Non-Technical Summary

Ełk Battery Energy Storage System (BESS) Project, Greenvolt Power, Poland

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Contact Details:

Name: Adrian Góralski

Telephone: + 48 532 432 911

Email: adrian.goralski@greenvolt.com

Address: aleja Wyścigowa 6, 02-681 Warszawa

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Acronyms and Abbreviations

Acronym	Description
BESS	Battery Energy Storage System
CESMP	Construction Environment Social Management Plan
CLOs	Community Liaison Officer
EBRD	European Bank of Reconstruction and Development
EHSS	Environment, Health, Safety and Social
EIA	Environmental Impact Assessment
E&S	Environment and Social
ESAP	Environmental, Social Action Plan
EU	European Union
GBVH	Gender-Based Violence and Harassment
GM	Grievance Mechanism
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
HR	Human Resources
H&S	Health & Safety
IFC	International Finance Corporation
NECP	National Energy and Climate Plan
NGO	Non-Governmental Organisation
NTS	Non-Technical Summary
PAP	Project Affected Person
PRs	Performance Requirements
PSs	Performance Standards
PSE	Polskie Sieci Elektroenergetyczne S.A.
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
TMP	Traffic Management Plan

1. Introduction

Greenvolt Power ("Greenvolt") is constructing two 200 MW Battery Energy Storage System (BESS) projects in northeastern Poland ("the Project"). The two Project sites are both at the start of the construction phase. This Non-Technical Summary (NTS) relates to the site based at Nowa Wieś Ełcka (Ełk site). The other site is situated at A separate NTS has been prepared on the Turośń Kościelna (TK) site.

The International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD) are considering financing the Project.

An Environmental and Social Due Diligence (ESDD) assessment was commissioned to be undertaken of the Project, which involved a site visit and a desk-based review of Project information in May 2025. The aim of the ESDD is to identify and assess any potentially significant adverse environmental or social impacts associated with the Project, assess compliance with national legislation and IFC performance standards and EBRD's performance requirements, determine the measures needed to mitigate the adverse impacts and identify environmental and social opportunities to enhance the sustainability of the Project. The gaps identified have been used to develop an Environmental and Social Action Plan (ESAP) for implementation, which contains actions required to be implemented to align the Project delivery with EBRD and IFC requirements. Greenvolt is committed to ensuring that the ESAP is implemented.

The Project has been categorised as category 'B' according to EBRD's Environmental and Social Policy (2019)[1] and IFC's Environmental and Social Review Manual and the Interpretation Note on Environmental and Social Categorization[2], as the anticipated environmental and social (E&S) impacts are site specific and readily identified and addressed through mitigation measures.

A disclosure pack comprising of this NTS, as well as a Stakeholder Engagement Plan (SEP), has been developed. The SEP provides a framework for consultation activities and the disclosure of Project information, including the identification of potential stakeholders, consultation methods, approaches for ongoing communications and record keeping as well as a stakeholder grievance mechanism.

2. What is Battery Energy Storage System (BESS)

Battery Energy Storage Systems (BESS) are devices that store energy in batteries. BESS technology is increasingly being used to support the growth in renewable energy and address the need to capture and store energy when it is in abundance, for use when renewable sources are producing less energy. They are designed to balance supply and demand and support the reliability of the electricity gride. Energy is collected from the grid, stored, and then redistributed into the grid when required.

[1] https://www.ebrd.com/home/news-and-events/publications/institutional-documents/environmental-and-social-policy-2019.html

[2] https://www.ifc.org/en/insights-reports/2012/publications-policy-interpretationnote-categorization

3. Project Description

The Ełk site is situated in Nowa Wieś Ełcka, northeastern Poland. This site has 200 MW capacity, 220kV voltage and a storage capacity of 800 MWh. The total development area for the BESS and accompanying infrastructure will cover up to 45,700m^2.

The site is owned by a Special Purpose Vehicles (SPV), Magazyn EE Ełk sp. z o.o, which is owned by Greenvolt. Greenvolt is a Portuguese private renewable energy company based in Lisbon. The general Contractor is P and Q, a Polish renewable energy contractor and development company based in Bialystok, northeastern Poland.

The Ełk site is located approximately 7km SE of the city of Ełk in Ełk County in northeastern Poland. The nearest major settlements to the site and their approximate populations are:

- Nowa Wieś Ełcka (approximately 1,870 residents as of 2021, situated within 1km from the Project site).
- Ełk (approximately 64,348 residents as of 2025, situated approximately 7 km from the Project site).

Figure 3-1 below shows the site locations of both Greenvolt's BESS sites within northeastern Poland.

Figure 3-1 - Ełk and Turośń BESS site locations in Poland

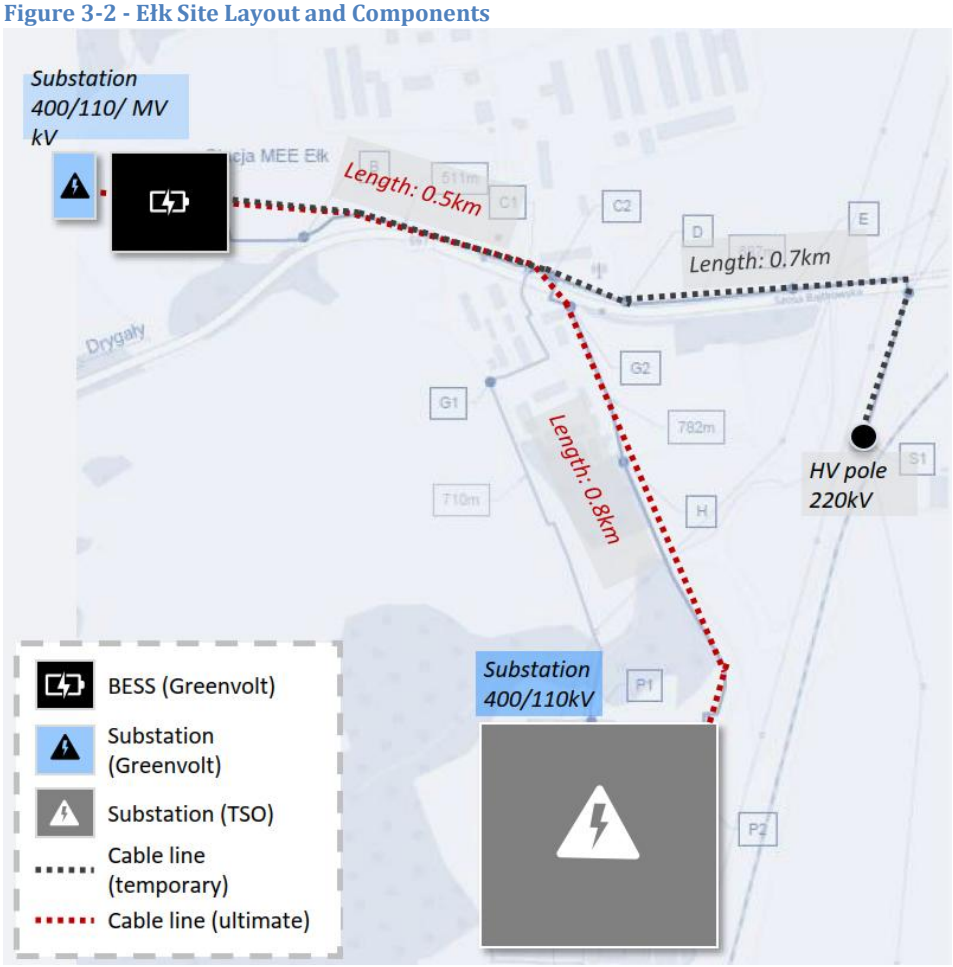
Source: Google Maps

The Ełk site will include the following key components, as shown in Figure 3-2:

- A total of 196 BYD MC-Cube T BESS units with a total capacity of 200.6 MW, providing 842 MWh on the grid side;
- An on-site 400/110/MV kV substation;
- A temporary Overhead Transmission Line (OHTL) connecting the site to an existing high voltage connection line (220kV) approximately 0.7km in length; and

- After 2-4 years, a final 0.5km long OHTL will connect the on-site substation to the Transmission System Operator (TSO) substation to the southwest of the site. The TSO substation is operated by national electricity transmission system operator, Polskie Sieci Elektroenergetyczne S.A. (PSE).

Figure 3-2 - Ełk Site Layout and Components



Source: Greenvolt Power

The site plots and surrounding land have been previously used for agriculture. To the south of the site, although not in immediate proximity to the BESS units, is a small cluster of residential and farm buildings, including a wood chipping workshop.

Figure 3-3 shows an example of a BYD BESS unit such as those to be installed at the BESS site.

Figure 3-3 - BYD BESS Unit

Source: BYD product webpage

4. Project Timeframe and Milestones

The planned timelines for Project milestones are as follows:

- Road Works and sub station: May 2025 - September 2025
- BESS delivery and assembly: Q3 2025 - Q1 2026
- Civil Works Completion: January 2026
- Energy management system completion: Q1 2026
- Use Permit: December 2025 - June 2026
- Final completion and commissioning: September 2026

5. Project Rationale

The Polish government has acknowledged the growing role of energy storage within the National Energy and Climate Plan (NECP) which was resubmitted in March 2024. The plan does not set out specific BESS related targets, but it identifies energy storage as a key enabler for the integration of utility-scale renewable energy into the Polish system. The NECP includes measures to support energy storage development such as market reforms and investment incentives.

In March 2025, Poland's Ministry of Climate and Environment announced a new public aid programme for investments in energy storage infrastructure to enhance the country's storage infrastructure through grants and loans for developers. Projects of 2 MW and above are eligible grants covering up to 65% of eligible costs for small businesses[3]. The programme aims to add at least 5.4 GWh of new storage capacity nationally. The Polish energy storage market is subsequently accelerating.

[3] Strategic Energy Europe: https://strategicenergy.eu/storage-poland-subsidise-65-projects-2-mw/

6. Land Acquisition

Long-term lease agreements are in place with the affected landowners, all of whom are willing to lease the land to Greenvolt. All of the land lease agreements for the BESS land plots were agreed under willing free market voluntary conditions. All of the landowners had the right to refuse, and no compulsory land acquisition powers have been sought or granted in relation to the project. The lease agreements include provisions allowing Greenvolt to acquire land for BESS project after certain requirements are met, including finalisation of construction and successful operationalisation of BESS project.

7. Compliance with Relevant Environmental and Social Laws

National Legislation

The Project is expected to meet the legislative and compliance requirements as per relevant national, IFC, EBRD and EU environmental, social, health and safety legislation and standards. The most stringent regulations and/or requirements (whether national, IFC, EBRD or EU) will be applied, to ensure environmental protection and community health and safety.

Under national Polish legislation, an Environmental and Impact Assessment (EIA) is not required for the Project. There are no specific BESS related environmental and social regulatory requirements that are stipulated within Polish law, however general environment and social (E&S) regulatory and legislative requirements that have been identified in relation to the development of potential BESS projects are summarised below.

- **Act of 3 October 2008 on Providing Information on the Environment and Environmental Protection, Public Participation in Environmental Protection and Environmental Impact Assessment (The EIA Act (2008)):** This legislation aligns with the EU EIA Directive and outlines the procedures and requirements for conducting EIAs in Poland. An EIA was not required for the Project. However, provisions within the Act may still apply to the Project as public authorities are involved in permitting processes and the Project may affect the environment.

As the Project site is located within the EU, EU legislation will therefore apply as transposed into Polish national legislation. The following EU directives have been identified as of relevance to the Project:

- **EU EIA Directive (Directive 2011/92/EU).** This relates to the assessment of projects and consideration by local authorities of where an EIA is required, such as the screening undertaken by the Mayors of the Communes local to the Project.
- **EU Batteries Regulation ((EU) 2023/1542).** This Regulation is directly applicable in Poland and doesn't require transposing into national law. The Regulation stipulates certain requirements (including those relating to classification, CE marking, carbon footprint, and due diligence obligations

relating to supply chain) that the batteries and project developer will need to adhere to.

- **EU European Critical Raw Materials Act ((Regulation (EU) 2024/1252).** As above, this Act directly applies within Poland. It outlines requirements relating to supply chain due diligence (as of May 2025), circular economy measures and reporting.
- **EU Corporate Sustainability Reporting Directive (Directive (EU) 2022/2464).** This Directive will require Greenvolt to report on sustainability under the European Sustainability Reporting Standards if it meets certain thresholds.
- **EU Habitats Directive (Directive 92/43/EEC) and EU Birds Directive (Directive 2009/147/EC).** This Directive has been transposed into Polish law and would potentially apply to the Project if it affected a Natura 2000 site or species listed in Annex IV of the Habitats Directive ot Annex I of the Birds Directive. Although no impacts have been identified at this stage, if either Project site is deemed likely to have a significant effect on a Natura 2000 site it will be required to undergo an appropriate assessment to ensure it does not adversely affect biodiversity.
- **ATEX Directive (Directive 2014/34/EU).** This Directive relates to health and safety requirements in relation to equipment operating in potentially explosive atmospheres. This will apply if the Project identifies any ATEX relevant zones at the site, in which case worker training requirements and equipment specification and conformity requirements would be triggered.

Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR)
The General Data Protection Regulation (GDPR) is a directly applicable EU regulation that sets out the legal framework for the protection of personal data of individuals within the European Union. It applies wherever stakeholder engagement activities involve the collection or processing of personal data. This includes information collected during consultations, surveys, grievance submissions, or other forms of communication with community members and stakeholders. The Regulation establishes key data protection principles, including lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, and integrity and confidentiality. Under the GDPR, individuals have specific rights in relation to their personal data, including the right to access, rectify, or erase their data, and to object to its processing. Where special categories of data (such as those relating to health, ethnicity, or social vulnerability) are collected, for example, through the grievance mechanism, Greenvolt ensures that such data is only processed with the data subject's explicit consent and handled with a high degree of confidentiality. The GDPR is binding across all EU Member States and is supplemented in Poland by the Act of 10 May 2018 on the Protection of Personal Data. Greenvolt's stakeholder engagement activities are aligned with these requirements and appropriate measures are taken to ensure compliance, including the implementation of privacy notices, secure data handling procedures, and restricted access to sensitive data.

International Standards

The international lenders involved with the Project require projects that they finance to meet the following international standards:

- Applicable local, national, regional, and international requirements, including those related with environmental and social impact assessments;
- European Bank for Reconstruction and Development ("EBRD") Performance Requirements as set out in EBRD's Environmental and Social Policy (2019);
- International Finance Corporate ("IFC") Performance Standards (PS) (2012) and its alignment with good international industry practice (GIIP) as per applicable World Bank Group General
- Environmental, Health and Safety (EHS) Guidelines, Guidelines for Electric Power Transmission and Distribution (2007) and all other applicable World Bank E&S Guidelines such as the IFC PS Guidance Notes and other E&S-related good practices notes and documents prepared by IFC (e.g., Contractor Management, Supply Chain);
- All ILO conventions signed and ratified by the country, all ILO conventions covering core labour standards and all ILO conventions covering the basic terms and conditions of employment;
- IFC Stakeholder Engagement Handbook (2007);
- IFC Good Practice Handbook, Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013);
- IFC Good Practice Note Managing Contractor's Environmental and Social Performance (2017);
- Relevant EU substantive environmental standards, including (but not limited to) the pertinent requirements of the EIA Directive (as updated in 2014), Industrial Emissions Directive, and Birds and Habitat Directives;
- Relevant international conventions and protocols relating to environmental and social issues, as transposed into national legislation; and

- Enhanced Supply Chain Due Diligence guidance, includPring EBRD Management Approach to solar and approach for BESS components, and Guidance for clients on solar supply chain risk assessment and management systems.

Permitting

Project design plans and applications have been submitted to the local Commune. As noted, an EIA is not required for the Project. On 6 April 2023 Mayor of Ełk municipality issued the Environmental Decision (ED) on building the energy storage with accompanying infrastructure. The status of all permits and decisions on the Project are summarised in Table 1 below.

Table 1: Status of Permits and Decisions

Permit / decision	Status – Ełk site
Zoning Decision(s)	Decisions obtained, with conditions
Environmental Decision	Decision obtained
Decision for geological work design and geological-engineering documentation	Not required
Land Exclusion Permit	Not required
Register of Monuments (Condition)	Required and included in Building Design
Water Permit	Pending
Tree Felling Permit	Not required
Noise Analysis	Pending, though low risk to receptors
Building Permit	Obtained
Unexploded Ordinance Assessment (UXO)	Initial assessments completed and concluded sapper supervision required as needed, for example during certain earthworks.

8. Stakeholder Engagement

Engagement undertaken to date

Stakeholder engagement to date has largely focused on consultation with local government, particularly with Mayors of the local commune, and local authorities in relation to planning and permitting. Prior to the issuing of the Environmental Decision, the following institutions were consulted: National District Sanitary Inspector, Director of the Water Supply Management Body of the state holding Wody Polskie, Regional Director of Environmental Protection. A public notice was displayed on the Elk Commune website.

Greenvolt has also engaged with landowners and near neighbours in relation to land access agreements. No EIA has been required which has meant there has been no formal requirement for public consultation.

Ongoing engagement and communication

A Stakeholder Engagement Plan (SEP) has been developed to guide ongoing consultation and communication with key stakeholders including affected communities, landowners and neighbours, local businesses and authorities. The SEP identifies relevant stakeholders, their potential interests in the Project, and the avenues and approaches for engaging them throughout the Project lifecycle. The SEP describes methods and timeframes to inform and engage stakeholders in an inclusive and timely manner about Project activities, including any potential impacts. It considers potential vulnerable and harder to reach groups and appropriate considerations to ensure that engagement approaches are accessible and inclusive. It is noted that this Project along with Greenvolt's Turośń development are the first

BESS projects within Poland, and Greenvolt acknowledges the importance and opportunity to support the development of community understanding in relation to the technology and its project activities.

As outlined within the SEP, Greenvolt will allocate resourcing and commence implementation of a proactive engagement programme to share Project information, consult with local communities to understand their views and any concerns, communicate the stakeholder grievance mechanism and ensure ongoing and timely management of Project impacts.

Grievance Management

The SEP includes a description of a grievance mechanism that will be implemented to ensure that stakeholders and communities can easily (and anonymously if preferred) submit grievances via a range of different methods, and that these will be addressed in an appropriate and timely manner.

Special care will be focused on the training of the designated staff involved in the management of the grievance mechanism. A separate internal worker grievance mechanism is to be available for all Project workers, including those engaged by contractors and subcontractors.

The grievance mechanism allows for the submission of anonymous and sensitive complaints (such as those related to gender-based violence and harassment). Any complaints, comments or concerns can be brought to the attention of the company verbally (phone or in-person), or in writing (by post or e-mail), or by filling in a grievance form for submission in physical boxes. Grievances forms and boxes for submission will be located at the Project site and appropriate and accessible locations within the community, such as at Commune office.

All grievances will be categorised and recorded in a confidential grievance log. Each grievance will be recorded in the register with the following information:

- Description of grievance;
- Date of receipt / acknowledgement returned to the complainant;
- Description of actions taken (investigation, corrective measures); and
- Date of resolution and closure / provision of feedback to the complainant.

Receipt of grievances will be acknowledged within three working days from their submission and responses will be provided no later than within 30 working days. At all times, complainants are also able to seek legal remedies in accordance with local laws and regulations.

9. Summary of Environmental and Social Impacts and Mitigation Measures

In general, the Project is expected to have moderate environmental, health and safety and social impacts, which will be reduced through management controls to be applied during construction and operation. The key environmental, health and safety and social risks and impacts associated with the development and operation of the Project, as well as the related mitigation measures to manage these impacts, are summarised in Table 9-1 below.

Table 9-1 – Summary of E&S Risks, Impacts and Mitigation Measures

Topic	Risk / Impact	Mitigation / Management Measure
Waste	Environmental impacts including those relating to waste were assessed by the Commune Office and it was concluded that these will not exceed permissable environmental standards during construction or operation and will be contained within the land legally held by Greenvolt. At a corporate level, waste management is included in Greenvolt's Sustainability Policy. No site-specific waste management plans have been developed for the Project at this stage. A decommissioning plan is also not yet in place. No or very low levels of hazardous waste streams will be produced directly during operation, and it is considered that minimal use of chemicals or other hazardous substances will be used by operational employees. Waste will be appropriately managed, particularly at the end of life. Notably this includes substances and materials such as battery cells, refrigerants, electronic waste and oils.	Provisions for construction and operational waste management be included within the C-ESMP and cascaded to the contractor to develop a site-specific waste management plan. A Decommissioning Plan will be developed which sets out the basic commitments for safe decommissioning of the site including site restoration in compliance with local legislation, permit conditions and international best practice.
Water	It is not expected that the Project will impact water local supply. Management and monitoring of discharge and surface water run-off to avoid contamination of groundwater and surrounding bodies of water or land. The Project will comply with site-specific Water Permit requirements.	A Project Construction Environmental and Social Management Plan (C-ESMP) will be implemented by the construction contractors, which will include systems for managing and monitoring discharges and surface water run-off to prevent contamination of groundwater and adjacent land or water bodies. Conditions associated with the water permits (to be acquired) will be adhered to.

Community Health, Safety and Security **(Air Quality, Dust, Noise and Vibration)**	Air quality impacts are anticipated to be low during construction and negligible during operation. During the construction phase, elevated noise levels and vibration is expected but these will be temporary. Greenvolt has conducted noise modelling analysis for the operational phase which concludes the need for noise attenuation barriers (approximately 4m high). Transport routes are not yet known, however there is a risk of traffic disruption to local roads around the site and an increase in noise and air emissions. Worker accommodation is likely to be required; however, detailed plans are not yet in place in regard to the final confirmed accommodation options. The risk of additional community exposure to disease related to worker influx is considered low but will be evaluated as part of the C-ESMP and worker accommodation management plan. Security at the site is managed by an external specialist agency. 24/7 CCTV is positioned at the site and site offices, monitored remotely. The construction area is fenced and earthed fencing along with warning signs will be in place once operational.	Community health and safety risks and the management of these will be considered within the contractor's C-ESMP. This includes management of noise, dust, vibration, air quality and plans to manage community health and safety impacts related to traffic and workforce. A Traffic Management Plan will also be developed as part of the contractor's C-ESMP, including guidance for sub-contractors responsible for transportation of the battery units and other materials to site. Local residents and stakeholders will be engaged and notified of project impacts in a timely and accessible manner. A worker accommodation management plan will be developed, aligned with national regulations and the IFC / EBRD Worker Accommodation: Processes and Standards guidance note. Greenvolt's Code of Ethics and Conduct and Supplier Code of Conduct will be cascaded to contractors and sub-contractors. A Community Liaison Officer (CLO) is to be assigned to serve as a point of contact for stakeholders and the community. A project community grievance mechanism has been developed as part of the SEP to ensure that issues can be raised and addressed in an effective and timely manner. The management of gender-based violence and harassment (GBVH) risks and impacts will be considered within Project management plans including the Labour Management Plan and Worker Accommodation Management Plan.
Biodiversity	No biodiversity related studies or assessments have been completed	No further actions required.

	for the site. However, the site is considered to have limited ecological diversity due to previous history of agricultural use. Further, the site is not located within or in close proximity to any protected sites, and as such ecological connectivity to any protected areas is considered low.	
Landscape and visual	The noise barriers present the potential for landscape and visual impacts. Few residences are located within direct proximity to the site, however visual impacts need to be considered and affected stakeholders consulted.	Consultation will be undertaken with local communities as appropriate to collaboratively assess options for minimising landscape and visual impacts.
Occupational Health and Safety (OHS)	Greenvolt has developed a Health and Safety Plan (2025) which includes all the scheduled health and safety related trainings, drills, and audits for the year. This includes first aid training, occupational risk assessment reviews, emergency drills across different sites, audits, and updates to safety instructions. Greenvolt and its contractor have experienced OHS personnel as well as supervisory engineering consultants engaged at the site to support and provide oversight including in relation to OHS.	Ongoing management, monitoring and reporting on OHS as per Greenvolt's policies and contractor management plans. The minimum distance between BESS units will be maintained to manage fire and blast risks. Additional risk assessments will be undertaken to consider aspects such as lone working and working in confined spaces. A sapper (engineer focus on possible unexploded ordinance risks) is to be engaged on the Project as needed, for example where excavation may reach beyond 1.5m.
Labour and Working Conditions	Greenvolt has in place group level human resources (HR) policies that will be cascaded to the Project. Polish national legislation provides robust protections in relation to labour and working conditions. The majority of the Project workforce will be engaged directly by the contractor. Current workforce estimates show a peak workforce of 85 on the site (during BESS deliveries). A Labour Management Plan will be	A Greenvolt HR Policy will include measures relating to labour and working conditions, in line with national legislation and international standards. Requirements outlined in these policies are cascaded to suppliers through the Supplier Code of Conduct and Greenvolt's requirements that all suppliers adhere to Polish national law. The contractor C-ESMP will include Human Resources measures for

	developed by the contractor, aligned with Greenvolt requirements and reflecting national law and international standards.	managing labour and working conditions at the Project level.
Land Acquisition and Resettlement	Long-term land lease agreements are in place with the affected landowners, all of whom are willing to lease the land to Greenvolt. All of the land lease agreements for the BESS land plots were agreed under willing free market voluntary conditions. All of the landowners had the right to refuse, and no compulsory land acquisition powers have been sought or granted in relation to the projects.	Ongoing consultation will continue with landowners. A Project community grievance mechanism has been developed as part of the SEP that will be shared with the affected landowners so that they can easily raise any concerns.
Cultural Heritage	Both Project site falls outside of Poland's Archaeological Protection Areas, meaning that further assessment is not required unless a chance find were to occur.	A Project Chance Find Procedure will be developed outlining steps to be taken should an archaeological find occur.
Supply Chain	Greenvolt has a comprehensive supply chain management process in place inclusive of a standalone Supplier Code of Conduct and Sustainable Procurement Policy. A robust risk management process is in place, following a systematic approach for all suppliers from selection to risk screening and tender award. Greenvolt acknowledges the need for prudent supply chain management and is implementing processes for evaluating and managing both its tier 1, tier 2 and downstream supply chain in line with good international industry practice.	To manage supply chain risks and in line with best practice, Greenvolt will evaluate its supply chain in relation to labour, safety and product quality. Ongoing supply chain management will be undertaken in accordance with Greenvolt's policies and procedures.

10. Monitoring and Reporting

Environmental and social monitoring will be implemented both during construction and operation of the Project. Greenvolt requires its construction contractors to monitor relevant environmental, health, safety and social (EHSS) issues related to their

operations. Greenvolt has engaged independent supervising engineer firm, Tensec, to have oversight at the Ełk BESS project during construction. Tensec has representatives on site and also undertakes safety inspections as part of its broader role providing ovesight in relation to technical as well as environmental, health and safety and social performance. Greenvolt will prepare an Annual Environmental and Social Report (AESR) for Project Lenders to present the status of the ESAP implementation, company EHSS performance and performance across the Project.

11. Project Contact Details

For any enquiries, seek further information or any clarifications, please use the contact information below:

Natalia Radtke, Community Liaison Officer, Ełk BESS Project, Greenvolt Power
Address:
aleja Wyścigowa 6, 02-681 Warszawa
Phone: +48 784 018 700
Email: natalia.radtke@greenvolt.com

Adrian Góralski, Project Manager, Ełk BESS Project, Greenvolt Power
Address:
aleja Wyścigowa 6, 02-681 Warszawa

Phone: +48 532 432 911
Email: adrian.goralski@greenvolt.com

Piotr Skura, EHS Manager, Ełk BESS Project, Greenvolt Power
Address:
aleja Wyścigowa 6, 02-681 Warszawa

Phone: +48 532 660 797
Email: piotr.skura@greenvolt.com