PROJECT #53297

Dunarea East, Romania

Environmental and Social Review Summary

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Project Description:

The proposed investment will support the development of the Dunarea East Project (Dunarea or the "Project"), an onshore wind power plant (WPP) of up to 315 MW, to be located in Deleni Commune, Constanţa County, southeastern Romania. The project is to be developed by Midmar Callatis S.R.L. (the "Company"), wholly owned by Rezolv Energy S.A. (Rezolv) (the "Sponsor"). Rezolv (https://rezolv.energy/) is an independent renewable energy producer focused on the Eastern European energy market, owned by Actis (65%) and Mubadala (35%), and an existing IFC client. The project consists of the construction, operation, and maintenance of the wind farm, which is anticipated to be operational for 30–35 years. The proposed investment includes an IFC A-Loan of up to EUR 100 million, plus 6-month pro-rata DSRF of up to EUR 6 million.

The project will involve the installation of 45 wind turbine generators (WTGs), each with a rated capacity of 6–7 MW and an anticipated hub height of 125 and rotor diameter of 162 m. At the time of IFC's appraisal, the final WTG supplier and EPC contractor had not yet been selected. The project is anticipated to generate approximately 750 GWh per year. Construction is planned to commence in 2026 with a target completion of approximately 24 months.

The WPP project comprises the following permanent infrastructure: 45 WTGs with associated foundations and crane platforms; a 33/400 kV transformer substation (Deleni substation) located on-site; an internal 33 kV underground cable network connecting all WTGs to the substation; and two short (~0.3 km) double-circuit 400 kV overhead transmission lines connecting to the national energy system (SEN). The project is also associated with approximately 55.75 km of new permanent access roads and upgrades to approximately 38 km of existing roads. During construction, a temporary construction site area (~15,000–20,000 m²) will be established for site management offices, equipment storage, and logistics. No dedicated worker accommodation camps will be established; construction workers are expected to be housed in private residences and rented facilities in nearby communities, primarily in Deleni Commune.

The project site is situated within a predominantly agricultural landscape with open topography. Land ownership within the project area is predominantly private, with a limited area of communal pastureland. The project requires access to 169 land plots for permanent and temporary use; access rights have been secured through voluntary lease and purchase agreements. The project is expected to permanently occupy approximately 36.29 ha and temporarily affect approximately 32.71 ha during construction. Physical displacement is not anticipated. The closest WTG is expected to be located more than 492 m from any residential property.

Overview of IFC's Scope of Review:

IFC's Environmental and Social (E&S) appraisal of this proposed investment consisted of a review of available environmental, health, safety, and social documents, including an Environmental & Social Impact Assessment

(ESIA), Stakeholder Engagement Plan (SEP), Critical Habit Assessment (CHA), Livelihood Restoration Framework (LRF) and Environmental and Social Management Plan (ESMP), together with a suite of Project Owner-level management sub-plans covering environment, labor, Occupational Health and Safety (OHS), community health and safety, cultural heritage, waste, traffic management, emergency preparedness, and contractor management.

The appraisal included discussions with company representatives as well as an in-person appraisal visit to the site undertaken between the 23rd and 26th February 2026, during which meetings were held with the Project Owner, the Lender's Independent Environmental and Social Consultant (IESC), municipal government representatives, landowners and the Community Liaison Officer (CLO).

Identified Applicable Performance Standards:

While all Performance Standards are applicable to this investment, IFC's environmental and social due diligence indicates that the investment will have impacts which must be managed in a manner consistent with the following Performance Standards:

PS 1 – Assessment and Management of Environmental and Social Risks and Impacts

PS 2 – Labor and Working Conditions

PS 3 – Resource Efficiency and Pollution Prevention

PS 4 – Community Health, Safety and Security

PS 5 – Land Acquisition and Involuntary Resettlement

PS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources

PS 8 – Cultural Heritage

PS7 does not apply because the Project area does not have any indigenous populations as per IFC's PS7 definition.

If IFC's investment proceeds, IFC will periodically review the project's ongoing compliance with the Performance Standards.

Environmental and Social Categorization and Rationale:

This is a Category A project as per IFC's Policy on Environmental and Social Sustainability, as the project activities have the potential to cause significant adverse environmental risks and/or impacts that are diverse, irreversible, or unprecedented. The project is a large-scale (up to 315 MW) greenfield wind energy development located in proximity to multiple [4] Natura 2000 designated areas and a key risk for this project concerns avoiding, monitoring, and managing biodiversity impacts.

Other E&S risks and impacts are expected to include: (i) adequacy of ESIA documentation in line with IFC PSs; (ii) the company's and contractor's E&S management capacity and systems; (iii) stakeholder engagement and grievance mechanisms; (iv) labour and working conditions, including OHS, contractor management, emergency planning, gender-based violence and harassment (GBVH), child/forced labour, workers' grievance mechanisms and supply chain risks including human rights impacts ; (v) resource efficiency, noise, shadow flicker, and visual impacts; (vi) community health, safety and security, including blade and ice throw and traffic risks; (vii) land use and livelihood impacts on private landowners, tenant farmers, and informal land users; and (viii) impacts on tangible and intangible aspects of cultural heritage.

Environmental and Social Mitigation Measures

IFC's appraisal considered the environmental and social management planning process and documentation for the project and gaps, if any, between these and IFC's requirements. Where necessary, corrective measures, intended to close these gaps within a reasonable period of time, are summarized in the paragraphs that follow and in an agreed Environmental and Social Action Plan (ESAP). Through the implementation of these measures, the project is expected to be designed and operated in accordance with Performance Standards.

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

The company obtained an Environmental Agreement from the Constanţa Environmental Protection Agency in 2011, subsequently revised in 2025. An International ESIA was prepared in 2023 for a combined 600 MW east-west wind farm, following which the project was divided into Dunarea East (Deleni Commune) and Dunarea West (Adamclisi Commune), and an updated ESIA prepared focused on Dunarea East (DNV, 2026). In accordance with the ESIA, the project's Area of Influence (AoI) has been defined and a Cumulative Impact Assessment (CIA) undertaken.

The E&S disclosure package shared with this E&S review summary comprises a project-focused Scoping Report and ESIA, Stakeholder Engagement Plan, Critical Habitat Assessment with CHA Update, Archaeological Survey Report, Collision Risk Modelling (CRM), Visual Impact and Shadow Flicker Assessments, Climate Change Risk and Greenhouse Gas (GHG) Assessments, Livelihood Restoration Framework and a Framework Environmental and Social Management Plan. The E&S disclosure documents have been conducted in accordance with IFC PS and are considered fit-for-purpose for a project of this scale and character; with further measures required to address outstanding E&S risks outlined in the ESAP.

The project's E&S Management System (ESMS) is structured around the ESMP as the overarching document, supported by a suite of Project Owner-level topic-specific sub-plans encompassing pollution prevention and control, waste management, water management, noise management, hazardous materials, traffic and transport, community health and safety, biodiversity management and monitoring, biodiversity action, invasive species management, habitat restoration, cultural heritage, stakeholder engagement, labor management, emergency preparedness and response (EPRP), occupational health and safety, social management; livelihoods restoration; security management, and contractor management (ESAP#1). Although an Owner Plans Tracker is in place to address traceability between ESIA commitments and implementation, a consolidated and standardized list of EPC contractor management plans (CMPs), aligned with the company ESMS, is required to avoid gaps and inconsistencies (ESAP#2). The ESMP also needs to be reviewed and updated prior to operations, to take account of updates including decisions on EPC contractor and supply chain. An Operations ESMP and updated sub-plans will be developed and implemented (ESAP#3), with a corresponding ESMS implemented by the O&M Contractor.

The company includes legally binding obligations in its EPC and O&M contracts (cascading requirements to subcontractors) for compliance with project standards including IFC PSs and national legislation, and these requirements are set out in the project's ESMS.

The company will appoint competent Environmental, Social, Health, Safety and Security (ESHSS) staff and contractor resources to manage E&S performance in accordance with ESAP#4. During the construction phase, the company will employ at a minimum (either as its own staff or contracted as needed) suitably qualified and experienced resources including an ESHSS Manager, Community Liaison Officer(s), Health and Safety Supervisor(s), Biodiversity Specialist, and Cultural Heritage Specialist. The company will require its EPC contractor to appoint appropriate counterparts to these staff (ESAP#4). The company will also develop a detailed competency framework including role-specific requirements and a training matrix aligned with the project's ESHSS risk profile.

During the operational phase, the company will appoint an ESHS Manager and Biodiversity Specialist to implement the ESMS and require its O&M contractor to appoint competent support staff (ESAP#4).

The ESMS will include a consolidated Permitting & Compliance Register and Compliance Monitoring Procedure (ESAP#1) and E&S monitoring requirements will be included for the construction and operational phases, including monitoring frequency, performance indicators, and targets. The ESMP establishes a structured monitoring and reporting framework combining EPC contractor self-monitoring with Project Company oversight. The management review process will be strengthened to require more frequent reviews where monitoring data identifies issues with the management approach, where project changes occur, or where a significant incident arises and the ESMS/ESMP updated accordingly (ESAP#1). The CIA undertaken as part of the ESIA is aligned with IFC's Good Practice Handbook on CIA, but requires updating and publishing as per ESAP#5. A Human Rights Impact Assessment (HRIA) has been included in the ESIA which is aligned with the UN Guiding Principles on Business and Human Rights. The HRIA will need to be reviewed and, where necessary, updated once the turbine supplier and EPC contractor have been confirmed, and supply chain due diligence procedures implemented (ESAP#6).

PS 2 – Labor and Working Conditions

During construction, the workforce is anticipated to peak at 100–150 people, most of which are anticipated to be Romanian nationals. During operations, staffing requirements will reduce significantly, comprising around 20 maintenance staff responsible for routine inspections, servicing, and technical support and a small number of security personnel. Some roles, including security, drivers, maintenance operators, and administrative personnel are expected to be sourced predominantly from the local labour market.

Project Owner-level management plans covering labour have been developed including a Labour Management Plan, Labour Commitment Policy, Local Content Policy, Code of Conduct for workers and security, and a Workers' Accommodation Policy (WAP). As per ESAP#7, the company will adopt a Labour Management Plan (LMP) to include project-specific human resources policies in accordance with IFC PS2, ILO requirements, and EU and Romanian labour codes applicable to all project workers (including contractors and subcontractors). The LMP will define the company's commitments concerning labour and working conditions, equal opportunities and non-discrimination, gender-based violence and harassment (GBVH), prohibition of child and forced labour, whistleblower protection, freedom of association, and collective bargaining. An enforceable Code of Conduct applicable to all workers, specifically including provisions on zero tolerance for GBVH and associated disciplinary measures, will be developed and implemented.

Construction workers will be accommodated in private residences and rented facilities in nearby communities. As per ESAP#8, the company will implement its Workers Accommodation Plan (WAP) to define minimum standards in accordance with IFC PS2 and the IFC Guidance Note on Workers Accommodation (2009). During construction, the company will engage a qualified independent consultant to undertake semi-annual monitoring of contractor and subcontractor adherence to national labour laws and project labour and working conditions commitments (ESAP#9).

As per ESAP#10, the company will develop a project-level Workers' Grievance Mechanism (WGM) in accordance with IFC PS2, available to all project workers including contractors and subcontractors. The WGM will include specific considerations related to GBVH grievances, confidential and anonymous reporting options, multiple entry points, a trained focal point, and non-retaliation protections. The company will require through contractual clauses that its EPC and O&M contractors develop and implement site-specific OHS management systems, plans, and procedures commensurate with project risks, applicable to all project workers including subcontractors, in accordance with ESAP#2 and ESAP#3.

To manage E&S risks related to procurement and supply chain, the company has developed formalized processes, including vendor pre-qualification, selection procedures, and a Partner (Supplier) Code of Conduct, which defines the company's E&S commitments (including commitments relating to labor practices and human rights). The company incorporates these commitments into the contracts it signs with its suppliers. In accordance with ESAP#6, the Sponsor will conduct supply chain due diligence on key suppliers and contractors, covering governance, supply chain traceability, grievance mechanisms, and exposure to high-risk geographies, and cascade its requirements to all relevant parties, including primary suppliers, EPC contractor(s) and their subcontractors.

The company will adopt a structured approach for preventing and managing GBVH, Sexual Exploitation and Abuse, and Sexual Harassment (GBVH/SEA/SH) risks within the project ESMS. As per ESAP#11, the company will establish a survivor-centered GBVH/SEA/SH management procedure with defined prevention measures, reporting protocols, investigation procedures, disciplinary measures, and referral pathways, embedded within the ESMS with clear roles and responsibilities. Mandatory GBVH/SEA/SH training will be included in the training plan for all personnel and contractors at onboarding and periodically thereafter, and EPC contractor agreements will include binding GBVH/SEA/SH requirements prior to workforce mobilisation.

PS 3 - Resources Efficiency and Pollution Prevention

The project is estimated to generate approximately 750 GWh per year with total lifecycle GHG emissions estimated at approximately 368,278 tCO2e (on a lifecycle assessment basis), with annual operational emissions estimated at approximately 3,683 tCO2e. The project is expected to deliver avoided emissions of approximately 195,013 tCO_2e per year over its operational lifetime.

Water use during construction will primarily be associated with dust suppression, concrete production, and workforce domestic consumption. Water will be sourced externally by water tanker trucks or from a legal, permitted supply; groundwater extraction is not planned. Water supply sources and detailed consumption estimates will be defined by the EPC contractor during detailed design, at which time it will be reconfirmed that sourcing will not adversely affect local community water availability and appropriate mitigation measures, including metering and reporting requirements, will be incorporated in the EPC contractor's Contractor Management Plans (CMPs).

The project is expected to generate negligible impacts to air, water, and soil during construction, but pollution risks will be mitigated through the implementation of standard pollution prevention and control measures defined within the Construction Environmental and Social Management Plan (C-ESMP) and associated construction sub-plans. These include dust suppression, drainage management, topsoil handling, hazardous materials storage and containment, and waste management. The EPC contractor will be required to specify sources of construction materials (in particular aggregates) and to develop a concrete batching management sub-plan addressing site location, air quality, noise, and wastewater management at the batching facility, consistent with the Owner ESMS.

Operational noise modelling, based on a conservative turbine assumption (Vestas PO6800), concludes that predicted noise levels at nearby sensitive receptors are within applicable Romanian and WBG EHS Guideline limits (55 dB daytime, 45 dB nighttime). As per ESAP#12, the noise assessment will be reviewed and, where necessary, updated once the final turbine model is confirmed, aiming for continued compliance. Noise monitoring at the site boundary and nearest sensitive receptors will be implemented during construction and operations, and within 1 year of operation a noise and flicker assessment and calibration of the initial modelling will be undertaken.

The project will generate significant volumes of solid waste during construction, with negligible volumes expected during operations. Both non-hazardous and hazardous waste will be generated during construction. Waste will be segregated, stored in designated areas, and collected by licensed waste management contractors. The EPC contractor will identify and confirm appropriately licensed treatment and disposal facilities prior to the commencement of construction activities as part of the Contractor Waste Management Plan.

PS 4 - Community Health, Safety, and Security

The ESIA assessed risks and impacts to the project's host communities and the public, which are addressed at a framework level through the ESMP and Owner-level sub-plans. No residential properties are located within the WTG safety exclusion zone (approximately 492 m). As per ESAP#13, the company will develop and implement a Community Health and Safety Management Plan (CHSMP) and Security Management Plan (SecMP). The CHSMP will define the management measures, roles, responsibilities, and monitoring for key community interface risks, including turbine safety exclusion zones, safety signage, and incident response procedures for events affecting nearby communities. During operations, agricultural activities, including herding of animals, will continue within the project area and care will be required during winter periods when ice throw could occur.

An Emergency Preparedness and Response Plan (EPRP) has been developed and will incorporate community-focused response procedures, roles, responsibilities, and communication channels with local emergency service providers, developed in consultation with those providers.

An enforceable workers' Code of Conduct will define individual responsibilities including zero tolerance for GBVH and related disciplinary measures.

The primary road traffic risk is associated with the transport of turbine components and construction materials, primarily coming from the Port of Constanţa to the project site. As per ESAP#13, the company will revise the Project Owner Traffic Management Plan (TMP) to set out all required traffic and public road safety measures including vehicle routing and scheduling (to avoid sensitive periods such as school hours), speed limits, segregation measures, protection of vulnerable road users, community communication, and monitoring procedures and that these requirements are fully passed down to the EPC contractor. The EPC contractor will develop a Traffic and Transport CMP in line with the TMP (ESAP#2).

Security personnel will be engaged during construction and operation of the project. As per ESAP#1 and ESAP#11, the company will include in the Security Management Plan a context-specific approach, community-security interaction protocols, conflict de-escalation procedures, KPIs, integration with the EPRP, GBVH

safeguards and mandatory training for security personnel, and alignment with the Voluntary Principles on Security and Human Rights (VPSHR). Security management will be linked to the SEP to ensure community engagement and security management are coordinated.

PS 5 - Land Acquisition and Involuntary Resettlement

The project requires access to 169 land plots for permanent and temporary use. Land ownership within the project area is predominantly private, with a limited area of communal pastureland. Micrositing and design adjustments have been applied to minimise land disturbance and no physical displacement is anticipated. The project will permanently occupy approximately 36.29 ha and temporarily affect approximately 32.71 ha during construction. The majority of land access requirements have been secured through voluntary lease and purchase agreements on a willing buyer–willing seller basis. Temporary impacts are anticipated for approximately 30 herders using access tracks that will be upgraded to project roads.

A Livelihood Restoration Framework (LRF) has been prepared aligned with IFC PS5. The LRF sets out compensation principles for land, crops, trees, perennial crops, and structures, using market or comparative valuation methods supported by independent assessments where available. Tenant farmers and informal land users are explicitly recognised as legitimate affected persons and are intended to be covered by formal agreements or MOUs. Landowners interviewed during site visits confirmed satisfaction with engagement processes, absence of associated costs, and improved contract terms. As per ESAP#14, all permanent and temporary lease and purchase agreements for private and state-owned plots will be fully executed and documented, with verification provided.

As per ESAP#14, the company will finalise the Livelihood Restoration Plan (LRP) aligned with national law and IFC PS5 prior to the start of construction. The LRP will capture all potential impacts on land (including temporary structures), livelihoods, ecosystem services, and access to natural resources related to the construction and operations phases. It will include a detailed socio-economic baseline; compensation at full replacement cost for landowners, tenant farmers, and informal users; formal agreements for non-landowning users; cut-off dates and asset validation procedures; mitigation measures for potential loss of government agricultural subsidies; special assistance measures for vulnerable groups; and access to project-related employment and training opportunities. To minimize temporary impacts, the LRP will include construction phasing and engagement with affected herders using access tracks. As per ESAP#15, the company will report on LRP implementation through annual monitoring reports until all LRP activities are completed and a completion audit will be conducted by a qualified independent consultant three years after all LRP activities are deemed complete, confirming whether livelihoods have been restored to pre-project levels or better.

PS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources

The Project area is located within the Pontic Steppe Ecoregion (PA0814). This region is characterized by a temperate climate with appreciable winter rain, generating characteristic European steppe vegetation, dominated by feather grasses (*Stipa* spp.) and fescues (*Festuca* spp.). The major habitats in the area are the Ponto-Sarmatic steppes and Ponto-Sarmatic deciduous thickets or oak dominated steppe woods. However, the area occupied by the Project has been progressively transformed into arable land and pastures, with a floristic composition that is strongly modified due to agriculture and cattle and sheep grazing, to a point where very little of these natural habitats are found today. Remaining Natural habitat is highly fragmented, occurring only in isolated pockets within the mosaic of pastures and farmland.

The Project partially overlaps two Natura 2000 sites, which are also Important Bird Areas (IBA): ROSCI0353 Pestera – Deleni Natural Area and ROSCI0071 Dumbraveni – Valea Urluia Natural Area - Lacul Vederoasa. One turbine is located within each of the above protected areas (impacting < 1 hectare each), both sited in arable land with no conservation value (DNV Italy, 2025). Two more Natura 2000/IBA's are within 1km of the project area: ROSPA0001 Aliman–Adamclisi (approximately 20m) and ROSPA0036 Dumbraveni (approximately 895m). The Project completed an Appropriate Assessment (2023, updated in 2025), to assess impacts on Natura 2000 sites in line with local legislation and the European Habitats Directive, the outcomes of which were consulted with relevant stakeholders, such as the Natural Agency for Protected Natural Areas (ANANP) and the Romanian Ornithological Society (SOR).

Priority bird species at the project include: Eastern Imperial Eagle *Aquila heliaca* (IUCN Vulnerable); Red-footed Falcon *Falco vespertinus* (IUCN Vulnerable); Pallid Harrier *Circus macrourus* (IUCN Near-threatened); Lesser Spotted Eagle *Aquila pomarine* (IUCN Near-threatened); Saker Falcon *Falco cherrug* (IUCN Endangered); Greater Spotted Eagle *Clanga clanga* (IUCN Vulnerable); Red-footed Falcon (IUCN Vulnerable); European Turtle-dove *Streptopelia turtur* (IUCN Vulnerable); and Northern Lapwing *Vanellus vanellus* (IUCN Near-threatened). Priority bat species at the project include twenty-two bat species recorded, all of which are listed in Annex IV (strictly protected species), and one of them, *Miniopterus schirebersii,* is listed in Annex II (species that member states are required to designate sites for) of the Habitats Directive, as well as assessed as Vulnerable (IUCN). The Site of Community Importance ROSCI0071 Dumbrăveni - Valea Uruia - Lacul Vederoasa (one turbine within) has one *Miniopterus schreibersii* listed as a qualifying feature. Eight plant species were identified as listed on the National Red List, but all are listed as globally Least Concern. Three priority mammal species are relevant to the project: Common Hamster *Cricetus cricetus* (IUCN CR); European Ground Squirrel *Spermophilus citellus* (IUCN EN); and the Romanian Hamster *Mesocricetus newtoni* (IUCN VU). Priority habitats include the EU Habitats Directive Annex 1 listed: 62C0* Ponto-Sarmatic steppes with *Stipion lessingianae* plant associations; 91I0* Euro-siberian forest-steppe with Quercus spp; and 40C0 Ponto-Sarmatic deciduous thickets, with *Pruno spninosae-Crataegetum* plant associations.

The Critical Habitat Assessment (CHA) concluded that no habitats or species qualify as Critical Habitat under IFC criteria. Three habitats, listed as priority habitats in Annex I of the EU Habitats Directive qualify as Critical Habitat under EBRD ESR6, due to their presence in the Project's Area of Impact. These are: 62C0* Ponto-Sarmatic steppes with *Stipion lessingianae* plant associations; 91I0* Euro-siberian forest-steppe with Quercus spp; 40C0 Ponto-Sarmatic deciduous thickets, with *Pruno spninosae-Crataegetum* plant associations. A number of other species are identified as Priority Biodiversity Features under EBRD ESR6. IFC Natural Habitat No Net Loss (NNL) requirements will apply to these priority biodiversity values given the potential construction-phase impacts.

Although the project is not considered to be located in CH per IFC's requirements, the company will develop a fit-for-purpose Biodiversity Action Plan (BAP) (ESAP#17) and Biodiversity Monitoring and Evaluation Plan (ESAP#19) given that the project is located in a Natura 2000 Site. The BAP will be informed by pre-construction surveys, quantify any residual impacts on priority biodiversity values, and identify measures to meet NNL objectives, including a Habitat Restoration Program for the: 62C0* Ponto-Sarmatic steppes; 91I0* Euro-siberian forest-steppe; and 40C0 Ponto-Sarmatic deciduous thickets habitats. The Habitat Restoration Program will, at the minimum, include (i) a detailed mapping of the habitat, (ii) identification of impacts (iii) recommendations on avoidance, minimization and restoration measures (iv) quantification of residual impacts and (v) a clear demonstration of how NNL will be achieved defining offset requirements, as applicable. If offset measures are required, a qualified expert with international experience on offsets will be contracted to develop an Offset Management Plan (ESAP#21). The BAP will also identify additional conservation actions for the Natura 2000 Site, which will be developed and implemented in coordination with relevant stakeholders (i.e., ANANP and SOR).

As per ESAP#16, the project will update the construction-phase Biodiversity Management Plan (CBMP), to include pre-construction surveys of the identified priority biodiversity features and set forth all associated measures relevant to these values, including avoidance and minimization of disturbance to bird and mammal nests during the construction phase. For the 62C0* Ponto-Sarmatic steppes, 91I0*Euro-siberian forest-steppe, and 40C0 Ponto-Sarmatic deciduous thickets, a separate Habitat Restoration Plan will be developed, which will include (i) detailed mapping of the habitat, (ii) identification of impacts (iii) recommendations on avoidance, minimization and restoration measures (iv) quantification of residual impacts and (v) a clear demonstration of how NNL will be achieved defining offset requirements, as applicable. Certain operational mitigations need to be implemented or prepared in the construction phase and these should be included in the CBMP (e.g. Shutdown on Demand for birds).

The project will develop an Operations phase BMP (OBMP, ESAP#18), which will include the following: i) confirmation of priority biodiversity values; ii) threshold setting for priority biodiversity values; iii) a robust Post Construction Fatality Monitoring programme; iv) mitigation measures for birds and bats; and v) an adaptive management strategy. As per the adaptive management strategy, if the review identifies that any of the defined thresholds are exceeded, the company will take additional mitigation measures, including enhanced shut-down on demand (e.g. birds) and curtailment (e.g. bats), in consultation with IFC.

During the operations phase of the project, the key measure will be the implementation of a robust bird and bat fatality monitoring program that follows GIIP and is able to generate unbiased fatality rate estimates. For this reason, as indicated in ESAP#20, the company will contract a specialized wind-wildlife consultancy to design and implement a Post-Construction Fatality Monitoring (PCFM) program at the wind energy facility (the grid connection overhead line will be only ~300m long and does not require monitoring). The PCFM program will, at the minimum, include (i) systematic carcass searches conducted at weekly intervals year-round under all turbines with transects 6-m in width, (ii) implementation of an adequate number of industry-standard bias correction measures for searcher efficiency (detectability), carcass removal (scavenging), and unsearched and unsearchable areas, (iii) industry standard statistical calculation of total, bias-corrected bird and bat fatality using GenEst software on a semi-annual (2x/year) basis. The program will take place for at least a three-year period with semi-annual reporting following a standardized template, but the actual timeframe of the PCFM program will depend on fatality results. A strategic review of the PCFM program will take place one year after implementation.

PS 8 - Cultural Heritage

A cultural heritage baseline was completed as part of the ESIA, aligned with Romanian national legislation and IFC PS8, employing a phased archaeological risk management approach including baseline surveys, evaluation near surface excavation, and mitigation measures, which involved cancellation or rerouting of several turbines and access roads and preventive archaeological excavation and documentation. The project area is notable for the nationally significant Roman heritage sites of Tropaeum Traiani (Monumentul Tropaeum Traiani) and Civitas Tropaensium, as well as numerous tumuli and subsurface archaeological features. An Environmental Agreement has been obtained from the Constanţa Environmental Protection Agency, and a Cultural Heritage Clearance Notice issued from the Constanţa County Directorate for Culture.

The remains of three WWI soldiers and associated artefacts were uncovered during mitigation excavations. As per ESAP#22, the company will adopt a Cultural Heritage Management Plan (CHMP) and Chance Finds Procedure (CFP) aligned with national laws and IFC PS8, including clear protocols for any objects/remains found. These will define the scope and triggers for additional excavations, include micrositing where possible and address as-yet-undiscovered features through a CFP. The CHMP and CFP will be developed in consultation with community members and the Ministry of Culture as applicable.

Intangible cultural heritage (ICH) was not formally assessed in the ESIA. Site visits identified active cultural and religious receptors within the project's AOI, including Mănăstirea Naşterea Maicii Domnului Monastery (Deleni), Orthodox churches and cemeteries in Pietreni, Petroşani, and Sipotele, and Turkish cemeteries. Operational-phase visual impacts on these receptors are expected to be limited; however, construction-phase impacts (noise, dust, traffic, and access restrictions) will be assessed and updated in the ESIA as per ESAP#22, with formal engagement with custodians and community stakeholders undertaken prior to construction.

Stakeholder Engagement:

A Stakeholder Engagement Plan (SEP) has been prepared for the project consistent with IFC PS1. The SEP provides a framework for engagement across all project phases, identifies key stakeholders, assigns responsibilities, and links activities to project milestones. It includes a Community Grievance Mechanism (CGM) with multiple channels for raising concerns (CLO, written forms, hotline, and grievance boxes), GBVH-sensitive procedures, and a structured process for receiving, screening, investigating, and closing grievances.

The project has undertaken multiple rounds of stakeholder disclosure and consultation, consistent with IFC PS1, since the 2010–2011 national EIA process, with further engagement in 2019, during the 2022 ESIA scoping, and

through socio-economic baseline consultations in 2023. A Community Liaison Officer (CLO) is appointed and has engaged with local communities, landowners, and Deleni Commune on project related issues.

As per ESAP#23, the company will update the SEP to reflect the current project scope and design, strengthen the stakeholder analysis (including identification of vulnerable groups and targeted measures for their participation, with gender-disaggregated records where feasible), formalise contractor roles in stakeholder engagement and grievance handling, define KPIs and monitoring parameters for engagement performance, and include clear plans for formal structured disclosure of the ESIA and Natura 2000-related assessments in accessible, culturally appropriate, and gender-sensitive formats. The company will also update the CGM to include an internal appeals or escalation process, a clear anti-retaliation statement, extended confidentiality procedures, KPIs and monitoring procedures for tracking and reporting grievance trends, and an approach for handling construction-related accidental damage claims (ESAP#24). The LRP will integrate a dedicated grievance mechanism for livelihood and land-related issues, with publicly disclosed contact information and provisions for GBVH-related complaints.

The project's community grievance mechanism was disclosed to affected people during the ESIA process and is managed by the CLO. The company will update its SEP at least two months before the start of construction and commencement of operations. The company will also inform communities of the project workers' and security force's Code of Conduct and the availability of the project's grievance mechanism to raise complaints (ESAP#24). Communities will be consulted on the Emergency Preparedness and Response Plan, and their feedback incorporated into the final plan. The formal Informed Consultation and Participation process, including documentation of participation by women and vulnerable groups, will be completed and documented.

Broad Community Support (BCS) was determined not to apply to the project as the project is unlikely to generate significant adverse social impacts that would be irreversible, diverse, or unprecedented.