

## Dunărea East: Environmental and Social Action Plan (ESAP), Midmar Callatis SRL

Action	Description	Completion Dates
<b>PS 1/ESR 1 - Assessment and Management of Environmental and Social Risks and Impacts</b>		
1	<p><b>Project Owner ESMS:</b> The company will develop and adopt an Environmental &amp; Social Management System (ESMS) aligned with IFC PS1 and EBRD ESR1, which will include a consolidated Permitting &amp; Compliance Register and Compliance Monitoring Procedure covering all permit conditions and reporting obligations. The ESMS will be communicated to the workforce and updated in response to significant project changes or events.</p> <p>The ESMS will include a consolidated list of all required Owner-level management plans, which will include, at a minimum: Construction Environmental and Social Management Plan (C-ESMP) and associated construction sub-plans covering pollution prevention and control, waste management, water management, noise management, hazardous materials, traffic and transport, community health and safety; biodiversity management and monitoring; biodiversity action; invasive species management; habitat restoration; cultural heritage, stakeholder engagement, labor management, emergency preparedness and response (EPRP), occupational health and safety; social management; livelihoods restoration; security management (including community-security interaction protocols, conflict de-escalation procedures, KPIs, integration with the EPRP, GBVH safeguards and training for security personnel, and alignment with the Voluntary Principles on Security and Human Rights), and contractor management. The ESMS will include consideration of climate change risk and adaptation.</p>	Four weeks prior to construction
2	<p>The company will require its EPC Contractor to develop and adopt a Contractor ESMS and corresponding Contractor Management Plans (CMPs) aligned with the Owner ESMS, communicated to the workforce and covering all relevant E&amp;S and OHS risks applicable to their scope of work and construction methodology.</p> <p>The CMPs will include: Pollution Prevention and Control CMP (including, among others, air, noise, water supply and wastewater, hazardous materials management, etc.); Topsoil Management and Site Reinstatement CMP; Waste CMP; Chance Finds Procedure (pertaining to earthworks operations); Labour CMP/LMP (including employment, working conditions and worker accommodation aspects); Traffic CMP; Occupational Health and Safety CMP and associated procedures; Emergency Preparedness and Response CMP; Contractor Management CMP (for management of EPC second and third-tier subcontractors and subcontractor management of their subcontractors).</p> <p>Perform an in-house contractor's readiness and monitoring audit to ensure adherence to the above and integration with Project Owner ESMS.</p>	Two weeks prior to construction
3	<p><b>Operations ESMP:</b> Aligned with corporate ESG management and reporting requirements, the company will develop and adopt an Operations ESMP (OESMP) and updated sub-plans aligned with the ESMS and appropriate to the operational phase. Plans will address, at a minimum: pollution prevention (including noise), Occupational Health and Safety (OHS), labor management, hazardous materials and waste management; emergency response (including blade and ice throw); community health and safety; biodiversity management (OBMP); traffic management; stakeholder engagement and livelihood restoration (if ongoing obligations are applicable); security management, Site Reinstatement Monitoring and an O&amp;M Contractor Management Plan.</p> <p>The company will require its O&amp;M Contractor to develop and implement a corresponding O&amp;M ESMS aligned with Owner-level plans. The structure and content of the O&amp;M OESMS will be fully aligned with the company's and with the adopted project specific standards.</p>	Ops ESMP: Three months prior to commencement of operations  6 weeks prior to commencement of operations
4	<p><b>E&amp;S Resourcing:</b> For the Project, the company will employ suitably qualified and experienced ESHSS resources to implement ESMS and ESMP during construction, including: ESHSS Manager, Community Liaison Officer(s), Health and Safety Supervisor(s), Biodiversity Specialist, and Cultural Heritage Specialist. The company will require its EPC Contractor to appoint appropriate counterparts.</p> <p>The company will employ a qualified ESHS Manager and Biodiversity Specialist to implement the operational ESMS and will require its O&amp;M Contractor to appoint competent support staff to ensure E&amp;S oversight of their activities and implement applicable project commitments.</p>	Resourcing (construction): Two weeks prior to construction  Resourcing (operations): Two weeks prior to start of operations.
5	<b>Cumulative Impact Assessment (CIA):</b> The company will update and publish updated CIA	Prior to Financial Close
6	<p><b>Human Rights, Supply Chain Due Diligence, and EPC Contract Requirements:</b> The Company will:</p> <p>(i) Review and, where necessary, update the Human Rights Impact Assessment (HRIA) when turbine supplier and EPC Contractor are confirmed. Where material risks are identified, implement appropriate mitigation measures or contractual commitments consistent with the UN Guiding Principles on Business and Human Rights (UNGPs).</p> <p>(ii) Conduct supply chain due diligence on key suppliers and contractors, covering governance, supply chain traceability, grievance mechanisms, and exposure to high-risk geographies. Map and verify high-risk components up to Tier 3 suppliers where feasible, and document the methodology, verification approach, and any corrective actions for identified risks.</p> <p>(iii) Confirm that the EPC contract includes binding environmental and social requirements covering mandatory modern slavery and forced labour clauses; requirements for supply chain due diligence for high-risk suppliers; flow-down of EBRD and IFC E&amp;S and labour standards to subcontractors and suppliers; and monitoring and reporting obligations to the Project Owner.</p> <p>The Company, as part of the procurement process will implement a supply chain rider in form provided by the lenders and agreed with the Owner in the EPC and suppliers' contractual documents for no-objection and approval.</p>	Prior to appointment of turbine supplier and EPC Contractor
<b>PS 2/ESR 2 – Labor and Working Conditions</b>		

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7	<p><b>Labour Management:</b> The company will adopt a Labour Management Plan (LMP) in accordance with EBRD ESR 2, IFC PS2, ILO requirements, and applicable EU and Romanian labour codes, applicable to all project workers including contractors and subcontractors for both construction and operation. The LMP will define commitments on: labour and working conditions; labour influx management; equal opportunities and non-discrimination; anti-sexual harassment and GBVH; prohibition of child and forced labour; whistleblower protection; freedom of association; and collective bargaining. An enforceable Code of Conduct applicable to all workers (including specific GBVH mitigants) will be developed and implemented, with mandatory training provided during induction and periodically thereafter.</p>	LMP and CoC: Two weeks prior to construction
8	The company will implement its Workers' Accommodation Policy (WAP) defining minimum standards in accordance with EBRD ESR 2, IFC PS2 and the joint EBRD IFC Guidance Note on Workers' Accommodation (2009). Accommodation will be approved prior to occupation, inspected regularly and non-conformities corrected.	Two weeks prior to construction
9	During construction, the company will engage a qualified independent consultant to undertake semi-annual monitoring including one audit at peak construction of contractor and subcontractor adherence to national labour laws and project labour and working conditions commitments and LMP implementation.	First labour monitoring audit: Six months after construction start
10	The company will develop and adopt a project-level Workers' Grievance Mechanism (WGM) in accordance with IFC PS2 and EBRD ESR2, available to all project workers irrespective of employer or employment status. The WGM will include: specific considerations for GBVH grievances; confidential and anonymous reporting options; multiple entry points; a trained focal point; referral pathways; and non-retaliation protections. The WGM will be separate from but coordinated with the community grievance mechanism.	Prior to construction mobilisation
11	<p>The company will adopt a structured approach to preventing and managing Gender-Based Violence and Harassment, Sexual Exploitation and Abuse, and Sexual Harassment (GBVH/SEA/SH) risks in line with IFC PS2, EBRD ESR2, and GIIP, via the following</p> <ul style="list-style-type: none"> <li>(i) A GBVH/SEA/SH management procedure with clearly defined survivor-centered prevention measures, reporting protocols, investigation procedures, disciplinary measures, and referral pathways.</li> <li>(ii) Clear definition of where GBVH/SEA/SH risk management sits within the Project ESMS, including roles, responsibilities, and interfaces with workforce management and community engagement processes.</li> <li>(iii) Explicit GBVH/SEA/SH zero-tolerance provisions and related disciplinary measures in the Code of Conduct, with mandatory worker acknowledgement.</li> <li>(iv) Binding GBVH/SEA/SH requirements in EPC and O&amp;M contractor agreements, covering training, Codes of Conduct, and compliance with Project procedures, prior to workforce mobilisation.</li> <li>(v) Mandatory GBVH/SEA/SH training included within the Project training plan and matrix for all project personnel and contractors.</li> <li>(vi) Multiple confidential, accessible, and survivor-centred GBVH reporting channels embedded within the WGM and CGM.</li> </ul>	Prior to construction mobilisation
<b>PS 3/ESR 3: Resources Efficiency and Pollution Prevention</b>		
12	<p><b>Noise, Shadow Flicker, and Wind Energy-Specific Assessments:</b> The company will undertake the following assessments and update the ESIA (or provide standalone documents) accordingly:</p> <p><b>Noise:</b> If an alternative WTG is selected with higher noise levels than current modelling assumptions, the noise modelling assessment will be revised to aim for compliance with Romanian regulatory limits and WBG EHS Guideline thresholds. Noise monitoring at the site boundary and nearest sensitive receptors will be implemented during construction and operations, with exceedances requiring corrective action.</p> <p>Within 1 year of operation the Company will undertake a noise and flicker assessment and calibration of the initial modelling. The report will be sent to the Lenders Adviser and Lenders for review and sign-off.</p> <p>Based on the results the Company will develop an action plan (if needed) to ensure compliance with National law.</p>	<p>Prior to Financial Close</p> <p>Noise monitoring programme: prior to construction / post construction noise monitoring and flicker assessment</p> <p>Within 1 year of operations</p>
<b>PS 4/ESR 4: Community Health, Safety and Security</b>		
13	<p><b>Community Health, Safety and Security Management:</b> The company will develop and adopt a Community Health and Safety Management Plan (CHSMP) and a Security Management Plan (SecMP), including definition of management measures, roles, responsibilities, and monitoring requirements. The CHSMP will include turbine safety exclusion zones, safety signage, and incident response procedures for events affecting nearby communities.</p> <p><b>Traffic Management:</b> A Project Owner Traffic Management Plan (TMP) setting out traffic and public road safety measures, including routing and scheduling (with avoidance of sensitive periods), speed limits, segregation measures, protection of vulnerable road users, community communication, and monitoring procedures.</p>	<p>Four weeks prior to construction</p> <p>Four weeks prior to construction</p>

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<b>PS 5/ESR 5 - Land Acquisition and Involuntary Resettlement</b>		
14	<p><b>Livelihood Restoration Plan:</b> The company will finalise the LRP in line with IFC PS5, EBRD ESR5 and confirm that all permanent and temporary lease agreements for private and state-owned plots are fully executed and documented, including unit rates, terms, and evidence of receipt of payments, with formal agreements in place for all tenant farmers and informal land users. The LRP will set out the strategy for engaging with all Affected Persons (APs).</p> <p>Disclose draft LRP (including supporting non-technical document) and inform and engage in meaningful consultation with all APs on the LRP, including through direct engagement to explain eligibility, compensation principles, entitlements, and any special assistance measures provided, prior to land access.</p> <p>Document the consultations (dates, attendees, issues raised, preferences expressed, and agreements). Update the LRP accordingly to include the consultation findings, agreed compensation or land access arrangements, and reflect these in the Entitlement Matrix as applicable.</p> <p>Disclose the final LRP to all affected people. Provide information to affected persons on the project grievance mechanism so they can raise any concerns regarding the land access and livelihood restoration process.</p>	Final LRP disclosed prior to Financial Close
15	<p><b>LRP Monitoring and Completion Audit:</b> The company will monitor and report on LRP implementation throughout construction and operations until all LRP activities are completed. Annual monitoring reports will be submitted to IFC/EBRD for review, confirming progress against LRP commitments, status of compensation payments, implementation of corrective actions, and outcomes of engagement with APs.</p> <p>Three years after all LRP activities have been deemed complete, the company will engage a qualified independent consultant (not previously associated with the LRP) to conduct a completion audit assessing whether livelihoods have been restored to pre-project levels or better, and documenting any supplemental actions required.</p>	<p>First monitoring report: Six months after construction start</p> <p>Completion audit: Three years after completion of LRP activities</p>
<b>PS 6/ESR 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>		
16	<p>The Company will update and implement the construction-phase Biodiversity Management Plan (CBMPs) to set forth mitigation measures to avoid and minimize impacts on Natural Habitat, Critical Habitat and priority biodiversity features that overlap with the components of the Project. The CBMP will incorporate all related procedures that will be implemented during the project’s activities, which at the minimum, will include procedures for pre-construction checks, flora management, fauna management, topsoil management, sediment management, invasive alien species management, reinstatement and bio restoration.</p> <p>The Reinstatement and Bio restoration Procedure will include details for restoration implementation in areas of Natural and Critical Habitat, and Priority Biodiversity Features. Bio restoration will continue into post-construction and operations phases.</p> <p>Certain operational mitigations need to be implemented or prepared in the construction phase and these should be included in the CBMP (e.g. Shutdown on Demand for birds)</p> <p>The Company will appoint a biodiversity expert to oversee the implementation of the CBMP and provide on-site supervision.</p>	<p>Prior to construction</p> <p>Prior to construction</p>
17	<p>The company will complete a residual impact assessment after the completion of construction. If residual impacts are identified the company will develop a Biodiversity Action Plan (BAP) commensurate with the updated residual impact assessments. The BAP will set forth the biodiversity offset strategy and detail the approach for the project and associated overhead transmission lines to reach No Net Loss of Priority Biodiversity Features and Natural Habitat and Net Gain for Critical Habitat. The BAP will utilize qualified experts with international experience on offsets and additional conservation actions (ACAs) to define: (i) quantified residual impacts on critical habitats, Natural Habitats and PBF;(ii) offset criteria, options and feasibility (iii) selected offsets and monitoring philosophies aiming to deliver measurable conservation outcomes to include indicators and thresholds for adaptive management; (iv) loss/gain analysis (v) engagement actions (vi) budgets for implementation and monitoring (vii) implementation and monitoring schedules (viii) list of BOMPs</p> <p>The BAP will be updated if new residual impacts are identified in the future, particularly to include operational phase residual impacts, such as bird and bat mortality.</p>	Prior to start of operations (Commercial Operation Date COD)
18	<p>The project will appoint a specialized wind-wildlife consultancy to develop an <b>Operational phase BMP (OBMP)</b>, which will include the following: i) confirmation of priority biodiversity values; ii) threshold setting for priority biodiversity values following the potential biological removal method for birds and Frick et al 2026 for bats (<i>A global decision framework for reducing bat fatalities at wind energy facilities. Ecological Solutions and Evidence</i>, 7, e70189. <a href="https://doi.org/10.1002/2688-8319.70189">https://doi.org/10.1002/2688-8319.70189</a>); iii) design of a robust Post Construction Fatality Monitoring programme; and iv) mitigation for birds and bats, including: blade feathering and curtailment for bats. Implement cut in speeds at below 6m/s for bat protection and apply EUROBAT Guidance; <b>and shutdown on demand for birds</b>; and v) an adaptive management strategy. As per the adaptive management strategy, if the review identifies that any of the defined thresholds are exceeded, the company will take additional mitigation measures, including enhanced shut-down on demand (e.g. birds) and curtailment (e.g. bats), in consultation with IFC/EBRD.</p>	<p>6 months prior to start of operations (Commercial Operation Date COD)</p> <p>6 months prior to start of operations (Commercial Operation Date COD)</p>

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19	<p>The company will develop a biodiversity evaluation and monitoring plan (BEMP) to monitor the success of project mitigations, restoration and inform adaptive management and residual impact assessments during the construction and operations phases. The BEMP will include at a minimum:</p> <ul style="list-style-type: none"> <li>- Monitoring of impacts to PBF fauna within the footprint and in adjacent protected areas.</li> <li>- Monitoring of impacts to annex 1, annex 1 priority and other natural habitats including restored areas.</li> </ul> <p>Any new residual impacts identified will be included in a revision of the BAP.</p>	<p>Prior to start of construction</p> <p>Updated 6 months prior to start of operations (Commercial Operation Date COD)</p>
20	<p>The project will implement a robust operational bird and bat fatality monitoring program that follows GIIP (2023 IFC-EBRD-KFW Good Practice Handbook and Decision support Tool for Post Construction Bird and Bat Fatality Monitoring for Onshore Wind Energy Facilities in Emerging Market Countries) and is accurately able to generate unbiased fatality rate estimates. For this programme, the company will contract a specialized wind-wildlife consultancy to design and implement a <b>Post-Construction Fatality Monitoring (PCFM) program</b> at the wind energy facility. (the grid connection overhead line will be only ~300m long and does not require monitoring). The program will be implemented for at least a three-year period with semi-annual reporting following a standardized template, but the actual timeframe of the PCFM program will depend on fatality results and should be extended if necessary. Ongoing strategic review of the PCFM program will take place annually, with a formal review 1 year after implementation.</p>	<p>Prior to operations</p> <p>Prior to operations</p> <p>Six monthly during operations</p> <p>1 year into PCFM program</p>
21	<p>The Company will develop a suite of Biodiversity Offset Management Plans (BOMPs) that detail specific actions required to implement and monitor each offset or ACA identified in the BAP.</p> <p>The BOMPs will utilize qualified experts with international experience on offsets and additional conservation actions (ACAs) to define:</p> <p>(i) roles and responsibilities (ii) site description (iii) objectives and targets (iv) implementation activities (v) monitoring activities (vi) indicators and adaptive management thresholds (vii) schedule (viii) budget</p>	<p>3 months post start of operational phase</p>
<b>PS 8/ESR 8 – Cultural Heritage</b>		
22	<p><b>Cultural Heritage Management Plan (CHMP) and Chance Finds Procedure (CFP):</b> The company will adopt a CHMP and CFP aligned with national laws and IFC PS8 / EBRD ESR 8. The CHMP will:</p> <p>(i) Define the scope and triggers for additional mitigation excavations at identified archaeological sites, coordinated with the appropriate authorities.</p> <p>(ii) Address Intangible Cultural Heritage (ICH) receptors identified within the Area of Influence and assess construction-phase impacts (noise, dust, traffic, access restrictions) in the ESIA, including formal pre-construction engagement with custodians and community stakeholders regarding ICH receptors.</p> <p>The CFP will include clear escalation, reporting, and documentation protocols, including stop work and chain of custody measures (for any objects/remains found).</p>	<p>CHMP and CFP: One month prior to construction</p>
<b>PS 1 / EBRD ESR 10 - Stakeholder Engagement</b>		
23	<p><b>Stakeholder Engagement Plan (SEP):</b> The company will update and adopt the SEP to reflect current project design. The updated SEP will:</p> <p>(i) Strengthen the stakeholder analysis, including identification and mapping of vulnerable groups, and define targeted measures for their participation in disclosure and consultation activities, with gender-disaggregated records where feasible.</p> <p>(ii) Define clear disclosure methods, responsibilities, and timelines for ESIA disclosure and Natura 2000-related assessment disclosure, in culturally appropriate, accessible, and gender-sensitive formats.</p> <p>(iii) Formalise EPC and O&amp;M contractor roles in stakeholder engagement and grievance handling, including coordination with the CLO.</p> <p>(iv) Establish KPIs and monitoring parameters for engagement performance and include periodic public reporting on engagement outcomes.</p> <p>(v) Inform communities of the worker and security force Codes of Conduct and the availability of the community grievance mechanism to raise concerns.</p> <p>(vi) ESIA disclosure will be conducted using methods that specifically target women and vulnerable groups. The disclosure process and all stakeholder feedback will be documented, including attendance and participation disaggregated by gender and other relevant vulnerability criteria where feasible.</p>	<p>Updated SEP: One month prior to construction</p> <p>ESIA disclosure: Per lenders' disclosure plan</p>

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	<p>The ESIA disclosure package shall include a draft BMP, draft LRP, and a Project Non-Technical Summary, agreed with lenders, containing a description of the project and the environmental and social action plan, including actions relevant to affected people and local communities.</p> <p>The Company will disclose a summary of the consultation process including stakeholder feedback received, and the client's response to such feedback (consultation summary). and maintain a web site with updates on data on the project.</p>	
24	<p><b>Community Grievance Mechanism (CGM):</b> The company will update the CGM to include:</p> <ul style="list-style-type: none"> <li>(i) Accidental damage listed as a grievance category.</li> <li>(ii) An internal appeals and escalation process.</li> <li>(iii) Strengthened anti-retaliation and confidentiality provisions.</li> <li>(iv) Monitoring through KPIs including grievance logging, resolution tracking, trend analysis, and periodic public reporting; with specific monitoring of historical landowner expectations from previous turbine hosting arrangements.</li> </ul>	Updated CGM: One month prior to construction