

Environmental and Social Action Plan

P000863ENGIE Sustainability Linked Green Loan

S.no	Description	Anticipated Completion Date
1	Engie will develop a Land Acquisition and Resettlement Policy (LARP) aligned with PS5 to be applied to all greenfield or acquired assets utilizing IFC proceeds	03/30/2025
2	Engie will review the CSR risk matrix vis-à-vis the IFC Performance Standards and supplement it with E&S aspects and considerations related to alternative analysis, identification of AZE or UNESCO sites, cumulative impacts, and E&S impacts identification and assessment, even if local regulations do not require it.	03/30/2025
3	To enhance the environmental compliance monitoring and identify opportunities for improvement, the Company will define and implement a program to undertake annual onsite environmental audits of each sub-project utilizing IFC proceeds.	12/31/2025
4	Engie will establish a Worker's Grievance Mechanism (WGM) following national and IFC's PS2 requirements to be implemented on each sub-project in which IFC proceeds will be used in Poland.	03/30/2025
5	Engie will develop a "SF6 Management Plan" describing the environmental framework and guidance on SF6 mapping, management, monitoring, and reporting according to industry best practices to prevent and minimize SF6 associated risks and impacts.	03/30/2025
6	Engie will conduct a desktop review of all the wind power sub-projects that are part of the IFC proceeds to assess operational environmental noise, ice throw and shadow flicker vis-à-vis the World Bank Group EHS Guidelines for Wind Energy.	02/25/2025
7	Engie will develop a "Security Management Framework" aligned with IFC PS4 requirements.	04/30/2025
8	Engie will engage a qualified third-party consultant to develop a Wildlife Incident Reporting System (WIRS), which the Company will then implement at all of its covered operational PV solar and wind assets in Poland. Once developed, training on use of the	09/30/2025

	WIRS will be provided to Company/contractor, as part of the facilities' required site safety and orientation (induction) programs.	
9	Engie will use a qualified, third-party consultant to conduct an assessment to document the extent of loss and develop a strategy to achieve 'no net loss' of Natural Habitat in compliance with PS6 at the Prieska, Konkoonsies II, and Aggeneys PV Solar Projects, and the Golden Valley Wind Project. As part of this exercise, relevant stakeholders will be consulted to identify any additional conservation actions that may be warranted in the event of potential impacts to KBA.	01/30/2026
10	For the Excelsior and Golden Valley Wind projects, Engie will use a third-party consultant with experience in application of biodiversity offsets (per PS6) to update its BAPs, and also to enhance them to meet the pertinent mitigation standard, per PS6 with respect to Critical Habitat and Natural Habitat requirements. BAPs will outline a viable path to achieving the applicable mitigation standards for applicable biodiversity values and include implementation partners, methods, budgets, and timelines for specific offsets and other mitigation programs to be implemented. This ESAP item includes not only the BAPs, but the achievement of the mitigation objectives stated within the BAPs, hence it will be considered closed when the pertinent mitigation objectives have been accomplished and documented.	01/30/2026
11	For the Excelsior and Golden Valley Wind projects, the Company will use a qualified 3rd party consultant to enhance its Biodiversity Monitoring and Evaluation Plans (BMEPs), transforming them into Biodiversity Monitoring Plans (BMP) following good industry practice and typical IFC requirements. At minimum, each BMP will include the following: a) bird and bat fatality monitoring protocol, covering both the wind turbine areas and the project-associated overhead transmission line, accompanied by an adaptive management program for bird and bat fatalities, with both of these elements aligned with the IFC-EBRD-KfW Good Practice Handbook (2023). Fatality thresholds presented therein should be scientifically justified and aligned with national guidance for fatality threshold development (SABAA), indicating project- and species-specific fatality levels which, if exceeded, will trigger the implementation of additional impact mitigation measures. c) Shut-down-on-demand curtailment protocol to minimize wind turbine collision fatalities of priority bird species d) bird flight diverter (BFD) management plan, describing monitoring and maintenance of BFDs in functional condition e) Cape Vulture food management program – aligned with BARESG guidance f) cut-in speed	01/30/2026

	curtailment program to minimize turbine collision fatalities of bats to be developed in the event that sustainable fatality thresholds (presented in item a) are exceeded.	
12	For all sub-projects to be developed utilizing IFC proceeds in Poland, Engie will apply its Stakeholder Engagement Referential to include the development and implementation of project-level Stakeholder Engagement Plans (SEP) to meet PS1 requirements.	06/30/2025