



Non-Technical Summary



Banie Phase 3 and Zelechowo Wind Farms
developed by Energix – Renewables
Energies Ltd

20 December 2021

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Acronyms and Abbreviations

Name	Description
BoP	Balance of Plants
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental Social Action Plan
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
OHS	Occupational Health & Safety
MW	MegaWatt
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SPA	Special Protection Area (Natura 2000 areas established for protection birds)
WEP	Wind Electric Plant
WT/ WTG	Wind Turbine/ Wind Turbine Generator

1. INTRODUCTION

This Non-Technical Summary (NTS) provides an overview of the environmental and social impacts associated with the construction and operation of the Banie 3 and Zelechowo Wind Farms (hereinafter referred to as “Projects”) with special attention to cumulative impacts and on the measures considered to keep these potential impacts at acceptable levels.

Both Projects are being developed by Energix Renewable Energies Ltd. (Energix Group, hereinafter referred to as “the Projects Owner”), which is one of Israel’s largest renewable energy companies with a portfolio of more than 1GW of projects under development. The Group also runs the existing 106 MW Banie Windfarm (Banie 1 and 2), which is one of the largest in Poland.

Energix Group intends to develop:

- The third part of the Banie Wind Farm, comprising 37 onshore turbines with a total capacity of 81.4 MW and associated project components. The Project is located in the area of Banie commune (Banie, Baniewice, Kunowo, Lubanowo, Piaseczno, Sosnowo, Swobnica and Tywica villages) and Widuchowa commune (Zelechowo village), in Gryfino County, West Pomeranian Voivodship in north-western Poland.

The Banie 3 Project is already approved by the Polish authorities: the Environmental Impact Assessment (EIA) process was done in 2019 and the Project obtained the development consent and the associated permits for construction. The current stage of the Project (December 2021) is erecting wind turbines.

- The Zelechowo Wind Farm, comprising 16 onshore turbines with a total capacity of 56 MW and associated project components. The Project is located in the area of Widuchowa commune (Zelechowo, Zarczyn, and Wilcze villages) in Gryfino County, West Pomeranian Voivodship in north-western Poland.

The Zelechowo Project is already approved by the Polish authorities: the Environmental Impact Assessment (EIA) process was done in 2015 and the Project obtained the development consent and the associated permits for construction. The current stage of the Project (December 2021) is the beginning of the construction phase.

Energix Group is seeking to enter a financial agreement with financial institutions which have additional requirements besides the Polish procedures already completed. Therefore, the following additional studies and documents were commissioned so that the Projects also meets the requirements of the EBRD, IFC, EP IV environmental and social standards:

- this Non-Technical Summary (NTS) – together for both Projects;
- a Stakeholder Engagement Plan (SEP) – together for both Projects;
- an Environmental and Social Action Plan (ESAP) – separately for both Project;
- a Supplemental Study Report to Local EIA (ESIA) – for Banie 3 Project, and
- Environmental and Social Due Diligence (ESDD) – for Zelechowo Project.

For the entire construction phase of Banie 3, Energix’s main constructor contractor, under the Company’s supervision, developed a set of topic-specific Management Plans, accompanied by a Commitments Register, to document how Project-related impacts will be managed during construction. Furthermore, Energix will continue implementation of the commitments during operation, to assure the Project will not have negative impacts on the environment and local communities.

The same approach is planned for the development of the Zelechowo Project.

2. PROJECTS DESCRIPTION

2.1 Projects components

2.1.1 Banie 3

The Project is planned outside settlement boundaries, on arable land, within the territory of Banie and Widuchowa communes. The main Project components will include the 37 WTG, a project substation, the underground MV line, and the internal access roads:

- 34 Vestas110 WTG located in Banie commune, with 110-m rotor diameter and a hub height of 120 m; each WTG will have a capacity of 2.2 MW, which results in a total Project capacity of 74.8 MW;
- 3 Vestas110 WTG located in Widuchowa commune, with 110-m rotor diameter and a hub height of 120 m; each WTG will have a capacity of 2.2 MW, which results in a total Project capacity of 6.6 MW.
- one 30/110 kV Project electrical substation covering an area of approximately 4700 m² located on the land plot no. 281/3, precinct Lubanowo, Banie commune;
- the 3 WTGs located in the Widuchowa commune will be connected via an underground MV line to BEW 36 WTG located in Baniewice.

2.1.2 Zelechowo

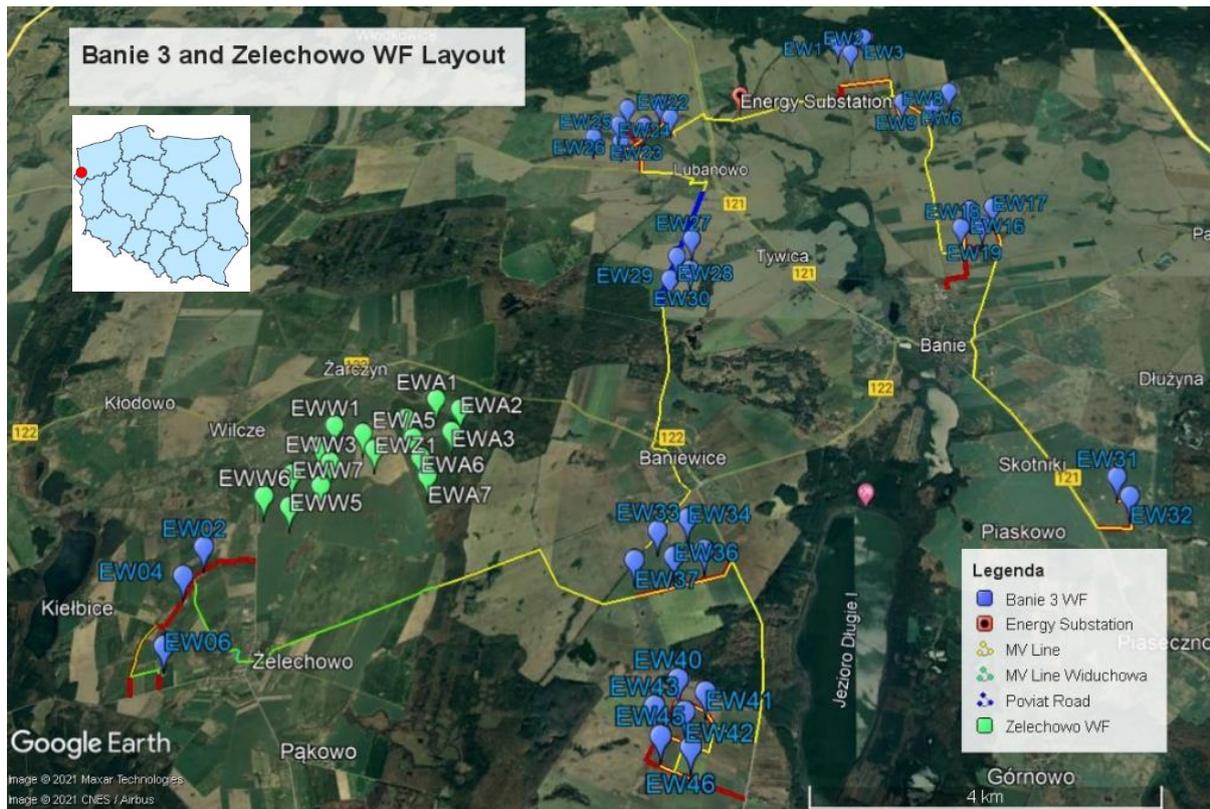
The Project is planned outside settlement boundaries, on arable land, within the territory of the Widuchowa commune. The main Project components will include the 16 WTG, the underground MV line, and the internal access roads.:

- 16 Vestas126 WTG located in Widuchowa commune, with 126-m rotor diameter and a hub height of 137 m; each WTG will have a capacity of 3.5 MW, which results in a total Project capacity of 56 MW;
- All infrastructure including wind turbines, service pads, internal roads, underground cables is located in Zarczyn precinct on plots 294/1, 310, and 289/2.

The Zelechowo wind farm will be connected with the same energy substation as Banie 3, located on land plot no. 281/3, precinct Lubanowo, Banie commune.

Figure 2-1 below shows the Banie 3 and Zelechowo WEP layout and Figure 2-2 presents the location of the Projects concerning natural protected and/or designated sites.

Figure 2-1 Banie 3 and Zelechowo WF layout



In both commune on the areas where wind turbines are located local spatial development plans developed for the wind farm are implemented.

Figure 2-2 Vestas WTGs



Vestas V-110

Source: www.vestas.com



Vestas V-126

Source: <https://pl.wind-turbine-models.com/>

2.2 Schedule

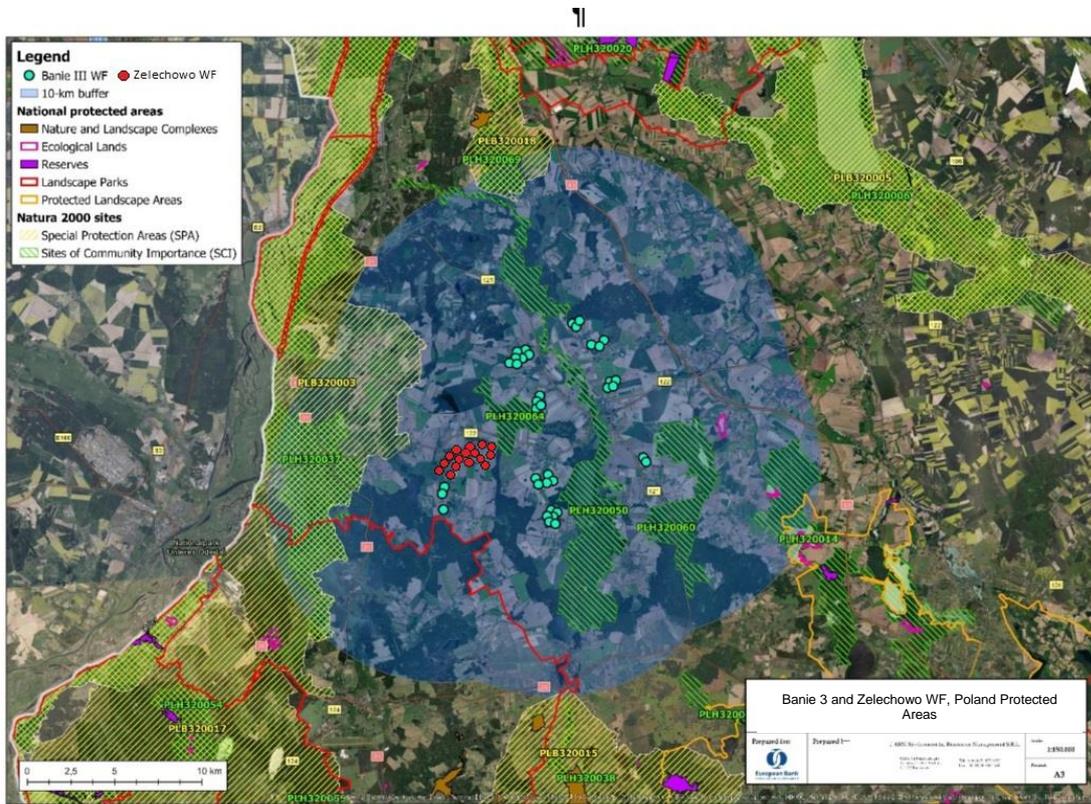
The construction activities in Banie 3 Project started in Q1-2021 and would be completed as expected in Q2 2022 as of the date of this report. The completion of the works is currently scheduled for spring 2022.

The construction activities in Zelechowo Project started at the beginning of Q4 2021 and would be completed as expected in Q3 2022.

2.3 Nature Protected Areas

Although both Projects sites are surrounded by Special Protection Areas (SPAs) as defined by the European Natura 2000 Birds Directive, all wind turbines are located outside of the borders of the protected areas / designated sites.

Figure 2-3 Protected and designated areas within 10 km of Banie 3 wind farm



2.4 Land acquisition

Both Projects will not require physical displacement of people, all land required for the Projects is located on agricultural plots. Land for permanent projects components has been acquired via voluntary land lease agreements with private owners or easement agreements with public authorities for roads and cable lines. The agreements were negotiated on a case-by-case basis, following individual negotiations.

Figure 2-4 General lands overview in the area selected for Banie 3 and Zelechowo wind farms



3. SUMMARY OF IMPACTS AND MITIGATION MEASURES

3.1 Soil and groundwater

Potential impacts on soil and groundwater during the wind farm construction could be associated with the removal and handling of topsoil, soil compaction, and potential spills of petroleum hydrocarbons, other oils, lubricants, and paint. Potential impacts on soil and groundwater generated by future operations of both Projects could potentially result from leakage of lubricants from the wind turbine nacelle and the transformer substation. However, this is unlikely due to the liquid retention systems integrated into the structure of the wind turbine nacelle and the electrical substation.

Energix Group's main construction contractor, under the Company's supervision, will voluntarily develop a Resource Efficiency and Pollution Prevention and Control Management Plan for Projects to include measures that will be implemented on-site to avoid potential contamination, for example:

- avoid storage of construction waste outside designated areas for temporary storage;
- implement preventive maintenance of construction vehicles and machinery;
- place machinery and equipment on metal trays to collect oil, condensate, and diesel spills;
- avoid storage of construction waste outside designated areas for temporary storage;
- conduct refueling outside the construction site.

Similarly, during construction, Energix's main contractors, under the Company's supervision, will develop and implement a Waste Management Plan to cover all waste streams generated by the Projects activities and will make sure that the waste is temporarily stored and managed in line with national requirements and international best practices. The Waste Management Plans developed by

the Company's contractors will be approved by EneGix which will further monitor their implementation through internal audits.

With the above mitigation measures in place, impacts on soil and groundwater are not expected to be significant.

3.2 Air emissions and ambient air quality

During Projects construction, air emissions sources will consist of dust generated from construction activities (e.g. land clearance and excavation, traffic on local roads) and combustion-related emissions from vehicles and construction equipment. These impacts will be mitigated by employing good construction practices, including using well-maintained construction equipment and employing dust abatement measures. Such measures will be included in the Resource Efficiency and Pollution Prevention and Control Plan to be developed and implemented for the Project by Energix's main construction contractors, under the Company's supervision.

No significant air quality impacts are associated with the Projects operational phase. Operational traffic emission impacts will be associated with a limited number of vehicles accessing the site for maintenance or security purposes.

3.3 Waste management

All waste categories resulting from construction works related to the administrative area will be handled by specialized companies. The measures envisaged for mitigating impacts include storage of building materials and waste in dedicated areas, monitoring the state of oil filters and vehicles to prevent leakages, maintenance of auto and construction equipment, refuelling equipment from a special tanker with the use of pallets.

3.4 Biodiversity and nature conservation

3.4.1 Legally Protected Sites

Although both Projects sites are surrounded by Special Protection Areas (SPAs) as defined by the European Natura 2000 so-called Birds Directive (2009/147/WE), all wind turbines are located outside of the borders of the protected areas / designated sites. The nearest SPAs are *Dolina Dolnej Odry* (PLB320003), a birds protection area, located approximately 3 km west of the Zelechowo Project site, and *Jeziorko Wętyńskie* (PLB320018), located approximately 6.7km north-northeast of the Banie 3 Project.

Based on the field inventory performed as a part of environmental impact assessment for both wind farm sites, the Projects area was identified as important for breeding a White-tailed eagle (*Haliaeetus albicilla*), which is a qualifying species for the neighbouring SPAs. Since the Projects do not overlap with natural protected areas, the Polish authorities did not require an Appropriate Assessment (AA) Study. Energix Group for Banie 3 Project voluntarily undertook additional supplementary surveys and assessments to mitigate potential effects on the Natura 2000 sites integrity. As both wind farms are adjacent to each other and the same natural conditions prevail, the results of additional birds studies for Banie 3 can be directly interpreted in the same way for the Zelechowo project.

3.4.2 Habitats and Flora/vegetation

The Projects components are mostly located on agricultural land associated; therefore, only anthropogenic habitat (and not "natural habitat") may be impacted by the Project. Therefore, no significant impact is expected on vegetation and habitats for animals.

3.4.3 Birds and bats

Birds and bats are particularly sensitive to windfarm operations.

- The assessment of potential impacts on birds and bats biodiversity in the Banie 3 Project was based on three campaigns of field studies in 2009, 2013, and 2019. The baseline identified 6

species of bats and 105 species of birds, 11 of which are listed under Annex I of Birds Directive (meaning the threatened bird species in danger of extinction; vulnerable to specific changes in their habitat; considered rare because of small populations or restricted local distribution; requiring particular attention for reasons of the specific nature of habitat).

- The assessment of potential impacts on birds and bats biodiversity in Zelechowo Project was based on two campaigns of field studies in 2009/2010, and 2013. The baseline identified 6 species of bats and 58 species of birds, 9 of which are listed under Annex I of Birds Directive (meaning the threatened bird species in danger of extinction; vulnerable to specific changes in their habitat; considered rare because of small populations or restricted local distribution; requiring particular attention for reasons of the specific nature of habitat).

The species composition for both sites is equal and the most vulnerable to collisions species is the White-tailed eagle (*Haliaeetus albicilla*).

The Company will appoint an Independent Ornithological and Chiropterologist (birds and bats) expert (IOCE) to undertake monitoring of the Project during commissioning then of Banie 3 and Zelechowo Projects subsequently during operation.

As common practice for wind farm operations, the monitoring includes a check of carcasses of dead birds and bats around the turbines to determine the extent of impacts, and if further protection is needed.

In addition to the surveys undertaken during the EIA process, ensuring the construction phase of the Banie 3 Project Energix Group voluntarily undertook additional supplementary surveys for birds and bats, using quantifiable methods such as VP (Vantage Point) surveys and CRM (Collision Risk Modelling) and will implement additional measures to protect biodiversity. The above-mentioned surveys and assessments supplemented by further desk study and consultation will assist with identifying whether automated approaches such as DTbird would be suitable, and if so, how best to configure them. Such studies will also assist in refining and understanding peak risk periods when shut down procedures may be most effective. Based on that detailed analysis in Banie 3 Project the decision of conduct similar for the Zelechowo Project will be taken after analysing these results

Based on the results and if necessary, Energix and its consultants will develop a shut down on demand procedure to be used by the IOCE to shut down individual turbines if needed due to the risk of collision with the endangered birds (mainly white-tailed eagle).

Although the covered by wind turbines area is not attractive for bats, a bat mitigation procedure will be established for the Projects, to include triggers for change based on the number of bats per turbine killed assessed against European averages for operational turbines and population levels. Results from the carcass monitoring in relation to the time of year and location of casualties will be used to optimise any curtailment regime. Bat monitoring will be also conducted at the beginning of the operation phase for both wind farms, according to environment decision requirements.

3.5 Community Health and Safety

3.5.1 Noise

For the Projects, Energix has selected turbines type Vestas V-110 and V-126 which are less noisy than the other types of similar turbines.

To minimize negative impact during the construction phase of the Projects, the following rules will be implemented:

- the construction timeline will be organized in a way to reduce the number of construction days to the minimum;
- all groundworks will be conducted between 6 am and 10 pm only;
- all equipment and machines will be in good technical condition;

- temporary areas created for the construction work purposes as well as transportation routes will be placed as far away as possible from the nearest residential areas;
- engines of trucks and machinery will be turned off during work breaks.

The EIA for Banie 3 was performed in 2019 and the Supplemental study to local EIA (ERM, 2020) includes noise analysis for new investment alternatives. The noise modeling results show that, during operation, it is expected that the Project to comply with the limits established by Polish Law and IFC / international standards.

The Zelechowo Project noise emission was modeled in the EIA report and no exceedance was recorded about noise-protected areas. Additionally, the local spatial development plan which covers the Zelechowo windfarm site contains relevant restrictions to locate residential buildings within the area designated for wind turbines, where noise emission exceeds permissible levels for settling of people.

Confirmatory noise monitoring during the operational phase will be conducted in line with the Polish regulations and international standards and, if exceedances are identified, relevant mitigation measures will be defined and put in place.

The implementation of the measures will be done in consultation with the communities as part of the stakeholder engagement process described under section 4.

3.5.2 Shadow flicker

Shadow flicker refers to the on-off “strobe effect” that may be experienced by a viewer when the sun is setting behind a wind turbine, and the rotor blades pass in front of the sun causing a rapid change of light and shadow.

Areas that are particularly sensitive to shadow flicker impacts are residential houses in the vicinity of the wind turbines. A shadow flicker is observed when the windows in a house are facing the wind turbine, and the position of the sun on the horizon results in a shadow of the turbine blades being cast on the window. The shadow flicker effect may be an inconvenience, however, due to the low rotation frequency of the rotor in modern turbines (12 – 20 rotations per minute), it does not reach the frequency harmful to human health which is approx. 50.

In general, the maximum impact distance from the wind turbines at which the impacts of shadow flicker will be observed is 10 times the blade length. The turbines planned for the Banie 3 this Project have a blade length of 55 m, meaning that shadow flicker may extend max. about 550 m. In the case of the Zelechowo Project where the blade length is 63 m shadow flicker may extend max. about 630 m.

The Projects Owner will voluntarily undertake additional screening to assess shadow flicker impacts, starting with the identification of all receptors within the maximum potential impact distance and then assessing the significance of impacts upon each receptor. An External Grievance mechanism will be put in place to allow the residents to raise complaints or flag any associated issues during the operation stage.

3.5.3 Ice and blade throw risk

Wind farms operating in cold climates may suffer from icing in certain weather conditions and ice throwing from the wind turbines may affect public safety. Also, in case of damage to the rotor blades, some parts of the blade may break off and be thrown from the turning rotor.

- The calculations conducted for the turbines of the Banie 3 Project indicate that ice throw may extend to a distance of approximately 360 m and blade throw to 480 m.
- The calculations conducted for the turbines of the Zelechowo Project indicate that ice throw may extend to a distance of approximately 400 m and blade throw to 530 m.

There are no houses within these ranges, but some farm fields and roadways. To mitigate any risks to community health and safety, warning signs will be posted at the entrance to the Windfarm’s area and periodical checks of each WTG location will be made with a focus on safety and warning signs

condition is performed. Additionally, the local public and authorities will be informed so that the Company can respond quickly to any issues related to ice and blade throw risk.

With the aforementioned mitigation in place, no significant impacts from ice or blade throw are expected.

3.5.4 Public health and safety

Potential impacts to community health and safety may arise as a result of:

- transportation of people, goods, and Projects components during construction;
- noise generated by the wind turbines;
- shadow flicker and electromagnetic interference.

A Community Health and Safety Plan (CHSP) will be developed by Energix's contractors to define health and safety measures for the protection of the local communities. This Plan will also include measures to address community exposure to diseases, with a particular focus on COVID-19. Energix will approve the plan and further monitor its implementation through internal audits to its contractors and by reviewing the external grievance log which records the complaints or recommendations raised by the communities or general public.

3.5.5 Projects traffic

The potential impacts of increased heavy and oversized transportation may include:

- increased noise, vibrations, and particulate matter;
- increased traffic on the local roads (delivery of construction materials, wind farm components);
- damages to road's surface and possibly also building structures; and
- temporary roads access.

During the construction phase, Energix's contractors will develop and implement a Traffic Management Plan (TMP), which will describe truck routes and planned schedules when heavy and oversized transportation can be expected. Energix will approve the plan and further monitor its implementation. Oversized transportation occurs in a limited period.

Appropriate public communication to allow timely notice of affected residents before major construction operations or traffic movements on public roads will be implemented before commencement and during the construction phase.

Currently, the area of both wind farms is used for arable farming. Measures to allow safe access to farming areas will be identified and implemented upon consulting local authorities and residents. These will be reflected in the Traffic Management Plan.

If the abovementioned mitigation measures will be implemented, no significant transportation impacts would be anticipated to occur.

3.6 Socio-economic

The following types of socioeconomic impacts are likely to arise as a result of the Projects construction:

- positive impacts:
 - direct employment opportunities with the Project of local workers and companies; direct economic impacts as a result of Projects purchase of goods and services such as construction materials for civil works, construction equipment, and machinery, catering, transportation; the Projects owner will seek to maximize local procurement of goods and services for the Projects;
 - induced economic effects of spending by construction workers;
 - increase of the commune income through payment of taxes by the Projects owner;

- increase of household income of landowners leasing their land for each WTG. The land for the Projects was secured based on land lease agreements signed with the landowners by the Projects owner;
- improvement of local communication routes;
- potential positive impacts on community cohesion arising from the influx of construction workers;
- potential adverse impacts:
 - permanent loss of arable land;
 - potential increased pressure on local infrastructure and utilities as a result of transporting goods and services, constructing new roads and rehabilitating existing ones, wiring the wind farms.

The operational stage will also feature both direct employment opportunities with the Projects and indirect opportunities, as the Projects will subcontract maintenance and security services.

3.7 Landscape and visual

To mitigate any potential landscape and visual impacts, the following measures will be implemented:

- smooth cylindrical towers will be used, as this type of tower has a simpler configuration, less complex surface characteristics, and a lower reflection/shadow casting potential;
- non-reflective paints and coatings will be used to reduce glare;
- only underground power cables will be used at the site to minimize distortion of the surface.

3.8 Cultural heritage

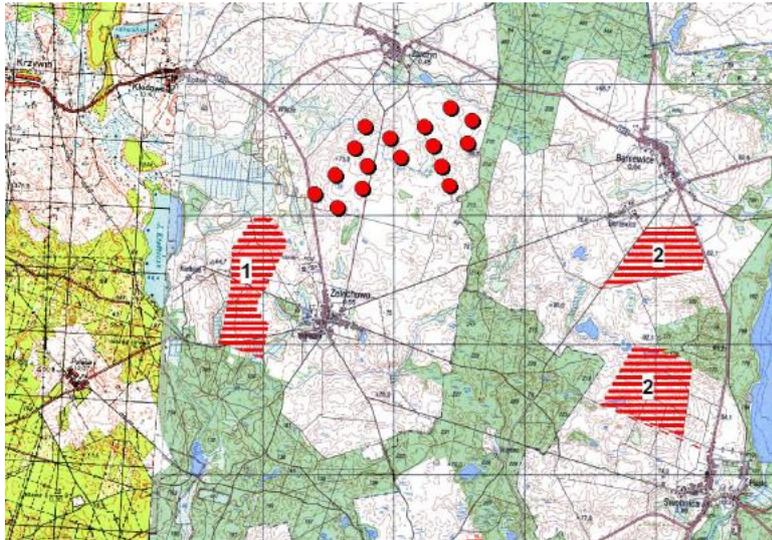
The existing EIA provides a list of 30 protected heritage sites in the vicinity of the proposed wind farms. In most cases, these are communal monuments: churches, graveyards, and parks. They are very largely distributed within the historic villages and towns of the area: Banie, Sosnowo, Lubanowo, Baniewice, Piaseczno, Gornowo, Swobnica, Zarczyn, Zelechowo. The region of the Szczecin Lowlands – well-watered and fertile - is rich in archaeological heritage including, for example, large numbers of prehistoric monumental burial sites. There has been very extensive development in Western Pomerania in recent decades, including the construction of the S3 motorway in the 2000s which involved large-scale pre-construction archaeological works. These identified large numbers of buried archaeological sites of all periods – prehistoric, Roman and medieval – throughout the corridor which runs 3.5+km to the east of the proposed wind turbines.

No historical and cultural heritage was discovered within the Projects area, except for some archaeological sites. These sites however are mainly scientific and documentation value, not material, museum value, or collectors. Following good international practice, the Projects Owner voluntarily develop and implement a so-called “chance finds procedure” that prescribes how any cultural heritage that may be identified during the construction works will be managed and define relevant roles and responsibilities for the process, and obtained permits with the scope of archaeological rescue research specified by the Provincial Conservator of Monuments

4. CUMULATIVE IMPACT

Due to the homogeneity of the area of Banie 3 and Zelechowo Projects, there will be no cumulative impact with investments of other types. Potential impacts may occur in connection with the location of two and more wind farms nearby. The figure below show Zelechowo wind farm (red dots) and the area of location closest turbines in Banie 3 Project (areas marked 1 and 2). The shortest distance between Banie 3 and Zelechowo turbines is approx. 950 – 1000 m. Remaining turbines are located more than 3 km. one from each other, and are divided by a forest complex.

Figure 4-1 Cumulative impact



Source: EIA Report for Zelechowo

Moreover, in the EIA report prepared for the Żelechowo project other investments within a radius of 10 km were analyzed. In addition to the Banie 3 other wind farms have been identified:

- planned wind farm in the area of Dłużyzna in Banie commune - application for a decision on environmental conditions for 16 wind turbines;
- planned wind farm in the vicinity of Piaseczno in Banie commune - application for a decision on environmental conditions for 4 wind turbines;
- planned wind farm in the area of Grzybno in Chojna commune - application for a decision on environmental conditions for 12 wind turbines;
- planned wind farm in the area of Bolkowice in Widuchowa commune - the negative decision on environmental conditions was issued for 9 wind farms, appeal proceedings were pending.

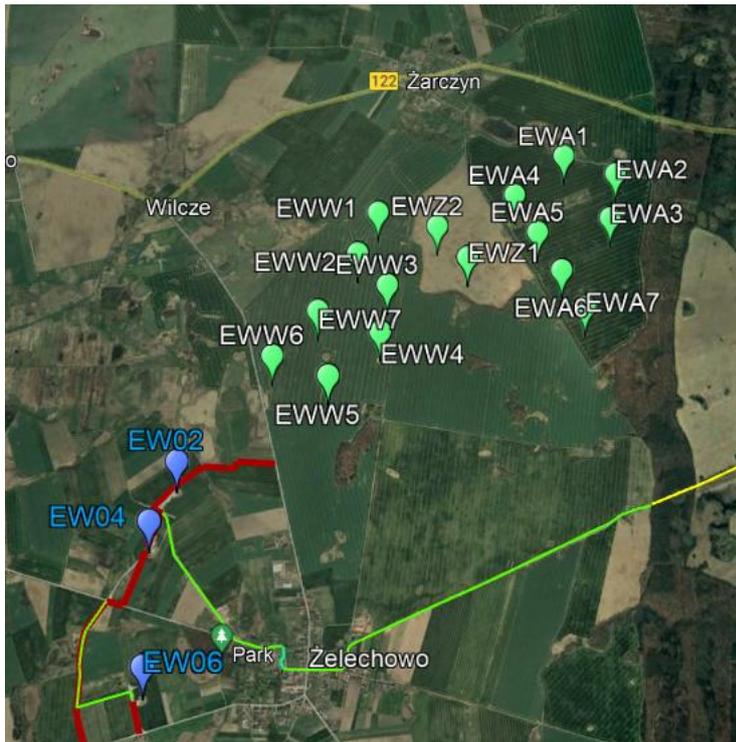
Table 4-1 Distance to the closest planned wind farms

Location	Approximate distance to Banie 3	Approximate distance to Zelechowo
area of Dłużyzna	2 000 m (from 2 turbines)	9 000 m
area of Piaseczno	1 600 m (from 2 turbines)	5 400 m
area of Grzybno	3 300 m	4 900 m.
area of Bolkowice	7 500 m	6 800 m

It should be noted that the given distances are approximate and have been determined only based on the indicative location of the areas, not a specific wind turbine

Based on that potential cumulative impact may arise between Zelechowo WF and wind turbines located within the area marked 1. This area in the first scenario was to be built by 8 wind turbines, however only 3 were erected in fact, and actually, there is no decision on building the remaining 5.

Figure 4-2 Potential cumulative impact of Banie 3 and Zelechowo wind farms



4.1 Noise

Using conservative estimations cumulative noise may occur for wind turbines that are located at a distance up to 2.5 km. Three Banie 3 turbines (area 1) are located within that distance. The noise propagation depends on several factors such as weather, wind strength, ground cover. Cumulation of noise is a logarithmic function which means that in the case of two sources with the same noise level, the cumulative/total noise level will be 3 dB higher (i.e. 45 dB + 45 dB = approx.48 dB). As the levels for noise-protected areas (residential buildings in this case) are detailed established and limited, the Investors will be required to steer the turbines in the way to meet the noise standards. Thanks to that both Projects are in one Investor's hands the management on potential mitigation measures will be easier to implement.

4.2 Birds

Impact on birds of each wind farm was analysed in detail and preceded by fields observation, and described in each EIA Reports. Based on the analysis and layout of wind farms the risk of cumulative impact is insignificant. Clusters have usually several (4-7) turbines, up to 16 turbines in Zelechowo Projects, with preserved spaces between (more than 1 km.) them. This kind of approach to design will allow migratory species to migrate freely. Taking into account that the main direction of migration in the region of the Widuchowa and Banie commune is on the north-south axis and migrations are concentrated within the Odra valley and Tywa valley, Projects located outside that areas will have an insignificant impact on the migrations of most species.

The areas of the Zelechowo, Banie 3, and other potential Projects in this area are not key feeding grounds for the population of species that are the subject of protection in the SPA. There is no risk in case of reduction bird feeding areas, as similar and more valuable sites occur all around Projects location, especially in the Natura 2000 Dolina Dolnej Odry which is also rich with agricultural open areas. To avoid potential impact on birds as well as cumulative impact some actions related to the type of crops in the vicinity of wind turbines may be needed to implement. If the recommendation to change the structure of crops (abandoning the cultivation of maize) in all projects in the vicinity is implemented, then the area will not be an attractive feeding ground for migrating and local species.

Summing up the potential cumulative effects of wind farm projects in relation to the potential loss of feeding grounds will not be significant for the nearest SPA Natura 2000. And there is no scientific basis to suppose that the implementation of both Projects and others outside the SPA area may adversely affect the integrity of the Natura 2000 area and its functioning.

4.3 Bats

All existing and planned wind turbines in the vicinity of Projects are located within large-scale, intensive crops, poor in linear structures (watercourses, tree strips). These areas do not act as ecological corridors through which bat species could freely migrate, which results not only from the research on the Zelechowo location but also the neighbouring areas (Banie 3 location). The main concentration of bat migration, takes place within the Odra Valley, far away from wind farm projects in the commune Widuchowa and Banie. Food sources of bats in intensively used open agricultural areas are scattered, concentrated around ponds, flowering alleys, wetlands, trees lines, etc. Occupation with wind turbines of open areas with a large-scale crop structure and a poor landscape, which is uninteresting for bats, will not result in a significant loss of feeding grounds for this group of animals.

As a result, the cumulative effect of the Zelechowo and Banie 3 Projects and the neighbouring projects will be insignificant for the functioning of the bat population in the region.

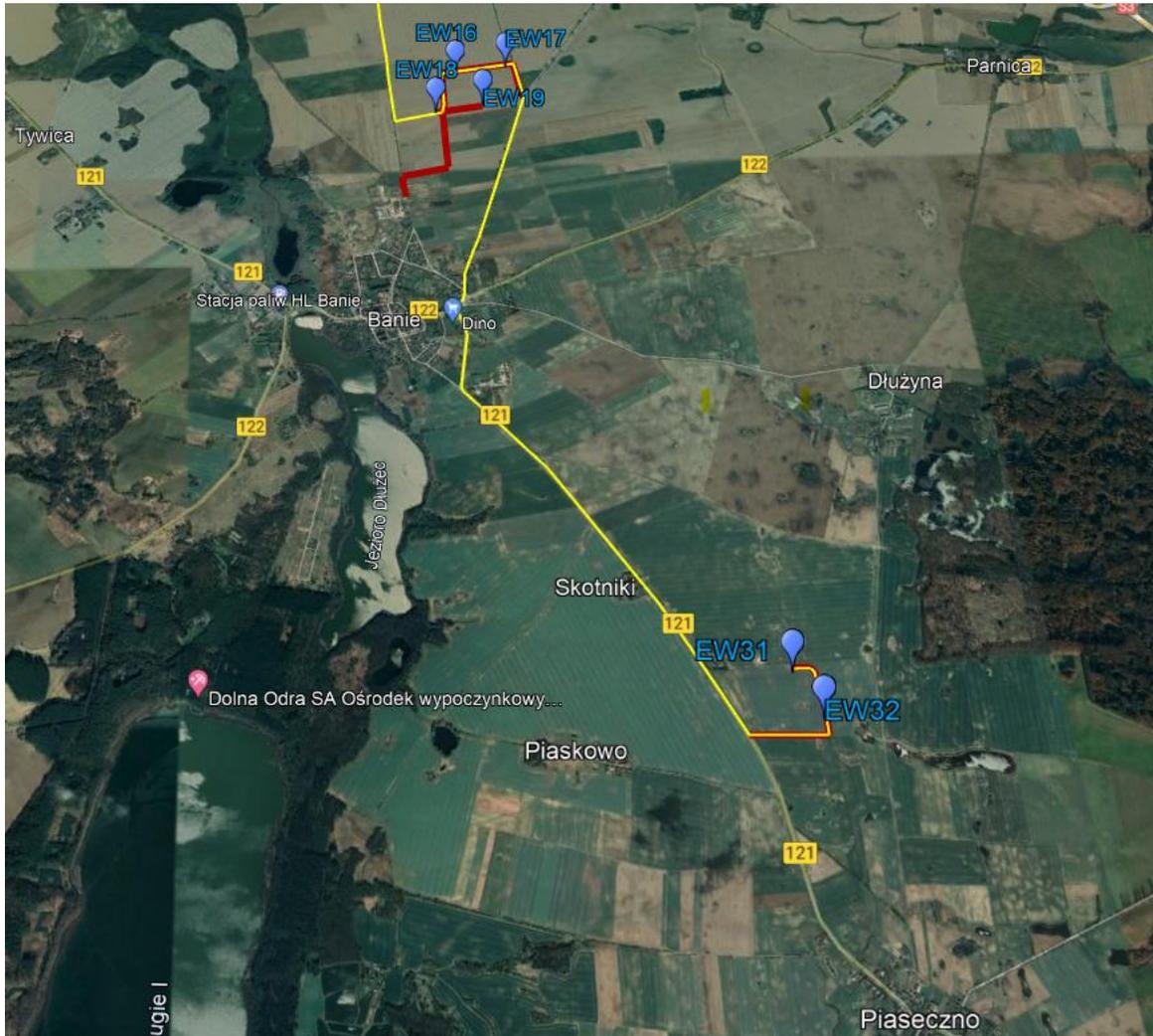
4.4 Landscape

The cumulative impact on landscape occurs in regards to Zelechowo wind farm and 3 turbines of Banie 3 located on the west side of the Zelechowo village. The entire eastern part of the Banie 3 Project is divided with a line of forest which significantly limits visual effects from one or the other side of it. Possibly both wind farms may be visible clearly from the Klodowo – Zelechowo road, and Zelechowo village.

As both Projects are located in open agricultural areas, poor in the most valuable natural landscape elements, with large monocultures of hundreds of hectares carried out as part of relatively intensified agriculture, visibility of additionally 3 turbines from few spots will not significantly impact the landscape.

A similar situation may occur in the case of two turbines of the Banie 3 wind farm and four planned turbines of the Piaseczno project (marked yellow). However, this type of cluster of 7 turbines fits into the already existing surrounding landscape. Similar situation may occur with the turbines of the Dluzyzna wind farm (marked red)

Figure 4-3 Potential cumulative impact of Banie 3, Piaseczno and Dluzyzna Projects



5. ENVIRONMENTAL AND SOCIAL MANAGEMENT

The local EIA prepared for both Projects identified the potential environmental impacts associated with the Project and defined mitigation measures to be implemented to maintain these impacts within acceptable limits. Additional measures to comply with international (EBRD, IFC, EP IV) standards were added for the project. These measures are included in the Environmental and Social Action Plan (ESAP), which represents a roadmap for implementation of key environmental and social actions required for the Project.

Energix Group will implement an Environmental and Social Management System with policies and procedures, as well as, through its contractors, management plans to manage environmental and social aspects. Energix also developed and implemented a Stakeholder Engagement Plan (SEP) that:

- define the relevant Projects stakeholders, planned engagement activities, resources from the Projects Owner to deal with stakeholder engagement, a community grievance mechanism, and a management process along with monitoring and evaluation. The Projects SEP will aim to lay the foundation for effective, bilateral communication between the Projects and its stakeholders, and to build reliable relationships between the Projects and local communities. Regular stakeholder engagement will also enable the Projects Owner to gain a better understanding of how communities prefer to receive information about the Projects. The Projects SEP will be made available to the public on the Projects Owner's website, and as a hard copy to local authorities

and communities. It will be periodically updated as needed, to reflect engagement undertaken, stakeholder feedback, and potential changes in the Projects.

- feature a formal grievance management procedure for the Projects. This mechanism will be disseminated to the affected communities so that people understand how to proceed in case they have questions or complaints concerning the Projects.
- furthermore, to build community members' trust in the Projects and its contribution to local development, the Projects Owner will elaborate and implement an annual Community Investment Plan, engaging appropriately all relevant parties and, in particular, the neighbouring households impacted during construction and/ or operation of the Projects.

5.1 Stakeholder engagement

Energix Polska team maintains engagement with the communes' administrations, landowners, and the community at large. The overall responsibility for external engagement lies with the Construction Manager, with support from the Project Manager who will be present on-site daily. The Project Manager will be close to the site, making sure that everything is running smoothly and can escalate matters to the Construction Manager as required for timely and effective resolution.

For Banie 3 Project before 2018, the information and consultation activities conducted for the Project were largely limited to complying with the permitting requirements of Polish legislation, according to existing documentation. The public could participate in the EIA proceedings from April 10 to May 9, 2019, and from May 29, 2019, to June 27, 2019, with the case files is available for review at the seat of Banie commune. No comments from the public were received during the proceedings, as reported in the Environmental Decisions.

During the process of changing the building permit in 2019, the Company has been in contact with the local stakeholders, focusing on commune and county authorities and landowners, regarding many aspects: introduction, project updates, EIA (2019) process, update of the building permit. This was achieved via daily contact with the authorities and monthly meetings with both authorities and landowners, attended by Energix Construction Manager, Country Manager, Operation Manager, Israel HQ relevant functions, WKB consultants, as per the case.

For Zelechowo Project the environmental impact assessment process started in 2010 for 16 WTGs located in Widuchowa commune, area of Zarczyn, Zelechowo, and Wilcz villages, a process which resulted in an Environmental Decision issued in November 2012. In 2014 the EIA Report was updated entering some parameters change to turbines and the amended Environmental Decision was issued in February 2015. Moreover, the decision on staging the investment was issued in November 2015.

Stakeholder identification, including vulnerable people, and analysis were not conducted in any of the impact assessments reports conducted for the project components.

The public could participate in both EIA proceedings, however, the date and results of social participation in the first procedure are unknown. Based on the amended ECS issued in 2015 the public disclosure of the report took place between 8 September and 29 September 2013. No comments from the public were received during the proceedings. Upon a request from RDOS in Szczecin, the Investor provided some additional clarifications according to noise modeling, and after that second public disclosure between 25 November and 17 December took place.

No details were provided with regards to any additional public meetings.

During the issuing of the building permit, prior to Energix being a shareholder in the project, the Investor applied to suspend this procedure. Some parties did not agree to this. This was a group of people identified as arable land users in the vicinity of the WF, which wanted to be involved in the administrative procedure. The authority responsible for issuing the building permit allowed their participation and did not agree to the suspension of the procedure. The investor complained about this decision, which concerned incorrect identification of these parties (according to the investor legal

analysis, these persons were incorrectly classified as parties with the right to participate in the procedure). The Investor complaint was issued to the administrative body of a higher instance, that agreed presented arguments, which resulted in the rejection of these parties' requests as unfounded, as they have no formal rights to participate in the procedure.

After Energix became an Investor in Zelechowo Project the procedure for issuance of the building permit was unfrozen, and the process did not face any further appeals or complaints.

During construction, the contractor will be responsible for engagement with the local community, under the supervision of the Energix Polska team. During operation, it will be Energix Polska who will conduct the turbine condition monitoring and will prepare the required operation policies. These agreements will include the requirement that if anything material occurs at any moment, the owners' engineer and the investor are to be informed.

Prior and during to construction, Energix plans to organize a kick-off meeting with the authorities and with the landowners where they are going to present how the construction works will look like, what type of equipment is coming to the site, when they should expect it, to agree with the farmers when should the works start so to minimise damages in crops and any other issues raised by the local community. Additionally, the company will distribute information including expected locations of the turbines, expected routes for the transport of the construction equipment and turbines, the timeline for construction, details about the contractors, and contact details for contractor and investor, alongside emergency contact details. For the operation stage, a similar leaflet will be created and distributed locally.

Acting as a corporate citizen, the company proactively donated sanitary devices for the schools and public institutions in Banie commune, in support of local safety measures required by the Covid-19 pandemic. Additionally, the company answered a support request for a sports community event for children in September 2020.