Project Omega - PV Plants Portfolio
Non-Technical Summary

Prepared in cooperation with:

Multiconsult
POLSKA

November 2025

1 Introduction

Optima Wind sp. z o.o. is the project company developing a portfolio of three photovoltaic plants ranging from 194 to 290 MWp (719 MW in total). Optima Wind is the sole owner of Green Bear Corporation Sp. z o.o. – wind and PV plants developer operating on Polish market since 2007. Optima holds project rights to gross portfolio of approx. 3.1 GW of planned RES projects in Poland. It is financed mainly by Virya Energy and on some projects it entered into a joint venture with Eiffel Transition Infrastructure S.L.P. The Project will be co-financed by European Bank for Reconstruction and Development (EBRD) as co-lender.

The Project has been classified as "Category B" (in line with EBRD's Environmental and Social Policy, 2024) as the farms are below 400MW and are located in low sensitivity areas. Moreover, the Project was subject to review by the independent company (Multiconsult Polska Sp. z o.o) who assessed the Project against the national and EU environmental law and EBRD Environmental and Social Requirements. Results of the assessment show general compliance with applicable requirements and actions needed to achieve full compliance with the good industry practice and EBRD Environmental and Social Requirements have been summarized in the Environmental and Social Action Plan (ESAP) and Stakeholder Engagement Plan (SEP).

EBRD requires, that the projects are subject to meaningful public consultations and that stakeholders engagement process is properly conducted. In order to meet this requirement a set of documents which comprise:

- Environmental and Social Action Plan;
- Stakeholders Engagement Plan, and
- this Non-technical Summary,

has been prepared in English as the Project Disclosure Package.

The environmental and social impacts associated with the Project had been identified and addressed, they can be easily limited through standard mitigation measures.

2 Project Background

In line with the European Climate Change Program, many European countries, including Poland, have adopted national programs aimed at reduction of greenhouse gases emissions. These cover various policies, adopted at the European level as well as national levels, includes among others:

- Planned increase in use of renewable energy (wind, solar, biomass)
- Improvements in energy efficiency in e.g. buildings, industry, household appliances.

The main regulations of EU countries to reduce emissions is the cost-effectively Emission Trading Scheme of carbon dioxide and legislation tackling with emissions of fluorinated greenhouse gases.

In March 2007, the EU approved an ambitious climate change and energy plan to limit CO2 emissions by at least 50 % by 2040 (comparing to 1990 levels) and achieve, by 2020 a target of 20 % of total EU primary energy use through renewable energy and 32% in 2030.

Poland, has adopted its energy policy until 2040 'Polityka energetyczna Polski do 2040 roku'. Based on this document Poland plans to achieve the renewable energy in total energy consumption of at least 15% by 2020 with its further growth in the following years. According to the Policy, Poland declared achievement of 27 % renewable energy use in total energy consumption by 2030. In 2022 an update of the PEP was announced.

The development of solar energy is one of the measures to achieve the limitations of air emissions and increase of energy production from renewable sources. The main benefit is that solar plants convert the Sun energy to electricity, while generating no emissions to the air. Conventional energy sources used in Poland are mainly based on various types of coal combustion and are associated with emissions of greenhouse gases, SO2, dust and others.

The farms have all the necessary building permits, and in terms of transmission lines (connecting these farms to high-voltage grid), the permitting process is also advanced. All necessary permits are in place, including construction permit containing all requirements specified in preceding environmental consent decisions (issued by the competent authorities).

Environmental procedure and legal context of PV farm construction

The Environmental Impact Assessment Directive is implemented into Polish legislation by EIA Act of Oct 3, 2008 on access to environmental information, public participation in environmental protection and environmental impact assessments. The Act follows the ongoing changes in the EU EIA Directive and implements EU and Polish environmental policies, thereby it is frequently amended.

Scope and contents of the environmental documentation as determined by the EIA Directive is dully followed by Polish EIA Act.

In line with Polish regulations, the photovoltaic plants are investments, which could potentially impact the environment (mainly due to the area changed into "industrial" use). In such a case authorities may request that the full EIA procedure is followed. In these cases the assessment is optional, and when it is decided by the authorities that there is no need for an EIA, the procedure include simplified public participation process (limited comparing to the procedure in the case of full EIA). Nevertheless, according to Article 85 (3) of the EIA Act, the information about the decision being considered and then ready to be issued should be made public (notices on boards, Public bulletins pages).

With respect to Natura 2000 areas and other forms of nature conservation, it should be emphasised that before issuing an environmental decision, it is obligatory to request an opinion from the Regional Environmental Authorities (RDOŚ) as the authority competent in nature protection and the Natura 2000 areas in Poland. The RDOŚ analyses the

application and the KIP (pol. Karta Informacyjna Przedsięwzięcia; Eng. Project Information Sheet) and, based on own knowledge/database, issues an opinion and determines the conditions for the implementation of the investment.

For each development a Project Information Sheet was prepared and issued to the local authorities for their assessment of the need for Environmental Impact Assessment Reports. Each PIS contained description of the location, setting and possible impacts of the project.

The procedures included review by statutory bodies and public announcement of the intention to issue the decision. According to Polish EIA Act the statutory institutions involved in the procedure (providing opinion, requesting further data) included Regional Director of Environmental Protection (RDOS) and regional Sanitary and Epidemiology Station. In some cases also Water Management Authority (Wody Polskie) was consulted regarding melioration issues.

This procedure is regarded as equivalent to Appropriate Assessment, carried out under Polish regulations, compatible with EU environmental legislation. The results of wildlife survey and impact assessment was consulted publicly during the EIA procedure, but also specialised opinion was provided by Regional Directorate for Environmental Protection.

The Projects have all the necessary decisions on environmental conditions allowing their implementation. There are specific environmental protection requirements contained in the Regional Director for Environmental Protection opinions included in the environmental decisions.

All the projects have already obtained construction permits.

Subcontractors

Polish requirements regarding child and forced labour, health and safety and other requirements related to the conduct and ethics of suppliers, advisors and other partners are included in the agreements signed with subcontractors.

Each contract signed with subcontractors includes relevant clauses on environmental and social aspects of cooperation.

Failure to comply with the requirements might result in termination of business relations with partners (suppliers) who violate Polish regulations.

The final supplier of photovoltaic panels has not been chosen yet. The selection of the photovoltaic panel supplier will be carried out in accordance with EBRD guidelines after conducting appropriate supply chain due diligence, including gathering information from bidders or selected suppliers, risk screening of components (bill of materials).

3 Project Management

To manage the Project effectively, Optima Wind will introduce a multi-level management system covering environmental, health and safety and social issues. The system will be structured as below

Corporate-Level E&S Governance

1. Defined E&S Responsibilities and Reporting Lines:

Clearly assigned roles and responsibilities across departments, with direct reporting channels to senior management and Board-level oversight of E&S matters.

2. Standardized E&S Risk Management Procedures:

Systematic processes for identifying, assessing, and mitigating E&S risks across all operations, including environmental protection, occupational health and safety (H&S), labour, stakeholder engagement, and community impacts.

3. Compliance and Permit Management:

A structured system for tracking all environmental, construction, and operational permits.

Each project will ensure that all permit conditions and legal obligations are fully met through dedicated compliance registers, monitoring schedules, and reporting to competent authorities as required.

4. Internal Review and Reporting:

Periodic internal reviews and consolidated E&S performance reporting to senior management, including corrective actions and progress against key performance indicators (KPIs).

5. Integration into Procurement and Contracting:

E&S and H&S standards will be integrated into procurement policies and contractor selection criteria, ensuring that suppliers and contractors operate in line with corporate standards and applicable regulations.

Project-Level E&S Management

Each project will be implemented under a dedicated Environmental and Social Management Plan (ESMP) aligned with corporate E&S standards and relevant national and international requirements. The ESMP will:

1. Define site-specific mitigation and monitoring measures covering air, water, soil, waste, noise, biodiversity, and community health and safety.

2. Set clear performance indicators, responsibilities, and reporting mechanisms for E&S and H&S implementation.

3. Include a Permit Compliance Plan to ensure all permit requirements—such as environmental limits, construction timing restrictions, and reporting obligations—are monitored and fulfilled.

4. Establish Biodiversity Management Measures to protect habitats, species, and ecological corridors, including avoidance of sensitive areas, seasonal restrictions on works, habitat restoration.

5. Provide Traffic and Transport Management Plans to minimize local disturbance, ensure road safety, and coordinate with local authorities and communities.

6. Address Underground Power Line Routing and Installation by minimizing environmental impact and monitoring environmental permits conditions.

7. Ensure that contractors and subcontractors adhere to the same E&S and H&S standards through binding contractual clauses, induction training, and continuous on-site supervision.

Supervision, Monitoring, and Compliance

To ensure effective implementation and supervision:

1. Dedicated on-site E&S and H&S experts will be appointed for daily monitoring, compliance verification, and coordination with the corporate E&S team.

2. Regular site inspections and internal audits will verify compliance with ESMP measures, permit conditions, and lender standards.

3. Biodiversity and environmental specialists will oversee sensitive works, habitat management, and ecological monitoring.

4. Traffic, noise, and community safety performance will be continuously monitored, with results integrated into monthly progress reports.

5. Non-conformities will be identified early and addressed through corrective and preventive actions.

6. Periodic consolidated E&S performance reports will be submitted to senior management and, where applicable, to lenders and regulatory authorities.

4 What is a photovoltaic plant?

A large scale photovoltaic plant – 100 MWp (source Goldbeck Solar)

A photovoltaic plant, also called solar farm is an installation of photovoltaic panels (PV panels) commonly known as solar panels. Solar farms generate power using devices that absorb energy from sunlight and convert it into electrical energy through semiconducting materials.

A single PV device is known as a cell. An individual PV cell is usually small, typically producing about 1 or 2 watts of power. These cells are made of different semiconductor materials. In order to withstand the outdoors for many years, cells are sandwiched between protective materials in a combination of glass and/or plastics.

To boost the power output of PV cells, they are connected together in chains to form larger units known as modules or panels. Modules can be used individually, or several can be connected to form arrays. One or more arrays is then connected to the electrical grid as part of a complete PV system. Because of this modular structure, PV systems can be built to meet almost any electric power need, small or large.

PV modules and arrays are just one part of a PV system. Systems also include mounting structures that point panels toward the sun, along with the components that take the direct-current (DC) electricity produced by modules and convert it to the alternating-current (AC) electricity. AC is then transformed to high voltage (110 kV). Laski Koszalinskie transformer station will change the voltage to 400 kV and fed into the grid (Dunowo network station).

5 Where the Project is located?

In the first stage, Optima plans to develop three photovoltaic farms (so called SKD Cluster):

1. Sidłowo – 290 MWp
2. Kikowo – 235 MWp
3. Dobrowo – 197 MWp

There are also other photovoltaic and wind projects considered by Optima Wind in the area of SKD Project, but they are at the early stage of development, thus these were screened only for potential environmental or social issues, as the locations and final configuration has to be confirmed. These will be assessed in line with EBRD guidelines in due course following implementation of Environmental and Social Management System.

The Project includes three groups of farms in northern Poland in the area of Sidłowo, Dobrowo and Kikowo, in the West Pomeranian Voivodeship, all of them found in rural areas.

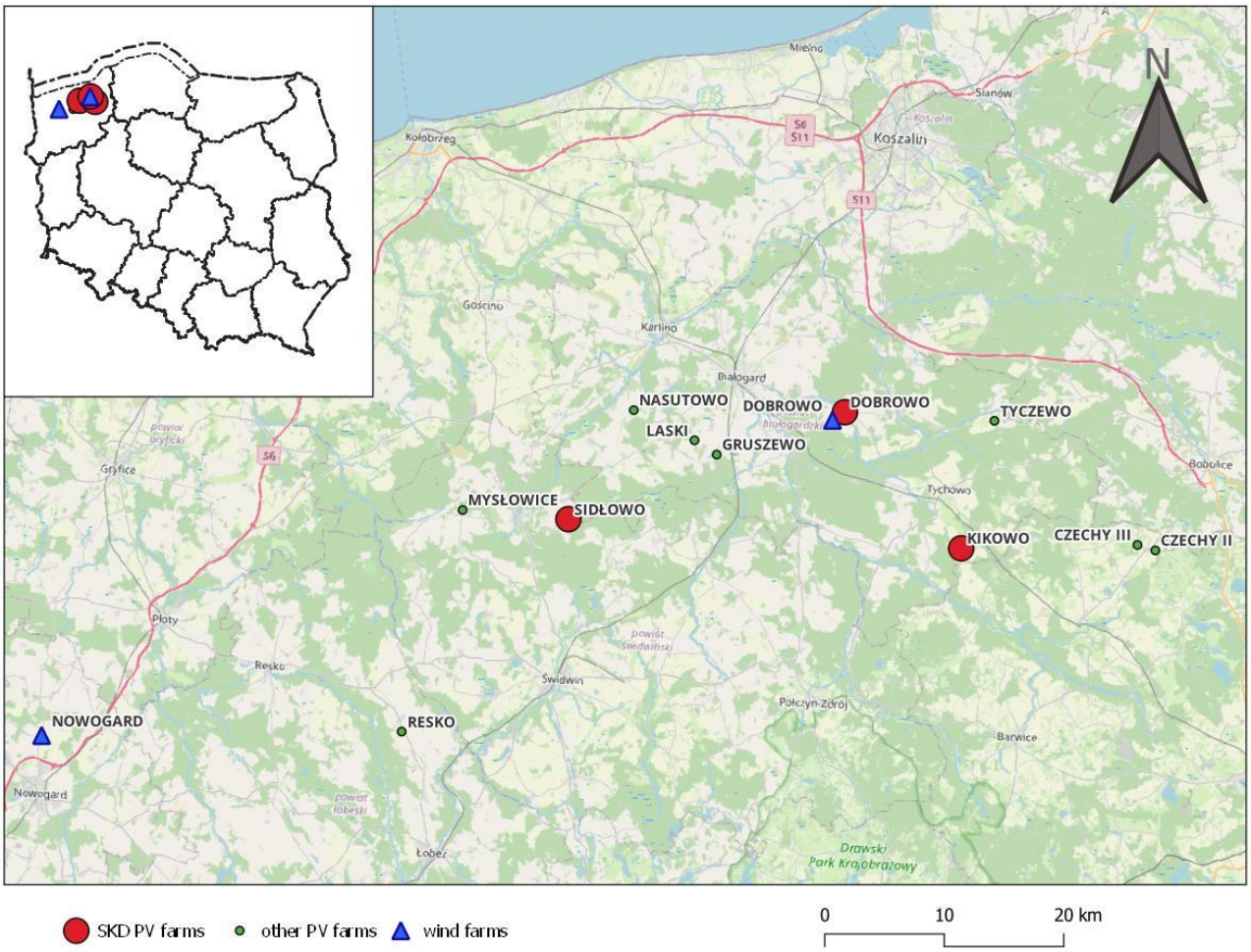


Figure 1. Location of SKD cluster and other Optima projects

The locations were selected keeping in mind the site setting (landscape, sloping, neighbourhood, green cover, surface water, etc.) and access to public road. Areas with low-quality arable soil were selected. Organic soils were excluded from farms construction. In this part of Poland, general topography is characterised by glacial lands, which exclude any valuable agricultural crops. The sites are located away from woodlands or high vegetation to avoid shadowing the photovoltaic panels.

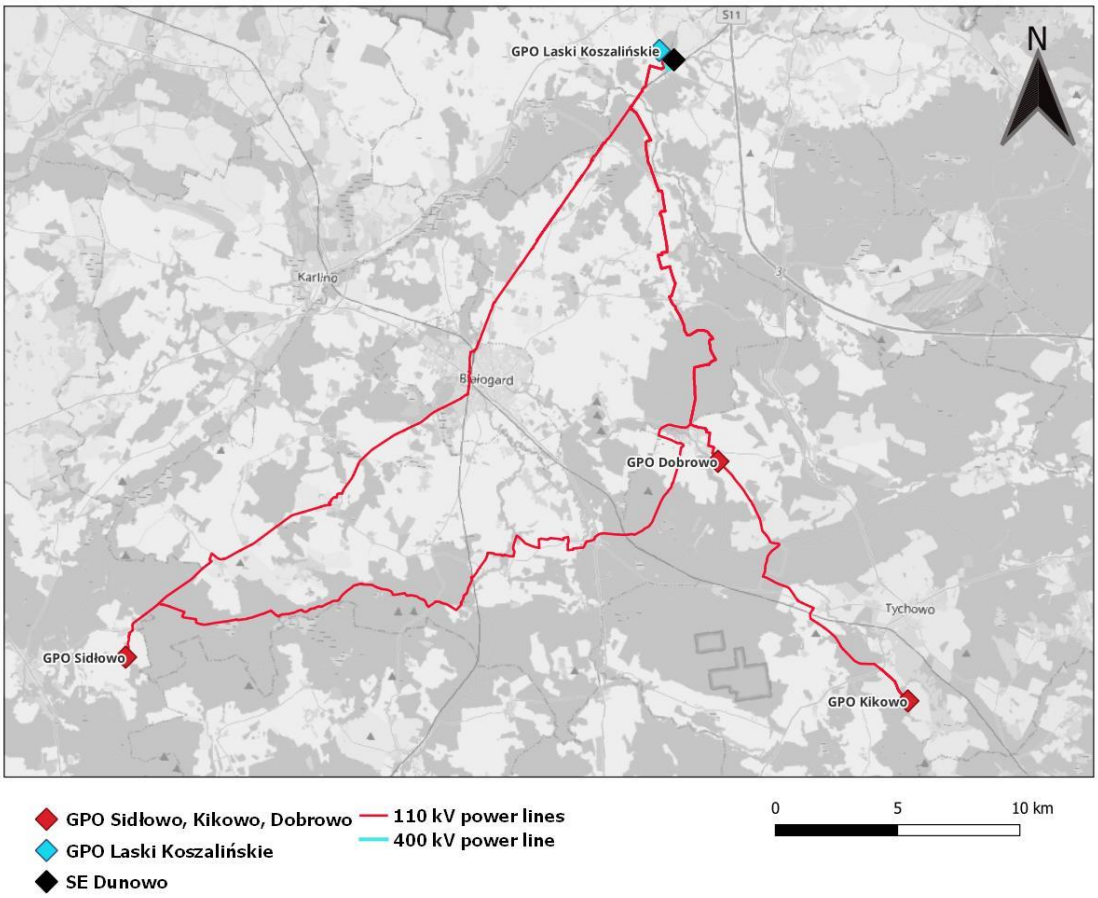


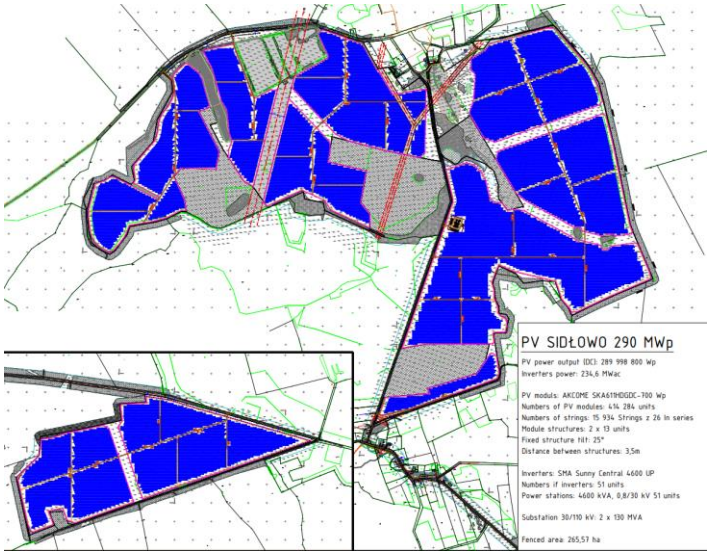
Figure 2. Connection cables of SKD cluster sites to National Grid

Some of the remaining projects could be connected to the SKD Cluster (Mysłowice, Czechy and Dobrowo Wind).

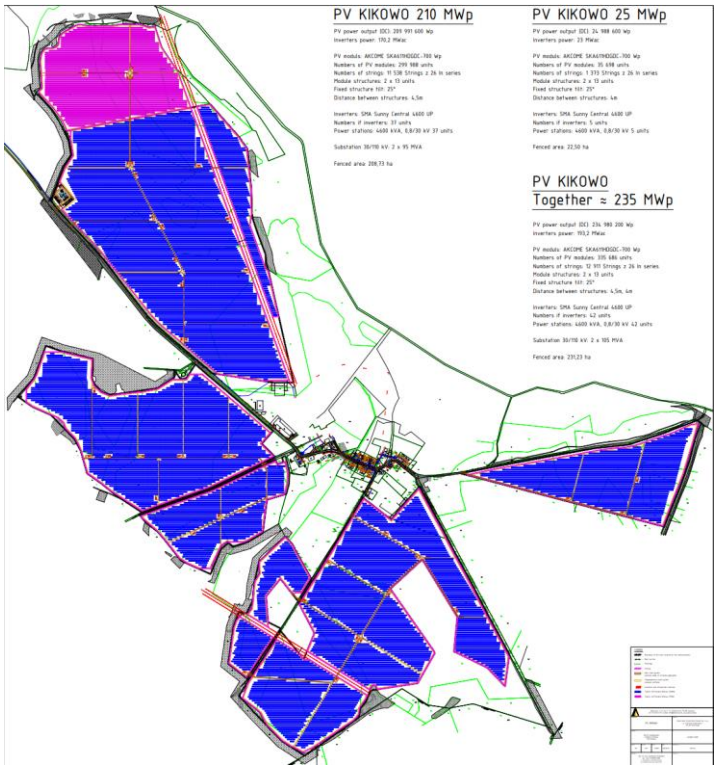
6 What is the scale of the Project?

The farms of Sidłowo – Kikowo – Dobrowo cluster will be one of the biggest plants in Poland. Their planned capacity and areas covered by the panels are as follows:

Sidłowo – 290 MWp, covering 265,6 ha. Number of PV modules: 414 284 panels

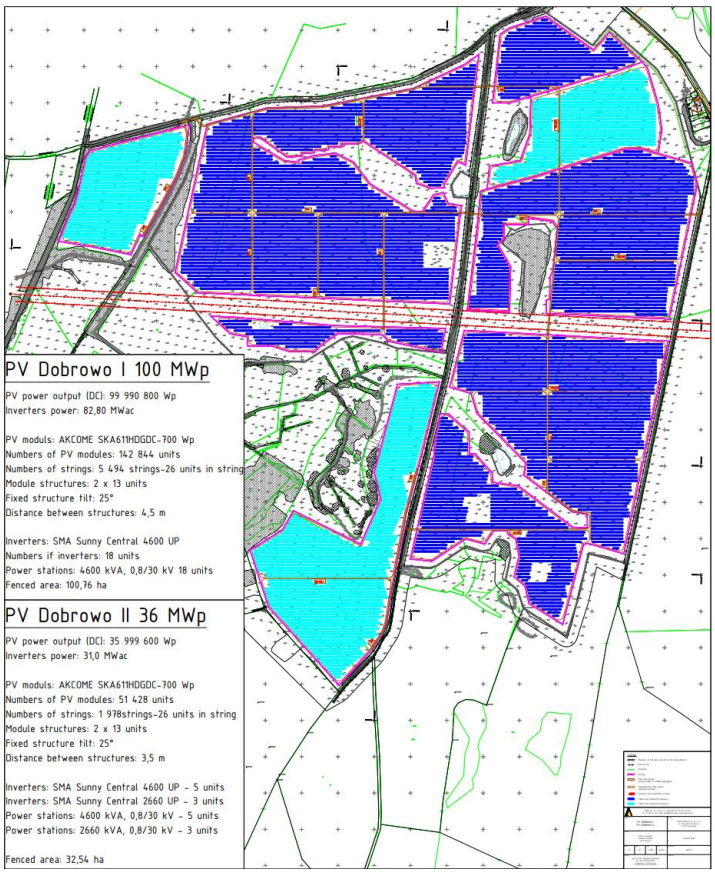


Kikowo – 235 MWp, fenced area of 231 ha. 335 686 panels will be installed.

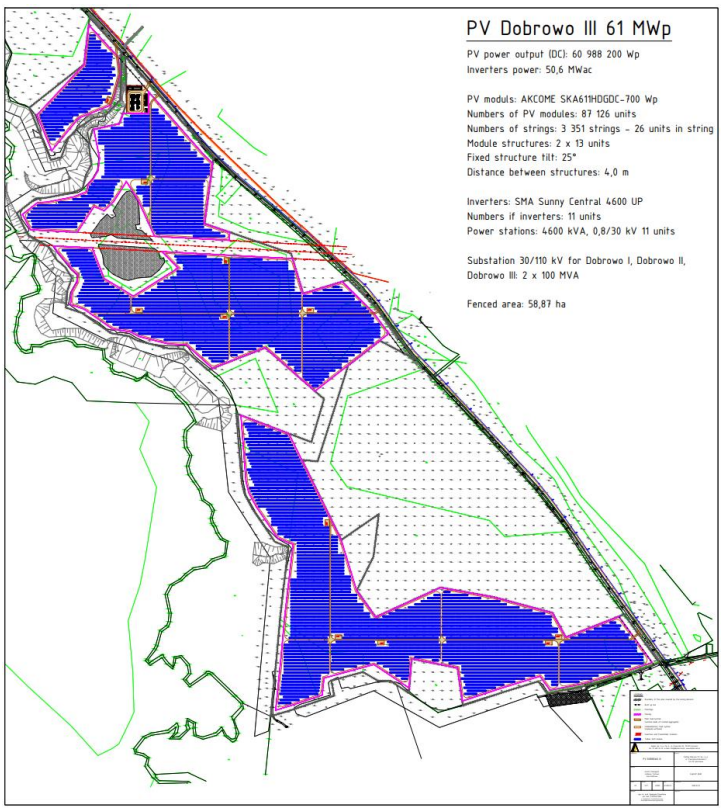


Dobrowo I – 100 MWp, 100,8 ha. 142 844 PV modules will be installed.

Dobrowo II – 36 MWp, 32,5 ha. 51 428 units



Dobrowo III – 61 MWp at a 58,9 Ha plot. 87 126 PV panels installed



Each plant comprises of:

- photovoltaic panels;
- supporting structure for installing panels (so called photovoltaic tables) at an angle of 25 degrees, south oriented, founded on the ground,
- inverters converting direct current into alternating current energy,
- monitoring and control installation to monitor energy production and the operating parameters of the solar power plant,
- lightning protection,
- transformer station located in the area close to the photovoltaic installation itself,
- fence,
- access roads and manoeuvring areas,
- other infrastructure elements.

All SKD subprojects include access roads and internal power transmission (medium voltage). All the farms are connected with 110 kV underground cables to new transformer station Laski Koszalinskie located in the vicinity of Dunowo Main Station. The Dunowo is the 400 kV main station that is part of the high-voltage transmission network in Poland. The longest connection between SKD Project and Dunowo area will be in the range of 38 km.

All the farms will be connected with Laski Koszalinskie transformer station via underground 110 kV cables. According to the rules applicable in the Polish system, the investor is responsible for connecting the cable line to the network stations. Energy from these farms will be transmitted from the Laski Koszalinskie facility to the Dunowo network station via an underground cable connection with a voltage of 400 kV.

7 How will the Project impact protected areas?

The areas of the investment are located outside significant and dense forest complexes, marshy areas, areas identified as valuable for scientific interest. As can be seen on the maps above, the panels cannot be installed on soils classed III and better, therefore these parts of land are excluded from the PV farms.

No impact on biodiversity has been identified during the assessment, as the Project is located only on low quality arable grounds. The power lines connecting the project with transformer stations will be underground, with tunnelling under any valuable nature areas.

The project will be located mainly within arable land, where biodiversity is very low (monoculture crops). In such areas, the community of living organisms is extremely poor and degraded, unstable and variable from year to year, shaped by agricultural practices, fertilisation and other agrotechnical measures. The natural values of such an area are the lowest possible in a non-urbanised area.

On arable land, the change of use to a photovoltaic power plant causes the growth of grass and herbaceous vegetation, which, in the absence or limitation of agrotechnical treatments, has the opportunity to achieve a certain stability. As a result, the biodiversity of the area increases in subsequent growing seasons.

Therefore no negative project-related impacts on biodiversity, including areas that could be regarded as “critical habitat” or “priority biodiversity features” have been identified. Sites located close to Natura 2000 areas have been screened and assessed by competent authorities as not interfering with the subject of protection in a given area. The extent of the assessment was sufficient to characterise the impacts, based on their likelihood and the significance and severity of impact, and include the concerns of potentially affected communities.

8 What are the Environmental and Social impacts of the Project?

During construction, the key impacts are associated with transport and installation of supporting structures.

The Project will have limited impact during construction and decommissioning phase, as the construction works will be associated with transport of materials and equipment and piling (using mechanical hummers) resulting in noise and air emissions. The impacts of operational phase are limited to visual interference of relatively large-scale PV farm in rural surrounding.

The heaviest and the noisiest equipment is the pile driver nailing the metal poles into the ground (support construction for the panels). Construction works and increased heavy traffic include heavy machinery operations during earthworks, increased noise and vibration. The developer will be required to implement best practice solutions to minimise the nuisance caused by the construction works.

No significant environmental impacts are associated with the operation of the Project.

The photovoltaic plants are constructed to the maximum level of 4 metres above the ground and will not influence the landscape of the agricultural areas. The plants may be regarded as visually intrusive to current rural landscape. Nevertheless, it should be stressed that the evaluation of the influence of the photovoltaic farm on the landscape is difficult and depends on the individual approach. This can be easily mitigated by planting bushes at the perimeter of the sites, if any comments from the local communities or other stakeholders are received.

Current photograph of part of planned Kikowo Plant

Given the average electricity production of the SKD Project of in the region of 800 GWh per year, the cumulative emission reduction (when comparing to traditional thermal plants) will amount to:

- Sulphur dioxide (SO2) – 356 tonnes per year,
- Nitrogen oxides (NOx) – 385 tonnes per year,
- Dust – 14 tonnes per year,
- Carbon oxide (CO) – 218 tonnes per year.

Assuming energy production of the PV farms will be at the level of 800 GWh per year, that will be equivalent to annul emission reduction of 586 400 tonnes of CO2 (a Polish National Grid emission factor of 733 kg CO2/MWh was accepted).

As calculated above, the Project will allow for significant air emission reduction. Moreover, solar farms allow to advance local communities, providing financing to communal budgets.

The solar farm design assumes at least 30 years of operations. After that time, the area can be returned to previous, agricultural production.

Land acquisition

Optima Wind leases the sites for PV plants from land owners based on lease agreements.

It should be stressed, that all lease agreements concluded by Optima Wind have been entered into voluntarily, with the full consent and awareness of both parties. The owners of the land are, in the vast majority of cases, large-scale agricultural producers who

conducted their own farming activities. In cases where the land was sub-leased to other farmers, these were also large, professional agricultural operators. In fact, no “informal” land users were identified, as the land is continuously used for crops grooving.

Optima maintain regular communication with the owners of the leased land, providing them with ongoing updates on the progress of the development projects and sharing the planned project timeline in advance. Information about the expected commencement of construction works is communicated with sufficient notice to allow planning harvesting accordingly or refrain from new plantings.

In cases where construction must begin before the harvesting is completed, Optima pay appropriate compensation for any lost crops. All lease agreements contain specific provisions regarding compensation for crop damage – in particular, as set out in §5 “Right to Use the Property.” The provisions of Optima agreements that regulate undesirable situations such as compensation for crop losses not only for the landowner, but also in cases the landowner leases his plot to another agricultural producer.

§5 Right to Use the Property

The Owner and any third party using the Property for agricultural purposes shall be entitled to use the roads constructed by the Lessee, including for the passage of vehicles and agricultural machinery. The Owner and such third party shall not be obliged to maintain the said roads in proper condition but shall be liable for any damage to the roads caused by their actions. Until the commencement of construction works on the Property, the Owner shall have the right to use the Property for agricultural purposes. The dates for the commencement of construction works shall be consulted with the Owner each time, taking into account the agricultural activities conducted by the Owner, i.e., the agricultural works calendar. If the Lessee’s interest requires carrying out works during periods conflicting with agricultural activities or resulting in the destruction of crops or yields, the Lessee may perform such works, provided that it pays compensation equal to the value of the lost yield, determined based on an appraisal prepared by a certified expert or as mutually agreed between the Parties.

To date, there have been no claims raised by third parties.

Therefore, it is our conclusion that the land designated for the construction of photovoltaic farms and substations was acquired voluntarily. Its acquisition will not affect the livelihoods of land users, thus it will not influence their overall living conditions, and they will not lose their source of income. There have been no claims from third parties related to difficulties in using the plots, harvesting crops, access or deterioration of living conditions or loss of livelihood. The reduction in the area of land used for agricultural purposes will not affect land users, nor will it contribute to a deterioration in their living conditions or loss of livelihoods. There is no need for public consultation, particularly in the context of access to alternative resources and the restoration of livelihoods for informal land users.

Local taxes

Future Optima plants operations will result in significant increase of local communes budgets. Current budget of Sławoborze commune, where Sidłowo Plant is located is at the level of 33,5 mln PLN. Operation of the plant will add ca. 2,5 mln PLN per year.

For Tychowo commune (Kikowo and Dobrowo) current annual budget is at the level of 45,7 mln PLN. Operations of the plants will bring another 4 mln PLN to the local budget.

9 What is the legislative context of the project and were there any public consultations?

According to environmental regulations on disclosure on environmental information, public participation in environment protection and on environmental impact assessments, an Environmental Impact Assessment (EIA) procedure must be performed for projects which can always significantly impact the environment (group I projects) or may be conducted upon discretion of the authorities in charge for particular investments, which can potentially impact the environment (group II projects), or may impact area of 'Natura 2000'. EIA's are carried out to obtain a Decision on Environmental Conditions (environmental consent decision) for group I and group II projects.

In line with Polish regulations, the photovoltaic plants are investments, which could potentially impact the environment (mainly due to the area changed into industrial use).

Given the scale of operations, the following sub-projects were subject to full environmental impact assessment procedure:

- ✓ Sidłowo – final environmental decision issued on 24.05.2021
- ✓ Kikowo - final environmental decision issued on 09.04.2021
- ✓ Dobrowo I – final environmental decision issued on 10.05.2021
- ✓ Dobrowo II – final environmental decision issued on 18.05.2023
- ✓ Dobrowo III – final environmental decision issued on 24.01.2022

Following the environmental impact assessment procedure and consultation periods, the competent authorities issued the environmental consent decisions for other facilities of this investment.

10 Is additional information available?

Any comments or concerns can be brought to the attention of the company in writing (by post or e-mail) or by filling in an on-line grievance form.

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