

ENVIRONMENTAL AND SOCIAL ACTION PLAN

No.	Action	Requirement (Regulatory, EBRD PRs/IFC PSs Practice)	Resources, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
0	Report to the Lenders the results of Project Environmental, Health and Safety and Social (EHSS) monitoring and performance, including the implementation status of each of this ESAP elements.	EBRD PR1, IFC PS1 Standard 1, Best Practice	Resources: Own resources Responsibilities: Premier Energy Distribution	Annually, by end of Q1 for the previous year, starting 2024	Environmental and Social Reports on monitoring results and on the implementation status of each ESAP requirement below.
Assessment and Management of Environmental and Social Risks and Impacts					
1.1	Implement the Project in accordance with the commitments in the Project Documents, including the ESIA, ESMP and this ESAP	EBRD PR1 / IFC PS1, Best Practice	Resources: Own resources. Responsibility: First Look Solutions S.A.	For the life of the Project.	First Look Solutions annual reports to Project lenders and Project Lenders monitoring
1.2	Implement and maintain/update the Project Construction Environmental and Social Management Plan (ESMP) and any Management Plans that require updating.	EBRD PR1 / IFC PS1, Best Practice	Resources: External specialized consultant and Own resources. Responsibility: First Look Solutions S.A.	Construction ESMP and Management Plans in place upfront construction works initiation.	ESMP disclosed on Project's website
1.3	Require EPC Contractor to develop Construction E&S Management Plans, guided by the ESMP (refer to ESAP item 1.2). Review and approve contractor's E&S management plans as precondition to construction works initiation. EPC Contractor to ensure that the Construction E&S Management Plans requirements extend to their contractors and subcontractors.	EBRD PR1 / IFC PS1, Best Practice	Resources: External specialized consultant and Own resources. Responsibility: EPC Contractor (plans development) First Look Solutions S.A. (plans review and approval)	Construction E&S Management Plans in place upfront construction works initiation.	Approved Construction E&S Management Plans listed in Annual Report (ESAP item 0), available for Lenders review during periodic monitoring and upon request.
1.4	Contractually require the EPC contractor to ensure the timely availability of resources (staff, budget, equipment) to organize and implement the EPC contractor's obligations under the ESAP and ESMP.	EBRD PR1 / IFC PS1, Best Practice	Resources: Own resources. Responsibility: First Look Solutions S.A.	Throughout Project execution	Resources budgeted, mobilized timely. Sufficient resources allocation and confirmed based on ongoing construction works supervision by First Look Solutions and periodic Lenders monitoring.

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1.5	Develop the Project Operation ESMP before commencement of operations.	EBRD PR1 / IFC PS1, Best Practice	Resources: External specialized consultant and Own resources. Responsibility: First Look Solutions S.A.	Operational ESMP in place and disclosed on Project website one month before start of operations.	Operational ESMP disclosed on Project website.
1.6	Contractually require the O&M contractors to develop their own E&S Management Plans, guided by the Operation ESMP (refer to ESAP item 1.5) and to ensure the availability of resources (staff, budget, equipment) to deliver their responsibilities in line with the ESAP and ESMP.	EBRD PR1 / IFC PS1, Best Practice	Resources: External specialized consultant and Own resources. Responsibility: O&M Contractors (plans development) First Look Solutions S.A. (plans review and approval)	Operations E&S Management Plans in place before start of operations.	O&M E&S Management Plans in place approved by First Look Solutions and available for Lenders' review during periodic monitoring and upon request.
Labour and Working Conditions					
2.1	In support to the Construction ESMP, develop and implement a Workforce Management Plan addressing the construction workforce (including subcontractors) related aspects. The Workforce Management Plan is to be structured to cover the employment and working conditions aspects in line with Romanian Labour Code and workers accommodation aspects (guided by the EBRD/IFC guidelines on Workers' Accommodation: Processes and Standards ¹). Further, the Workforce Management Plan shall include a Workers' Grievance Mechanism that will be made available to all Project workers, irrespective of their employer (refer to ESAP item 2.2 below).	EBRD PR2 / IFC PS2, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	Workforce Management Plan in place upfront construction works initiation.	Workforce Management Plan in place and records of implementation kept on file and available for Lenders' review during periodic monitoring and upon request.

¹ https://www.ebrd.com/downloads/about/sustainability/Workers_accomodation.pdf

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2.2	Define and implement a Worker Grievance Mechanism in line with the criteria of UN Guiding Principles on Business and Human Rights and ensure that EPC and O&M Contractors set up and implement similar workers' grievance management procedure and provide access to it to own and subcontractor's staff.	EBRD PR2 / IFC PS2, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	Worker Grievance Mechanism in line with the criteria of UN Guiding Principles on Business and Human Rights in place upfront construction works initiation.	Worker Grievance Mechanism and records of implementation kept on file and available for Lenders' review during periodic monitoring time upon request.
Resource Efficiency and Pollution Prevention and Control					
3.1	In support to the ESMP, develop and implement a Pollution Prevention and Control Plan addressing air emissions, noise, wastewater discharges, hazardous materials management and spill prevention aspects associated with the Project implementation.	EBRD PR3 / IFC PS3, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	Pollution Prevention and Control Plan in place upfront construction works initiation.	Pollution Prevention and Control Plan and records of implementation kept on file and available for Lenders' review during periodic monitoring and upon request.
Health, Safety and Security					
4.1	In support to the ESMP, develop and implement a Project Health and Safety (H&S) Management Plan ensuring that H&S risks are identified and adequately managed and addressed and H&S performance monitored against the management plan and H&S performance targets.	EBRD PR3 / IFC PS3, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	H&S Management Plan in place upfront construction works initiation.	H&S Management Plan and records of implementation kept on file and available for Lenders' review during periodic monitoring and upon request.
4.2	Ensure that EPC Contractor develops and implements required Traffic and Transportation Plans for the shipment of wind turbines, equipment, materials and project workers. The Traffic and Transportation Plans are to consider the community health and safety risks with specific focus on sensitive receptors.	EBRD PR3 / IFC PS3, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	H&S Management Plan in place upfront construction works initiation.	H&S Management Plan and records of implementation kept on file and available for Lenders' review during periodic monitoring and upon request.

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4.3	Contractually require EPC and O&M Contractors to align their security management plans and practices (including procedures and code of conduct) with the Voluntary Principles of Security and Human Rights ² and including requirement for their security services providers to adhere to these.	EBRD PR2 / IFC PS2, Best Practice	Resources: Own resources Responsibility: First Look Solutions S.A.	Upfront construction works initiation.	Documented contractor security management plans and security practices available for Lenders' review during periodic monitoring and upon request.
Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
5.1	Define and implement a Livelihood Restoration Plan (LRP), to cover all different types of livelihood/economic impacts associated with the Project implementation activities and ensure compensation to all affected land users, including those with no formal rights to the land. The LRP is to ensure that compensation is provided for any types of associated losses including (but may not be limited to): <ul style="list-style-type: none"> ■ Damages to land and assets, loss of resources or income due to Project access to land; ■ Temporary land use restrictions associated with Projects' construction works; ■ Permanent land use restrictions as result of Project implementation. 	EBRD PR5/ IFC PS5, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	LRP in place before land access to construction LRP implementation: throughout project execution and operations, in line with LRP provisions	LRF in place and available for Lenders review. Records of LRP implementation available for Lenders review during periodic monitoring and upon request.
Biodiversity Conservation and Sustainable Management of Living Natural Resources					
6.1	In support to the ESMP, develop and implement a Biodiversity Management Plan (BMP) for the construction stage of the Project (Construction BMP). The Construction BMP to include required management planning and control measures for mitigation of construction impacts on habitats and species, for construction monitoring and for restoration of affected habitat areas post-construction, The Construction BMP is to include management, control and monitoring provisions ensuring implementation of all construction-stage	EBRD PR6 / IFC PS6, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	Construction BMP in place prior to start of construction	Construction BMP and records of implementation kept on file and available for Lenders' review during periodic monitoring and upon request.

² <https://www.voluntaryprinciples.org/>

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	mitigation measures as identified in the Project ESIA.				
6.2	Execute pre-construction biodiversity surveys prior to start of construction at each worksite area to ensure implementation of biodiversity impacts mitigation measures, according to the BMP (refer to ESAP item 6.1).	EBRD PR6 / IFC PS6, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	Surveys executed prior to start of construction at each Project area. In performing the pre-construction surveys, observe the following indicative timelines: <ul style="list-style-type: none"> ■ Birds; 2-7 days prior to construction during breeding season; ■ European Souslik 1-6 months prior to construction during appropriate survey period for species; ■ Herpetofauna; 2-7 days prior to construction; ■ Otter; 2-7 days prior to construction. 	Pre-construction biodiversity surveys kept on file and available for Lenders' review during periodic monitoring and upon request. Any additional requirements arising from surveys to be incorporated into BMP and updated version shared with lenders.
6.3	Appoint a qualified Ecological Clerk of Works (Biodiversity Specialist) to execute the pre-construction biodiversity surveys (ESAP item 6.2) and oversee the BMP implementation (ESAP item 6.1) including construction monitoring and coordination of biodiversity-related mitigation.	EBRD PR6 / IFC PS6, Best Practice	Resources: External specialized support and Own resources Responsibility: First Look Solutions S.A.	Ecological Clerk of Works (Biodiversity Specialist) appointed prior to construction initiation.	Job description prepared and available for Lenders' review. Ecological Clerk of Works survey and monitoring reports kept on file and available for Lenders' review during periodic monitoring and upon request.
6.4	Develop and implement a Biodiversity Management Plan (BMP) for the operational stage of the Project (Operations BMP). The Operations BMP to include required management planning and control measures for mitigation of biodiversity impacts and monitoring during the operational stage including adaptive management planning and monitoring programs (e.g. fatality monitoring) to assess the effectiveness of mitigation measures and make necessary adjustments. The Operations BMP is to include management, control and monitoring provisions ensuring implementation of all operations-stage mitigation measures as identified in the Project ESIA.	EBRD PR6 / IFC PS6, Best Practice	Resources: External specialized consultant and Own resources Responsibility: First Look Solutions S.A.	Operations BMP in place before start of operations.	Operations BMP and records of implementation kept on file and available for Lenders' review during periodic monitoring and upon request.

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Cultural Heritage					
8.1	Contractually require EPC to ensure that a Chance Finds Procedure is developed and implemented for all construction works involving earthworks execution.	EBRD PR8 / IFC PS8, Best Practice	Resources: External specialized consultant and Own resources Responsibility: EPC (procedure development and implementation) First Look Solutions S.A. (procedure review and approval)	Chance Finds Procedure in place upfront construction works initiation.	Chance Finds Procedure and records of implementation kept on file and available for Lenders' review during periodic monitoring and upon request.
Information Disclosure and Stakeholder Engagement					
10.1	Implement the Stakeholder Engagement Plan (SEP) and the Grievance Mechanism in line with the criteria of UN Guiding Principles on Business and Human Rights and review at least annually for any required updates.	EBRD PR10 / IFC PS1, Best Practice	Resources: Own resources and External specialized consultant Responsibility: First Look Solutions S.A.	SEP and Grievance Management in line with the criteria of UN Guiding Principles on Business and Human Rights implementation ongoing throughout Project life cycle	SEP and Grievance Management implementation records in place and available for Lender's review during periodic monitoring and upon request.
10.2	Ensure at all times required resources for SEP and Grievance Mechanism implementation including staffing (e.g. Community Liaison Officer(s) and appointed Grievance Manager function), budget and external specialised support as needed.	EBRD PR10 / IFC PS1, Best Practice	Resources: Own resources and External specialized consultant Responsibility: First Look Solutions S.A.	Community Liaison Officer(s) (CLO) appointed, and Grievance Management responsibility allocated upfront construction works initiation. Positions/responsibilities maintained throughout Project execution.	Job description/appointment letter in place and available for Lenders' review. Positions/responsibilities filled.