

FINAL REPORT

Annual environmental and
occupational health and safety
report
for 2017

PAWŁOWO WIND FARM

RELAX WIND PARK III Sp. z o.o.

EDP Renovaveis
EDP Renewables

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Contents

	Page
1 Introduction.....	1
2 Current status of EDP projects.....	2
Project location.....	2
2.1 Pawłowo Wind Farm (Pawłowo – Golańcz)	2
2.2 Margonin Wind Farm.....	5
2.3 Pawłowo Wind Farm (Pawłowo – Budzyń).....	5
2.4 Other wind farm projects.....	7
3 Implementation of the Stakeholders Engagement Plan (SEP) and the Environmental and Social Action Plan (ESAP).....	7
3.1 Actions taken in 2017 to meet the SEP requirements.....	7
4 Environmental issues related to Pawłowo wind farm.....	12
5 Changes in environmental law affecting the project	13
6 Material compliance of the project with environmental, social, and occupational health and safety regulations	13
7 Major social and OHS issues.....	13

1 Introduction

1

EDP Renovaveis (hereinafter referred to as EDPR) is a global leader in renewable energy sector in Europe and America. Among others, the company is developing and operating wind farms in Poland.

The development of Pawłowo wind farm project received financial support from EBRD and other banks of the International Finance Corporation. The financial involvement of the banks was preceded by the analysis of project's impact on environment and its social consequences, and the development of two documents, Stakeholder Engagement Plan (SEP) and the Environmental and Social Action Plan (ESAP), which constitute a roadmap for the company, allowing to meet the requirements of good management practices and the internal regulations and procedures of the Bank.

This report was developed to inform the Banks about the status of the project and the EOHS issues, as well as to present the level of implementation of SEP and ESAP. As required by the Bank, the report contains:

- Information on the status of the project, its changes and information on the environmental impact of the project, mainly on the compliance with contractual specifications and environmental standards valid in the country and the European Union (section 2).
- Information about the compliance with ESAP and about new projects or changes to the planned project (section 3).
- Information about the results of monitoring performed after the completion of construction (sections 3.2 and 4).
- Summary of material changes in the law of a major impact to environmental or social issues, which affect the Company to a significant extent (above EUR 100 thousand) (section 5).
- Summary of all areas, where major non-compliances with the environmental laws were identified (section 6).
- Information on major social issues (section 7).

This report will be published on EDPR website.

2 Current status of EDP projects

2

Project location

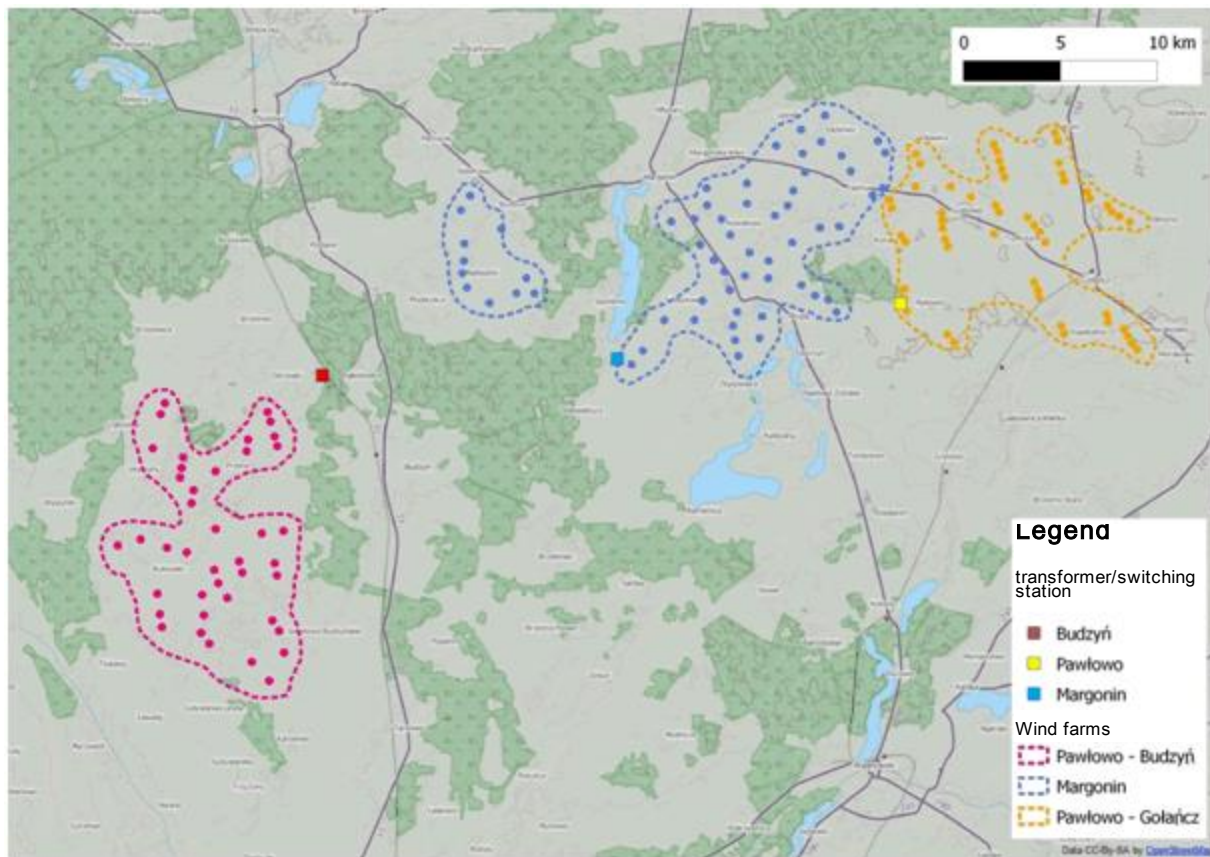


Fig. 1. Location of individual wind farms comprising the described complex and their transformer/switching stations

2.1 Pawłowo Wind Farm (Pawłowo – Gołańcz)

Pawłowo-Gołańcz Wind Farm, comprising 53 turbines, neighbours with the Margonin East WF area from the east. The project was commissioned in July 2013.

Initially, the project included three subprojects, assuming the construction of 65 wind turbines in the area of Gołańcz commune (stage I and II) and 31 turbines in the area of Wągrowiec commune. In Gołańcz commune, the administrative procedures were performed separately for two subprojects: for 60 wind turbines comprising stage I of the Pawłowo-Gołańcz WF (90 MW), for which it was intended to obtain the zoning decision, and for 5 turbines comprising stage II of the discussed Farm (7.5 MW), for which a local master plan was enacted. Commune Council in Wągrowiec was not favourable to the wind farm project, and therefore EDPR decided to suspend the project in this commune.

In Gołańcz commune, after lengthy administrative proceedings, the project was limited to 53 turbines:

1. Pawłowo WF, consisting of 49 wind turbines of up to 1.5 MW each and of total capacity of 73.5 MW located in Gołańcz commune, for which the Mayor of Margonin Town and Commune issued the decision on environmental conditions (decision dated September 21, 2011, ref. No.: ROŚ.7624/01-84/2010/2011 (stage I)); and
2. Pawłowo WF, consisting of 4 turbines of up to 1.5 MW each and of total capacity of 6 MW located in Gołańcz commune, for which the Mayor of Gołańcz Town and Commune issued the decision

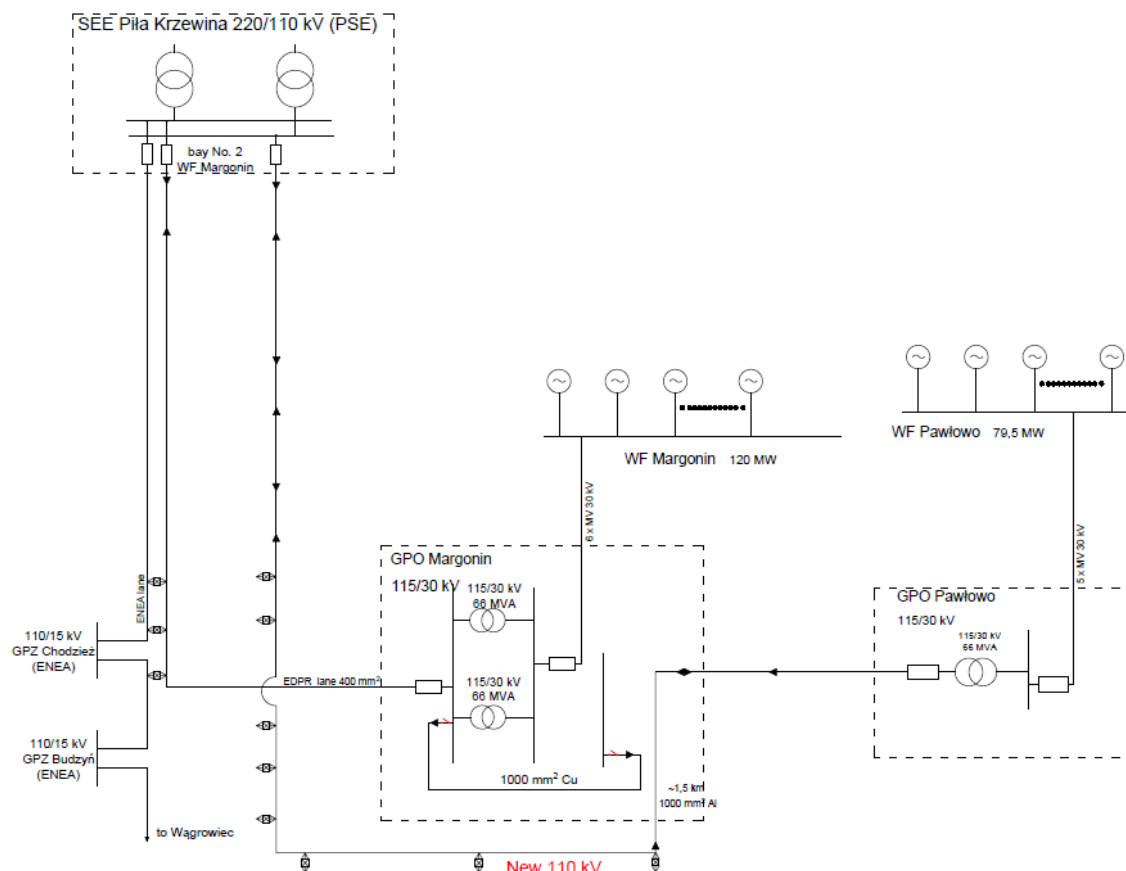
on environmental conditions (decision dated 20 May 2011, ref. No: NR OŚ.7624.08/14/10 (stage II)).

In the case of stage I of the project, the procedure of developing the decision on environmental conditions resulted in the removal of a few turbines from the original plans due to noise and environmental requirements, including the need to minimize impact to bats. The environmental decision was issued for 73.5 MW.

In the case of stage II, the Project Owner removed one turbine from the original layout due to noise impact. The environmental decision was issued for 6 MW.

One appeal against the environmental decision (for 73.5 MW) was submitted on 13.10.2011 by BUTEO Association. On 23 December 2011 the Local Government Appeal Court (SKO) in Piła through the decision No. SKO-41/OŚ-1443/D/2011 upheld the appealed decision on environmental conditions No. NR OŚ 7624.08/14/10, which therefore became final. Buteo Association filed an appeal against the decision of SKO, which was dismissed by the Province Administrative Court in Poznań (27.09.2012, file No. IV SA/Po216/12). On 25.11.2012 BUTEO Association submitted a cassation appeal against the ruling of the Province Administrative Court (WSA) in Poznań. The Supreme Administrative Court (NSA) issued a ruling (file No. II OSK 236/13) on 8.07.2014, referring the case for judicial review to the WSA in Poznań and the WSA rejected the appeal of BUTEO Association (file No. IV SA/Po1130/14) on 18.11.2014 for failure to meet the deadlines for curing formal defects in the appeal of BUTEO. The environmental decision thus became valid and final.

The analysed Pawłowo – Gołańcz wind farm (stage I and II – 79.5 MW in total) until 2015 was connected to the transformer/switching station in Rybowo (Pawłowo TSS), and then through a 110 kV single circuit overhead power line to the feeder bay at Margonin station in Sypniewo and then through the existing overhead line Margonin – Piła Krzewina to the national power network. This was a temporary solution intended for operation until the end of 2015. The Final solution is to transfer energy produced in Pawłowo Wind Farm separately through the new HVL to Piła Krzewina. The diagram of this connection is presented below.



An application to issue a decision on environmental conditions for the above line was filed with the Regional Environmental Protection Director (RDOŚ) in Poznań on 28.04.2014. On 27.05.2014, the RDOŚ set, by way of a decision, a requirement to carry out an environmental impact assessment. An environmental impact report was submitted on 12.06.2014, and then supplemented on 25.07.2014. In his letter dated 03.09.2014, the Wielkopolskie State District Sanitary Inspector approved the implementation of the project as compliant with the hygienic and health requirements. The pending administrative procedure and the possibility to access the case documentation and submit comments and motions in the relevant case within 21 days were announced between 04.08.2014 and 26.08.2014 (no such comments or motions were received from any interested parties within that time limit). Considering the above, the RDOŚ issued a decision on environmental conditions (ref. No.: WOO-II.4202.5.2014.JS.16) on 07.11.2014 for the project involving the construction of a buried cable-overhead 110 kV power line (with an optic fibre tract) at the Ostrówki TSS – Margonin TSS – Piła-Krzewina TSS section located in the Budzyń commune, Chodzież – village commune, Margonin, Chodzież district, and Kaczory, Piła district. That decision was not subject to an appeal and therefore became final on 18.12.2014.

10th of August 2015 the construction of a new 110 kV power line from Pawłowo feeder bay at Margonin station in Sypniewo to Piła Krzewina started. The construction works were accomplished 19th of December 2015. All appropriate building permits were obtained for this works. Investment were issued with occupancy permits by 25.05.2016, and on 15.04.2016 the project was reported to the Wielkopolskie Province Environmental Protection Inspector.

In the case of Pawłowo transformer/switching station, a decision on environmental conditions was obtained (decision of the Mayor of Gołańcz Town and Commune dated 23.12.2010, No. OŚ.7624-07/17/10). After consultation with the Regional Environmental Protection Directorate and the sanitary and epidemiological unit, the mayor did not impose the obligation to develop the environmental impact report.

In the case of the overhead power line from Pawłowo transformer/switching station to Sypniewo, the Mayor of Margonin Town and Commune issued a decision on environmental conditions (decision dated 14.02.2011, ROŚ 7624/02-19/10/2011). After consultation with the Regional Environmental Protection Directorate and the sanitary and epidemiological unit, the mayor did not impose the obligation to develop the environmental impact report. Furthermore, the decision on the site location of public purpose project was issued for the mentioned line (decision of the Mayor of Margonin Town and Commune dated 23.08.2011, No. GP 6730.22.22.2011).

The decision on environmental conditions for the extension of the existing Margonin Sypniewo transformer/switching station was obtained (decision of the Mayor of Margonin Town and Commune dated 8.08.2011, ROŚ 6220.03.09.2011). After consultation with the Regional Environmental Protection Directorate and the sanitary and epidemiological unit, the mayor did not impose the obligation to develop the environmental impact report.

Building permits were obtained for the entire project of Pawłowo – Gołańcz wind farm together with auxiliary infrastructure (Pawłowo TSS, overhead line, extension of Margonin TSS).

In 2013, Pawłowo – Gołańcz Wind Farm was completed and commissioned. All construction works began in July 2012, with 23 turbines (Acciona 1.5 MW, towers of 80 m) installed until the end of 2012. The construction of the 110 kV overhead line was completed by the end of 2012 as well. According to the environmental decision, in October 2012 garishly coloured FireFly bird diverters were installed on the section running along the forest to divert large birds moving between the forest and the “Rybowo” ecological site. All the turbines were erected in June 2013, and the works on Pawłowo TSS in Rybowo and the extension of Margonin TSS were completed. All the turbines were issued with occupancy permits by 26.07.2013, and on 22.07.2013 the project was reported to the Wielkopolskie Province Environmental Protection Inspector. The license to produce electrical energy from a renewable source was issued on 22.10.2013.

In 2017, the wind farm generated 187 356 MWh of electrical energy net and received 193 665 MWh of green certificates (renewable energy certificates – corresponding to the gross energy produced by wind turbines).

2.2 Margonin Wind Farm

Margonin Wind Farm consists of 60 single wind turbines of 2 MW each of total capacity of 120 MW.

Margonin WF comprises two major parts located on two banks of Margonińskie Lake:

1. Margonin West wind farm (11 turbines) of total capacity of 22 MW; and
2. Margonin East wind farm (49 turbines) of total capacity of 98 MW.

Power is fed from both parts of Margonin WF through the underground cable line to transformer/switching station in Sypniewo (Margonin TSS), and then through the overhead power line 110 kV Margonin-Piła Krzewina to the national power system. The described project has been in operation since 2010. Waste generation permits were obtained for Margonin East and Margonin West wind farms in 2011. Due to the amount of generated waste, in 2012 an application was made to the Chodzież District Head to change the permit in the scope of amount and quality of generated waste. The change of waste decision was granted in 2013 for Margonin West. In 2015 there was a need to increase the amount of contaminated sorbents produced, and new codes were added: 170503 –waste soil, 160216 – elements from used devices. The updates of waste decisions were granted in 10th of June 2015. Waste management is controlled on a current basis – waste registration is performed. Waste is selectively collected in the designated place at the on-site switching station, and then passed to companies holding the suitable permits or administrative decisions.

Wind turbines are subject to service and maintenance program provided by Gamesa, the manufacturer of the turbines.

Electrical engineering maintenance of the on-site switching station is contracted to an external company, ENEA serwis and EDPR is responsible for operational management.

In 2017, the wind farm produced net 278 668 MWh of electrical energy and received 307 751 MWh of green certificates (renewable energy certificates – equivalent to gross energy produced by wind turbines).

2.3 Pawłowo Wind Farm (Pawłowo – Budzyń)

The planned Pawłowo wind farm in Budzyń commune comprises 41 wind turbines of up to 2 MW each and of total capacity of 82 MW, and is located approx. 6.2 km to the south-west of the Margonin West wind farm. At the moment the administrative procedure for the decision on environmental conditions is in progress. Locations of wind turbines are planned in the master plan for Budzyń commune (Resolution No. VI/41/2003 of Budzyń Commune Council dated 30.06.2003).

In April 2012 an application to issue the decision on environmental conditions was submitted. The head of Budzyń commune requested an opinion from the Regional Environmental Protection Directorate (RDOŚ) in Poznań and the State District Sanitary Inspector in Chodzież (PPIS) on the necessity of the environmental impact assessment. The above mentioned bodies decided that the impact assessment is necessary (decision of RDOŚ dated 13.06.2012, WOO-1.4240.256.2012.PS, decision of PPIS dated 14.06.2012, ref. No.: ON.NS-72/2-12/12). The head of Budzyń Commune issued a decision of 13.07.2012, ref. No.: GKM.6220.4.2012 imposing the obligation to assess the environmental impact and determined the scope of the report, and then suspended the proceeding until the report is submitted (decision of 13.07.2012, ref. No.: GKM.6220.4.2012). The procedure is conducted with the participation of the local residents, who were informed with announcements posted in Budzyń, Chodzież and Ryczywół commune

offices, on BIP website, and on announcement boards of the villages within the range of potential impact of the wind farm. On 14 March 2013, the Project Owner submitted to the Head of Budzyń commune a report on the impact of the project upon the environment. The authority conducting the proceedings decided to hold civic consultations. On 28 March 2013, the Head of Budzyń commune issued decision No. GKM.6220.4.2012 on launching the procedure and applied for the approval of the conditions of project implementation to the RDOŚ in Poznań and for an opinion of the PPIS in Chodzież. At this stage of the proceedings, in accordance with the Act on Environmental Protection, the authority conducting the proceedings resolved to hold civic consultations. Between 8 and 29 April 2013, every interested person could submit their motions and comments. No motions or comments were received by the Head of Budzyń commune within the statutory time limit.

In its letter dated 2 May 2013, the RDOŚ in Poznań asked the Project Owner – Relax Wind Park III Sp. z o.o. to supplement the report assessing the impact of this project. In its letter of 20 May 2013, Relax Wind Park III Sp. z o.o. responded to the comments of the RDOŚ in Poznań and supplemented the report (with copies sent to the Commune Office in Budzyń and the PPIS in Chodzież). On 8 May 2013, the PPIS in Chodzież approved the conditions of project implementation. In connection with the supplements to the report the Head of Budzyń Commune decided to repeat the civic consultations procedure. Between 21 June and 12 July 2013, every interested person could submit their motions and comments. No motions or comments were received by the Head of Budzyń commune within the statutory time limit.

On 12-13 June 2013, consultation meetings were held with members of the local community concerning the project planned by Relax Wind Park III Sp. z o.o. Apart from the representatives of the Project Owner and the Commune, the meeting was attended by the authors of the environmental impact report, experts in acoustics and the author of the birds and bats monitoring programme. The aforesaid meetings were held in the villages of Bukowiec and Prosna and were attended by numerous representatives of the local community. Apart from receiving information materials, the interested residents could listen to information on the project and address questions to experts in various fields.

After the analysis of the supplemented environmental impact report, the RDOŚ in Poznań issued decision No. WOO-I.4242.67.2012.KB dated 4 July 2013, approving the project and setting forth the conditions of its implementation. On 24 July 2013, the PPIS in Chodzież upheld its approval of the project. The Head of Budzyń commune decided to repeat the civic consultations procedure. Between 6 and 26 August 2013 (21 days), every interested person could submit their motions and comments. No motions or comments were received by the Head of Budzyń commune within the statutory time limit.

The following environmental organisations took part in the procedure: BUTEO Association, Instytut Kajetana Koźmiana Foundation.

A decision on the environmental conditions for a project consisting in the construction of Pawłowo Wind Farm with a power of up to 82 MW and with the accompanying infrastructure, located in Budzyń commune near the following villages: Grabówka, Prosna, Ostrówki, Wyszyny, Wyszynki, Nowa Wieś Wyszynska, Bukowiec, Sokołowo Budzyński, was issued on 17 September 2013 (becoming final on 21.10.2013).

On 22.01.2014, the Commune Office in Budzyń received an application for the issuance of an environmental conditions decision for a project consisting in "Building a 110/30 kV transformer station with the necessary structures", planned on plot No 196/6, Ostrówki precinct, Budzyń Wielkopolski commune. By his letter of 06.02.2014 the State Sanitary Inspector and by his letter of 13.02.2014 the Regional Environmental Protection Director in Poznań issued opinions, according to which the project does not require conducting an environmental impact assessment and drawing up a report. On 21.02.2014, the Head of Budzyń commune issued a decision waiving the obligation to conduct an environmental impact assessment for the planned project. The environmental conditions decision ref. No. GKM.6220.1.2014 was issued on 31 March 2014 and became final on 23 April 2014.

On 11.03.2014, an application for the issuance of a decision on the environmental conditions for a project consisting in "Building a buried cable-overhead 110 kV power line (with an optic fibre tract) at the Ostrówki

TSS – Margonin TSS – Piła-Krzewina TSS section located in Budzyń commune, Chodzież village commune, Margonin and Kaczory, Chodzież and Piła district” was filed with the RDOŚ in Poznań. However, the application was withdrawn and then supplemented and resubmitted on 28.04.2014 to the Regional Environmental Protection Director (RDOŚ) in Poznań. The RDOŚ issued a decision on environmental conditions (ref. No. WOO-II.4202.5.2014.JS.16) on 07.11.2014. That decision was not subject to an appeal and therefore became final on 18.12.2014. The project ensures connection of the Budzyń Wind Farm from its transformer station (GPO) to the National Power System (KSE).

The building permits for substation and turbines were obtained in 2015. The building permits for cables and most road sections were obtained in 2016. The application for building permits for last sections of roads and medium voltage line were submitted in March 2017. All missing decisions were issued in July 2017 and February 2018.

2.4 Other wind farm projects

EDPR is currently conducting a few projects related to wind farms in Poland. These include both development and construction of wind farms developed by the Company and by third parties.

Since EDPR is a joint stock company operating in multiple countries, distribution and release of detailed data on current activities without the written consent of the headquarters is not possible. As this report is designated for public release, information on projects other than the discussed one can be provided to the Banks upon a separate request.

3 Implementation of the Stakeholders Engagement Plan (SEP) and the Environmental and Social Action Plan (ESAP)

The agreement concluded between the banks and EDPR obliges EDPR to take actions necessary to meet the international standards and banking requirements determined in the SEP and ESAP plans agreed between the parties. The following sections of the report describe how the company fulfilled the SEP and ESAP.

3.1 Actions taken in 2017 to meet the SEP requirements

The Stakeholders Engagement Plan (SEP) was developed to formalize the communication of EDPR with the stakeholders and to build a complaint mechanism.

According to the requirements of SEP, the company maintains internal and external communication with the stakeholders in the conducted administrative procedures. Internal communication was based on routine exchange of information between different organizational units of the Company and persons engaged in project execution. In order to guarantee a free flow of information between the employees, the following means were applied: exchange of electronic messages, periodical meetings and announcements posted on information boards.

External communication was focused on assuring a good understanding of Margonin and Pawłowo projects among the local community, non-governmental organizations and authorities.

Information on Pawłowo wind farm and other projects of EDP RENEWABLES Polska Sp. z o.o. was made available at the EDPR website at: <http://www.edpr.com>. In addition, in 2013 a Polish website of EDP RENEWABLES was created at <http://poland.edpr.com/>. The above websites were complemented the annual EOHS reports for last years. The Polish-language website additionally contains basic information on EDP Renewables and its operating wind farms, and enables contact, questions and the filing of possible complaints from the community.

To improve communication, Pawłowo commune office has contacts to employees of EDPR Polska Sp. z o.o., and if any questions from the local people and related to Pawłowo WF arise, these are passed on current basis to the Project Owner.

In 2015, EDPR continued the cooperation with Q&A Consulting (Q&A) in order to maintain an effective communication with the stakeholders. Since mid-2010, Q&A has been professionally handling all actions related to social consultations, providing the stakeholders with information and public opinion polls both for Margonin and Pawłowo projects.

Aiming to build positive relations with the local community and to promote the environmental attitudes, EDPR organized the following education and sponsorship activities in Gołańcz commune in 2017:

a) FEBRUARY 2017 – LOCAL CARNIVAL BALL

Thanks to a close cooperation with local opinion leaders, EDP Renewables was involved in the organization of a carnival ball for residents from Rybowo. Support provided by EDPR was highly appreciated by the locals.

b) JUNE 2017 – GLOBAL WIND DAY

Global Wind Day competitions in schools

Almost 120 students in ten local schools located in the neighborhood of four different EDPR wind farms celebrated the Global Wind Day 2017 by participating in a wind-themed arts&crafts competition. The participants created posters promoting the use of renewable energy or environmentally friendly behavior, used mixed crafting techniques to make collages about the wind and its benefits to the mankind and built anemometers. The winners received prizes that included education games and EDPR merchandise.

Competitions were held in primary school students in municipalities: Korsze, Margonin, Radziejów and Gołańcz and the participants included children ages 7-13.



9

c) OCTOBER 2017 – UNIVERSITY CHALLENGE CEREMONY

On October 11th, EDP Renewables announced the winner of the second edition of the EDPR University Challenge for Polish university students. The winning project 'Electric Wave – Breakwaters producing electricity' was presented by students from the University of Warmia and Mazury in Olsztyn. The award ceremony was hosted by the EDPR Managing Director in Poland and Romania – José Juan Canales Trenas who was accompanied by the management representatives of the company's Polish branch.

During his visit in Poland, José Juan Canales Trenas gave interviews to:

- Puls Biznesu – one of the 3 most important dailies in Poland, a nationwide opinion leader on business and finance subject matter.
- PAP – the Polish Press Agency, the oldest and most respected press agency in PL that provides news and information for other media.
- Newseria – new style press/ media agency that prepares and publishes materials on their own channel but they are available for other media too.



Monitoring of avifauna after the completion of each stage of the project

Based on the provisions of the ESAP and the environmental decisions, the monitoring of birds and bats should be conducted for a period of three years after the completion of the project.

The official commissioning of Pawłowo wind farm took place in July 2013. At that time SPV Relax Wind Park III sent an official letter to the Regional Environmental Protection Director (hereinafter: RDOŚ) in Poznań requesting determination of the scope and method of the post-completion monitoring for the newly-built Pawłowo wind farm. On 16 August, the company received a positive opinion of the RDOŚ regarding the proposed avifauna monitoring project. In order to select a professional team tasked with conducting such detailed surveys, EDPR organised a tendering procedure, after submitting the methodology approved by the RDOŚ. A group of recognised experts has been chosen to conduct the monitoring, which began in October 2013 and will be continued for three years. During that time EDPR will receive the monitoring results from each full year.

The results obtained during the first year of conducting the survey for the period between September 2013 and August 2014 show only a negligible impact upon birds: death rate of 0.6 individuals/turbine and upon bats: 0.9 individuals/turbine. During the entire year of monitoring, 80 victims of collisions with the wind turbines were found; 34 victims were birds (42.5%), and 46 (57.5%) – bats.

In all phenological seasons, the core of the avifauna is composed of species which are typical for the agricultural landscape of the particular season of the year. Dominant species represented common birds in Poland (primarily of the Passerine order), the populations of which are not endangered by the development of the wind energy sector.

The second year of birds and bats monitoring was completed in August 2015. The most birds species were typical for agricultural land. Predominant species were not threatened by wind energy. Mortality of birds was assessed as low -34 victims (average 0,6 birds by turbine). The mortality of bats was placed at the level of 84 bats (average 1,5 bats per turbine).

The last year of birds and bats monitoring of wind farm was completed in 2016. During the entire year, 67 victims of collisions with the wind turbines were found; 27 victims were birds (average 0,5 birds by turbine) and 46 were bats (average 0,75 bats per turbine). The most birds species were typical for agricultural land.

The first year of birds monitoring of 110kV power line has started in July 2016 and should be conducted for a period of three years based on environmental decision. The results of first year birds monitoring are really positive. Mortality of birds was assessed as very low –only 8 victims.

Noise level monitoring

In accordance with the environmental decisions, the Project Owner must meet the following requirements: within no more than two-three months from the commissioning of the project, it must carry out noise levels measurements in the adjacent areas covered by acoustic protection. Based on the results obtained, it must immediately carry out any necessary corrections of the settings of each turbine so that the operation of the project does not result in exceeding the allowed noise levels. The correctness of the adjustments must be confirmed by further noise levels measurements. After making the final corrections, it must conduct periodic noise level monitoring in the adjacent areas covered by acoustic protection over a period of two years. This monitoring should include noise measurements carried out at least four times a year, one during each season, under wind conditions creating the biggest impact of the turbines upon the acoustic climate. The results of the measurements must be presented to a competent environmental protection authority, the Province Environmental Protection Inspector (hereinafter: WIOŚ) in Poznań and the Regional Environmental Protection Director in Poznań.

The first noise levels measurements after project commissioning were carried out by Eko-Pomiar in October 2013. The measurements were taken at twenty locations. The measurements showed that the allowed values were exceeded at some locations during night-time, which was the result of the wind farm operating during the start-up and testing phase. Further measurements, this time at 12 locations, following the adjustment of the Noise Reduction System were carried out in December and showed no excessive noise levels. In 2014 and 2015 noise measurements were taken at 21 control locations four times, i.e. for each season. The results were positive without any exceedance of noise standards.

In accordance with the decisions, all results of the noise measurements were sent to Gołańcz and Margonin communes and to the WIOŚ and the RDOŚ in Poznań. No exceedance of noise in the protected households were measured.

Cumulative impact of the wind farms

Due to execution of Pawłowo wind farm in the neighbourhood of Margonin farm, ESAP plan required an assessment of the cumulative impact of the farms.

The environmental impact reports for both 73.5 and 6 MW projects pertain to assessment of the cumulative impact of EDPR wind farms and the planned Kcynia – Task IV farm on nature and the environment. The environmental impact reports do not identify any negative cumulative impact. Additionally, in relation to the planned Pawłowo project in Budzyń commune, the Project Owner took into consideration the cumulative impact of the entire complex of wind farms Margonin and Pawłowo in Gołańcz commune, and also of all other existing wind farms, and of the projects, which are now in

the stage of administrative procedures related to environmental decisions. At the moment, the environmental impact report is being developed for Pawłowo Wind Farm in Budzyń commune. The previous analyses aimed to assess the impact of Pawłowo Wind Farm in Budzyń to the environment suggest that there will be no significant negative cumulative impact on birds or bats or related to acoustic impact. The complete analyses and conclusions are being assessed in the administrative procedure. 12

EOHS management systems

EDPR has implemented and certified the environmental management system for the operation of Pawłowo wind farm compliant with ISO 14001 standard in 2014. In 2017 Pawłowo was certified by Lloyds Register according a new ISO 14001:2015 standard.

In 2013, an occupational health and safety management system was implemented in compliance with OHSAS 18001 standard (date of certificate: 10 December 2013). The system covers development, construction and operation of wind farms. During the implementation of the systems, internal and external audits of the project were performed. Currently, the EOHS management is conducted on the basis of corporate procedures and routine practices.

In 2014 the company was audited for compliance of the implemented Safety Management System with the OHSAS 18001:2007 standard. The outcome of the audit was positive, and thus the Certificate awarded to the company in 2013 was upheld. The compliance audit was performed by a renowned and reputable company, Bureau Veritas. In 2017 external audit were performed in Pawłowo Wind Farm with positive result.

Project monitoring

Pawłowo wind farm is operated by the company headquarters through field representatives. Polish branch of the company is responsible for business management. Regular maintenance of the wind turbines is performed by an external company – Nordex Acciona. General management of environmental issues is the responsibility of Ms. Paulina Szuliga-Piętka and Ms. Barbara Sidoruk. Ms. Monika Weis is responsible for safety management issues. The planned project operation audit was performed by an external company ENVIRON Poland Sp. z o.o. in early 2013 and included the operation of Margonin wind farm, the development and construction of Pawłowo-Gołańcz wind farm project and the development of Pawłowo-Budzyń wind farm project.

SEP execution

The company has executed the SEP plan. For details please refer to section 3.1.

4 Environmental issues related to Pawłowo wind farm

The environmental issues related to the wind farm operation were continuously monitored and all identified issues were solved on a current basis.

No environmental problems occurred in 2017.

Ice scattering effect

Although no ice scattering-related accidents occurred in the winter since the commissioning of Pawłowo wind farm, the company decided to limit this risk by placing warning signs on the access roads to every working turbine. The signs inform of entering an area threatened with ice scattering.

5 Changes in environmental law affecting the project

13

In 2017 there were no changes affecting the Margonin and Pawłowo projects in a significant way.

6 Material compliance of the project with environmental, social, and occupational health and safety regulations

The company is operating in compliance with all regulations valid in Poland.

The company evaluates the regulatory and other safety and environmental protection requirements twice a year under the internal procedure of the OHS management system. No deviations from the regulatory requirements have been found as a result of those evaluations. Moreover, company is following all the current legal changes in terms of safety via newsletter notifications.

Continuous OHS surveillance

To maintain high safety standards, EDPR conducts regular OHS inspections. The frequency and scope of such inspections are in compliance with the annual schedule approved by the company's Management Board. Inspections extend to the employees of EDPR and to all its contractors.

Eight inspections were carried out at Pawłowo Wind Farm in 2017. They included an inspection of the facilities and the contractors performance.

Emergency response

Continuing the cycle started in 2013, EDPR held emergency response drills at Pawłowo WF in 2017. Those drills were performed in wind turbine and consider scenario of evacuation from the places with difficult access. The simulation showed good response of technician and Wind Farm manager on environmental accidents.

7 Major social and OHS issues

No significant social or OHS issues were observed in relation to Pawłowo wind farm. In particular, in 2017 no proceeding related to social or OHS problem was started against the company and no incidents posing a threat of death, injury or damage to property of third parties occurred at the farm. As identified in the public opinion poll (see section 3.1), the project induced a positive attitude of the local community towards the benefits resulting from the presence of a wind farm.

No complaints were filled in 2017 on operation of Wind Farm.