be used for submitting a grievance in relation to the Project. The grievance form can be accessed here at [Please insert here link to the SEP including the Grievance Form location on the relevant Project/INVL website. In case these are available locally indicate where].

³ Habitat of significant importance and/or accommodating protected species.