

Table: VWP Environmental and Social Action Plan

No.	Action	Environmental Risk, Liability / Benefit	Legislative Requirement / EBRD / Good practice	Investment Needs / Resources Costs	Timetable Action to be Completed	Target and Evaluation Criteria For Successful Implementation	Comment
1	<p>VWP will maintain a corporate environmental, energy, health and safety management system. A designated person will be responsible for environmental, energy, health and safety issues. The system shall include the following requirements:</p> <ul style="list-style-type: none"> • Grievance Mechanism; • Stakeholder Engagement Plan. 	<p>Need to co-ordinate responsibility and develop corporate polices on environmental, energy, health and safety.</p>	<p>ISO 14001, ISO 50001 Best practice EBRD PR 1</p>	<p>Internal</p>	<p>Ongoing. Environmental, energy, health and safety management system to be implemented within a year of commissioning the plant.</p>	<p>Environmental, energy, health and safety structure in place. Maintain environmental, energy, health and safety management systems.</p>	
2	<p>The Company will implement the EIA and permit requirements to ensure compliance with Polish and EU Environmental requirements. This will include:</p> <ul style="list-style-type: none"> • post-construction measurements of noise level and air pollutants concentration in the vicinity of the plant to confirm compliance with the environmental laws, • implementation of groundwater monitoring. <p>The company undertakes internal corporate audits on annual basis. Every year corporate audit summary will be submitted by the Company to the Bank in order to confirm compliance. Summary will be attached to the annual report for the Bank.</p>	<p>Optimisation of management through a formalised environmental management system (ISO 14001).</p>	<p>Good Practice BAT EBRD PR 1, PR 2 and PR 10 E&S Policy</p>	<p>Own resources</p>	<p>In 2016-2017, according to the requirements of environmental decision regarding post-construction analysis and then periodically as required by law and permits.</p>	<p>Implemented environmental management structure.</p>	

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3	<p>VWP will maintain a corporate CSR at the Company level.</p> <p>VWP's annual CSR report will be prepared by the Company and provided to the Bank.</p> <p>In the annual report for the Bank the Company will provide information on the level of environmental indicators such as CO₂ emission, waste production, lost time due to injury.</p> <p>The Company will provide corporate CSR report published annually.</p>	<p>Statement on the implementation of corporate social responsibility policy.</p>	<p>EBRD PR 1</p>	<p>Own/external</p>	<p>2016</p>	<p>Information on CSR policy implementation. Indicators prepared by the Company and provided to the Bank.</p>	
4	<p>Annual Reporting</p> <p>Provide the Bank annual report with information on the legal status, important environmental, health, safety and social matters as well as social interactions and relevant grievance and complaints.</p> <p>The Company will provide abbreviated annual report, however the Bank may visit the site. Site visit will be agreed with the Company.</p>	<p>Need to disclose information to the Lender to show compliance with ESAP and current status of ESHS issues.</p>	<p>EBRD Environmental and Social Procedures</p>	<p>Own resources plus external support if required</p>	<p>First report in 2016 12 months after financial close and annually for the duration of the agreement.</p>	<p>Annual report against the actions listed within this ESAP.</p>	