



Non-Technical Summary

of the Environmental and Social Impact Assessment

DAMA Solar PV Project Arad County, Romania

Up to ~1.3 GWp installed

March 2026



ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AoI	Area of Influence (the area where the Project could have impacts)
BAP	Biodiversity Action Plan
CLO	Community Liaison Officer
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
GRM	Grievance Redress Mechanism (a way to raise complaints and get responses)
IFC	International Finance Corporation
LRP	Livelihood Restoration Plan
MW	Megawatt (export capacity)
MWp	Megawatt-peak (installed solar capacity)
Natura 2000	Network of protected areas in the European Union
NGO	Non-governmental organisation
NTS	Non-technical summary
PUZ	Zonal Urban Plan
PV	Photovoltaic (solar power)
SEP	Stakeholder Engagement Plan
SPV	Special purpose vehicle (the Project company)

Outline of the project and its environmental and social implications

The DAMA Solar PV Project (the “Project”) will be the largest, **ground-mounted solar photovoltaic (PV) development** in Europe, located in Arad County, western Romania, within the administrative areas of Grăniceri and Pilu communes. The Project will generate renewable electricity and export up to **approximately 1,065 MW** to Romania’s high-voltage transmission network. The development includes PV arrays and inverter stations, internal access roads and cabling, a main step-up substation, the 400 kV “Grăniceri” interconnection substation, and an approximately 3.5–3.6 km underground high-voltage cable linking the substations and connecting to the national grid. The Project is planned as a phased development to allow progressive construction and commissioning.



The Project is in an **advanced pre-construction stage**. The Environmental and Social Impact Assessment (ESIA) and key management plans have been prepared and updated to reflect the current design and lender requirements, including the Stakeholder Engagement Plan (SEP), Livelihood Restoration Plan (LRP), and Biodiversity Action Plan (BAP). The Project is nearing mobilisation, with contractor selection and detailed planning underway. All key permits and approvals required to proceed to construction have been issued, and the Project will implement the works in compliance with permit conditions, Romanian law, and applicable international lender standards.

The main environmental and social **risks relate to the scale of construction activities and the sensitivity of the Project’s setting**, including its location within Natura 2000 protected areas and a landscape used for agriculture and livestock grazing. Key potential impacts include disturbance to habitats and species, temporary nuisance to nearby communities (dust, noise), construction traffic and road safety risks, soil disturbance and erosion, waste generation, and temporary restrictions to access along agricultural roads and pasture—particularly associated with the installation of the underground high-voltage cable. The Project will apply the **mitigation hierarchy** (avoid–minimise–restore–offset/compensate) through embedded design measures and detailed construction management planning. Measures will include **biodiversity-sensitive working methods and monitoring under the BAP** (including an **82 ha set-aside area** where panels will not be installed), strict controls on working areas and vegetation clearance, traffic management and community safety measures, dust/noise controls, spill prevention and waste management, and reinstatement of disturbed land. The LRP sets out measures to avoid livelihood impacts where possible (including scheduling and access management) and to compensate verified losses if impacts cannot be fully avoided.

Stakeholder engagement will continue throughout pre-construction, construction and operations in line with the SEP. A Project grievance mechanism will remain available for any stakeholder to raise questions or concerns (including anonymously if preferred), with defined response timeframes. The Project’s **Community Liaison Officer** will serve as a key point of contact to ensure timely communication, effective issue resolution, and transparent reporting of Project progress and performance.

1. INTRODUCTION

This Non-Technical Summary (NTS) provides an overview of the DAMA Solar PV Project and the main findings of the environmental and social studies prepared for the Project.

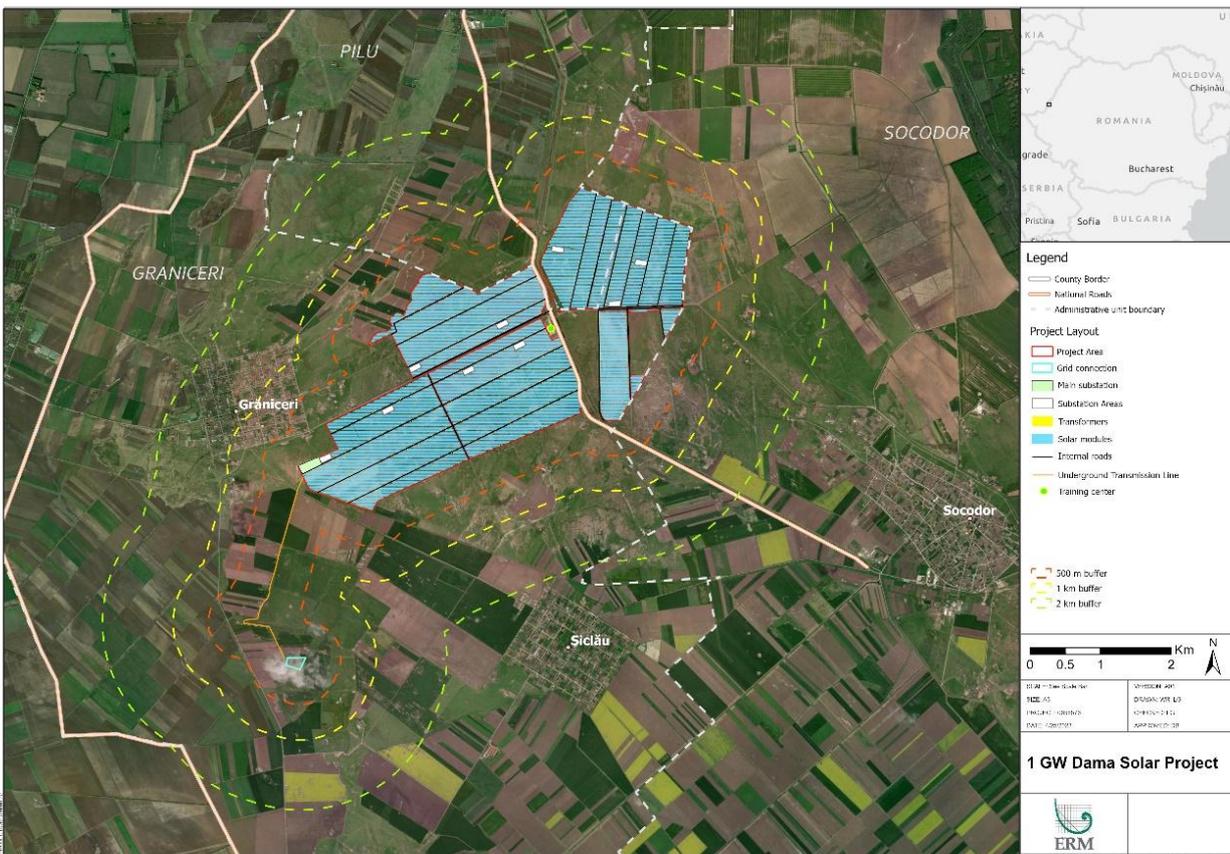
The NTS summarises information from the Project's Environmental and Social Impact Assessment (ESIA, 2023) and the updated management plans prepared to meet Romanian requirements and international lender standards, including the Stakeholder Engagement Plan (SEP, 2026), Livelihood Restoration Plan (LRP, 2026), the Supplementary Lenders Information Package (SLIP), and the Biodiversity Action Plan (BAP).

What is the Project about?

The Project will build and operate a large, ground-mounted solar power plant in Arad County, western Romania. It will generate renewable electricity and export up to approximately 1,065 MW to Romania's high-voltage transmission network. The Project is planned in phases so that parts of the plant can be commissioned progressively.

Where is the Project located?

The Project is located in the administrative territories of Grăniceri and Pilu communes, Arad County, around 3.6 km east of the border with Hungary. Nearby settlements include Grăniceri (approximately 250 m), Pilu (approximately 2.5 km), Șiclău (approximately 2 km) and Socodor (approximately 2.7 km).



Location of the Project. Source: ERM 2023

Why is the Project needed?

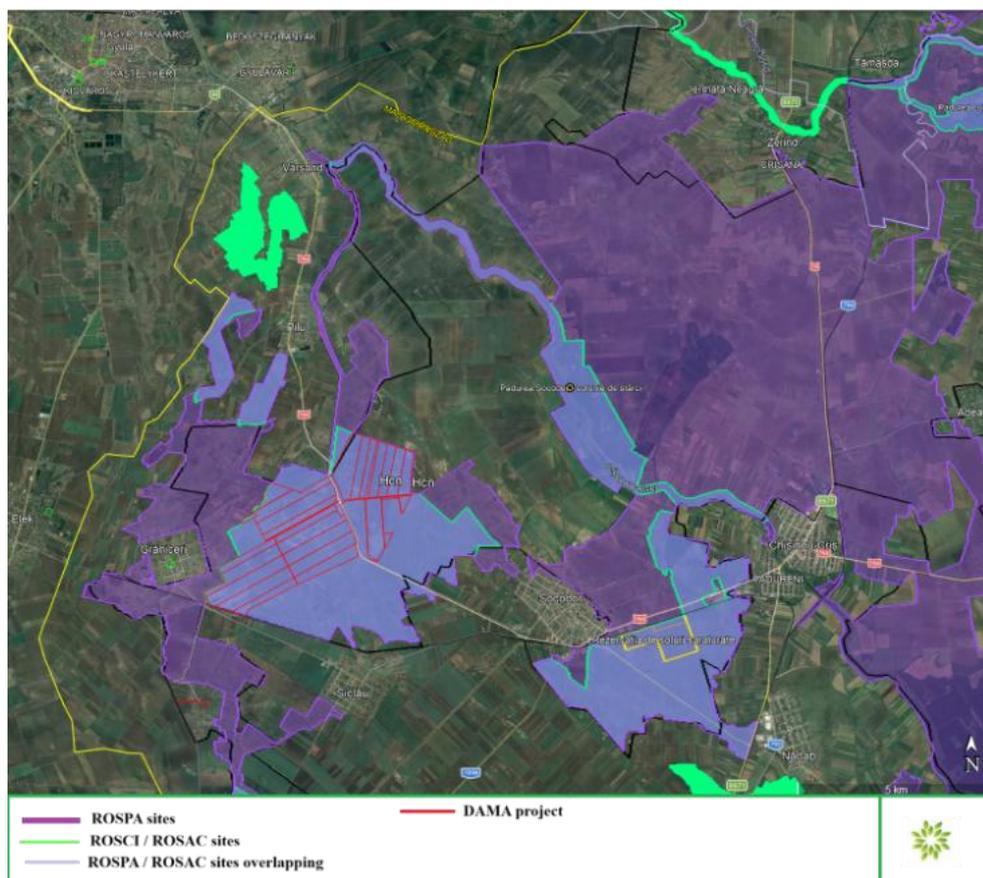
Romania and the European Union are increasing the share of electricity produced from renewable sources. Large solar projects can help deliver new low-carbon energy generation, strengthen security of supply and reduce greenhouse gas emissions compared with fossil fuel generation.

How did the Project design evolve during the planning process?

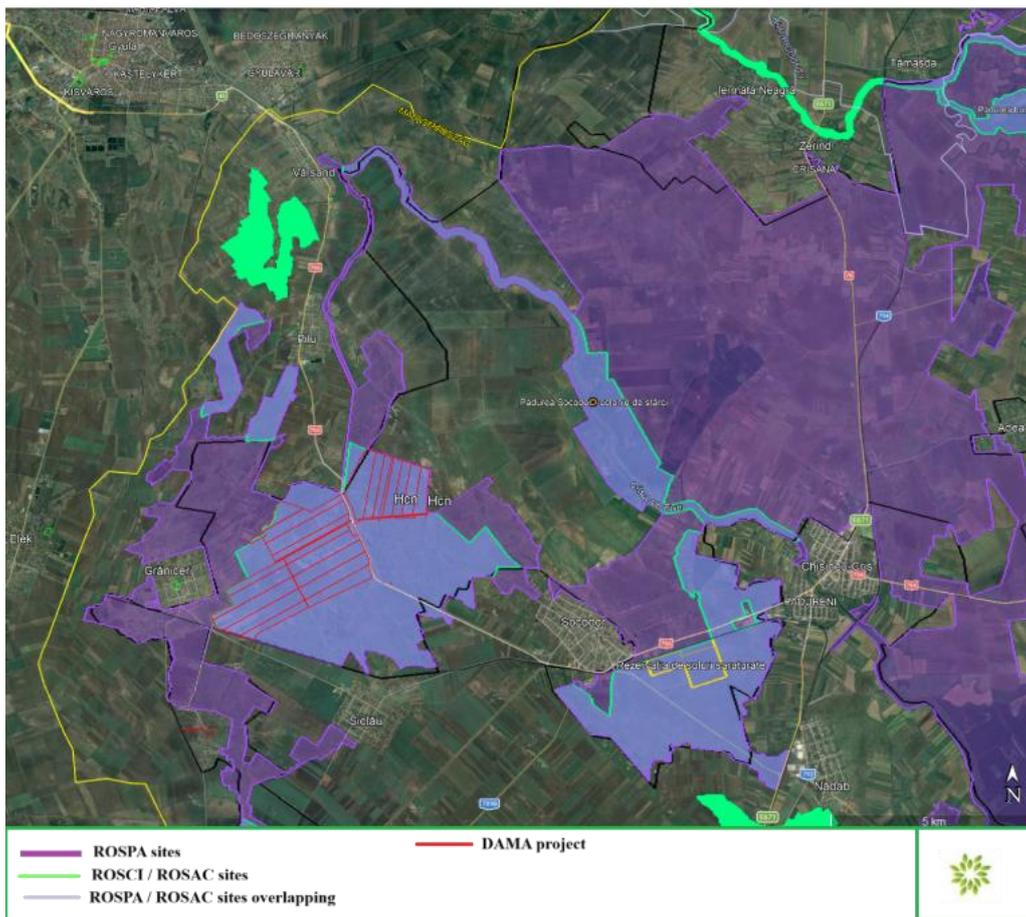
As part of the planning process, a Zonal Urban Plan (PUZ) and associated Local Urban Regulation (RLU) were prepared to enable the change of land-use designation from agricultural land to land allocated for renewable energy infrastructure, allowing the development of the photovoltaic park and associated facilities. The PUZ planning procedure was subject to Strategic Environmental Assessment (SEA) in accordance with national legislation. Following approval of the planning documentation, the Project proceeded to obtaining the Construction Authorisations, including through performing the Environmental Impact Assessment (EIA) stage required for construction permitting.

During the planning phase, the Project design was further refined to strengthen biodiversity protection. As a result, land plots 9, 10 and 11 were excluded from the development footprint and designated as a biodiversity set-aside area of approximately 82 ha, where solar panels will not be installed.

The maps below illustrate the location of the Project in relation to nearby Natura 2000 sites and the exclusion of the biodiversity set-aside area from the final Project layout.



Initial project location and layout



Adjusted layout - Exclusion of land plots 9, 10 11 from the project design

2. PROJECT DESCRIPTION

Main components

DAMA project will include the following elements:

- Ground-mounted PV module arrays installed on fixed mounting structures
- Inverter stations converting direct current (DC) into alternating current (AC)
- Internal medium-voltage collection network and underground cabling within the PV site
- Internal access roads, drainage features, security fencing and a control/SCADA system
- A main 110/400 KV transformer substation and interconnection substations
- An approximately 3.5-3.6 km underground 400 kV cable linking the substations and connecting to the transmission system

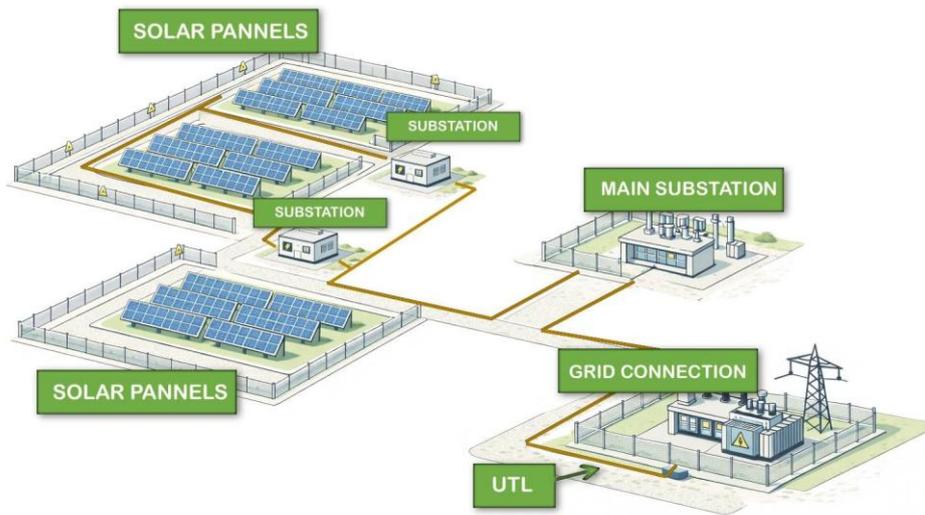


Illustration of main project elements

Size and capacity

The Project is designed to export up to approximately **1,065 MW of active power** to the grid and has an installed DC capacity of **up to 1.3 GWp**. The overall **Project footprint is approximately 1,064 ha**.

Project owner

The Project is owned and advanced by Rezolv Energy through the West Power Investments (Project SPV). Construction and operations will be implemented through contracted specialists under the Project's Environmental and Social Management System (ESMS).

Project phases and indicative schedule

Phase	Activities included
Pre-construction	Final design and contractor mobilisation, pre-construction surveys, community notifications, establishment of management plans and monitoring
Construction	Civil works (access, foundations, cabling), PV and electrical installation, substation works, testing and phased commissioning
Operation	Routine maintenance, vegetation management (including grazing where applicable), inspections, monitoring and reporting
Decommissioning	Removal of equipment, recycling and waste disposal, and site reinstatement in line with permits and good practice

Construction phase

This phase is expected to begin in mid-2026 and last about 2.5 years. It will be implemented in three main stages (A, B and C) and will require a workforce of approximately 500 workers.

This period is also anticipated to generate the most significant impacts on the environment and nearby communities. Nevertheless, with the planned mitigation measures in place and well-organised construction activities, most of these impacts should be short-term and will subside once the plant becomes operational.

Major activities:

- Temporary site set-up areas (offices, storage, worker facilities – worker accommodation will be off-site in accredited accommodation facilities in nearby towns and villages) and marked access points
- Delivery of materials and equipment (including PV modules, mounting structures and electrical equipment)
- Ground preparation and installation of mounting structures and PV modules
- Trenching and installation of underground cables, including the 400 kV cable laid along an existing agricultural road
- Substation construction and electrical testing prior to energisation
- Progressive restoration of disturbed areas and removal of temporary facilities

Operation activities

During operation, the Project will be largely quiet and automated. Activities will mainly include inspections, electrical maintenance, vegetation management and security patrols. Vegetation under and between panels will be managed to protect equipment and reduce fire risk, and may include controlled grazing where compatible with biodiversity objectives.

Decommissioning activities

Project lifetime has not been established yet, but is expected to be 25 year or more. When the beneficial life of the Project facilities comes to an end a detailed Decommissioning Plan will be prepared in line with the technology available at the time to guide the execution of the decommissioning works.

As part of the Project decommissioning, the site will be reinstated as pastureland.

Permits and approvals

The Project has followed Romania's environmental and planning permitting process. All key permits and approvals required to proceed to construction have been issued. The Project will continue to manage ongoing permitting obligations (including compliance conditions) through its permit register and compliance tracking.

Current phase

The Project has completed the main environmental and social studies and is nearing the pre-construction phase. Financing arrangements and contractor selection are in progress. Updated plans have been prepared (SEP, LRP and BAP) and the Project is aligning with international lender standards.

3. ENVIRONMENTAL AND SOCIAL MANAGEMENT

- **Environmental and Social Impact Assessment (ESIA, 2023)**, including annexes
- **Stakeholder Engagement Plan (SEP, 2026)**, including an external grievance mechanism
- **Livelihood Restoration Plan (LRP, 2026)**, covering the grid connection components
- **Biodiversity Action Plan (BAP)**, including on-site measures and offset planning
- **Supplementary Lenders Information Package (SLIP, 2026)**, including all annexes
- **Construction Environmental and Social Management Plan (CESMP, 2026)**, including all annexed management plans
- **Biodiversity Management Plan (BMP 2026)**
- **Non-Technical Summary (NTS, 2026)**

The Project’s environmental and social management is based on Romanian legal requirements and good international industry practice. It is also designed to align with the standards typically applied by international lenders, including the IFC Performance Standards and the EBRD Environmental and Social Policy and related requirements. Thus, a set of documents have been prepared in order to comprehensively assess the environmental and social impacts and define the required mitigation measures.

An Environmental and Social Action Plan (ESAP) has been developed as part of the due diligence process. The ESAP sets out specific actions required for the Project to achieve full alignment with EBRD Performance Requirements and international best practice.

The ESAP includes the Company’s commitment to address a number of non-material gaps identified during the assessment. These gaps do not represent significant risks to the environment or communities but require corrective actions to ensure full compliance prior to construction and during implementation.

E&S Baseline Methodology

The environmental and social baseline for the Project was established using a combination of desk-based studies, field surveys, and stakeholder consultations, in accordance with Romanian regulatory requirements and international standards. Existing information from national databases, scientific literature, previous studies, maps, and publicly available sources was reviewed to characterize environmental conditions and socio-economic context within the Project area.

Specialist site visits and field investigations were conducted to verify baseline conditions and collect primary data where required. Surveys addressed key environmental components such as geology, soils, water resources, air quality, noise, biodiversity, and land use, as well as social aspects including demographics, livelihoods, infrastructure, and community services. Cultural heritage considerations were also reviewed.

Consultations with local authorities, community representatives, and other stakeholders provided additional information on local land use patterns, economic activities, and potential sensitivities. The collected data were analysed to establish a robust reference point against which Project impacts could be assessed and mitigation measures developed.

How impacts are managed

The Project applies a **mitigation hierarchy**: **avoid impacts** where possible through design and scheduling, **minimise impacts** through good practice controls, **restore affected areas** after works, and **offset or compensate** residual impacts where needed.

Before construction starts, contractors will prepare detailed management plans consistent with the ESIA and permit conditions. These plans will cover traffic, dust and noise control, waste management, emergency response, worker health and safety, community health and safety, and biodiversity protection.

Overview of the environmental and social context

<p>Land use and landscape</p>	<p>The Project area is predominantly agricultural land, including large arable fields and pasture. The landscape is generally flat, and visibility can be long-distance in open areas. Local roads and agricultural tracks are used by farmers and livestock owners.</p>
<p>Soils and water</p>	<p>Soils are typical of the region’s agricultural plains. These are of low quality, predominantly a clay-based mix. Temporary soil disturbance can occur during excavation and cabling, and this is managed through topsoil handling and reinstatement. The area contains drainage channels and ditches; surface water protection measures focus on preventing sediment run-off and accidental pollution during construction.</p>

<p>Protected areas and biodiversity sensitivity</p>	<p>The Project footprint lies within Natura 2000 protected sites, namely:</p> <ul style="list-style-type: none"> • <i>Câmpia Crișului Alb și Crișului Negru Special Protection Area</i> (ROSPA0015), also recognised as a Key Biodiversity Area (KBA) and as an Important Bird Area (IBA), and • <i>Nădab - Socodor – Vârșad Site of Community Importance</i> (ROSAC0231). <p>Most of the Project area is modified habitat.</p> <p>The Project includes enhanced biodiversity measures, including a set-aside area of about 82 ha managed for biodiversity.</p> <ul style="list-style-type: none"> ➤ Of this area, a small proportion (around 17 ha) of degraded natural habitat (<i>Pannonic salt steppe and salt marshes</i>) has been identified and is excluded from infrastructure. This is a priority habitat type listed in Annex I of the EU Habitats Directive (HD) and qualify as Critical Habitat. ➤ The remaining 64.76 ha of the set-aside area is agricultural land. This area will be improved and maintained for biodiversity conservation. The biodiversity gains will be achieved through conversion of agricultural land to grassland and increase of the condition/quality of the existing grassland.
<p>Cultural heritage</p>	<p>62 perimeters located on the project impacted area have been investigated from cultural-heritage perspective. Most of these areas are dominated by prehistoric barrows/tumuli/mounds and several open settlements (including multi-period scatters spanning prehistory/Bronze Age, Roman-era 2nd–4th centuries AD, and medieval 11th–13th centuries AD). Out of the total 62 perimeters, only about 10 have been considered as important for being further investigated and researched.</p>
<p>Communities and socio-economic context</p>	<p>Nearby communities include Grăniceri, Pilu, Șiclău and Socodor. Local livelihoods are strongly linked to agriculture and livestock raising. Key sensitivities relate to traffic during construction, access to agricultural roads and pasture, and clear communication to avoid disruptions.</p>

Expected benefits

- Renewable electricity generation supporting Romania's energy transition and reduced greenhouse gas emissions compared with fossil fuel generation
- Indirect and induced employment opportunities and local procurement during construction (e.g. services, supply chain, logistics, hospitality)
- Potential contributions to local budgets through taxes and fees
- Biodiversity enhancement opportunities through habitat management and targeted conservation actions

4. MAIN ENVIRONMENTAL AND SOCIAL RISKS AND MITIGATION MEASURES

The ESIA and all related documents prepared for the project (see textbox above) assessed potential impacts during construction, operation and decommissioning and defined appropriate mitigation measures whenever needed. With the implementation of good practice management measures, residual impacts are generally expected to be minor or negligible.

Topic	Key risks (examples)	Mitigation and management measures	Expected residual risk
Biodiversity and habitats	Habitat disturbance; disturbance to fauna; potential bird collision risk; barriers created by fencing.	Keep natural habitat and the set-aside area free of infrastructure; limit vegetation clearing; speed limits, lighting management and worker rules; wildlife-permeable fencing where appropriate; implement BAP measures (habitat management, monitoring and offsets where required).	Minor
Soils and erosion	Topsoil stripping and compaction; erosion; accidental spills.	Minimise disturbed areas; segregate and reuse topsoil; reinstate disturbed areas; spill prevention and response; training and supervision; use licensed waste contractors.	Negligible
Water and drainage	Sediment runoff; accidental pollution; changes in local drainage patterns.	Buffers to drainage channels; sediment controls; prohibit uncontrolled discharges; spill response; restore drainage features after works; monitoring where required.	Negligible
Air quality and dust	Dust from earthworks and traffic; emissions from machinery.	Watering; speed limits; cover trucks; maintain machinery; manage stockpiles; schedule works to reduce nuisance.	Negligible
Noise and vibration	Construction noise; potential nuisance to nearby residents.	Daytime working where possible; maintain equipment; temporary controls if needed; advance notice of high-noise activities; respond to grievances.	Negligible
Traffic and road safety	Increased vehicle movements; safety risks; temporary disruption to road access.	Traffic management plan; agreed routes and timing; signage; coordination with authorities; maintain safe access and restore roads.	Minor
Landscape and glare	Visual change; potential glare for residents and road users under certain conditions.	Design measures to reduce glare; vegetation buffers where feasible; manage lighting; investigate and respond to any glare complaints.	Negligible
Cultural heritage	Chance finds during excavation.	Chance-find procedure; surveys/diagnostics and archaeological discharge as required; stop-work and expert assessment if finds occur.	Negligible

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Topic	Key risks (examples)	Mitigation and management measures	Expected residual risk
Land use and livelihoods	Temporary restrictions to pasture and agricultural roads during cable installation.	Avoidance-first scheduling; advance notice; agreed access management; full restoration of roads and pasture; compensation for verified losses if needed.	Negligible
Labour and working conditions	Worker OHS risks; contractor performance risks.	Contractor E&S requirements; OHS plans and training; PPE; incident reporting; code of conduct; worker grievance mechanism; monitoring and audits.	Minor
Worker influx and community interactions	Increased pressure on local services; community disturbance; risk of communicable and sexual health issues; potential Gender-Based Violence and Harassment (GBVH); tensions between workers and residents; interactions with security personnel.	Prefer local hiring where feasible; enforce worker Code of Conduct; GBVH prevention measures and awareness training; worker accommodation management (if applicable); health screening and access to medical services; stakeholder engagement with host communities; strict security management aligned with international standards; functioning grievance mechanism accessible to communities; monitoring of workforce behavior.	Minor
Community health and safety / security	Community exposure to hazards; unauthorised access; security interactions.	Secure fencing and controlled access; signage; safe worksite management; emergency preparedness; trained security; communication and GRM.	Negligible

5. SPECIFIC COMMITMENTS

Given the project's scale (the largest PV plant in Europe) and its location, which overlaps with Natura 2000 sites, Rezolv Energy is committed to adopt a robust set of targeted measures set out in dedicated management documents. These measures address biodiversity, livelihoods, labour and working conditions, and community health and safety, and are designed to be embedded into project planning, construction, and operations.

Together, these measures demonstrate Rezolv Energy's clear commitment to applying high environmental and social standards, safeguarding local communities and the surrounding environment, and delivering measurable biodiversity enhancement where feasible.

Construction Environmental and Social Management Plan (CESMP)

To ensure that the environmental and social commitments identified in the ESIA and subsequent assessments are effectively implemented during construction, the Project has developed a CESMP. The CESMP forms part of the Project's broader Environmental and Social Management System (ESMS) adopted by Rezolv Energy and implemented through the Project company. The CESMP translates the mitigation measures and commitments defined in the ESIA, BAP and other project studies into practical procedures and management requirements applicable during construction.

The CESMP requirements will be contractually transferred to the EPC contractor responsible for construction of the Project. The EPC contractor will be required to implement the CESMP and develop site-specific

management plans, procedures and method statements consistent with the Project ESMS and Lenders requirements.

The Project company will maintain oversight of CESMP implementation through its environmental and social management team, ensuring that construction activities remain aligned with national regulatory requirements, international Lender standards, and the commitments set out in the ESIA and associated management plans. In addition, an induction training on the Environmental and Social Management requirements of the DAMA Project will be delivered to the EPC contractor and relevant subcontractors prior to the commencement of construction activities. The training programme will include key topics such as environmental protection, biodiversity conservation measures, health and safety, and compliance with the CESMP requirements. In addition, the Project ESG Manager will provide ongoing guidance and support to the EPC contractor during the construction phase to ensure the effective implementation of environmental and social management measures.

Below are briefly presented some of the main commitments that will be addressed.

Biodiversity commitments

The DAMA Project is located within an area designated as part of the Natura 2000 network, requiring compliance with both European and national biodiversity protection legislation, thus biodiversity considerations were therefore integrated into the Project development process from the early planning stages, namely:

- During the planning phase, the Project was subject to a SEA procedure as part of the approval of the PUZ, which enabled the change of land-use designation from agricultural land to land allocated for renewable energy infrastructure. Because the site overlaps Natura 2000 areas, the competent authority also required a full Appropriate Assessment (AA) supported by biodiversity surveys and monitoring. The SEA and AA concluded that the development could proceed without adversely affecting the integrity of the Natura 2000 sites, subject to mitigation measures.
- During the construction permitting stage, the Project entered the national EIA procedure. Following screening and scoping under Law no. 292/2018, the competent authority determined that a full EIA report was not required, as the environmental impacts had already been sufficiently assessed during the SEA and AA at the planning stage.

In parallel, the Project entered the international lender due diligence process in 2022, requiring compliance with IFC Performance Standard 6 and the EBRD Environmental and Social Requirement 6. As part of this process, additional biodiversity studies were prepared, including a Biodiversity Baseline Report, Critical Habitat Assessment (CHA) and Biodiversity Impact Assessment. The CHA identified the need for enhanced biodiversity management measures, leading to the preparation of a Biodiversity Action Plan (BAP) following the mitigation hierarchy. These studies were subsequently revised and updated through several iterations to incorporate additional data, stakeholder feedback and refinements to the Project design.

In July 2023, a local environmental NGO submitted a complaint regarding the environmental permit issued for the Project. Through further dialogue and refinement of biodiversity commitments, including the development of the BAP and the designation of the set-aside area, an agreement was reached and the complaint was subsequently withdrawn in 2024.

As can be seen from the figure below included in the Biodiversity Impact Assessment, considering the set-aside area and compensation measures outlined in the BAP, **no residual impacts are anticipated for the Project**, in particular for the most important aspects of biodiversity (being CH and PBF values and species/habitats conserved within the Natura 2000 sites and IBA/KBA), with the overall mitigation strategy aligned with the mitigation hierarchy and designed to achieve at least No Net Loss and Net Gain where possible. Additional conservation actions have been proposed separately to address lender requirements applicable when project operations are carried out within or in proximity to protected areas.

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#	Impact Category	Construction Phase		Operational Phase	
		Pre-mitigation	Post-mitigation (residual)	Pre-mitigation	Post-mitigation (residual)
1	Destruction/disturbance of terrestrial habitat and vegetation	High	Low-Medium	Low-Medium	Positive*
2	Degradation of aquatic habitat (wetlands/salt marsh)	Medium	Low-Medium	Low-Medium	Low
3	Habitat fragmentation	Low-Medium	Low	Assessed for the construction phase, not duplicated here	
4	Species mortalities	Low-Medium			
5	Disturbance of wildlife (noise, vibration, light)	Low-Medium			
6	Barriers to faunal movement	Low-Medium			
7	Invasive Alien Species introductions/spread	Medium			
8	Pollution of soil/water	Medium			
9	Air quality impact	Low-Medium			
10	Impact on Protected Areas and Internationally Recognized Areas	High	Low-Medium	Medium	Positive*

On-site measures (as per the BAP)



- Set-aside area: approximately 82 ha where PV panels will not be installed, managed for biodiversity (including excluded natural habitat)
- Grassland establishment and management within solar farm areas, supported by controlled grazing and mowing regimes
- Control of lighting, speed and worker behaviour to reduce disturbance and prevent hunting/poaching
- Invasive species prevention and control measures

Priority bird species and offsets

For some priority bird species, the BAP identifies residual impacts after mitigation and proposes offset measures to achieve no net loss. For species that are considered to suffer residual impacts above negligible level, offsets that aim to fully compensate for these impacts are proposed. Some additional conservation actions likely to provide gains for priority species (and others) are also proposed.



Imperial eagle
Source: milvus.ro



Artificial nests for Red-footed falcon
Source: milvus.ro

Offset measures are expected to include actions such as installation of nest boxes for certain raptor and falcon species and planting trees as potential nest sites for Eastern Imperial Eagle and other raptors, implemented with competent authorities and specialists.

Access to land and livelihoods

The main PV site has been secured through a commercial transaction with a single entity. Due to the project scale and the large volume of construction activities which might take place in the same time, a dedicated Livelihood Restoration Plan (LRP) was developed. The document focuses mainly on the grid connection components: the interconnection substation and the underground 400 kV cable route along an existing agricultural road which might have an economic displacement impact.

Stakeholder consultation has been a central component of the land acquisition and livelihood impact assessment process. Affected land users, landowners, local authorities, and other relevant stakeholders were engaged through meetings, interviews, and information disclosure activities to understand the nature and extent of potential impacts on livelihoods resulting from the Project.

Consultations confirmed that the Project will result primarily in the loss of agricultural land use for certain households and land users, which may affect income generation, subsistence activities, and economic security. Particular attention was given to identifying vulnerable households and individuals who may experience disproportionate impacts or reduced capacity to restore their livelihoods independently.

A cut-off date for eligibility for livelihood restoration assistance was formally announced (October 2025), after which new claims will not be considered eligible.

The preparation of a Livelihood Restoration Plan (LRP) was required where Project activities may adversely affect livelihoods, regardless of whether physical displacement occurs. The LRP aims to ensure that affected persons are assisted in improving, or at minimum restoring, their pre-Project income levels and living standards.

As the project location is outside the inhabited areas, no physical displacement is expected. The cable will be laid under an existing agricultural road on public land, so no private land acquisition is required for the cable route. Permanent land take is limited to the interconnection substation area (approximately 3.3 ha) on unproductive communal land, with no livelihood impacts expected.

The Project will monitor livelihood restoration outcomes through follow-up engagement with affected households and verification of income and livelihood recovery indicators. Where necessary, corrective measures will be implemented to address any gaps in restoration. This process will be subject to oversight by the lenders to ensure that affected households' livelihoods and income levels are fully restored to pre-project conditions or better.

Potential impacts are expected to be largely temporary, mainly involving restricted access to pastureland and agricultural roads during cable installation, with two pastoral households identified as directly affected.

Impact type	Entitlement / mitigation
Temporary grazing access loss	<p>Primary measure: Avoidance through scheduling works in winter months (Nov–Feb) outside grazing and agricultural seasons, with ≥60 days advance notice.</p> <p>Contingency: If avoidance fails, the project will:</p> <ul style="list-style-type: none"> • pay cash compensation for temporary grazing interruption using herd-per-day formula (€0.55/sheep/day; €2.50/cow/day; €100/day labour) • restore pastureland through reseeding and soil stabilization at project cost, and • reimburse any verified subsidy losses under APIA schemes based on official rates and documented penalties

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Temporary restriction on agricultural road access	Advance notice of construction works; traffic management; temporary alternative access routes to be agreed in consultation to neighbouring land communal road DE 553/1; full road restoration (no graveling). If any provable loss occurs, full compensation at full replacement cost will be provided on a case-by-case basis. Temporary alternative routes will be identified and agreed in consultation with indirectly affected road users.
Indirect disturbance (dust, noise)	Advance notice; and the project-level grievance mechanism (GRM) is available to all affected persons for any concerns related to land access, compensation, or livelihood restoration.
Unforeseen impacts	Case-by-case mitigation and compensation.

Labour and working conditions

The Project is expected to create temporary employment during construction (with a peak workforce that may be several hundred workers) and a smaller number of long-term jobs during operation. Contractors will be required to apply fair working conditions, prevent child and forced labour, and ensure safe and healthy workplaces.

National regulatory requirements and international best practices related to labour and working conditions will be fully implemented for this project and will include, but not limit to, the following measures: site induction and task-specific trainings, PPE and safe procedures for electrical works, lifting and excavation, incident reporting, investigation and corrective actions and emergency preparedness and first aid arrangements.

During construction, some workers will come from outside the local area. Instead of building new camps, the Project will house these non-local workers in existing apartments or houses in nearby communes. These units will be rented under formal agreements and managed by the Contractor in line with Romanian law and international standards for workers' accommodation.

All accommodation will be reviewed and approved by the Project's Environmental and Social team before use. Units must meet minimum standards for safety, hygiene, and comfort, including limits on occupancy to prevent overcrowding, access to clean water, electricity, heating, sanitation, and waste services, as well as compliance with building and fire safety requirements. Regular cleaning, maintenance, and inspections will be carried out throughout the construction period.

Workers will be required to follow a Code of Conduct that promotes respectful behaviour toward local residents and minimizes disturbances. Both workers and community members will be able to raise concerns through the Project's grievance mechanism.

Community health, safety and security

During construction, the main community-related risks are traffic safety, temporary nuisance (dust and noise), and maintaining safe access around work areas. During operation, risks are generally low and relate mainly to electrical safety, site security and, potentially, glare under certain conditions.

DAMA project will develop and implement specific management plans related to traffic and will coordinate the transportation during construction period with local and national authorities. The project representatives together with the EPC contractors will communication of work schedules and any temporary access restrictions, will establish clear site boundaries, fencing, signage and implement controlled access to the construction sites and will develop and implement emergency response plans.

6. STAKEHOLDER ENGAGEMENT

Stakeholder engagement has been carried out as part of the planning and environmental assessment process, including consultations during the PUZ process and ESIA preparation. Targeted engagement was also undertaken for the specific aspects (cultural heritage, biodiversity, livelihood restoration, etc.), including meetings with local authorities and interviews with the directly affected stakeholders.

Key stakeholder groups

- Local communities and residents near the Project and along the cable route
- Livestock-herding households relying on grazing land intersected by or adjacent to the underground cable corridor
- Local and county authorities and relevant agencies
- Farmers/ road users using the communal road DE 553/1
- Sheep herders/ farmers that are using the local pasture neighbouring the Project
- Natura 2000 and biodiversity stakeholders, including protected area authorities and NGOs
- Workers and contractors

A project dedicated Stakeholders Engagement Plan (SEP) has been developed and is available for consultation. The SEP includes a detailed description of the already identified stakeholders, a brief assessment of each category of stakeholders and the engagement activities foreseen for the project construction period.

Regulatory engagement began during permitting stage of the project, including public notices and a public debate held in February 2021 at Arad County Council. Stakeholder concerns raised during the regulatory process included biodiversity and pastureland-related issues. Further structured engagement supported ESIA scoping (site visits and interviews in November 2022 with local authorities, landowner representatives and other community stakeholders) and baseline socio-economic engagement in May 2023 (interviews and focus groups, supported by a Project Information Leaflet). Livelihood-related targeted consultations were also undertaken in October 2025 with two directly affected pastoral households as part of LRP preparation, alongside disclosure of a Public Information Brochure and grievance information.

The SEP sets out how stakeholders will continue to be informed and consulted. A Community Liaison Officer (CLO) will lead day-to-day engagement and maintain a stakeholder log.

Engagement tool	Purpose
Project updates	Briefings and written updates to local authorities and communities on schedule, traffic and key activities
Notice boards	Notice boards at the site entrance and agreed locations, updated regularly in Romanian
Hotline and email	A serviced contact channel for questions and concerns
Meetings	Meetings with directly affected stakeholders when works may affect access or livelihoods

Disclosure Process

In line with Romanian legislation and international requirements, the Project will disclose key environmental and social (E&S) information to stakeholders in a timely and accessible manner. The Environmental and Social Impact Assessment (ESIA) package — including the Non-Technical Summary (NTS), Environmental and Social Management Plans, and the Stakeholder Engagement Plan — will be made publicly available

prior to construction. Disclosure will be carried out through multiple channels, such as publication on the Project or Company website, availability at local municipal offices, and direct communication with affected communities and authorities.

Stakeholders will have the opportunity to review these documents and provide comments during the disclosure period. Information will be presented in Romanian and in formats accessible to non-specialists. Where needed, additional explanations or meetings will be organized to ensure that interested parties understand the Project's potential impacts, proposed mitigation measures, and planned stakeholder engagement activities under the SEP.

Grievance mechanism – how to raise concerns?

A project-level grievance mechanism is available for anyone to ask questions or raise concerns related to the Project. Complaints can be submitted anonymously if preferred. The Project aims to acknowledge receipt and provide a response within defined timeframes. The mechanism does not limit access to courts or other remedies.

The mechanism will also apply to issues related to land acquisition, land use, and livelihood impacts. Stakeholders affected by land access restrictions, temporary economic displacement, or any other livelihood-related matters may use the same channel to submit concerns, requests for clarification, recommendations, or formal grievances.

All submissions will be recorded, assessed, and addressed in accordance with the Project's grievance procedures, with appropriate follow-up and feedback provided to the complainant.

How to get additional information?

Before construction starts, the Project will finalise detailed design, appoint contractors and prepare detailed management plans. Stakeholders will receive updates on schedule and traffic arrangements, and the grievance mechanism will remain available throughout construction and operation.

Key Project documents (including this NTS, the ESIA, SEP, LRP and BAP) will be made available for public access through appropriate channels in line with the Stakeholder Engagement Plan.

For questions or concerns, please **contact our Community Liaison Officer (CLO):**

Oana Iuga

Phone: +4 (0) 735 513 690

E-mail: oiuga@dama.energy