



BC-Wind Offshore Wind Farm Environmental and Social Action Plan

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BC-Wind Offshore Wind Farm Environmental and Social Action Plan

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Glossary

BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
C-ESMP	Environmental and Social Management Plan for the construction phase
CCRA	Climate Change Risk Assessment
CHA	Critical Habitat Assessment
CO ₂	Carbon dioxide
DEC	Decision on Environmental Conditions
E&S	Environmental and Social
E&SS	Environmental and Social Standard
ECES	Environmental Contractor Execution Subplan
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EIB	European Investment Bank
EP	Equator Principles
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
EU	European Union
GHG	Greenhouse gases
GIIP	Good international industry practice
GM	Grievance Mechanism
H&S	Health and Safety

HRIA	Human Rights Impact Assessment
IFC	International Finance Corporation
LIESC	Lenders' Independent Environmental and Social Consultant
LRP	Livelihood Restoration Plan
NTS	Non-Technical Summary
O-ESMP	Environmental and Social Management Plan for the operational phase
OWF	Offshore wind farm
Project	BC-Wind Offshore Wind Farm and its connection infrastructure
PS	Performance Standards
RDEP	Regional Directorate for Environmental Protection (pl. Regionalny Dyrektor Ochrony Środowiska)
RFP	Request for Proposal
SEP	Stakeholder Engagement Plan
SSP	Site Security Plan
TOR	Terms of Reference

Introduction

The project consisting of the BC-Wind Offshore Wind Farm (OWF) and its connection infrastructure (the Project) was developed in compliance with applicable national environmental and social (E&S) laws and regulations, including applicable European Union (EU) law as implemented in Polish law.

The competent authority issued the Decisions on Environmental Conditions (DECs) for the Project, following the Environmental Impact Assessment (EIA) procedures prepared in accordance with the requirements of Polish laws and regulations. The environmental decisions contain conditions and requirements to ensure that the Project will comply with Polish laws and the *acquis communautaire* of the EU as transposed into Polish law during its implementation and operating phases.

The Project is expected to be financed, amongst others, by the European Investment Bank (EIB), several export credit agencies and other Equator Principles Financial Institutions. In order for the Project to qualify for financing by these potential Lenders, the Project shall be required to comply with specific, additional requirements derived from each respective Lenders' "Environmental and Social Standards", including the benchmarks of the Equator Principles (EP) IV, the EIB Environmental and Social Standards (EIB E&SS) and the International Finance Corporation (IFC) Performance Standards (PS), which are additional to the requirements set out in the DECs issued by the relevant Polish authority.

Actions required to ensure the Project is developed in line with these additional requirements (which the Project's promoter has committed to implement) are presented in the following Environmental and Social Action Plan (ESAP). These actions were determined based on gaps that were identified in the Environmental and Social Due Diligence Report (2025).

All deliverables outlined below in the ESAP are – at the request of the potential Lender – to be reviewed by a Lenders' Independent Environmental and Social Consultant (LIESC), which shall assess compliance with the ESAP and the Lenders' E&S Standards.

ENVIRONMENTAL AND SOCIAL ACTION PLAN FOR BC-WIND OFFSHORE WIND FARM

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
1.	<p>Finalise an Environmental and Social Management System (ESMS) for the construction phase. It shall be appropriate for the scale and complexity of the Project.</p> <p>Develop the ESMS for the operational phase of the Project.</p> <p>Assign E&S responsibilities to site-based personnel and provide resources for implementation and monitoring.</p>	<p>Management of environmental, social, health and safety risks and impacts</p> <p>Optimisation of environmental and social management through a formalised system</p> <p>Avoidance of issues related to E&S compliance</p>	<p>EIB E&SS 1</p> <p>EP IV Principle 3, 4</p> <p>IFC PS 1</p> <p>Good international industry practice (GIIP)</p>	<p>Internal resources</p> <p>EHS Manager</p> <p>Staff time</p> <p>Training cost</p>	<p>ESMS for the construction phase in place</p> <p>ESMS for the operational phase in place</p> <p>Policies, procedures and management plans developed and implemented</p>	<p>Finalise before the start of construction phase</p> <p>Develop before the start of operational phase</p>
2.	<p>Implement and maintain ESMS for the lifecycle of the Project. Implementation should capture all Project-related personnel, contractors and subcontractors.</p>	<p>Management of environmental, social, health and safety risks and impacts</p> <p>Optimisation of environmental and social</p>	<p>EIB E&SS 1</p> <p>EP IV Principle 3, 4</p> <p>IFC PS 1</p> <p>GIIP</p>	<p>Internal resources</p> <p>EHS Manager</p> <p>Staff time</p> <p>Training cost</p>	<p>ESMS regularly reviewed to reflect site-specific conditions and the current phase of the Project</p>	<p>Throughout the lifetime of the Project</p>

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	Ensure regular revision, improvement and updates of the ESMS.	management through a formalised system Avoidance of issues related to E&S compliance				
3.	Finalise and implement an Environmental and Social Management Plan for the construction phase (C-ESMP) and prepare and implement Environmental and Social Management Plan for the operational phase (O-ESMP). In addition to management plans specified elsewhere in this ESAP, these Plans shall include but not be limited to: <ul style="list-style-type: none"> Waste Management Plan, Emergency Response Plan, Noise and Vibration Management Plan. 	Management of environmental, social, health and safety risks and impacts during the construction and operational phases Compliance with the DEC's requirements and ESAP provisions Avoidance of issues related to E&S compliance	EIB E&SS 1 EP IV Principle 2, 4 IFC PS 1 GIIP	Internal resources EHS Manager Staff time Training cost	C-ESMP in place O-ESMP in place Compliance with the ESMP as one of the conditions of contractors' / subcontractors' appointment	Finalise and implement C-ESMP before the start of construction phase Prepare and implement O-ESMP before the start of operational phase

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	<p>These Plans shall address the identified E&S risks and impacts and other performance improvement measures.</p> <p>Ensure that obligations and measures included in the obtained permits are included in the proper management plans.</p>					
4.	<p>Prepare the Terms of Reference (TOR) and Scope of Work acceptable to the Lenders for the engagement of the LIESC.</p> <p>Appoint a LIESC to monitor Project implementation against the ESAP and E&S matters.</p> <p>LIESC will be provided access to all relevant / requested Project documentation, staff, contractors and consultants through which will be</p>	<p>Project monitoring and reporting conducted by the external consultant with experience in Category 'A' projects</p>	<p>EIB E&SS 1</p> <p>EP IV Principle 7</p> <p>IFC PS 1</p>	<p>Internal resources</p> <p>External consultant with E&S experience in Category 'A' projects</p>	<p>TOR and the Scope of Work of LIESC accepted by the Lenders</p> <p>Appointed LIESC accepted by the Lenders</p>	<p>Before the financial close</p> <p>Before the start of construction phase</p>

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	able to review Project's E&S performance.					
5.	<p>Report to Lenders information on the environmental, social, health and safety matters as part of the periodical Environmental and Social Report.</p> <p>These reports shall include i.a. a summary of compliance status, information on the Livelihood Restoration Plan (LRP), Stakeholder Engagement Plan (SEP), C-ESMP and O-ESMP implementation, monitoring results and any grievances or complaints made.</p> <p>Periodical Environmental and Social Reports shall be prepared by the appointed LIESC.</p>	<p>Compliance with national law, Lenders' requirements, loan documentation</p> <p>Regular and transparent communication with Lenders</p> <p>Identification of potential risks, gaps or non-conformities requiring corrective action</p>	<p>EIB E&SS 1</p> <p>EP IV Principle 9</p> <p>IFC PS 1</p>	<p>LIESC</p> <p>Internal resources</p>	<p>Template of the report accepted by the Lenders</p> <p>Environmental and Social Reports</p>	<p>Semi-annually during the construction phase</p> <p>Annually during the operational phase</p>
6.	Prepare a Human Rights Impact Assessment (HRIA) to address potential adverse impacts on human rights, which will be in line with the	Consideration and assessment of impacts on human rights	<p>EP IV Principle 2</p> <p>UNGPs</p>	Internal resources	HRIA accepted by the Lenders	Before the start of construction phase

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	relevant United Nations Guiding Principles (UNGPs).					
7.	Maintain a formal workers' grievance platform for all direct and non-employee workforce (i.e. contractors, subcontractors) and communicate it to all personnel.	Improved communication and dialogue with the personnel	EIB E&SS 8 EP IV Principle 6 IFC PS 2 GIIP	Internal resources	Maintained workers' grievance platform Grievance Log in place Progress update on resolution of workers grievances included in periodical Environmental and Social Reports	Throughout the lifetime of the Project
8.	Prepare Supply Chain Risk Assessment to identify significant labour risks and impacts associated with the Project's core supply chains in relation to child labour, forced labour and occupational H&S.	Labour unrest	EIB E&SS 8 IFC PS 2 GIIP	Internal resources Contractors	Supply Chain Risk Assessment accepted by the Lenders Mitigation / remediation measures agreed	Before the start of construction phase

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
					<p>with the primary supplier if significant risks related to presence of child labour, forced labour or sexual exploitation or abuse are identified</p> <p>Reports on the progress made by the primary supplier in mitigating / remediating identified risks accepted by the Lenders</p>	
9.	Update and maintain the Environmental Contractor Execution Subplan (ECES), which will address relevant environmental issues and Project-level approach related to resource efficiency and pollution	<p>Efficient management of resources</p> <p>Pollution prevention</p> <p>Protection of the environment</p>	<p>EU law</p> <p>Polish law</p> <p>EIB E&SS 3</p> <p>IFC PS 3</p>	<p>Internal resources</p> <p>Contractors</p> <p>Subcontractors</p>	<p>Updated ECES in place</p> <p>Compliance with the ECES as one of the conditions of contractors' /</p>	Before the start of operational phase

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	prevention for the operational phase of the Project.	Compliance with the DEC's requirements	GIIP		subcontractors' appointment	
10.	Prepare Site Security Plan (SSP) to provide adequate security management arrangements and contingency plans to protect the integrity of Project operations from security incidents or changes to the operating environment. SSP shall include requirements for contracted security personnel.	Security on the site Contracted security personnel implicated in past abuses Allegations of unlawful or abusive acts by security personnel	Polish law IFC PS 4 Voluntary Principles on Security and Human Rights GIIP	Internal resources EHS Manager Contractors	SSP accepted by the EHS Manager	By the end of the second quarter of 2026
11.	Finalise and implement the LRP to address potential economic displacement in the offshore part of the Project, to ensure that any effects of economic loss are managed and restored or improved. Update the LRP to determine the impact of the Project on the livelihoods of affected persons during	Identification, assessment and management of economic displacement of Project Affected Persons during the operational phase	Polish law EIB E&SS 6 IFC PS 5 Code of Good Practice GIIP	Internal resources	LRP accepted by the Lenders in place and implemented Updated LRP accepted by the Lenders and implemented	Finalise and implement one month before the start of construction phase in the offshore part Update and implement one

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	the operational phase, as well as potential restrictions on the use of the OWF area imposed by the Maritime Office in Gdynia and possible further restrictions and fishing bans, or following the adoption of the Act on state aid for commercial fishing vessel owners or the establishment of a final uniform compensation system.	Compliance with Polish law / Code of Good Practice			Compensation system adapted in accordance with the applicable provisions	month before the start of operational phase or once the Act on state aid for commercial fishing vessel owners is adopted or a final uniform compensation system is established
12.	External monitoring of the implementation of LRP shall be conducted by the LIESC as part of the periodical Environmental and Social Reports to verify whether implemented measures are compliant with LRP and Lenders' requirements.	Compliance with Lenders' requirements, loan documentation Regular and transparent communication with Lenders Identification of potential risks, gaps or non-conformities requiring corrective action	EIB E&SS 6 IFC PS 5	Internal resources LIESC	Environmental and Social Reports	Before and during construction phase until completion audit is conducted Annually during the operational phase until completion audit is conducted

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
13.	<p>Completion audits to verify whether the LRP and its update have been successfully implemented shall be conducted by the LIESC.</p> <p>As part of the audits, prepare a completion audit reports, which will address findings addressing the objectives and scope of conducted audit. These reports shall be made available to stakeholders on the Project website and reported to the Lenders.</p>	<p>Compliance with Lenders' requirements, loan documentation</p> <p>Transparent communication with stakeholders and Lenders</p> <p>Verification of compliance of implemented measures with the LRP</p> <p>Identification of potential risks, gaps or non-conformities requiring corrective action</p>	<p>EIB E&SS 6</p> <p>IFC PS 5</p> <p>GIIP</p>	<p>Internal resources</p> <p>Project website</p> <p>LIESC</p>	<p>Completion audit reports accepted by the Lenders and disclosed on the Project website</p>	<p>First completion audit report within 60 days after the LRP for the construction phase is implemented</p> <p>Second completion audit report within 60 days after the implementation of the updated LRP is implemented</p>
14.	<p>Prepare and implement an Ecosystem Services Management Plan to assess the potential risks and impacts associated with the Project that affect ecosystem services.</p>	<p>Identification and management of risks and impacts of the Project on ecosystem services</p>	<p>EIB E&SS 4</p> <p>IFC PS 4, 6</p> <p>GIIP</p>	<p>Internal resources</p> <p>Contractors</p>	<p>Ecosystem Services Management Plan accepted by the Lenders</p>	<p>Before the start of construction phase</p>

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
		Assessment of dependence on ecosystem services by potentially affected communities and by the Project				
15.	Prepare a Critical Habitat Assessment (CHA) to determine the presence of critical habitats in the vicinity of the Project and assess possible impacts on critical habitats.	<p>Identification of presence of critical habitats</p> <p>Assessment of potential impacts on critical habitats</p> <p>Conservation and protection of critical habitats</p>	<p>EIB E&SS 4</p> <p>IFC PS 6</p> <p>GIIP</p>	<p>Internal resources</p> <p>Contractors</p>	CHA accepted by the Lenders	Before the financial close
16.	If any critical habitats are identified in the CHA (see No. 15.), no Project activities shall be implemented in these areas, unless the relevant conditions of Applicable Standards are met.	Conservation and protection of critical habitats	<p>EIB E&SS 4</p> <p>IFC PS 6</p> <p>GIIP</p>	<p>Internal resources</p> <p>Contractors</p>	BAP accepted by the Lenders	Before the start of construction phase

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	If these conditions are met, develop and implement a Biodiversity Action Plan (BAP).					
17.	<p>Prepare, implement and maintain a Biodiversity Management Plan (BMP), which will include Project's mitigation strategy and management of measures to avoid and minimise losses of biodiversity and provide opportunities for enhancement.</p> <p>BMP shall include mitigation measures and requirements for monitoring during the pre-construction and construction phases of the Project.</p> <p>Update BMP with mitigation measures and requirements for monitoring for the operational phase of the Project.</p>	<p>Identification, protection and conservation of biodiversity</p> <p>Minimisation of the potential Project impacts</p> <p>Compliance with the DEC's requirements</p>	<p>EU law</p> <p>Polish law</p> <p>EIB E&SS 4</p> <p>IFC PS 6</p> <p>GIIP</p>	<p>Internal resources</p> <p>Contractors</p> <p>Independent Ornithological Expert</p>	<p>1. BMP accepted by the Lenders</p> <p>2. Updated BMP for the operational phase</p> <p>3. Periodical partial monitoring reports accepted by the RDEP in Gdańsk</p> <p>4. Conclusion from the monitoring</p>	<p>1. Develop BMP before the start of construction phase</p> <p>2. Update before the start of operational phase</p> <p>3. Within 3 months after each year of individual stages of monitoring</p> <p>4. Within 6 months after</p>

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	Reporting of environmental monitoring results should be conducted in accordance with the timeframe indicated in the DEC for the OWF issued by the Regional Directorate for Environmental Protection (RDEP) in Gdańsk.				accepted by the RDEP in Gdańsk	completion of the last season of the operational monitoring
18.	Manage supply-chain related risks of significant land-use conversion that impacts biodiversity or ecosystem services caused by primary suppliers as part of the supply chain. Systems and verification practices shall be adopted in the Project's ESMS.	Management of supply-chain related risks Optimisation of environmental and social management through a formalised system Avoidance of issues related to E&S compliance	EIB E&SS 4 IFC PS 6 GIIP	Internal resources Primary suppliers	Policies, procedures and management plans developed and implemented	Before the start of construction phase
19.	Prepare a Climate Change Risk Assessment (CCRA), which will include consideration of relevant physical risks, in line with Climate Physical Risk and Climate Transition Risk categories of the Task Force on	Consideration and adaptation to risks related to climate change	National Energy and Climate Plan EIB E&SS 5 EP IV Principle 2	Internal resources	CCRA accepted by the Lenders	Before the start of construction phase

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	Climate-related Financial Disclosures (TCFD).		TCFD GIIP			
20.	On request, provide the Lenders with climate-related information relevant to assessing the economic case for the Project. This shall include climate change mitigation and adaptation aspects, and, when practical and feasible, an assessment of climate-related Project impacts on different groups in society, with a particular focus on vulnerable groups.	Climate-related information on economic case for the Project Assessment of climate-related Project impacts on different groups in society Transparency on climate-related issues related to the Project	EIB E&SS 5	Internal resources	Climate-related information relevant to assessing the economic case for the Project accepted by the Lenders who requested this analysis	Determined by the Lenders' request
21.	Implement a SEP on a continuous basis and monitor its implementation. Report and disclose on key engagement activities, including the status of grievance handling.	Ensuring effective stakeholder engagement and maintaining good community relations	EIB E&SS 2 EP IV Principle 5 IFC PS 1	Internal resources	Stakeholder Engagement Plan in place on the Project website and in dedicated locations	Throughout the Project lifetime Bi-annually during the construction phase and once

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	<p>Update SEP to define engagement during the construction and operational phases and for stakeholder reporting.</p> <p>Update SEP in case of any changes that result in significant changes to environmental and social risks and impacts.</p>	<p>Community issues identified and expectations manager</p> <p>Provision of ongoing information about any significant changes to the Project</p> <p>Ensuring the Project remains publicly accepted</p>	GIIP		SEP updated in accordance with established timeframe	<p>every three years during the operational phase</p> <p>In case of any changes that result in significant changes to environmental and social risks and impacts</p>
22.	<p>Maintain an effective Grievance Mechanism (GM) for stakeholders. Monitor its availability on the Project website and in dedicated locations for people without internet access. Register each of the grievances.</p>	<p>Ensuring effective stakeholder engagement and maintaining good community relations</p> <p>Ensuring all stakeholders have possibility and access to raise any concerns</p> <p>Ensuring the Project remains publicly accepted</p>	<p>EIB E&SS 2</p> <p>EP IV Principle 6</p> <p>IFC PS 1</p> <p>GIIP</p>	Internal resources	<p>Maintained GM on the Project website and in dedicated locations</p> <p>Reports on grievances received in periodical Environmental and Social Reports</p>	Throughout the Project lifetime

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
					Grievance log in place	
23.	<p>Disclose the LRP and ESAP on the Project website.</p> <p>Ensure that all of the above documents (together with SEP, GM, NTS, EIA Reports and DEC's) are available in dedicated locations for people without internet access. Inform stakeholders where these documents are available in physical form and how to access them.</p>	<p>Ensuring transparency and effective disclosure of information related to the Project</p> <p>Ensuring effective stakeholder engagement and maintaining good community relations</p> <p>Ensuring the Project remains publicly accepted</p>	<p>EIB E&SS 2</p> <p>EP IV Principle 10</p> <p>IFC PS 1</p> <p>GIIP</p>	Internal resources	EIA Reports, DEC's, NTS, LRP, ESAP, SEP, GM in place on the Project website and in dedicated locations	<p>ESAP disclosed before the signing</p> <p>LRP disclosed by the end of the first quarter of 2026</p> <p>Throughout the Project lifetime</p>
24.	If the Project emits over 100,000 tonnes of CO ₂ equivalent annually, report publicly greenhouse gases emission levels (combined Scope 1 and Scope 2 emissions and, if appropriate, the greenhouse gases	Ensuring transparency and effective disclosure of information related to greenhouse gases emission	EP IV Principle 10	Internal resources	Public reports on greenhouse gases emission	Annually during the operational phase

No.	Required Action	Environmental & Social Risks (Liability / Benefits)	Applicable Standard / Requirement	Resources, Responsibility	Deliverables / Evidence of completion	Timeframe
	ratio) during the operational phase of the Project.					
25.	<p>Hold annual meetings with local communities and key stakeholders to provide information on Project operations and activities, and increase awareness on availability of the GM.</p> <p>Collect structured, synthetic notes from stakeholder meetings and consolidate them to assess how stakeholder feedback influences the Project.</p> <p>Review the frequency of meetings after the first 3 years of operational phase.</p>	<p>Ensuring effective stakeholder engagement and maintaining good community relations</p> <p>Ensuring the Project remains publicly accepted</p>	<p>EIB E&SS 2</p> <p>EP IV Principle 5</p> <p>IFC PS 1</p> <p>GIIP</p>	Internal resources	<p>Archive structured summary notes from stakeholder meetings</p> <p>Summary of stakeholder meetings included in the SEP updates</p> <p>Reports on meetings in periodical Environmental and Social Reports</p>	<p>Annually</p> <p>Revision after first 3 years of operational phase</p>