

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

No.	Action	Requirements	Resource / Responsibilities	Timetable	Target / Evaluation Criteria	Status
1	Ensure that all Project components have obtained final, valid, building permits prior to the commencement of specific / relevant construction activities. This includes securing all pending amendments to existing permits and ensuring alignment of permitting scope across all Project elements (BESS facility, substation and 220 kV cable connections). Keep the permit register up to date	Polish building permitting Management of permit register; EP3, EP4, EP8; IFC PS1; Best-practice documentation control.	Project Director Permitting Manager	Prior to relevant / specific construction works of each relevant / specific project component.	Copies of all final building permits and (pending and received) amended decisions covering all Project components Confirmation that permits and (pending and received) amended decisions reflect the final Project design and scope Permit register up to date – on request or at latest during half-year monitoring event.	
2	Confirm whether any additional water permits 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.	Permitting Manager Design team with EPC construction team support Project Manager	Prior to the 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	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.	ESG Manager supported by Project Director; EPC focal points/. Chief Liaison Officer (CLO)	Q3 2026, with initial version available no later than 30 days after FC.	Live tracker tool (excel file) established with all ESMS/ /ESAP actions entered, and risks; evidence repository. Revision of ESG Action Tracker at least monthly during construction.	
4	Finalize and disclose a Mieczysławów - information pack in Polish and English including: - Stakeholder Engagement Plan for Mieczysławów Project; - Leaflet containing information on Project; - 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; 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.	
5	Translate and disclose Grievance Mechanism (GM) for workers and affected communities and establish grievance log.	EP6; IFC PS1, PS2, PS4; Best practice for community and worker grievance systems.	CLO	Disclose community GM available on the Project website within 30 days after FC. Grievance records to be kept in accordance with the GDPR for minimum 3 years, and maximum 5 years after commissioning the Project Worker GM available within 30 days after FC.	Disclosed GM as a part of Project SEP. Actively monitor and react to community grievances. Establish and implement community grievance log as a part of Project ESMS. Establish project specific grievance procedure for workers.	
6	Implement the community engagement program described in the 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.	Mailing campaign completed, and event held and documented. Confirmation on stakeholder attendance, and question/grievances/discussions noted. Evidence uploaded to ESG Action Tracker.	

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7	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 HSE/ESG Manager; EPC HSE Manager; Equipment suppliers.	Missing Emergency Response documentation from ONDE (EPC Contractor), and 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 (reported through monthly reporting). Presentation of at least one drill completed and lessons learned recorded – after first significant drill (when battery containers have arrived on site).	
8	Finalize site-specific Traffic 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; ESG Manager supported by CLO.	Q3 2026 or 2 weeks before specific traffic activity start	Approved Site-specific Traffic Management Plan which includes delivery routes, incidents tracked, and corrective actions implemented where needed.	
9	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 site visit audit (half yearly monitoring audit by LTA), and updated ESAP status. Final scope to be agreed in the shared template.	EP8, EP9; IFC PS1; Lender reporting best practice.	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 (separate from monthly reporting).	
10	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	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 or written confirmation that no update is needed, or ESG Action Tracker with updated risk register.	
11	Due to existing Evangelical cemetery within the Project's Area of Influence (AoI) ensure integration of the Archaeological Management Plan (FLA-NPI-ENV-PLN-0009 into EPC Contractor management procedures. Ensure proper secure of the construction site by fencing it, and conduct instruction for workers in case of finding any graves.	EP4 IFC PS1, IFC PS8	Project Director Site Manager with close cooperation with EPC Contractor Owners Engineer	Prior to construction works start.	Written confirmation on training Implementation of the Archaeological Management Plan into EPC Contractor ESMS,	
12	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; 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 through design review process and ultimately the Takeover certificate.	
13	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; ESG/Permitting Manager.	Throughout entire construction phase.	Reporting through Sponsor Monthly Construction Monitoring Reports as per action 9. Verification through LTA Reports every 6 months issued to the Lenders Any non-compliances and/or required actions, and relevant mitigation/corrective measures recorded in ESG Action Tracker	

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14	Ensure compliance with the requirements listed in the Environmental decision for the Operational phase.	Environmental consent conditions EP3, EP4, EP8; IFC PS1, PS3, PS4; GIIP	ESG/Permitting Manager. Project Director	Before project starts Operational Phase.	Implement relevant notes on respecting environmental decision requirements in the Project maintenance instruction.	