Environmental and Social Non-Technical Summary

Tenevo Solar PV Project, Bulgaria

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Acronyms and Abbreviations

E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EPC	Engineering, Procurement, and Construction
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
EU	European Union
HSE	Health, Safety, and Environment
IFC	International Finance Corporation
O&M	Operations and Maintenance
PV	Photovoltaic
SCI	Site of Community Importance
SPV	Special Purpose Vehicle

1. ABOUT THE PROJECT

The Project is a solar photovoltaic (PV) power plant with a capacity of 237.58 MW developed by Tenevo Solar Technologies EAD [1] (the "Company"), a company incorporated in Bulgaria.

The Project is located in South-East Bulgaria, near Tenevo village, Yambol region. The Project components and their location are represented in Figure 1 below.

The PV Plant is located on two plots ("the northern PV Plant plot" and "the PV Plant southern plot").

The Project includes, in addition to the PV Plant, an approximately 3 km-long 33kV underground cable (connecting the northern PV Plant plot to the southern one) and a substation located approximately 80 m to the south of the southern plot.

The Project connects to the electrical distribution system through two short 400 kV overhead lines, which link to an existing 400 kV line located roughly 60 meters south of the substation site. These grid connection overhead lines will cross agricultural land in the immediate vicinity of the site and will be supported by poles constructed as part of the Project.

FIGURE 1-1 PROJECT LOCATION

[1] Tenevo Solar Technologies EAD is owned by Eura IPP AD (the "Shareholder"), which is incorporated in Bulgaria and is a 50:50 joint venture (the "Sponsors") between Renalfa IPP GmbH ("Renalfa") and Eurowind Energy A/S ("Eurowind").

2. HOW ARE THE ENVIRONMENTAL AND SOCIAL ASPECTS ADDRESSED DURING PROJECT CONSTRUCTION AND OPERATION?

2.1 ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL IMPACTS

The Project's environmental and social impacts were assessed in line with the Bulgarian regulations' provisions and all permits required for construction were obtained.

As part of the Project permitting procedure, authorities with responsibilities related to the environmental aspects have issued permit conditions included in authority approvals, part of the Project construction permitting package.

The authority review process resulted in the identification of the Project potential impacts and of the mitigation measures to be implemented for the Project to address these potential impacts.

On this basis, the Company and the construction contractors will define required management processes and will allocate resources needed to ensure the potential environmental and social impacts associated with the Project are mitigated at all times.

In practice, this will be ensured through the implementation of a package of environmental and social management planning (ESMP) procedures and through provision of the resources and staffing needed for their implementation. These management processes address all Project environmental and social aspects including:

- Project ESHS Management Organization, Control and Assurance Processes;
- Workforce Management Planning including Grievance Mechanism;
- Pollution Prevention and Control;
- Wastes Management;
- Health and Safety, including
    - Occupational Health and Safety Management, i.e. aspects pertaining to Project staff safety during construction and operation;
    - Community Health and Safety Management, i.e. arrangements made to address the safety risks to communities and people resulting from Project execution e.g. from construction traffic on public roads, from works execution on public domain and private properties, aspects pertaining to construction workforce accommodation in local communities e.g. prevention of communicable diseases, foreign workforce code of conduct in interactions with local people etc.;
- Compensation of accidental property, crop or other potential livelihoods impacts during Project execution;
- Cultural Heritage safeguard measures enforced in case of incidental finds during construction earthworks execution.

The responsibility for the implementation of the above-indicated measures and for the management of Project's environmental, health and safety and social impacts lies with the Company.

The responsibility for the implementation of the above-indicated measures and for the management of Project's environmental, health and safety and social impacts lies with the Company. During the construction stage this responsibility is shared with the construction

contractors, while during the operation stage with the operations and management contractors.The below sections provide highlights on how the above-indicated Project aspects are handled during the Project construction and operation.

2.2 POLLUTION PREVENTION AND CONTROL

As indicated above, a complete set of measures aimed at ensuring that Project impacts on environment are at all times managed and mitigated are put in place during the Project construction and operation stages.

This includes procedures, allocation of responsibilities, resources and staffing ensured by the Company and their contractors and addressing all potential environmental aspects, as informed by the environmental assessment performed for the Project.

Of these, the most relevant environmental aspects associated with the Project implementation are summarised below.

Pollution Prevention and Control

Potential contamination sources during construction may be associated with accidental leaks of fuel from equipment and vehicles used to execute works at the Project sites and to install the underground and overhead electrical cables.

In the event of an accidental spill, immediate response measures will be executed by the Project contractors in line with the spill prevention and control planning defined for the Project.

Topsoil Management

Topsoil represents a valuable resource requiring adequate management during Project execution in line with applicable regulatory requirements and good industry practice.

To ensure these are effectively implemented during the construction of the PV Plant and particularly during the grid connection works execution, specific topsoil management requirements and mitigation measures will be implemented by the contractors.

Waste Management

Wastes generated during the Project construction will be stored temporarily onsite. The waste will then be taken from the site, transported and disposed of through licensed, specialized waste handling contractors and disposal facilities.

Water Management

The Project does not require water use other than water for sanitary purposes. During construction, mobile facilities equipped with fresh water and waste storage will be used.

Throughout operation, water for sanitary purposes will be sourced off-site and stored on-site, with waste disposal managed by contracted services. During the operational phase, limited water quantities may also be needed for solar panels cleaning. When needed, such water will be brought on site in small mobile containers as required.

Pest Management

Site vegetation control during construction as well as at the operations stage (e.g. weed and invasive species control) will be performed mechanically. In case herbicides use will prove required, the quantities used will be limited to minimum required and will be carefully handled.

2.3 LABOUR AND WORKING CONDITIONS

Throughout the life cycle of the Project, the construction stage is the most labour intensive, and involves construction workers both local and from other regions of Bulgaria and potentially from abroad. The non-local construction workers will likely be accommodated in spaces rented within the nearby settlements.

During operations, the workforce needs are rather limited and comprise few contracted personnel in charge of operating and maintaining the PV Plant.

In addition to complying with the provisions of the Bulgarian Labour Code, the Project is committed to implement measures aligned with best industry practices in terms of labour and working conditions provided to the staff in charge of Project construction and operation.

This includes measures and processes to ensure that contractors and subcontractors provide their workforce accommodation conditions according to the international best practices.

Also, a procedure allowing any person engaged in the Project construction and operation, including the staff employed by contractors and subcontractors, can raise any workplace-related concerns and have them addressed in line with best practice (i.e. a Worker Grievance Mechanism) will be defined and implemented.

The Project Developer implemented a responsible sourcing process ensuring that the solar panels as well as other equipment and materials required for the project are delivered by suppliers procuring in their turn the needed materials from sources not associated with labour abuses.

2.4 HEALTH, SAFETY AND SECURITY

Occupational Health and Safety

The Project Developer is committed to ensure that workers involved in the Project construction and operation are provided with safe and healthy work environment and conditions. These will be ensured through management procedures guided by the national occupational health and safety regulatory requirements as well as with the good international industry practice on the matter.

These will be ensured through planning, organizational capacity and resources provided by the Project Developer and the employed contractors.

Community Health and Safety

In addition to managing the occupational health and safety aspects, the Project is committed to addressing any potential health and safety impacts from Project implementation on general public and communities.

Given the relatively isolated PV Plant site location, potential community health and safety risks associated with the Project are expected to be limited. Such potential risks are expected to primarily be associated with the construction traffic on public roads and may also pertain to non-local construction workers (e.g. related to aspects such as worker accommodations, interactions with local communities, and Project security arrangements).

Also, the potential for exposure to disease may be linked to the non-local and foreign construction workforce, who are expected to be accommodated in rented spaces within nearby settlements.

Therefore, community health and safety management arrangements addressing the above have been considered by the Project Developer as part of the overall Project management, guided by the national regulatory requirements and the international best practice guidelines.

Emergency Preparedness and Response

Adequate Emergency Preparedness and Response planning defining the course of action in case of potential emergency situations that may occur during the implementation of the Project will be defined and implemented.

All staff involved in the Project implementation and operation will be trained in the emergency response implementation and on their duties in case such emergencies occur.

2.5 LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

The Project PV Plant sites and the Substation site were acquired through purchase agreements.

The installation of the electrical cables will be ensured based on easement rights allowing the access to the affected land plots. All these easement rights have also been secured.

The Project access to land to allow the installation of the Project infrastructure at the construction stage or for maintenance works execution purposes during Project operation, may potentially result in damages to the land owners or land users (e.g. the crop on the respective land area may be affected). In case such potential damages will occur, these will be compensated at the market price level, based on agreement with the affected land owner or user.

A specific procedure (grievance mechanism) has been put in place to facilitate the communication between and affected land owner or land user with the Project representatives and ensure that any potential complaints are addressed promptly.

This grievance mechanism is part of a Stakeholder Engagement Plan implemented for the Project to enable meaningful communication and consultation processes with the Project stakeholders (see Section 2.8).

2.6 BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

The Project is not affecting any valuable biodiversity as it is built on land either used for intensive agricultural cropping or occupied by existing infrastructure elements as well as along existing access roads.

The closest natural protected area is located along the Tundzha River at a distance of 300 m or more from the Project sites.

2.7 CULTURAL HERITAGE

The Project will not impact any known cultural heritage sites. There are no known cultural heritage sites in the proximity of the Project, the nearest registered cultural heritage sites being located at 2 km or more from the site.

However, if cultural heritage is unexpectedly discovered during project works execution, construction will cease immediately at that area, protective measures will be implemented and authorities will be notified according to regulatory requirements.

To ensure the above-indicated are implemented by the construction contractors will implement a so-called Chance Finds Procedure defining the course of action and implementation responsibilities, in line with good international industry practice.

2.8 INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT

A Stakeholder Engagement Plan (SEP) including a Grievance Mechanism was developed for the Project and is publicly available.

The SEP provides a framework for the Project stakeholder engagement and will be amend and further developed as needed as the Project progresses with the aim of ensuring meaningful consultation with stakeholders and communities throughout the Project life cycle.

The SEP includes a Grievance Mechanism. The Grievance Mechanism can be accessed by anyone to raise complaints and comments in relation with the Project, and ensures that any complaint raised is addressed and responded.

To ensure facile access to the Grievance Mechanism, a number of interfaces have been established including a Grievance Form that can be used for submitting a grievance.