

Environmental and Social Action Plan (ESAP) for the Kamionka Project

No.	Action	Requirements	Resource / Responsibilities	Timetable	Target / Evaluation Criteria	Status
1	Undertake a gap analysis of the segmented permitting strategy and confirm whether any corrective actions are required to address the fact that the eastern (BESS part of the Project) underwent EIA while western (Substation part of the Project and cable components) are functionally linked to the same Project.	Polish EIA Law and permitting framework for technologically connected projects; EP2, EP3, EP8; IFC-PS1.	Permitting Manager; Project Director;	Prior FC, or if not feasible, within 30 days after FC.	Written memorandum with conformation on no outstanding unidentified Environmental or Social Impact for whole-project scope issued to the Lenders.	
2	Confirm whether any additional water-legal permit or notifications for excavation dewatering or stormwater discharge is required for construction works and obtain/regularize any missing water-related approvals as necessary.	Polish Water Law EP3, EP8; IFC PS1, PS3.	Sponsor Permitting Manager Design team with EPC construction team and hydro design advisers.	prior relevant dewatering / earthworks.	Formal written confirmation that no additional permit is required, or copy of obtained permit/approval, reflected in updated permit register and construction logbook.	
3	Update and complete the Project permit register, including: (i) clear scope description for Amendment Building Permits, and other topic specific decisions.	Management of permit register; EP3, EP4, EP8; IFC PS1; Best-practice documentation control.	Sponsor Permitting Manager; Document Controller; EPC HSE Manager.	prior FC for core permits; then maintained throughout construction.	Available to the Lenders revised permit register issued with no missing key permits	
4	Establish and implement the Project ESG Action Tracker consolidating all obligations, from ESMS with topic specific Management Plans, and ESAP, and Lender requirements, including action owners, deadlines, verification records, and closure evidence. ESG Action Tracker will be also a tool to record and manage risks.	EP4, EP8, EP9; IFC PS1 (monitoring and review); Best practice for Lender monitoring.	Project Director supported by Project ESG Manager; Document Control; EPC focal points/ESG Manager. CLO	Q3 2026, with initial version available no later than 30 days after FC.	Live tracker tool established with all ESMS/ /ESAP actions entered, and risks; evidence repository. Revision of ESG Action Tracker at least monthly during construction.	
5	Finalize and disclose a Kamionka-information package in Polish and English including: - Stakeholder Engagement Plan for Kamionka Project; - Project Information Sheet; - ESAP Clearly identify the CLO, communication channels, grievance route, and engagement schedule.	EP5, EP10; IFC PS1, PS4; Good practice for lender-facing Category B disclosure.	CLO; Sponsor ESG Manager;	prior FC for draft finalization; within 30 days after FC for disclosure on Project website	Disclosure package in Polish and English approved and shared in Project website.	
6	Translate and disclose Grievance Mechanism for workers and affected communities and establish grievance log.	EP6; IFC PS1, PS2, PS4; Best practice for community and worker grievance systems.	CLO	Worker GV available within 30 days after FC. Disclose community GV available on the Project website within 30 days after FC Grievance records to be kept for entire Project lifetime	Disclosed GV as a part of Project SEP. Establish and implement grievance log as a part of Project ESMS. Actively monitor grievances. Establish project specific grievance procedure for workers.	
7	Implement the community engagement program described in the draft SEP, including information pack, mailing to defined receptor area, and at least one community information session / open-house style event, with construction notifications as needed.	EP5, EP10; IFC PS1, PS4; GIIP for ongoing community communication.	CLO; EPC site management for construction notices.	Within 1 year after FC, with construction notifications issued earlier if relevant impacts arise.	Mailing campaign completed, and event held and documented. Confirmation on stakeholder attendance, and question/grievances/discussions noted. Construction-impact notices issued where needed. Evidence uploaded to ESG Action Tracker.	

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8	Conduct noise modelling surveys for BESS facility, and Substation for the purpose of designing the acoustic protection measures for the operational phase, ensuring that no noise limits will be exceeded, and proper noise barriers will be designed and installed before commencing of the Operational phase of the Project.	Polish regulation on permissible noise levels during day and night; EP2, EP3, EP4, EP8; IFC PS1, PS3, PS4; GIIP.	Sponsor ESG Manager; Acoustic Contractor;	Within 6 months after start of construction works.	Approved noise model, and design of noise protection measures.	
9	Complete the emergency preparedness and response package by consolidating Sponsor ERP, EPC BIOZ/EPRP, battery supplier emergency response guidance, and transformer supplier emergency documentation; define interfaces, emergency roles, training, and drill schedule.	Required by Polish legislation EPRP (BIOZ Plan) Construction safety requirements; EP4; IFC PS1, PS2, PS4; GIIP for emergency preparedness.	Site Manager Sponsor HSE/ESG Manager; EPC HSE Manager; Equipment suppliers.	Missing Emergency Response documentation from CHINT (Transformer Supplier) targeted for Q3 2026.	Consolidated emergency preparedness and response plan issued, including all supplier documents received. Evidence on OHS trainings and approved drill schedule. Presentation of at least one drill completed and lessons learned recorded.	
10	Finalize site-specific Traffic and Road Safety Management Plans for EPC and key suppliers and implement controls for deliveries, routes, signage, driver conduct, and community notifications.	EP4, EP5; IFC PS1, PS4; GIIP for construction traffic safety.	EPC Contractor; Sponsor ESG Manager supported by CLO.	Q3 2026	Approved Site-specific Traffic Management Plan which includes delivery routes, incidents tracked, and corrective actions implemented where needed.	
11	Monthly Construction Monitoring Reports (CMR) to the Lenders, including at minimum environmental incidents, social incidents, grievances, fines/notices, H&S related drills, and training outcomes, summary findings of audit, and updated ESAP status. Final scope to be agreed in the shared template.	EP8, EP9; IFC PS1; Lender reporting best practice.	Sponsor ESG Manager; Owner engineer External E&S adviser if needed EPC reporting focal points.	Template to be prepared before FC First report from first full month after FC / construction reporting cycle.	Template to Lenders for their approval / comments prepared by NPI. Monthly report template issued and used; all key ESG indicators reported consistently; variances/incidents tracked to closure through ESG tracker.	
12	Review and, if necessary, update the ESG Category B Screening and Rationale document to ensure that early-stage risk identification remains consistent with the current project design, permitting status, ESMS, and ESAP.	EP1, EP2, EP4; IFC PS1	Sponsor ESG Manager External E&S adviser if needed.	Within 60 days after FC if final design inputs are still evolving.	Updated ESG Category B Screening and Rationale Report. Memo confirming no update needed, or ESG Action Tracker with updated risk register. ESAP aligned with current project status.	
13	Check compliance of design solutions, technical requirements for specific devices, and environmental impact mitigation measures as per requirement listed in the Environmental decision	Environmental consent conditions; EPC EHS Plan; EP3, EP4, EP8; IFC PS1, PS3, PS4	- Owners Engineer - EPC Contractor; - Sponsor ESG Manager.	Design verification prior installation of battery/transformer units. Take over certificate (Permit for use), which confirms that the equipment is built in accordance with the construction design.	Verification of design and technical sheets of supplied devices including drawings. Construction site inspection evidence confirming compliant installation.	
14	Monitoring and compliance with the requirements listed in the Environmental decision for the construction phase	Environmental consent conditions EP3, EP4, EP8; IFC PS1, PS3, PS4	- Owners Engineer - EPC Contractor; - Sponsor ESG/Permitting Manager.	Throughout entire construction phase	Confirmation of no violation of the environmental consent decision in the Sponsor monthly Construction Monitoring Reports, and LTA Reports every 6 months issued to the Lenders. Any non-compliances, and relevant mitigation/corrective measures recorded in the ESG Action Tracker	

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15	Monitoring and compliance with the noise requirements listed in the Environmental decision for the Operational phase, including measurements during Operations and following the process set out in the Environmental Decision	Environmental consent conditions EP3, EP4, EP8; IFC PS1, PS3, PS4; GIIP	• Sponsor ESG/Permitting Manager. • Project Director • Contracted noise analysis Contractor	As per timeline set out in the Environmental decision (control measurement of noise within 1 month after commissioning, and reporting to relevant Authorities within next 14 days).	Report with results of the control measurements of noise levels emitted into the environment at the border of the nearest acoustically protected areas, in accordance with specific regulations in this regard submitted to the Lenders and relevant authorities.	