

# Non-Technical Summary

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## **Turośń Kościelna (TUROŚŃ) Battery Energy Storage System (BESS) Project, Greenvolt Power, Poland**

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## Acronyms and Abbreviations

<b>Acronym</b>	<b>Description</b>
<b>BESS</b>	Battery Energy Storage System
<b>CESMP</b>	Construction Environment Social Management Plan
<b>CLOs</b>	Community Liaison Officer
<b>EBRD</b>	European Bank of Reconstruction and Development
<b>EHSS</b>	Environment, Health, Safety and Social
<b>EIA</b>	Environmental Impact Assessment
<b>E&amp;S</b>	Environment and Social
<b>ESAP</b>	Environmental, Social Action Plan
<b>EU</b>	European Union
<b>GBVH</b>	Gender-Based Violence and Harassment
<b>GIIP</b>	Good International Industry Practice
<b>GM</b>	Grievance Mechanism
<b>GRM</b>	Grievance Redress Mechanism
<b>HR</b>	Human Resources
<b>H&amp;S</b>	Health & Safety
<b>IFC</b>	International Finance Corporation
<b>NECP</b>	National Energy and Climate Plan
<b>NGO</b>	Non-Governmental Organisation
<b>NTS</b>	Non-Technical Summary
<b>PAP</b>	Project Affected Person
<b>PRs</b>	Performance Requirements
<b>PSs</b>	Performance Standards
<b>PSE</b>	Polskie Sieci Elektroenergetyczne S.A.
<b>SEP</b>	Stakeholder Engagement Plan
<b>SPV</b>	Special Purpose Vehicle
<b>TMP</b>	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 Turośń Kościelna (Turośń) site, situated near Białystok. The other site is situated at Nowa Wieś Elcka (Elk site). A separate NTS has been prepared on the Elk 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)<sup>1</sup> and IFC’s Environmental and Social Review Manual and the Interpretation Note on Environmental and Social Categorization<sup>2</sup>, 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 grid. Energy is collected from the grid, stored, and then redistributed into the grid when required.

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

<sup>2</sup> <https://www.ifc.org/en/insights-reports/2012/publications-policy-interpretationnote-categorization>

### 3. Project Description

The Turośń Kościelna site (“Turośń”) is situated in Białystok, in northeastern Poland. This site has a 200 MW capacity, 220kV voltage and a storage capacity of 800 MWh. The total development area is 6,955m<sup>2</sup>, with an additional northern plot that totals 1,980m<sup>2</sup>.

The project site is owned by a Special Purpose Vehicles (SPV), Magazyn EE Turośń Kościelna 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 Białystok, northeastern Poland. It is one of two sites being developed by Greenvolt, with the other located at Nowa Wieś Etcka (Etka site).

The site is located adjacent to the village of Turośń Kościelna in Białystok County, approximately 9km southwest of Białystok in northeastern Poland. The nearest major settlements to the site and their approximate populations are:

- Turośń Kościelna (approximately 7,000 residents as of 2023, within 1 km of Project site). The village has one school. Reportedly, most residents commute and work in Białystok.
- Białystok (approximately residents as of 298,900 as of 2025<sup>3</sup>, within approximately 13 km of the Project site). Białystok is the tenth largest city in Poland and the largest city in northeastern Poland and the capital of the Podlaskie Voivodeship. The University of Białystok is the largest university in north-eastern Poland.

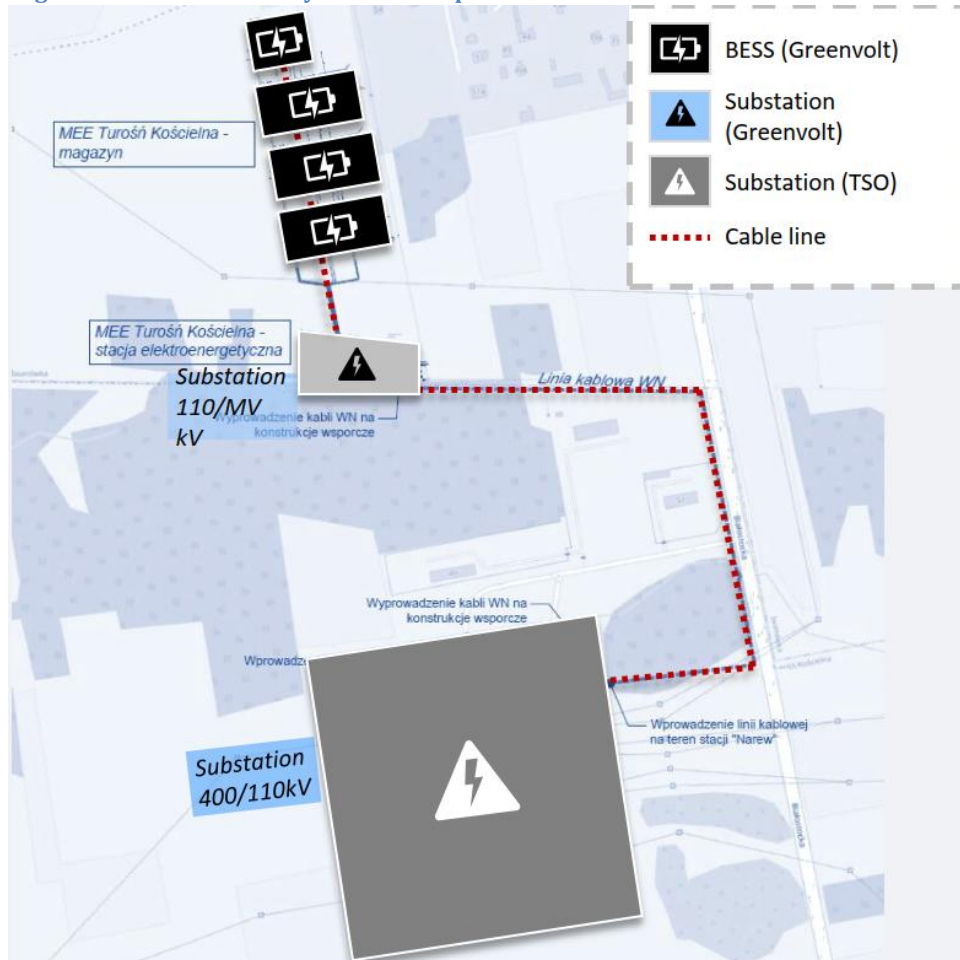
Figure 3-1 below shows the site locations for both Turośń and Etka sites within northeastern Poland.

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<sup>3</sup> <https://worldpopulationreview.com/cities/poland/bialystok>



Figure 3-2 - Turośń Site Layout and Components



Source: Greenvolt Power

The land was previously used for agriculture. The nearest residential buildings are to the north and northeast of the BESS site, nearby at approximately 25m away from the final row of BESS units. Additionally, approximately 780m west of the site is a recreational shooting range, and 350m southwest is a recreational motocross facility. Further, a car scrapyard is located 280m west of the site.

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



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 site set up / sub station commencement: March - July 2025
- BESS delivery and assembly: Q4 2025 – Q1 2026
- Civil Works Completion: December 2025
- Energy management system completion: Q4 2025 - Q1 2026
- Use Permit: December 2025 - February 2026
- Final completion and commissioning : March – April 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<sup>4</sup>. The programme aims to add at least 5.4 GWh of new storage capacity nationally. The Polish energy storage market is subsequently accelerating.

## 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 land plots at the Turośń site are of lower agricultural value. 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

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<sup>4</sup> Strategic Energy Europe: <https://strategicenergy.eu/storage-poland-subsidise-65-projects-2-mw/>

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 or 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, including 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 Turośni Kościelna Commune. As noted, an EIA is not required for the Project. On 24 March 2023 Mayor of Turośń Kościelna 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 **Error! Reference source not found.** below.

**Table 1: Status of Permits and Decisions**

Permit / decision	Status
Zoning Decision(s)	Decision obtained.
Environmental Decision	Decision obtained
Decision for geological work design and geological-engineering documentation	Not required
Land Exclusion Permit	Not required
Register of Monuments (Condition)	N/A
Water Permit	Pending
Tree Felling Permit	Obtained
Noise Analysis	Ongoing
Building Permit	Obtained

<b>Unexploded Ordinance Assessment (UXO)</b>	Initial assessments completed and concluded sapper supervision may be required at times, for example during earthworks.
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## 8. Stakeholder Engagement

### Engagement undertaken to date

Stakeholder engagement to date has largely focused on consultation with local government, particularly with Mayor of the Turośni Kościelna Commune, and local authorities in relation to planning and permitting. As part of the Environmental Decision process, a public notice was displayed on the Commune's website and on the notice boards in the villages of Iwanówka and Turośń Kościelna. 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.

Additionally, some social investment activities have been undertaken with schools in proximity to the Turośń site. Local schools participated in a community investment initiative organised and sponsored by Greenvolt. As part of the 'Energy of Dreams' competition, participants submitted videos on their activities that related to ecology or renewable energy, with the winners awarded financial rewards to 'pursue their dreams'. Schools from the Turośń Kościelna municipality that participated in the contest included Stanisław Staszic Elementary School in Turośni Kościelna, Leonard Prystrom Elementary School in Tolcze and Maria Konopnicka Elementary School in Turośni Dolna. Twelve children won prizes of at least 1000 euro each.

### 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 the Turośń Project (as well as Greenvolt's BESS development at Elk) 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 the 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 BESS 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
Traffic and transport	There is a risk of traffic disruption to local roads around the site and an increase in noise and air emissions, in particular during the period when large amounts of	A Traffic Management Plan will be developed as part of the contractor's construction environment and social management plan (C-ESMP), with requirements to be cascaded to sub-contractors responsible for

	<p>equipment will need to be delivered to the site.</p> <p>Traffic impacts will be temporary and largely limited to the construction phase of the Project, mainly related to transportation of goods and materials to the site, including the BESS units.</p>	<p>transporting goods and personnel. Community health and safety risks related to increased traffic in and around small nearby settlements will be considered and managed, in particular when construction / deliveries traffic increases. Local residents and stakeholders will be consulted in relation to access or community health and safety impacts. This will include those who are likely to use the shared access road at the site.</p>
Waste	<p>Environmental impacts including those relating to waste were assessed by the Commune Office and it was concluded that these will not exceed permissible environmental standards during construction or operation and will be contained within the land legally held by Greenvolt.</p> <p>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.</p> <p>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.</p>	<p>Provisions for construction and operational waste management will be included within the C-ESMP and cascaded to the contractor to develop a site-specific waste management plan.</p> <p>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.</p>
Water	<p>It is not expected that the Project will impact water local supply. Management and monitoring of discharge and surface water run-</p>	<p>A Project Construction Environmental and Social Management Plan (C-ESMP) will be implemented by the construction</p>

	<p>off to avoid contamination of groundwater and surrounding bodies of water or land. Site-specific Water Permit requirements will be adhered to.</p>	<p>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.</p> <p>Conditions associated with the water permits (to be acquired) will be adhered to.</p>
Soil	<p>The construction activities associated with the Project may result in the loss, erosion or (in case of any incidents etc.) contamination of localised soils. During operation, a potential point source of soil contamination could be the leakage of transformer oil. However, this risk is considered to be very low, as the transformers will be sealed within a concrete wall 'tanking', and the substations will have concrete basins.</p>	<p>Procedures to manage run-off and contamination will be included in the Construction Environmental and Social Management Plan (C-ESMP) as well as the Decommissioning Plan. This will include measures to reduce the risk of contamination or soil erosion as well as any required soil remediation during decommissioning.</p>
<p>Community Health, Safety and Security</p> <p>(Air Quality, Dust, Noise and Vibration)</p>	<p>Air quality impacts are anticipated to be low during construction and negligible during operation.</p> <p>During the construction phase elevated noise levels and vibration is expected, but these will be temporary.</p> <p>Greenvolt has conducted noise modelling analysis for the operational phase which concludes the need for noise attenuation barriers (approximately 8m in height). Further assessment work is planned to be undertaken in relation to noise, to ensure a precautionary principle is adopted and noise disturbance risks are managed and minimised.</p> <p>Transport routes are not yet known, however there is a risk of traffic disruption to local roads</p>	<p>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.</p> <p>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.</p> <p>Local residents and stakeholders will be engaged and notified of project impacts in a timely and accessible manner.</p> <p>A worker accommodation management plan will be developed, aligned with national regulations and the IFC / EBRD</p>

	<p>around the site and an increase in noise and air emissions.</p> <p>Worker accommodation is likely to be required; however, plans are not yet finalised in relation to the options for accommodation for workers. The risk of elevated 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.</p> <p>Security at the site is managed by an external specialist agency. 24/7 CCTV is positioned at the construction site and site offices, monitored remotely. The construction area is fenced and earthed fencing along with warning signs will be in place once operational.</p>	<p>Worker Accommodation: Processes and Standards guidance note<sup>5</sup>.</p> <p>Greenvolt's Code of Ethics and Conduct and Supplier Code of Conduct will be cascaded to contractors and sub-contractors.</p> <p>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.</p> <p>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.</p>
Biodiversity	<p>No biodiversity related studies or assessments have been completed 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 in close proximity to any protected sites, and as such ecological connectivity to any protected areas is considered low.</p>	<p>No further actions required.</p>
Landscape and visual	<p>The noise barriers present the potential for landscape and visual impacts. Notably, a number of residences are located in close proximity, approximately 25m from the site.</p>	<p>Consultation will be undertaken with local communities to collaboratively assess options for minimising landscape and visual impacts. Where residents can influence decision making in relation to the design of the noise barriers, or landscaping options to minimise the impact, they will be empowered to do so through. Consideration will be given to potential impacts on</p>

<sup>5</sup> <https://www.ifc.org/en/insights-reports/2000/publications-gpn-workersaccommodation>

		domestic solar PV systems at the residence/s located in proximity to the proposed noise barrier.
Occupational Health and Safety (OHS)	<p>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.</p> <p>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.</p>	<p>Ongoing management, monitoring and reporting on OHS as per Greenvolt's policies and contractor management plans.</p> <p>The minimum distance between BESS units will be maintained to manage fire and blast risks.</p> <p>Additional risk assessments will be undertaken to consider aspects such as lone working and working in confined spaces.</p> <p>A 'sapper' (engineer focused on unexploded ordinance risks) is to be engaged on the Project as needed, for example; where excavation may reach beyond 1.5m.</p>
Labour and Working Conditions	<p>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.</p> <p>The majority of the Project workforce will be engaged directly by the contractor. Current workforce estimates show a peak workforce of 96 on the site. A Labour Management Plan will be developed by the contractor, aligned with Greenvolt requirements and reflecting national law and international standards.</p>	<p>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.</p> <p>The contractor C-ESMP will include Human Resources measures for managing labour and working conditions at the Project level.</p>
Land Acquisition and Resettlement	<p>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</p>	<p>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.</p>

	right to refuse, and no compulsory land acquisition powers have been sought or granted in relation to the projects.	
Cultural Heritage	The 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	<p>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.</p> <p>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.</p>	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, Intertek, to have oversight at the Turośń site. Intertek has representatives on site and also undertakes safety inspections as part of its broader role, providing oversight 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:

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