CO_2 Storage Unit in Prinos

Framework Environmental and Social Management & Monitoring Plan

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GLOSSARY OF TERMS

TERM	EXPLANATION
CLO	Community Liaison Officer
Complainant	An individual, or group that submit a Grievance. Complainants may include individuals who allege harms against themselves, or who allege harms against others as a result of EnEarth or Contractor activities or operations.
Complaint	Discontent about EnEarth's or Contractor's operations or activities expressed by an individual, group, or community.
Concern	An issue arising from EnEarth's or Contractor's activities or operations that has the potential to cause an impact to an individual, group, or community.
Contractor	Engineering, Procurement and Construction (EPC) contractors and their sub-contractors engaged by EnEarth for the Project. Contractors are also required to align with EnEarth's grievance and HSE frameworks.
Contractor Worker Grievance Mechanism	Worker grievance mechanism implemented by Contractors for their workers and subcontractors. EnEarth's Grievance Coordinator interfaces and assists with resolution as required.
CO_2	Carbon dioxide, a greenhouse gas captured and permanently stored in geological formations under the Project.
EC	European Commission.
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EPC	Engineering, Procurement and Construction
EPCI	Engineering, Procurement, Construction, and Installation
ESIA	Environmental and Social Assessment
ESMS	Environmental and Social Management System

TERM	EXPLANATION
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
EU	European Union
GBVH	Gender-Based Violence and Harassment
Grievance	Used interchangeably with *complaint*. Refers to an allegation, issue, or problem related to a person's treatment or experience at work or in relation to Project activities. This may range from workplace issues (e.g., pay, welfare, relationships) to serious and potentially unlawful acts (e.g., harassment, discrimination, or violence). Includes matters under Greek Law 4808/2021 on prevention and combating violence & harassment at work.
Grievance Management Framework	The framework outlining principles, roles, and processes for implementing effective and culturally appropriate grievance mechanisms.
GDPR	General Data Protection Regulation
H&S	Health and Safety
HEREMA	Hellenic Hydrocarbons and Energy Resources Management Company
HSE	Health, Safety and Environment
Incident	Related to HSE, an incident is a discrete event that resulted in, or had the potential to result in, injury, loss of life, damage to assets (including non-EnEarth assets), or harm to the environment.
ISPSS	International Ship and Port Facility Security
KPI	Key Performance Indicator
MOC	Management of Change, a structured process for controlling modifications to scope, design, or procedures while reassessing risks.
OHS	Occupational Health and Safety
Procedure	Refers to this Worker Grievance Procedure (in context of grievances).

TERM	EXPLANATION
Project	The Prinos CO_2 Storage Project: installation of a full-scale geological CO_2 storage facility in Prinos.
SESR	Supplementary Environmental and Social Report
Severity	The degree of impact or consequence experienced by a worker or the Project. Severity is rated based on actual or potential consequences for health and safety, livelihoods, environment, or reputation.
SGMT	Stakeholder and Grievance Management Tool – EnEarth's electronic register to record, track, and manage grievances and stakeholder interactions.
SMS	Security Management System
Supply Chain	The chain of suppliers providing materials, goods, or services for EnEarth or the Project, including subcontractors and raw material providers.
Third-Party Grievance Mechanism	Refers to grievance process implemented by EnEarth for addressing/ managing/ resolving external stakeholder grievances
Third-Party	Includes members of the public, residents of affected communities, project-affected people (PAPs), institutional stakeholders, and other external parties.
Worker	A person employed directly by EnEarth, or indirectly through Contractors or Sub-Contractors.

1 Introduction

1.1 Project background and summary

The CO_2 storage site is located within the Prinos basin, in the Gulf of Kavala, in the northern Aegean.

The deposits in this area have been investigated since the 1970s; subsequently, oil production from three fields within the Prinos Concession was developed, as well as natural gas production from the South Kavala Concession, from the 1980s onward. The environmentally licensed onshore installations of the CO_2 storage Project are located within the operating area of Energean's Sigma facilities, at the boundary of the Municipality of Kavala, approximately 2.4 km east of the settlement of Nea Karvali. The existing environmentally licensed offshore installations of the Prinos complex, as well as the installations proposed are in the Gulf of Kavala, west of Thassos and south of the Kavala shoreline.

The following figure presents a satellite depiction of the project area.

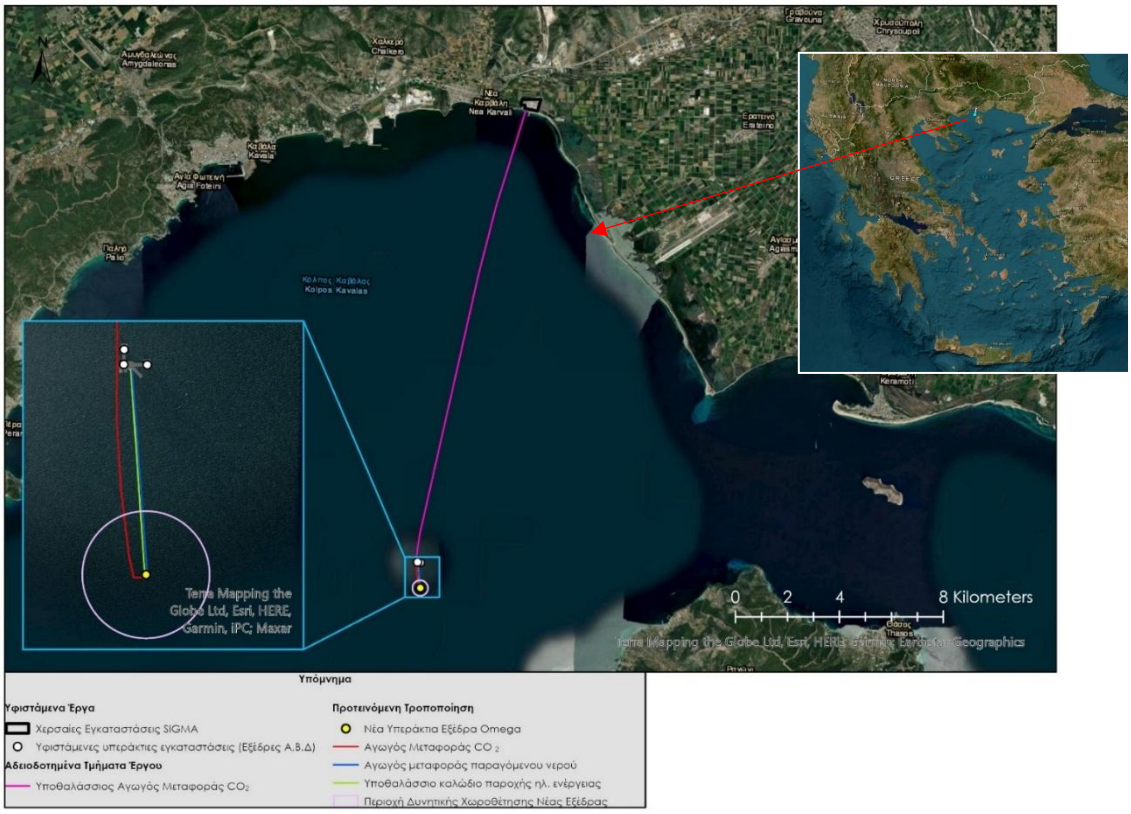


Figure 1-1: Satellite view of the Project

The Project (Phase 1) concerns the installation of a carbon dioxide (CO_2) storage unit at Prinos, with a nominal capacity of one million tonnes (1 MTPA) of CO_2 per year. The CO_2 storage formation is located within the Prinos Concession area, in the Prinos basin of the Gulf of Kavala, in the Northern Aegean.

The installation of the overall project will be developed in the following two distinct capacity-based phases (Phase 1 and Phase 2), in order to adapt to demand conditions:

- **Phase 1:** The Project's initial nominal capacity will be up to one (1) MTPA for 20 years. CO_2 will arrive mainly via third-party pipelines, while some quantities will also be received as CO_2 shipments at the onshore Sigma facilities from trucks through pilot projects.
- **Phase 2:** A gradual expansion of the Project is envisaged to a final nominal capacity of approximately three (3) MTPA.

The new installations and wells planned for implementing Phase 1 of the CO_2 storage project include:

- **Onshore installations:** Modification of a designated area within the existing footprint at the Sigma plant for construction of the CO_2 reception manifold and the unloading and compression area.
- **Offshore CO_2 transport pipeline:** A subsea pipeline connecting the Sigma plant area with the offshore **Beta** platform, approximately **19 km** in length.

As the project matures, and provided that technical or engineering improvements arise, Phase 1 is expected to be amended with respect to the infrastructure works as follows:

- **Offshore platforms:** Installation of a new offshore platform (Omega platform) for the reception of CO_2 from a new subsea pipeline and CO_2 cargo in containers, for the injection of CO_2 into the new wells. The new Omega platform is planned to be located within a radius of 300 meters from the indicative siting position, approximately 1 km south of the Prinos platform complex (geographical latitude (N) 40° 47.38327' and geographical longitude (E) 24° 29.92146') (Omega Platform Potential Siting Area). The final siting position of the Omega platform will be determined following the investigation and evaluation of the precise technical and soil characteristics, in order to identify the most technically appropriate solution, which constitutes the first step in the construction methodology of every new platform. The definitive final location of the new Omega platform will be specified in the context of submitting the Final Design Compliance Dossier to the competent environmental authority, as defined in paragraph 7 of Article 11 of Law 4014/2011. A prerequisite for this is that the siting of the Omega platform (for the implementation of the corresponding wells) lies within the 300-meter radius area from the coordinates of the designated central point, which constitutes the indicative siting position of the Omega platform, for which the relevant potential environmental and social impacts have been assessed and evaluated.
- **Wells:** Two (2) CO_2 injection wells and two (2) water production wells on the new offshore Omega platform.
- **Offshore produced-water pipeline:** A subsea pipeline connecting the new Omega platform with the existing offshore Delta platform of the Prinos offshore complex, approximately 1 km in length.
- **Offshore power supply cable:** A subsea power cable from the Delta platform to the new Omega platform.

The CO_2 sources and the main reception processes during operation of the CO_2 storage project will be as follows:

- Supply of a CO_2 stream under suitable conditions for injection via a third-party pipeline to an onshore reception station within the activity area of the Sigma facilities.
- Receipt of CO_2 shipments from trucks carrying ISO containers at the Sigma onshore facilities. The containers will be loaded by crane onto a supply vessel/transport barge, transported, and unloaded offshore. In parallel, direct injection of the CO_2 cargoes into the onshore reception manifold is also envisaged, via a compression station during unloading from the trucks.

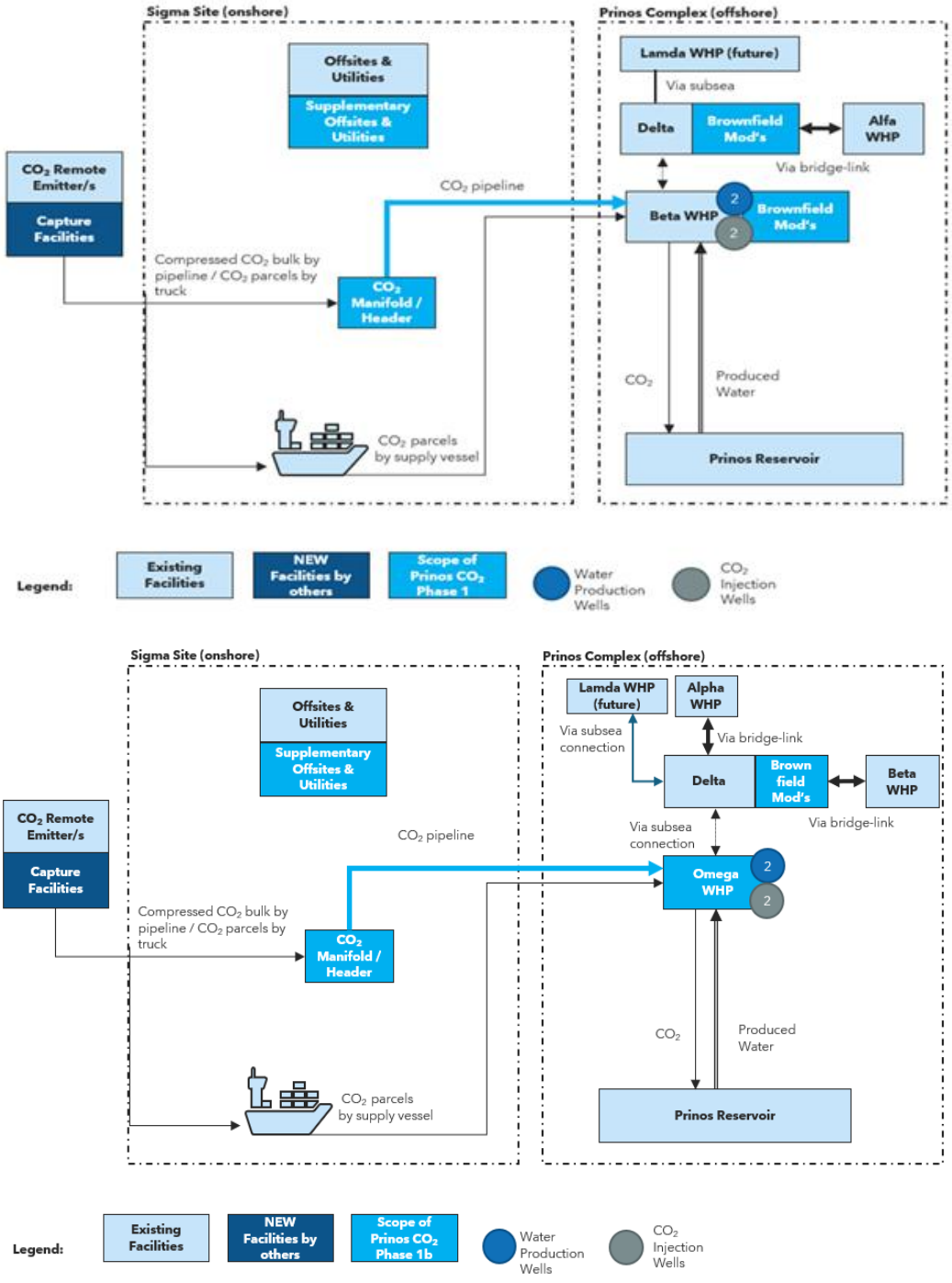


Figure 1-2: Schematic Representation of Project Phase 1 and potential proposed amendment

The Project owner (Operator) is **EnEarth Greece Single-Member S.A.** (Address: 32 Kifisias Ave., 151 25 Marousi, Tel.: 2108174200). EnEarth is a Greek corporation whose primary purpose is to develop CO_2 storage activities in Greece and, in particular, to develop the Project. EnEarth belongs to the Energean group of companies and is an affiliated company of Energean Oil & Gas S.A., which operates the Prinos, North Prinos, and Epsilon fields in the Gulf of Kavala—the country's only hydrocarbon production.

1.2 Overview of Environmental and Social Management & Monitoring Plan (ESMMP) purpose and scope

1.2.1 Purpose and Scope

This Supplementary Environmental and Social Report (SESR) has been prepared to provide additional analysis required under the Environmental and Social Policy (ESP) 2024 of the European Bank for Reconstruction and Development (EBRD).

Phase 1 of the project was subject to an Environmental and Social Impact Assessment (ESIA) in accordance with Greek legislation and the SESR serves as a complementary instrument to ensure compliance with EBRD requirements, focusing on issues requiring further analysis as the project progresses towards Phase 2.

The ESMMP confirms the applicability of the EBRD ESP 2024 to the project and further assesses environmental and social risks and impacts.

This Framework Environmental and Social Management & Monitoring Plan (ESMMP) has been prepared to provide additional analysis required under the Environmental and Social Policy (ESP) 2024 of the European Bank for Reconstruction and Development (EBRD).

Phase 1 of the project was subject to an Environmental and Social Impact Assessment (ESIA) in accordance with Greek legislation, and this Framework ESMMP serves as a complementary instrument to support alignment with EBRD requirements. At this stage, it provides a structured basis for managing and monitoring environmental and social aspects, recognising that specific conditions and obligations will be defined through the Environmental Terms (ETs) once these are issued.

This Framework ESMMP provides a structured approach for managing, monitoring, and reporting on the environmental and social performance of the Prinos CO_2 Storage Project. It sets out how Enearth will align project management with the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2024) and its Environmental and Social Requirements (ESRs).

1.2.2 Objectives

The Framework ESMMP is intended to:

- Guide the development and implementation of mitigation, monitoring, and management measures throughout the project life cycle (construction, operations, and decommissioning).
- Provide a clear reference to the environmental and social measures identified in the Environmental and Social Impact Assessment (ESIA).

- Integrate outcomes of stakeholder engagement activities, as captured in the Stakeholder Engagement Plan (SEP).
- Reflect additional findings of the Supplementary Environmental and Social Report (SESR).
- Establish a framework that will be updated and refined as project design progresses, contractors are mobilised, and Environmental Terms (ETs) are issued.

Accordingly, this Framework ESMMP is disclosed as a living document. It will be updated to reflect contractor method statements, stakeholder feedback and grievance trends, regulatory or permitting changes, technical design developments, and the conditions set out in the Environmental Terms (ETs) once issued. By disclosing it at this stage, Enearth demonstrates its commitment to a transparent, structured approach to managing environmental and social risks in line with good international industry practice (GIIP) and EBRD ESRs, while maintaining consistency with the ESIA, SESR, and SEP

1.3 Applicability of EBRD Environmental and Social Policy 2024

As noted above, the ESMMP confirms that the EBRD ESP 2024 applies to the Prinos CO_2 project. The ESP 2024 strengthens environmental and social sustainability commitments, emphasizing risk-based assessment and management throughout project lifecycles. It enhances biodiversity conservation measures and social inclusivity, requiring projects to address environmental risks proactively while promoting positive social outcomes. The Prinos project's environmental and social impacts will therefore be assessed and managed in alignment with these strengthened requirements to ensure sustainable development in line with EBRD priorities.

1.4 Areas of Focus under the SESR

Based on the assessment, triggered Environmental and Social Requirements include the following:

- **ESR1: Assessment and Management of Environmental and Social Risks and Impacts,** providing the overarching framework for identifying, evaluating, and managing risks and impacts throughout the project life cycle.
- **ESR2: Labour and working conditions**, addressing workforce management, occupational health and safety, and contractor oversight.
- **ESR3: Resource Efficiency and Pollution Prevention and Control**, focusing on the sustainable use of resources and the management of emissions, discharges, and waste throughout the project life cycle.
- **ESR4: Health, safety, and security**, covering risks to local communities from construction and operational activities, including security personnel management.
- **ESR6: Biodiversity conservation and sustainable management of living natural resources**, focusing on critical habitat identification, priority biodiversity features, and achieving no net loss or net gain.
- **ESR10**: **Stakeholder engagement**, ensuring meaningful consultations, grievance mechanisms, and transparent communication.

Additionally, **ESR5: Land acquisition, restrictions on land use, and involuntary resettlement** will be monitored for potential relevance, particularly regarding potential impacts on fisheries and local livelihoods.

2 Project Description

2.1 Project Overview

The Prinos CO_2 Storage Project will convert and optimise existing offshore oil and gas infrastructure in the Prinos Basin (Northern Aegean, Greece) into a dedicated facility for permanent CO_2 storage.

The Project is led by EnEarth, an affiliate of Energean, and builds on decades of geological, geophysical, and drilling knowledge from the Prinos and Epsilon fields. These studies confirm that the Prinos reservoir and its underlying aquifer are suitable for safe CO_2 storage.

In 2022, the Hellenic Hydrocarbons and Energy Resources Management Authority (HEREMA) confirmed the site's preliminary eligibility for CO_2 storage, following Energean's request under Greek legislation. Building on this confirmation, EnEarth has applied for the right to store up to 1 million tonnes of CO_2 per year (MTPA) in Prinos. The application is currently under review and at an advanced stage of assessment. Once the right is granted, Energean will transfer the required offshore and onshore facilities to EnEarth to carry out the storage activity.

In parallel, EnEarth has submitted a full Environmental and Social Impact Assessment (ESIA) for Phase 1a of the Project to the Ministry of Environment and Energy. The ESIA has already passed the completeness check and public consultation stage, with the permitting process ongoing.

2.2 Location and existing assets.

The storage site lies within the Prinos Basin in the Gulf of Kavala, approximately 8 km west of Thasos and 18 km south of the Kavala coastline. Onshore facilities are located within the industrial footprint of Energean's Sigma plant, about 2.4 km east of Nea Karvali (Municipality of Kavala, Region of Eastern Macedonia and Thrace). Offshore water depths in the area are modest (around 31 m), and the existing Prinos offshore complex (notably the Beta and Delta platforms) provides a robust foundation for reuse and adaptation. The Project's approach is to maximise reuse of this brownfield infrastructure, thereby reducing new build requirements and associated footprint.

2.3 Project Concept and Capacity Phasing

The Prinos CO_2 Storage Project is designed to expand in stages in line with market demand.

The Project is designed to expand in stages in line with market demand. Phase 1 will provide the initial capacity to receive, transport, and inject up to 1 million tonnes of CO_2 per year for about 20 years. Most of the CO_2 will arrive via a third-party pipeline to the Sigma reception facility, where it will be prepared for offshore transport and injection. Smaller pilot volumes linked to research projects may also be received at Sigma by truck in ISO containers, either for direct injection or transfer offshore. From Sigma, a subsea pipeline of around 20 km will connect to the Prinos platforms. The line is designed to handle the planned injection volumes while leaving room for future expansion. Construction will include surveys, installation of the pipeline and shore approach, tie-ins to platforms, and commissioning, with safety ensured through standard isolation and control systems.

At the platform level, Phase 1 involves modifying the existing Beta platform for CO_2 injection and using the Delta platform for produced-water treatment. The initial programme foresees two injection wells and two water-production wells drilled from Beta. Drilling will be carried out with modern rigs meeting European safety and environmental standards, with multiple layers of safety barriers in place to ensure well control.

Injection operations under Phase 1 will gradually expand across the Prinos reservoir, starting with limited volumes and progressively increasing up to 1 million tonnes of CO_2 per year. The injection process will follow a carefully controlled ramp-up, with performance monitored at each stage to ensure safety and reservoir integrity. Produced water will be managed through dedicated treatment facilities on the Delta platform, with production rates adjusted as required for effective pressure management. During construction and operation, restricted marine safety zones will be maintained around offshore platforms and subsea installations, with advance notice provided to fisheries and maritime users to ensure safe coordination. All interventions will take place within the existing exclusion zones, and therefore no additional impacts on marine activities are anticipated.

The amendment of Phase 1 reflects potential engineering refinements aimed at optimising design and operations. A key feature is the planned installation of a new, unmanned “Omega” platform, positioned approximately 1 km south of Delta at ~31 m water depth. Omega is envisaged as a steel jacket with multiple well slots, electrically connected to Delta via a short subsea power cable and equipped with the minimum systems required to receive CO_2 from the subsea pipeline, inject it, and transfer produced water to Delta for treatment. Omega would replace Beta as the primary injection hub, with the offshore pipeline’s terminal section re-routed to tie in at Omega. The two CO_2 injection wells and two water-production wells originally foreseen may, in this case, be drilled from Omega, leveraging its expanded slot capacity to facilitate future development. Produced water transfer from Omega to Delta would be via a short subsea line. No material changes are anticipated onshore at Sigma compared to the initial phase. Overall, the optimisation is not expected to materially alter the project’s environmental footprint; however, any refinements will be incorporated into the management and monitoring framework once approved and as contractor method statements become available.

Phase 2 is under development at the engineering and design stage and is intended to expand the Project’s nominal storage capacity up to approximately 3 MTPA. Planned works include new onshore facilities at Sigma, such as a marine jetty and liquefied CO_2 reception system, as well as additional storage and conditioning infrastructure. Offshore, Omega would remain the central hub, with further injection and water-production wells added as required. Produced-water handling will be optimised through either expanded offshore treatment or, if determined preferable, onshore treatment. The detailed configuration will be finalised through ongoing engineering, environmental assessment, and permitting.

The Prinos CO_2 Storage Project will progress through a series of phased activities.

Pre-construction activities include permitting, engineering, mobilisation, and surveys, with only minor impacts such as temporary vessel activity and survey noise.

Construction under Phase 1 will involve platform modifications, well drilling, and subsea pipeline installation; if the Phase 1 amendment proceeds, this will also include the new Omega platform. Anticipated impacts at this stage include increased vessel traffic, underwater noise, temporary exclusion zones for marine users, and localised seabed disturbance. Phase 2 may introduce new onshore and offshore facilities to expand

capacity, with potential impacts such as localised noise, traffic, and restricted access; these remain at scoping level and will require further assessment.

Operations will focus on controlled CO_2 injection, reservoir management, and produced-water handling, with low residual impacts mainly linked to vessel traffic and exclusion zones.

Decommissioning will follow good international practice, with impacts expected to resemble those of construction, though the specifics cannot yet be assessed.

3 Regulatory and Compliance Requirements

3.1 National and EU Regulatory Context

The Prinos CO_2 Storage Project is developed within the existing Prinos Concession and is governed by the applicable Greek and EU legislation for environmental permitting and CO_2 geological storage. Key pillars include:

- Law 4964/2022, Article 173 – provides the legal pathway for licensed hydrocarbon operators to investigate and develop geological formations for CO_2 storage within granted areas, subject to suitability confirmation and activation of a storage right.
- Law 4014/2011 (and implementing ministerial decisions) – framework for Environmental Impact Assessment (EIA/ESIA) and environmental permitting in Greece, including public consultation and decision-making procedures.
- Ministerial Decision ΔΙΠΑ/37674/10-8-2016 (as amended) – project categorisation and classification; the Prinos CO_2 Storage is classified under Category 11, item 6 ("Infrastructure for the transport and storage of CO_2 streams in geological formations, pursuant to Directive 2009/31/EC"), Subcategory A1.
- Directive 2009/31/EC (CCS Directive) and relevant EU acquis – technical and permitting provisions for geological storage of CO_2, including site characterisation, monitoring, corrective measures, and post-closure obligations.
- Applicable sectoral legislation and standards covering offshore safety, marine works, industrial safety, waste and chemicals management, emergency preparedness, and occupational health and safety (aligned with the Operator's ISO 14001/45001–based management system).

The ESIA for Phase 1a has been submitted to the Ministry of Environment and Energy and has passed completeness and formal/public consultation stages. Phase 1b (amendment) and Phase 2 (conceptual) will follow the applicable amendment/ESIA and permitting processes when their engineering is finalised. This ESMMP Framework is a disclosure-stage document and will be updated to reflect permit conditions and detailed contractor method statements.

3.2 EBRD ENVIRONMENTAL AND SOCIAL REQUIREMENTS

In addition to compliance with Greek and EU legislation, the Project is being developed in alignment with the European Bank for Reconstruction and Development (EBRD) Environmental and Social Requirements. These provide an internationally recognised framework for managing environmental and social risks, labour and community standards, biodiversity protection, and stakeholder engagement. Together, the national/EU regulatory framework and the EBRD ESRs ensure that the Project is designed and implemented according to both statutory obligations and best international practice, addressing potential impacts comprehensively across technical, environmental, and social dimensions.

ESR1 – Assessment and Management of Environmental and Social Risks and Impacts:

Consistent with the EBRD Environmental and Social Policy (2024) and ESR1, the Project's environmental and social risks and impacts have been identified and evaluated through the ESIA for Phase 1, with the Phase 1 amendment refining the technical baseline and the Phase 2 scoping-level assessment setting out forward-looking considerations. This framework ESMMP translates those assessments into implementable management, mitigation and monitoring arrangements: it consolidates measures, defines organisational roles and responsibilities across EnEarth and contractors, sets KPIs and reporting lines, and establishes explicit update triggers—contractor onboarding, grievance trends, regulatory changes and design developments—to ensure it remains a living document. A dedicated Commitments Register and an Integrated Monitoring/KPI Matrix provide one-to-one traceability from ESIA conclusions and permit conditions to site execution and reporting, while interfacing with the Operator's ESMS for continual improvement.

ESR2 – Labour and Working Conditions

Aligned with ESR2, labour and working conditions for the Project will be governed by an ESMS that Enearth is establishing by adopting and tailoring the existing Energean Group ESMS, policies and culture. As a newly introduced operator, Enearth is phasing in its own system; until fully stood up, the Energean ESMS provides the governing framework, with a documented transition plan, capacity-building, and management-review milestones. The framework applies equally to employees and contractors, embedding clear terms and conditions of employment, equal-opportunity and respectful-workplace provisions, and extending these requirements through contractor pre-qualification, contractual clauses and oversight. Competence and training are assured via induction, role-specific instruction and refreshers, verification of qualifications for safety-critical tasks, and contractor training oversight. A multi-channel Worker Grievance Mechanism - allowing anonymous reporting, protecting against retaliation, and operating to defined timelines with escalation and appeal-interfaces with incident/CAPA so concerns lead to corrective action and feedback. OHS controls (permit-to-work, JSA, toolbox talks, incident reporting and investigation, emergency preparedness) are integrated with ESR4 offshore measures. Proportionate audits/inspections and KPIs will evidence compliance and drive continual improvement, while update triggers (contractor onboarding, organisational changes, regulatory updates, and Phase 1 amendment/Phase 2 design evolution) are used to strengthen the system as the Project progresses.

ESR3 – Resource Efficiency and Pollution Prevention and Control

ESR3 is triggered for the Project. Relevant aspects include emissions, discharges, produced water, potential CO_2 leakages, ballast water from construction vessels, and waste streams. These issues are managed through the Operator's ESMS and addressed across several project-specific management plans (e.g., Waste Management Plan, Chemical Use Plan, CO_2 Monitoring and Corrective Action Plan, Emergency Management Plan). They are also cross-referenced under ESR1 (Assessment and Management of Environmental and Social Risks and Impacts) and ESR4 (Health, Safety and Security), ensuring a comprehensive approach. Performance will be tracked through the ESMMP monitoring and reporting arrangements, and if future design or operational changes introduce new pollution pathways, the requirements under ESR3 will be updated and further integrated into the Project's management framework.

ESR4 – Health, Safety and Security

Aligned with ESR4, Community Health, Safety and Security are managed through the Operator's integrated HSE and Security Management Systems - which Enearth is adopting from the Energean Group and implementing project-wide - incorporating ISPS-aligned controls where applicable. The Project respects established marine safety exclusion zones around offshore facilities, applies vessel traffic management plans to minimise navigational risk and interaction with fisheries, and implements noise management and other nuisance controls during construction and operations. Emergency Preparedness and Response is embedded through documented procedures, drills and clear interfaces with competent authorities, with community notifications (e.g., NAVTEX/NOTAM, where relevant), incident reporting and coordinated escalation paths. Where private security is used, arrangements are governed by vetting, targeted training, proportional use-of-force requirements and oversight mechanisms, in line with ESR4. These measures are linked to the Project's grievance channels and will be reviewed and updated as needed at key triggers - such as contractor onboarding, potential changes to safety zones and marine operations under Phase 1 amendment (Omega installation and pipeline tie-in) or the construction of the jetty under Phase 2 jetty - so that community health, safety and security performance remains effective and proportionate throughout the Project lifecycle.

ESR6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources

Aligned with ESR6, the Project applies the mitigation hierarchy to conserve biodiversity and manage living natural resources across all phases. The ESIA characterises marine ecological receptors in the Gulf of Kavala and has informed routing and construction choices that minimise seabed disturbance - most notably the burial of the ~20 km subsea pipeline (with a carefully managed shore approach) to reduce interaction with benthic habitats and fisheries. Construction and marine operations will be scheduled and executed to avoid or reduce impacts during sensitive periods, with controls for turbidity and sediment dispersion at the shoreline works, and underwater-noise management measures (e.g., soft-start/ramp-up, reduced vessel speeds, and marine fauna observation where appropriate). To limit the risk of invasive species transfer, vessel hull-fouling and ballast water will be managed in line with recognised guidance and the Operator's procedures. A programme of biodiversity monitoring - will track indicators relevant to benthic communities, marine fauna presence/behaviour, and fisheries interactions, providing data for adaptive management. Based on current assessments, no critical habitat has been identified within the planned works footprint; however, should subsequent surveys associated with Phase 1 optimisations or Phase 2 identify sensitive features or trigger conditions, the Biodiversity Management Plan (BMP) and ESMMP will be updated to incorporate ESR6 critical-habitat requirements, ensuring the Project remains proportionate and responsive to new information.

ESR10 – Information Disclosure and Stakeholder Engagement

Aligned with ESR10, the Project commits to timely, accessible and culturally appropriate information disclosure and meaningful stakeholder engagement throughout the lifecycle, as structured in the Stakeholder Engagement Plan (SEP). The SEP sets out stakeholder identification and prioritization, a disclosure and engagement program, and governance/roles for delivery, ensuring consistency between the

NTS, this ESMMP and ongoing consultation. Engagement is targeted to local communities, fisheries and other marine users, authorities, and interested parties, with information disclosed in Greek (and, as needed, English), using formats suited to each audience and channels that enable two-way dialogue and tracking of issues to closure. A Community Grievance Mechanism operates alongside the Worker GM, with multiple access points (including online and in-person options), acknowledgements and written responses within predefined timeframes, options for anonymity and strict non-retaliation; grievances are logged, assigned IDs, escalated where required and periodically reported to feed adaptive management (CAPA) and ESMMP updates. Delivery capacity and accountability are defined (e.g., Stakeholder Engagement Manager, Grievance Mechanism Officer, Community and Fisheries Liaison Officers), with routine monitoring/reporting and periodic SEP updates or ad-hoc revisions triggered by project changes, stakeholder feedback or grievance trends.

In line with EBRD's requirements, the Project has been screened against the full set of Environmental and Social Requirements to determine which are relevant at this stage. While several ESRs apply directly to the Project and are addressed in Section 3.2, others are not currently triggered given the Project's scope, location, and design as defined in the ESIA for Phase 1, and the conceptual framework for Phase 2. These ESRs are nonetheless subject to review triggers to ensure that, if future design developments or permitting steps introduce new risks or impacts, the ESMMP will be updated and the corresponding ESRs formally applied.

The following are ESRs that have not been triggered.

ESR5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

At this stage, ESR5 is not triggered. Phase 1a activities are confined offshore within the existing Prinos concession and onshore within the Sigma plant's industrial boundary, with marine exclusion/safety zones effectively coinciding with those already in force around the existing Prinos complex; no land acquisition or displacement is envisaged. Under Phase 1 amendment, exclusion/safety arrangements may be marginally adjusted to accommodate the Omega platform - positioned ~1 km south of Delta - and the final tie-in deviation of the subsea CO_2 pipeline; these adjustments remain adjacent to the established complex and within the existing operational footprint and are not expected to introduce new land use restrictions or displacement. Any temporary routing changes or access controls at sea will be managed through standard maritime notices and engagement under the SEP. Looking ahead to Phase 2, the new jetty would be developed inside the Sigma industrial area, although updated maritime safety zones and traffic management may be required. Should the final design introduce any additional restrictions on land or resource use (e.g., shore access limits or material changes to fisheries access beyond established safety zones) or otherwise create a risk of physical or economic displacement, Enearth will undertake a ESR5 screening and, if warranted, prepare the appropriate ESR5 instruments in coordination with the authorities and stakeholders. At present, no such effects are anticipated.

ESR7 – Indigenous Peoples

ESR7 is not applicable. The Project's area of influence lies within Greece, where no groups meet EBRD's definition of Indigenous Peoples (distinct social and cultural groups with collective attachment to distinct habitats or ancestral territories and differing from dominant groups). ESIA and SEP stakeholder mapping did not identify any such groups. Should future engagement or new information indicate otherwise, Enearth will re-screen and apply ESRR7 requirements, updating the ESMMP and SEP accordingly.

ESR8 – Cultural Heritage

Based on the ESIA - and as formally confirmed by the competent cultural heritage authorities during the ESIA public consultation - there are no known cultural heritage assets within the planned works footprint. Seabed interventions have been designed to be as limited as practicable (e.g., a buried subsea pipeline with a constrained shore approach) to reduce interaction with potential archaeological features. The Operator will apply a Chance Finds Procedure, consistent with Energean's ESMS, embedded in contractor method statements and toolbox talks: if any suspected asset is encountered during surveys or works, activities will stop, the area will be secured, and the competent authorities will be notified for assessment. Any confirmed finds will be managed through avoidance/protection measures, and the ESMMP (and permits, if required) will be updated to reflect the agreed controls. Should later surveys or design steps (e.g., Phase 1 optimisation or Phase 2 nearshore works) indicate the presence of cultural heritage or proximity to sensitive areas, ESR8 requirements will be applied, with targeted assessment, engagement and monitoring integrated into the Project's management and monitoring framework.

ESR9 – Financial Intermediaries

ESR9 is not applicable. The Project is not financed through a financial intermediary, so FI-level E&S management system requirements and portfolio reporting under ESR9 do not apply. If the financing structure were to change to include an FI at any stage, Enearth would re-screen the Project, ensure the intermediary's E&S procedures meet EBRD standards, and reflect any resulting obligations in the ESMMP and the relevant agreements.

3.3 Ongoing Compliance, Assurance and Update Triggers

Ongoing compliance is anchored in a modern environmental, social and occupational health & safety management system that Enearth is establishing by adopting and tailoring the Energean Group ESMS. Day-to-day control is exercised through documented procedures for legal compliance and permit condition tracking, document and records control, competence and training, contractor HSSE management, emergency preparedness and response, security, incident reporting and investigation, CAPA, and internal audits with management review. The ESMMP operationalizes these controls by linking the Commitments Register and the Integrated Monitoring/KPI Matrix to clear owners, reporting lines and predefined reporting intervals - internally to Enearth management and externally to authorities and third parties as required - so

that performance, grievances and incidents feed back into continual improvement. Assurance is delivered through a risk-based program of inspections and audits (first/second/third party as appropriate), verification of contractor performance against contractual E&S requirements, and periodic reviews of the legal register and ESR crosswalk to confirm continued alignment with national/EU law and the EBRD ESP/ESRs.

Consistent with the ESMMP's "living document" status, explicit update triggers are defined to ensure the plan is revised when circumstances change. These include contractor onboarding and mobilization (e.g., method statements that introduce new risks or controls), design developments (Phase 1 optimization and any Phase 2 outcomes from FEED), potential changes to exclusion/safety zones and marine operations, trends from the worker and community grievance mechanisms, material regulatory or permitting changes, significant incidents or audit findings, and organizational changes as Enearth's ESMS and workforce scale up. Where such triggers indicate that previously non-triggered ESRs may become relevant (e.g., ESR3 under Phase 2 liquefied-CO_2 import systems), the Project will be re-screened, the affected ESR requirements incorporated into management and monitoring, and the SEP will be updated accordingly at predefined intervals or ad hoc where warranted. This cycle-monitor, review, act, and update-maintains robust compliance and provides transparent, evidence-based assurance to stakeholders throughout the Project lifecycle.

4 Roles and Responsibilities

4.1 Organizational overview and current status

EnEarth is the Project Operator and is establishing its Environmental and Social Management System (ESMS) by adopting and tailoring the Energean Group ESMS, policies and culture. At this stage, positions are defined primarily by role and function, with a number of posts already assigned to named individuals (e.g., Head of CCS, Country Manager Greece, Commercial Lead, Stakeholder Engagement Manager, CLO, FLO, Subsurface Lead, Wells Lead, among others). Posts not yet filled will be populated as the Project evolves. Energean will continue to provide know-how, specialist resources and corporate support (Legal, Tax, HR, IT & Security, Marine/Warehouse) throughout the lifecycle. The Head of CCS holds overall accountability for E&S performance and for the implementation of this ESMMP, supported in-country by the Country Manager Greece and the functional leads during the pre-FID and post-FID/EPCI stages.

4.2 Management Structure

ESMMP implementation is embedded within line management and mirrors Enearth's structures and organizational capacity.

The HSE function, led by the HSE Manager, integrates both health & safety and environmental responsibilities and reports to the Head of CCS (with day-to-day coordination with the Country Manager). The HSE Lead interfaces with Engineering, Subsurface, Wells, Facilities, Construction (post-FID), Security, and Project Controls to translate E&S requirements into specifications, method statements and field execution.

Communications/CSR & local stakeholder management (under which sit the Stakeholder Engagement Manager, CLO and FLO) ensures alignment between ESMMP delivery and the SEP.

Contractor oversight follows single-point accountability: each major contractor reports to the relevant EnEarth line lead (e.g., Construction Manager post-FID, Engineering Lead pre-FID) with functional oversight by HSE.

Coordination mechanisms include a weekly ESMMP coordination meeting, monthly management review, and a formal Management of Change (MOC) process for any design or execution change that could affect E&S risk. Document control and traceability to permits/commitments are supported by Project Controls.

4.3 Roles and Accountability

Clear definition of roles and responsibilities is essential to the effective implementation of the ESMMP. Accountability is structured across dedicated functions to ensure that environmental and social requirements are translated into day-to-day practices, monitored consistently, and adapted as the Project evolves.

Here follows an outline of the key roles and responsibilities established to implement and maintain the ESMMP. These functions ensure that environmental and social requirements are embedded in daily operations, monitored effectively, and updated as the Project progresses.

HSE Lead (combined H&S and Environment; ESMMP Owner). Leads the integrated HSE program and owns this ESMMP. Responsibilities include converting ESIA/permit conditions into controls; maintaining the Commitments Register and Integrated Monitoring/KPI Matrix; approving contractors' HSE/environmental plans; organizing risk controls (PTW, JSA, SIMOPS, lifting, confined space, energy isolation); leading Emergency Preparedness & Response drills; coordinating marine safety zones and vessel traffic with Security and marine operations; ensuring incident reporting, investigation and CAPA close-out; and initiating ESMMP updates when triggers occur (e.g., Phase 1b optimization, grievance trends, regulatory change).

HR Manager. Ensures ESR2 compliance across employees and contractors (terms and conditions, equal opportunity, respectful workplace, DEI/gender commitments), workforce planning and recruitment, induction/competence management, oversight of contractor labour standards, and (if ever required) fair retrenchment planning. Co-owns the Worker Grievance Mechanism with the Grievance Mechanism Officer (access for all workers, including contractors; anonymity; non-retaliation; predefined timeframes).

Stakeholder Engagement Manager / SEP Focal Point. Implements the SEP, plans and documents disclosure/consultation, maintains the engagement and commitments log, and co-manages the Community Grievance Mechanism (with the CLO/FLO), ensuring findings feed into CAPA and ESMMP updates.

Community Liaison Officer (CLO). Primary interface with local communities and municipal/regional stakeholders; handles notifications (e.g., works, marine safety zones), channels issues to the project team and tracks closure.

Fisheries Liaison Officer (FLO). Dedicated interface with fisheries and marine users; communicates exclusion/safety zones, shore approach activities and vessel movements; monitors access considerations and escalates concerns into marine planning and the ESMMP.

Contracts & Procurement (C&P) Lead. Embeds E&S requirements in procurement strategy and contract documents (pre-qualification criteria, HSSE clauses, labour standards, grievance access), ensures supplier/contractor due diligence, manages performance securities tied to HSSE compliance, and coordinates with HSE/Legal on non-compliance remedies.

Accounting / Finance. Provides budgeting and cost control for ESMMP implementation (monitoring, training, emergency preparedness, audits), supports reporting to lenders/authorities where financial data are required, and ensures timely allocation of resources to risk controls and corrective actions.

Legal Counsel. Oversees regulatory compliance, contracting strategy and legal risk; ensures permit conditions and PR commitments are captured in binding documents; advises on grievance/complaint investigations and data privacy; and supports engagement with authorities on cultural heritage, maritime notifications and security where relevant.

Subsurface Lead. Owns reservoir characterization and modelling, injection strategy (including ramp-up), monitoring and pressure management concepts, and interfaces with Wells and Facilities to ensure integrity, MRV requirements and conformance criteria are met.

Wells Lead. Plans and delivers the drilling and completion program (well design, RSS execution, well control/BOP testing, integrity assurance), manages the drilling contractor and service companies, and coordinates with HSE for risk controls and incident investigations.

Facilities Lead. Leads onshore/offshore facilities engineering and integration (compression, heaters, methanol system, produced-water transfer/treatment), ensures design embeds E&S controls, supports construction/commissioning, and coordinates with Project Controls and HSE for verification and handover.

Engineering Lead / Construction Manager (post-FID). The Engineering Lead ensures design compliance and deliverable quality pre-FID; post-FID, the Construction Manager directs site execution, supervises Site Supervisors and QA/QC Inspectors, and ensures contractor compliance with the ESMMP and method statements.

Security Focal Point. Manages physical/procedural security in line with the Security Management System and ESR4 (vetting, training, proportionality, oversight), coordinates with HSE for joint drills and incident response, and supervises any private security providers.

Project Controls Lead / Document Controller. Maintains the master set of controlled documents and drawings, tracks permit and lender requirements, and ensures that approved ESMMP controls are embedded in work packs and reflected in progress and KPI reports.

Contractor Representatives. Each Tier-1 contractor appoints a Project/Site Manager and an HSE/Environmental lead responsible for meeting contractual E&S obligations, developing compliant method statements and risk assessments, ensuring worker access to the grievance mechanism, reporting incidents and KPIs, and cooperating in audits/inspections. EnEarth retains the right to intervene or stop work and require corrective actions where performance deviates.

4.4 Grievance Mechanism Oversight

4.4.1 Worker Grievance Mechanism

The Worker Grievance Mechanism (WGM) operates under EnEarth's Workers Grievance Procedure *(Annex 9.1 of this framework ESMMP)* and is accessible to all categories of workers, including contractor and sub-contractor personnel. Grievances may be submitted verbally or in writing, in person or anonymously, through multiple channels: a dedicated hotline (business hours), SMS/WhatsApp/Viber, a central HR/HSE email, drop-boxes at work locations, a QR-code digital portal, and via the line manager or HR "open-door" hours. All cases are registered in the Stakeholder & Grievance Management Tool (SGMT) with a unique ID and tracked to closure.

The mechanism includes acknowledgement within seven (7) working days and time-bound resolutions linked to a severity matrix (e.g., up to 30 days for low, 60 for medium, 90 for high/complex cases). Health and safety-critical issues are actioned immediately. Severity is determined against defined criteria (e.g., H&S/security, livelihood/income, access to services, social relations, environmental effects, company reputation, project schedule) and takes into account any vulnerabilities of the complainant. Where a

contractor closes a medium/high case without mutual agreement, the EnEarth Grievance Coordinator reviews the outcome.

Roles and governance are clearly defined. The Project Manager holds overall accountability; the Grievance Coordinator ensures intake, investigation, coordination with relevant functions, and trend reporting; HR safeguards fair labour practices and non-retaliation. A Grievance Management Committee (Country Manager, Head of Legal, Head of HSE, Head of HR) hears appeals; appeal decisions are issued in writing, recorded in SGMT, and any lessons learned feed into Corrective and Preventive Actions (CAPA).

The procedure distinguishes workplace grievances from whistleblowing in line with Greek Law 4990/2022 (transposition of the EU Whistleblower Directive). Allegations concerning public-interest wrongdoing received via WGM channels are redirected to the Whistleblowing Office for confidential handling. All personal data are managed under GDPR and company data-privacy policies; the mechanism is available in Greek and English and designed to be culturally appropriate.

With regards to contractor management, Tier-1 contractors are required to operate a WGM aligned with EnEarth's framework and to ensure their workers have effective access to it (including anonymous options and non-retaliation). They are expected to cooperate closely with the Grievance Coordinator, provide timely updates, and escalate issues they cannot resolve.

With respect to monitoring and improvement, performance indicators (e.g., % acknowledged/resolved within target timeframes, open vs. closed cases, recurrence) are reviewed at predefined intervals. Identified trends inform CAPA and, where relevant, Management of Change (MOC) updates to this ESMMP. Aggregate outcomes and significant cases are reported internally and, as appropriate, externally in line with the SEP and reporting requirements.

4.4.2 Community Grievance Mechanism

In parallel, a Community Grievance Mechanism (CGM) is in place, as described in the Project's Stakeholder Engagement Plan (SEP). This mechanism is open to all external stakeholders, including local residents, community organizations, businesses, and other interested parties. It provides clear channels for submitting grievances - verbally, in writing, or anonymously - ensuring accessibility and cultural appropriateness. The SEP outlines the intake, review, resolution, and feedback procedures for community grievances, as well as the commitments for transparency, non-retaliation, and timely response. Stakeholders are therefore encouraged to consult the SEP for full details on how to raise and resolve community concerns.

Note on evolution

As the Project transitions from pre-FID through FID/EPCI, commissioning (CSU) and into operations (and later post-closure), EnEarth will progressively populate named positions, scale capacity, and formalize interfaces while adopting and tailoring the Energean Group ESMS. Until all posts are filled, the Energean ESMS and corporate functions (e.g., Legal, HR, IT & Security, Marine/Warehouse) provide structured support, backfill and specialist know-how to maintain continuity of standards. At defined governance gates - including FID,

ETs and permits, award of major Tier-1 contracts, start of offshore construction, first gas- completion of pre-commissioning/commissioning and Ready-for-Injection (RFI), Permit-to-Inject issuance, first CO_2 receipt at Sigma and first offshore CO_2 injection, and any Phase 2 decisions - EnEarth will:

- update its Organizational Chart & RACI to reflect named role holders and lines of authority;
- revise the Competence & Training Matrix and resourcing plan;
- confirm contractor oversight arrangements and reporting;
- implement any structural changes via Management of Change (MOC).

Throughout construction, where contractors hold day-to-day control of activities, EnEarth retains accountability under RACI (Responsible, Accountable, Consulted, Informed) for ESMMP outcomes and ensures flow-down of requirements to Tier-1 and their supply chains. The HSE Lead remains the ESMMP Owner until the steady-state Operations HSE organization is stood up; any transfer of ownership is formalized via MOC and communicated to staff and contractors. Minor updates (e.g., naming incumbents) will be made through controlled document revision without altering the substantive ESMMP; structural changes that affect risk management will trigger an ESMMP update. This staged approach ensures that governance, capacity and accountability evolve in lock-step with Project risk, while preserving compliance and transparency.

5 Management and Mitigation Measures

This section summarizes, without introducing new issues, the environmental and social risks and impacts already identified for the Prinos CO_2 Storage Project and the overarching programme in place to manage them. It draws on the Phase 1a ESIA (risk/impact assessment, mitigation and monitoring), the technical amendment basis for Phase 1b (design refinements), and the scoping-level considerations for Phase 2.

5.1 Overview of identified impacts and the management approach

The ESIA characterises the Project as a brownfield development that largely reuses existing offshore and onshore assets in the Prinos complex and at the Sigma plant, with modifications to accommodate CO_2 reception, transport and injection. As such, potential impacts are typical of offshore construction and operations and are largely temporary, localised and manageable with standard controls. The ESIA's risk and effects assessment (Ch.10) frames the receptor baseline and interaction with existing Prinos infrastructure and regional activities (ports, navigation, utilities), which informs the selection of proportionate mitigation and monitoring commitments.

5.1.1 Construction-phase impacts

Onshore works at Sigma are limited to a compact area for the reception manifold and tie-in, with small excavation footprints for foundations and the shore section of the new line; routine construction nuisances (traffic, dust, noise) are expected but controllable through good practice. Offshore, key temporary impacts relate to seabed disturbance from trenching/laying the buried subsea pipeline, localised sediment resuspension, construction vessel presence/underwater noise, and temporary navigation safety measures around work areas and platforms. These are addressed by route optimisation within the established corridor, burial for trawling protection, phased works and standard marine controls; the ESIA embeds these measures and their monitoring in the plan.

5.1.2 Operations-phase impacts

During operation, principal pathways concern integrity-managed transport and injection of CO_2 (pipeline/well integrity, leak prevention and surveillance), produced-water management (treatment on Delta), routine platform and vessel activity (noise, lighting, emissions), and continued navigation safety around fixed assets. The ESIA specifies that produced water will continue to be treated at Delta within upgraded control and safety systems, with verification sampling at start-up to confirm treatment adequacy for aquifer-derived flows. The risk of CO_2 migration is assessed through reservoir modelling and leakage-pathway analysis, with monitoring designed to demonstrate containment and to trigger corrective actions if required.

5.1.3 Socio-economic interactions

Short-term interactions with fisheries and other marine users occur during offshore works and, to a lesser extent, through operational safety zones and vessel traffic. The mitigation approach—timely notification/coordination, scheduling to reduce conflict, and clear safety management—sits alongside the ongoing stakeholder engagement and grievance procedures described in the SEP; these channels inform adaptive management through the ESMMP reporting cycle.

5.1.4 Phase 1 design refinements

Phase 1 amendment does not introduce new impact pathways; rather, it relocates the primary injection hub from Beta to a new unmanned Omega platform ~1 km south of Delta and re-routes only the terminal section of the subsea pipeline to tie-in at Omega, with produced water transferred to Delta via a short line. All Phase 1 mitigation remains applicable, with targeted updates (e.g., site-specific noise/works controls at Omega, integrity/ESD provisions at the new riser, effluent-quality checks on the Omega-to-Delta transfer). The ESIA/SESR basis confirms that no material change in overall footprint is anticipated.

5.1.5 Phase 2 (scoping-level) considerations

At concept level, Phase 2 would scale to ~3 MTPA, potentially adding a Sigma jetty and associated liquefied CO_2 handling systems and expanding offshore wells/facilities. Detailed impacts and controls will be defined in future ESIA once engineering is mature. The expectation is to build on the Phase 1 mitigation hierarchy, adapted to higher throughput while remaining within the established industrial footprint and corridors.

5.1.6 Management, monitoring and continual improvement

The ESIA's mitigation and monitoring programme (Ch.11–12) translates identified risks into specific, auditable measures and monitoring tasks, with responsibilities, performance indicators and reporting routes captured in this ESMMP Framework and associated registers. This includes operational integrity/monitoring for pipeline and wells, produced-water compliance checks, construction and marine environmental monitoring where applicable, and stakeholder-facing reporting via the SEP and grievance mechanisms. The ESMMP incorporates update triggers (e.g., contractor onboarding, design changes, regulator feedback, grievance trends) to ensure the programme remains current and effective throughout construction, operation and through to decommissioning/post-closure.

This consolidated summary provides the context for the detailed mitigation, monitoring and management measures presented in the following subsections of the ESMMP, ensuring traceability from ESIA commitments to implementation on the ground and offshore.

5.2 ENVIRONMENTAL AND SOCIAL MITIGATION

The following register consolidates all Phase 1 environmental and social mitigation and monitoring measures for the Prinos CO_2 Storage Project into a single, implementation-ready view. It draws directly from the Phase 1 ESIA mitigation tables *(ESIA Chapter 11: Tables 11-1/11-2/11-3/11-4)* and the Phase 1 amendment *(Amendment Chapter 10: Tables 10-1/10-2/10-3/10-4)*, and aligns monitoring with the ESIA Chapter 12 monitoring program *(Tables 12-5/12-6)*, supplemented - only where updated is required - by the amendment's modification report *(Table 7-3)*. Where the amendment refines a Phase 1 measure, the amended approach supersedes the earlier entry. No new impacts are introduced. The table simply integrates, de-duplicates, and operationalizes what has already been assessed and disclosed.

Each row presents: (i) the topic (tagged to the relevant EBRD ESRs), (ii) the most up-to-date mitigation/management statement for Phase 1, (iii) responsibility (accountable/implementing roles), (iv) the monitoring frequency at a practical level, (v) the reporting channel, and (vi) two explicit sources - one for the mitigation *(ESIA/Amendment Chapter 11/10 tables)* and one for the monitoring *(ESIA Chapter 12 tables 12-5/12-6 and, if applicable, Amendment Table 7-3)*.

This register is designed to interface with Enearth's ESMS: contractor bridging documents, RACI mappings, the Commitments Register, and Management-of-Change will keep the register current through mobilization and operations. Where the ESIA defines precise parameters, locations and thresholds, those prevail in implementation; contractor method statements and permit conditions will provide further detail without altering the commitments captured here. A Phase 2 scope note follows the table.

Table 5-1: Consolidated Environmental & Social Mitigation Register

E&S topic (EBRD PR)	Mitigation / management measures (Phase 1 consolidated)	Responsibility	Monitoring frequency	Reporting	Sources (Mitigation; Monitoring)
Compliance, ESMMP governance (ESR1)	Maintain ESMMP and legal register; integrate permit/AEPO terms; Management of Change (MoC); internal audits; contractor bridging documents; KPI/commitments tracking.	Enearth HSE Lead; Project Director; Contractor PMs	Quarterly audits; monthly KPI review; event-driven MoC	Monthly HSE report; Audit reports; Commitments/KPI log	**Mitigation:** *ESIA Table 11-1/11-2/11-3/11-4; Amendment Table 10-1/10-2/10-3/10-4.* **Monitoring:** ESIA Table 12-5/12-6; Amendment Table 7-3.
Air emissions & dust (onshore works) (ESR1)	Low-emission plant; maintenance; dust suppression; speed limits; cover loads; minimise idling.	Contractor Construction Manager; Enearth HSE	Weekly site checks during works	Site inspection checklists; monthly HSE report	**Mitigation:** *ESIA Table 11-1; Amendment Table 10-1.* **Monitoring:** *ESIA Table 12-5; Amendment Table 7-3.*
Project GHG / energy efficiency (ESR1)	Optimise energy use of compressors/pumps; track carbon footprint; minimise non-routine flaring/venting; efficient vessel scheduling.	Facilities Lead; Enearth HSE	Annual carbon footprint; quarterly energy KPIs	Annual sustainability/KPI summary; monthly HSE report	**Mitigation:** *ESIA Table 11-2.* **Monitoring:** *ESIA Table 12-6.*
Noise (onshore & platform) (ESR4/ESR1)	Equipment selection/maintenance; temporary barriers if needed; work-hour controls; community notice for noisy activities.	Contractor HSE; Enearth HSE	Every 6 months (ops) and as-needed (construction)	Noise monitoring records; incident register	**Mitigation:** *ESIA Table 11-1/11-2; Amendment Table 10-1/10-2.* **Monitoring:** ESIA Table 12-5/12-6; Amendment Table 7-3.

E&S topic (EBRD PR)	Mitigation / management measures (Phase 1 consolidated)	Responsibility	Monitoring frequency	Reporting	Sources (Mitigation; Monitoring)
Underwater noise (ESR6/ESR4)	Soft-start/ ramp-up; marine fauna observation/exclusion protocols; timing to avoid sensitive periods; vessel speed control.	Marine Contractor; Enearth HSE; FLO support	Every 6 months (ops) and activity-based	Marine noise logs; monitoring datasets	**Mitigation:** ESIA Table 11-1/11-2; Amendment Table 10-1/10-2. **Monitoring:** ESIA Table 12-5/12-6; Amendment Table 7-3.
Seabed disturbance & pipeline burial (ESR6/ESR1)	Route selection using surveys; trenching/backfill; burial to trawling depth; DP vessel use where feasible; exclusion of sensitive spots.	Pipeline Contractor; Enearth Facilities	Activity-based during installation; post-lay survey	Lay/burial reports; as-built & post-lay surveys	**Mitigation:** ESIA Table 11-1; Amendment Table 10-1 (final reroute/ Omega tie-in). **Monitoring:** ESIA Table 12-5; Amendment Table 7-3.
Shore approach & erosion/sediment control (ESR1/ESR6)	Controlled dredging; silt control; phased backfilling and reinstatement; stormwater controls.	Civils Contractor; Enearth HSE	Weekly during works; after storms	Site inspection forms; photo logs	**Mitigation:** ESIA Table 11-1; Amendment Table 10-1. **Monitoring:** ESIA Table 12-5; Amendment Table 7-3.
Marine water quality & produced water management (ESR1/ESR6)	Maintain treatment at Delta; monitor effluent; integrity checks on Omega-to-Delta produced-water line; spill prevention.	Operations Manager; Facilities Lead	Continuous process control; monthly sampling	Effluent records; discharge compliance reports	**Mitigation:** ESIA Table 11-2; Amendment Table 10-2 (Omega transfer). **Monitoring:** ESIA Table 12-6; Amendment Table 7-3.
Stormwater & wastewater (onshore) (ESR1)	Segregate clean/dirty water; maintain interceptors; prevent illicit discharges; connection to authorised systems.	Sigma Onshore Supervisor; Enearth HSE	Weekly checks; quarterly sampling	Inspection sheets; water quality logs	**Mitigation:** ESIA Table 11-1/11-2. **Monitoring:** ESIA Table 12-5/12-6.

E&S topic (EBRD PR)	Mitigation / management measures (Phase 1 consolidated)	Responsibility	Monitoring frequency	Reporting	Sources (Mitigation; Monitoring)
Waste & hazardous materials (ESR1)	Segregation at source; licensed carriers; manifests; temporary secure storage; minimise hazardous inputs.	Contractor HSE; Enearth HSE	Weekly site checks; annual summary	Waste manifests; AER/AEMR entries	**Mitigation:** ESIA Table 11-1/11-2/11-3. **Monitoring:** ESIA Table 12-5/12-6.
Chemical management (incl. methanol) (ESR1)	Chemical Use Plan; SDS availability; bunding; inventory control; training; permit-to-work for transfers.	Facilities Lead; Contractor Supervisors	Monthly inspections; event-driven	Chemical inventory; inspection logs	**Mitigation:** ESIA Table 11-1/11-2. **Monitoring:** ESIA Table 12-5/12-6.
Spill prevention & response (ESR1/ESR4)	Secondary containment; spill kits; drills; vessel SOPEP; interface with national/port response; reporting.	HSE Lead; Marine Contractor	Drills per plan; continuous preparedness	Incident register; drill reports	**Mitigation:** ESIA Table 11-1/11-2/11-4. **Monitoring:** ESIA Table 12-5/12-6.
Well integrity & drilling fluids (ESR1)	Design casing/ cementing; BOP; mud weight windows; kick detection; cuttings/waste management.	Wells Lead; Drilling Contractor	Continuous during drilling; per section	Daily drilling reports; incident log	**Mitigation:** ESIA Table 11-1; Amendment Table 10-1. **Monitoring:** ESIA Table 12-5; Amendment Table 7-3.
Pipeline & riser integrity (ESR1)	Corrosion protection; intelligent pigging where applicable; ESDVs at platform; leak detection; cathodic protection.	Facilities Lead; Marine Contractor	Continuous operations; periodic survey	Integrity/maintenance records	**Mitigation:** ESIA Table 11-2; Amendment Table 10-2 (Omega tie-in). **Monitoring:** ESIA Table 12-6; Amendment Table 7-3.
CO_2 injection, flow assurance & hydrate control (ESR1)	Start-up heaters; methanol injection; temperature/pressure control; trip logic; alarms; operating envelope adherence.	Operations Manager	Continuous SCADA/process monitoring	Shift logs; alarm/event reports	**Mitigation:** ESIA Table 11-2.

E&S topic (EBRD PR)	Mitigation / management measures (Phase 1 consolidated)	Responsibility	Monitoring frequency	Reporting	Sources (Mitigation; Monitoring)
					Monitoring: ESIA Table 12-6.
Invasive species / biofouling & ballast (ESR6)	Ballast water management; anti-fouling compliance; hull cleanliness; gear decontamination.	Marine Contractor; Enearth HSE	Per-voyage checks; annual review	Vessel records; inspection checklists	**Mitigation:** ESIA Table 11-1/11-2. **Monitoring:** ESIA Table 12-5/12-6.
Biodiversity & fisheries interactions (ESR6/ESR10)	Maintain ~150–200 m safety zones; time works to avoid peak fishing; FLO engagement; routeing to avoid gear; compensation protocol if damage verified.	FLO; Marine Contractor; HSE Lead	Weekly during works; quarterly during ops	Fisheries liaison log; grievance log	**Mitigation:** ESIA Table 11-1/11-2; Amendment Table 10-1/10-2. **Monitoring:** ESIA Table 12-5/12-6; Amendment Table 7-3.
Cultural heritage – chance finds (ESR8)	Chance-finds procedure; stop-work, secure, notify authorities; seabed survey data to inform works.	Contractor PM; Enearth HSE	Event-driven	Incident register; authority correspondence	**Mitigation:** ESIA Table 11-1. **Monitoring:** ESIA Table 12-5. (Authorities confirmed no known assets in footprint via public consultation.)
Emergency preparedness & major anomalies (ESR1/ESR4)	Emergency Response Plan; drills; interface with maritime/port authorities; CO_2 release scenarios; medical readiness.	HSE Lead; Security Coordinator	Drill schedule; event-driven	Drill/after-action reports; incident register	**Mitigation:** ESIA Table 11-4. **Monitoring:** ESIA Table 12-6.
Climate-risk resilience & adaptation (ESR1)	Design for extreme weather; marine operability windows; redundancy; adaptation measures reviewed periodically.	Project Director; HSE Lead; Facilities	Annual review; post-event	Risk register; MoC records	**Mitigation:** ESIA Chapter 11 & risk/adaptation provisions. **Monitoring:** ESIA Table 12-6.

E&S topic (EBRD PR)	Mitigation / management measures (Phase 1 consolidated)	Responsibility	Monitoring frequency	Reporting	Sources (Mitigation; Monitoring)
Worker H&S (OHS) (ESR2/ESR4)	Permit-to-work; JSA/toolbox; PPE; confined space/working-at-height; Stop-Work Authority; drills; medicals.	HSE Lead; Contractor HSE	Daily supervision; weekly inspections	HSE inspections; incident/CAPA records	**Mitigation:** ESIA Table 11-1/11-2/11-4. **Monitoring:** ESIA Table 12-5/12-6.
Labour & working conditions (ESR2)	Clear terms & conditions; equal opportunity; code of conduct; induction & role-specific training; contractor clauses & oversight.	HR Manager; C&P Manager; HSE Lead	Quarterly audits; onboarding checks	HR/Training records; contractor audit reports	**Mitigation:** ESIA Table 11-1/11-2 (social controls embedded). **Monitoring:** ESIA Table 12-6.
GBVH prevention & respectful workplace (ESR2)	GBVH policy; training; confidential reporting; non-retaliation; disciplinary measures.	HR Manager; HSE Lead	Training per plan; event-driven	Training logs; grievance records	**Mitigation:** ESIA Table 11-1/11-2. **Monitoring:** ESIA Table 12-6.
Worker accommodation & welfare (ESR2)	Standards for hygiene/space/sanitation; rotations & rest; medical access; recreation; grievance access offshore.	HR Manager; Marine/Offshore Supervisors	Weekly checks during occupancy	Accommodation inspection logs; grievance log	**Mitigation:** ESIA Table 11-1. **Monitoring:** ESIA Table 12-5.
Worker grievance mechanism (ESR2)	Multi-channel access incl. anonymous; defined timelines; escalation & appeal; feedback to complainant.	HR Manager; HSE Lead	Monthly review; event-driven	Worker grievance register; CAPA link	**Mitigation:** ESIA Table 11-1/11-2. **Monitoring:** ESIA Table 12-6.
Data privacy & personal data protection (ESR2)	GDPR-aligned personal data handling; access controls; limited retention; awareness training.	IT/Compliance; HR	Annual audit; incident-driven	Compliance audit; incident log	**Mitigation:** ESIA Table 11-2 (management controls). **Monitoring:** ESIA Table 12-6.

E&S topic (EBRD PR)	Mitigation / management measures (Phase 1 consolidated)	Responsibility	Monitoring frequency	Reporting	Sources (Mitigation; Monitoring)
Local employment & supply chain (ESR2/ESR1)	Local hiring where feasible; supplier qualification incl. labour standards; transparent C&P processes.	C&P Manager; HR Manager	Quarterly KPI review	HR/C&P KPI reports	**Mitigation:** ESIA Table 11-1/11-2. **Monitoring:** ESIA Table 12-6.
Contractor management & oversight (ESR1/ESR2)	Pre-qualification; E&S clauses; mobilisation reviews; audits/inspections; performance meetings; demobilisation checks.	C&P Manager; HSE Lead; Contract Holders	Monthly during active works	Contractor audit reports; action trackers	**Mitigation:** ESIA Table 11-1/11-2/11-4. **Monitoring:** ESIA Table 12-5/12-6.
Security management (ESR4)	Risk-based deployment; vetting & training; rules on proportional use-of-force; incident reporting; VPSHR alignment.	Security Coordinator; HSE Lead	Quarterly drills/reviews; event-driven	Security incident log; drill reports	**Mitigation:** ESIA Table 11-1/11-2. **Monitoring:** ESIA Table 12-6.
Community health & safety (ESR4)	Maintain marine safety zones (~150–200 m); vessel traffic management; NAVTEX/Notices; interface with authorities.	Operations Manager; Marine Contractor; CLO	Weekly during works; quarterly in ops	Community notification log; incident log	**Mitigation:** ESIA Table 11-1/11-2; Amendment Table 10-1/10-2. **Monitoring:** ESIA Table 12-5/12-6; Amendment Table 7-3.
Fisheries liaison & access management (ESR10/ESR6/ESR4)	Appoint FLO; advance notices; gear-avoidance routing; complaint & claims handling pathway via SEP.	FLO; CLO; Marine Contractor	Weekly during works; quarterly in ops	Fisheries liaison & grievance logs	**Mitigation:** ESIA Table 11-1/11-2; Amendment Table 10-1/10-2. **Monitoring:** ESIA Table 12-5/12-6; Amendment Table 7-3.
Stakeholder engagement & community grievance (ESR10)	Implement SEP; accessible grievance channels; disclosure & feedback loops; periodic reporting.	CLO/SEP Focal Point	As per SEP schedule; monthly grievance review	SEP log; grievance register; disclosure record	**Mitigation:** ESIA Table 11-1/11-2; SEP. **Monitoring:** ESIA Table 12-6.

Note: This register applies only to Phase 1. Phase 2 will be addressed once its engineering definition is sufficiently advanced and a dedicated ESIA has been prepared, consulted upon, and approved by the competent authorities. At that point, Enearth will revise this ESMMP to incorporate Phase-2-specific mitigation, monitoring (with parameters and frequencies), roles/responsibilities, and KPIs, and will disclose the update in line with the SEP and EBRD ESR1. Until such time, no Phase 2 commitments are construed or implied by this register.

5.3 Management Plans

The Environmental and Social Impact Assessment (ESIA) and the Supplementary Environmental and Social Report (SESR) identify a range of environmental, ecological, and social impacts associated with the Prinos CO_2 Storage Project. These impacts primarily relate to construction and operational activities offshore, with localized onshore elements linked to supporting infrastructure.

From an environmental perspective, potential impacts include temporary deterioration of air quality and underwater noise during construction works, the risk of minor spills or accidental discharges, increased vessel traffic and associated emissions, and localized impacts on water and sediment quality.

In terms of ecological impacts, the project may interact with sensitive marine habitats and species, including those within designated Natura 2000 areas. Key risks include disturbance to marine fauna from underwater noise, potential introduction of invasive species, and restricted access to certain fishing grounds within safety exclusion zones.

The social impacts are largely associated with community health and safety, changes to fishing activities, employment opportunities, and the management of offshore workforce accommodation. Community perceptions and acceptance of the project also depend on transparent stakeholder engagement and the effective implementation of a grievance mechanism.

Given these identified impacts, the project will implement a suite of targeted Environmental and Social Management Plans (ESMPs) to ensure compliance with national legislation and EBRD Environmental and Social Requirements. These currently include the Stakeholder Engagement Plan and Community Grievance Mechanism, Construction Management Plan, Waste Management Plan, Biodiversity Management Plan, Emergency Management Plan, Worker's Grievance Mechanism, Chemical Use Plan, and the CO_2 Monitoring and Corrective Action Plan. Each plan is designed to translate mitigation commitments into actionable procedures, supported by monitoring, reporting, and continuous improvement mechanisms. Where specific management plans have already been prepared as part of the ESIA, they will be directly applied. For topics where plans have been identified as required but not yet developed, these will be prepared in due course, in line with the project schedule. In the interim, Energean's existing management plans can serve as bridging documents to ensure continuity and compliance until project-specific plans are finalized.

5.3.1 Current Project-specific Management Plans

5.3.1.1 Stakeholder Engagement Plan and Community Grievance Mechanism

Stakeholder engagement is a key element of the Prinos CO_2 Storage Project, ensuring transparent disclosure of information, meaningful consultation, and the integration of stakeholder perspectives throughout the Project lifecycle. In line with EBRD Environmental and Social Requirement 10 (Stakeholder Engagement), a Stakeholder Engagement Plan (SEP) has been prepared *(Annex 16.4 of the Phase 1 ESIA, the fully updated version is accessible through the EBRD disclosure package)*.

The SEP records engagement activities undertaken to date, provides an updated stakeholder list and mapping, including vulnerable groups and fisheries stakeholders, and sets out a disclosure strategy supported by communication materials. It also establishes a Stakeholder Engagement Action Plan (SEAP) covering the construction, operation, and decommissioning phases. The Plan includes a monitoring and evaluation framework with baseline data, indicators, and reporting formats, as well as clear institutional responsibilities and version control procedures to ensure regular updates.

The Project has also established a Community Grievance Mechanism, integrated within the SEP, to provide transparent and accessible channels for concerns to be raised by both workers and local communities. The mechanism is designed to be inclusive, offers multiple points of entry, and is coordinated with contractor-level systems to ensure consistency and effective resolution.

Together, the SEP and the Community Grievance Mechanism ensure alignment with EBRD requirements by fulfilling ESR10 on stakeholder engagement and ESR2 on workers' access to a fair and transparent grievance process.

5.3.1.2 Construction Management Plan

A Construction Management Plan (CMP) has been developed for the Prinos CO_2 Storage Project to provide a comprehensive framework for managing environmental and social risks during the construction phase. The CMP *(Annex 16.6 of the Phase 1 ESIA, Annex 12.5 of the Phase 1 Modification Report)* consolidates topic-specific sub-plans to ensure that works are conducted in a safe, environmentally responsible, and socially acceptable manner.

The CMP includes measures to:

- maintain air quality through emissions assessment, inventory, and control strategies;
- minimize noise and vibration impacts in both onshore and offshore environments, with monitoring and reporting obligations;
- manage traffic and maritime safety by addressing hazards such as pedestrian–vehicle interactions, vessel manoeuvring, falling loads, visibility, and speed, supported by maps, layouts, and communication strategies;
- safeguard cultural heritage through a chance finds procedure in coordination with the relevant authorities;
- prevent and respond to pollution incidents, including emissions to water and soil, spill prevention, notification, and training;
- ensure the sustainable use and conservation of water resources through assessment, mitigation, and monitoring; and
- prevent and control alien and invasive species that may pose risks to the local environment.

The CMP thereby provides an integrated management tool to control construction-related risks and ensure compliance with national legislation and international standards. It also aligns with EBRD Environmental and Social Requirements, notably ESR1 (Assessment and Management of Environmental and Social Risks and Impacts), ESR4 (Community Health, Safety and Security), and ESR6 (Biodiversity and Living Natural Resources).

5.3.1.3 Waste Management Plan

A Waste Management Plan (WMP) has been prepared for the Prinos CO_2 Storage Project *(Annex 16.3 of the Phase 1 ESIA)*. The Plan establishes the framework for the management of hazardous and non-hazardous waste generated during construction and operations, ensuring compliance with national legislation and alignment with best international practice. It defines procedures for segregation, storage, transportation, and disposal of waste, supported by monitoring and reporting requirements.

The Plan ensures that waste streams are managed to prevent pollution, minimize environmental impacts, and protect community and worker health and safety. It also provides for continuous improvement and integration with the Project's Environmental and Social Management System (ESMS).

Through this Plan, the Project meets the requirements of EBRD Environmental and Social Requirement 1 (Assessment and Management of Environmental and Social Risks and Impacts) and ESR3 (Resource Efficiency and Pollution Prevention and Control).

5.3.1.4 Biodiversity Management Plan

Biodiversity considerations for the Prinos CO_2 Storage Project have been addressed through the Appropriate Assessment, which was undertaken as part of both the Phase 1 ESIA and the subsequent amendment studies *(Annex 16.1 of the Phase 1 ESIA and Annex 12.4 of the Phase 1 Modification Report)*. The assessment included a biodiversity monitoring framework, covering the ecological status of the area, key habitats and species, and potential interactions with project activities. As such, biodiversity management has not been prepared as a stand-alone report but is integrated within the ESIA documentation.

The Appropriate Assessment applies the mitigation hierarchy (avoid, minimize, restore, offset) to identify and manage risks to biodiversity. Project design has incorporated avoidance and minimization measures where possible, supported by monitoring protocols to assess effectiveness and ensure adaptive management. The monitoring framework includes indicators for biodiversity status and provides mechanisms for evaluating the effectiveness of implemented mitigation measures.

Roles and responsibilities for biodiversity management and monitoring will be defined and assigned within the Project's Environmental and Social Management System (ESMS) to ensure effective implementation. In the interim, Energean's existing ESMS, which already includes a Biodiversity Management Plan, can provide the necessary framework and resources until Project-specific arrangements are finalized. Regular reporting and disclosure to regulators, lenders, and other stakeholders will be undertaken to ensure transparency. Should a dedicated Biodiversity Management Plan be required at a later stage, this will be prepared in line with EBRD requirements and international good practice.

Through these arrangements, the Project ensures compliance with national legislation and alignment with EBRD Environmental and Social Requirements, notably ESR6 (Biodiversity and Living Natural Resources).

5.3.1.5 Emergency Management Plan

Emergency preparedness and response is a critical component of the Prinos CO_2 Storage Project to safeguard workers, communities, and the environment. While a project-specific Emergency Management Plan has not yet been developed for the Project, emergency response is currently governed by the Energean Greece Internal Emergency Response Plan (IERP), which provides the framework for managing incidents across the company's Greek operations.

The IERP sets out procedures for emergency prevention, preparedness, response, and recovery, covering scenarios such as accidental releases, spills, fires, natural hazards, and other incidents with potential impacts on health, safety, and the environment. It defines escalation levels, command structures, communication protocols, and coordination mechanisms with authorities and external stakeholders. Regular training, drills, and exercises are also part of the framework to ensure readiness and continuous improvement.

For the Prinos CO_2 Storage Project, roles and responsibilities for emergency preparedness and response will be defined and assigned within the Project's Environmental and Social Management System (ESMS). In the interim, the existing Energean IERP will provide the necessary structure and resources until Project-specific arrangements are finalised.

Should a dedicated Emergency Management Plan be required at a later stage, it will be developed in accordance with EBRD requirements and international good practice. This approach ensures compliance with national legislation and alignment with EBRD Environmental and Social Requirements, notably ESR1 (Assessment and Management of Environmental and Social Risks and Impacts) and ESR4 (Community Health, Safety and Security)

5.3.1.6 Worker's Grievance Mechanism

A dedicated Worker's Grievance Mechanism (WGM) has been established for the Prinos CO_2 Storage Project to ensure that all employees and contracted workers have a clear, accessible, and confidential process to raise concerns, complaints, or suggestions related to their working conditions. The mechanism is designed in line with EBRD Environmental and Social Requirement 2 (Labour and Working Conditions), guaranteeing protection against retaliation and ensuring fair, timely, and transparent resolution of grievances.

The Worker's Grievance Mechanism *(Annex 9.1 of this framework ESMMP)* provides multiple accessible channels for submission, including in-person, written, and electronic options. It also establishes defined timeframes for acknowledgment, investigation, and resolution of grievances. The procedure ensures confidentiality, clear communication with complainants, and systematic record-keeping to support monitoring and reporting.

Oversight of the WGM is integrated into the Project's Environmental and Social Management System (ESMS), with clear responsibilities assigned to ensure accountability and effective implementation. Regular reporting and disclosure of aggregated, anonymised grievance data will be carried out in line with EBRD requirements, allowing continuous monitoring of the mechanism's effectiveness and responsiveness.

This Project-specific Worker's Grievance Mechanism complements Energean's corporate-level procedures, while ensuring alignment with EBRD standards and the specific needs of the Project workforce. The full Worker's Grievance Mechanism will be included as an Annex to the ESMMP for reference and implementation.

5.3.1.7 Chemical Use Plan

A Chemical Use Plan has been prepared for the Prinos CO_2 Storage Project *(Annex 16.5 of the Phase 1 ESIA)*. The Plan establishes the framework for the management of chemical substances used during drilling and operations, in line with the Barcelona Protocol and relevant EU legislation. It sets out procedures for the selection, handling, storage, and disposal of chemicals, with the aim of preventing pollution, protecting the marine and terrestrial environment, and safeguarding worker and community health and safety.

Through this Plan, the Project ensures compliance with national and international regulations and alignment with EBRD Environmental and Social Requirement 3 (Resource Efficiency and Pollution Prevention and Control).

5.3.1.8 CO_2 Monitoring and Corrective Action Plan

A dedicated CO_2 Monitoring and Corrective Action Plan has already been developed and submitted as part of the Phase 1 ESIA documentation *(Annex 16.2 of the Phase 1 ESIA and Annex 12.5 of the Phase 1 Modification Report)*. This plan was prepared in line with the requirements of the CCS Directive and Joint Ministerial Decision 48416/2037/E.103/2011, ensuring compliance with both EU and national regulatory frameworks.

The plan outlines a structured Monitoring, Measurement and Verification (MMV) framework to track the short- and long-term integrity of the Prinos CO_2 storage complex. It specifies monitoring parameters, applicable technologies, spatial and temporal sampling logic, as well as corrective measures in the unlikely event of leakage or significant anomalies. The framework applies throughout the project lifecycle, from baseline data collection to operational monitoring, post-closure verification, and corrective response.

Corrective actions are clearly defined in accordance with Article 17 of the Joint Ministerial Decision, including immediate notification of competent authorities and the adoption of technical measures such as injection suspension, adjustment of operational parameters, or drilling of auxiliary wells, if required.

Through this Plan, the Project ensures compliance with EU and national regulatory frameworks and alignment with EBRD Environmental and Social Requirements, notably ESR1 (Assessment and Management of Environmental and Social Risks and Impacts).

5.3.2 Additional Management Plans under Review

In addition to the management plans already prepared as part of the Phase 1 ESIA, the Project has developed a set of standalone management plans that have been submitted to the competent authority (HEREMA) in the context of the storage permit application and in compliance to the requirements of Directive 2009/31/EC. These plans are currently under review by HEREMA and European Commission. Once approved, they will be formally integrated into the ESMMP. In specific:

- CO_2 Monitoring, Measurement, and Verification Plan (MMV Plan): Establishes the monitoring framework to ensure the integrity of the storage complex, including parameters, methodologies, frequency, and reporting obligations across all project phases.
- Corrective Measures Plan: Defines the procedures and technical measures to be implemented in the event of leakage or irregularities, ensuring timely response and safeguarding environmental and operational integrity.
- Post-Closure Plan: Outlines the monitoring, maintenance, and long-term stewardship requirements following site closure, ensuring continued safety and compliance with regulatory standards.
- Risk Management Plan – Containment: Identifies containment-related risks and defines preventive and mitigation measures to ensure the permanent storage of CO_2 in line with regulatory requirements.

5.3.3 Potential Additional Management Plans

Beyond the management plans already developed and submitted, additional project-specific management plans may be prepared if deemed necessary during the lifecycle of the Prinos CO_2 Storage Project or if requested by the competent authority and lenders. These would be developed in accordance with national legislation, EBRD Environmental and Social Requirements, and international good practice. In the interim, Energean's existing corporate ESMS and management plans can provide bridging arrangements to ensure continuity and compliance.

Indicatively, the following plans may be considered:

Operations Management Plan

An Operations Management Plan may be developed to consolidate procedures for the operational phase of the Project. The plan would cover key environmental and social aspects, including air quality, noise and vibration (onshore and offshore), chance finds, pollution prevention, and management of alien and invasive species. Its purpose would be to ensure safe, efficient, and environmentally responsible operations throughout the lifetime of the Project.

Labour (and Accommodation) Management Plan

A Labour and Accommodation Management Plan may be developed to ensure fair, safe, and transparent working conditions for all categories of workers throughout the Project lifecycle, in line with EBRD Environmental and Social Requirement 2. The plan would include an overview of the workforce, labour risks and mitigation measures, accommodation standards, and terms and conditions of employment. It would also address offshore-specific risks such as fatigue, emergency response, and living conditions on vessels, supported by measures such as rotation schedules, health checks, and grievance access.

The plan would establish clear roles and responsibilities for implementation, link to the Worker's Grievance Mechanism and occupational health and safety policies, and provide for regular monitoring and reporting. Where the majority of the workforce is drawn locally, limited additional community impacts are expected.

Traffic Management Plan

A Traffic Management Plan may be developed to ensure the safe and efficient movement of vehicles, pedestrians, and maritime traffic associated with the Project. The plan would address hazards such as vessel interactions, falling loads, lack of visibility, and excessive speed, and would set out control measures, layouts, and communication strategies for internal and external stakeholders.

Onshore traffic impacts are expected to be limited, as construction activities will take place within Energean's existing project area at Nea Karvali, Kavala, outside populated areas. Similarly, offshore construction activities will be undertaken within existing exclusion zones, where maritime access is already restricted, thereby minimising potential traffic-related impacts.

Emergency Preparedness and Response Plan (Project-specific)

A Project-specific Emergency Preparedness and Response Plan may be developed to complement Energean's existing corporate Internal Emergency Response Plan (IERP). The plan would provide tailored procedures for prevention, preparedness, response, and recovery specific to the Prinos CO_2 Storage Project, ensuring the protection of workers, communities, and the environment.

Pollution Prevention Plan

A Pollution Prevention Plan may be developed to establish measures for preventing and mitigating accidental releases to air, water, or soil during all phases of the CO_2 storage project. The plan would address risks not only from unintended CO_2 releases but also from supporting activities involving fuels, lubricants, drilling and operational chemicals, wastewater, and other hazardous substances. It would set out spill prevention and control measures, response procedures, communication and notification protocols, and training and drills for personnel. The purpose is to safeguard the integrity of the storage complex, protect surrounding environmental resources, and ensure compliance with regulatory requirements and international good practice.

Chance Finds Procedure

A Chance Finds Procedure may be developed to ensure that any unexpected discoveries of cultural heritage during project activities are properly managed. The procedure would include immediate suspension of works in the affected area, notification of the competent cultural authorities, and implementation of agreed protective or conservation measures. Its purpose is to safeguard cultural heritage resources in compliance with national legislation and EBRD Environmental and Social Requirement 8 (Cultural Heritage).

Other Topic-Specific Plans

Other topic-specific management plans may be developed if new risks are identified or regulatory requirements emerge during Project implementation. These may include, for example, specialised containment measures or risk management tools tailored to the CO_2 storage context. Such plans would be prepared in line with national legislation, EBRD Environmental and Social Requirements, and good international industry practice, ensuring that emerging issues are addressed in a timely and structured manner.

The matrix below defines the activation phase, roles, and responsibilities for each existing management plan under the Prinos CO_2 Storage Project. Oversight is embedded in EnEarth's organizational structure, with overall accountability resting with the Project Director. Contractors and subcontractors hold a key role in implementation, particularly during construction and operations, where they are directly responsible for site-level compliance with management plan requirements. EnEarth, through the HSE & Sustainability Manager, the Stakeholder Engagement Manager, and supporting teams, retains responsibility for supervision, verification, and reporting.

As the Project evolves, additional management plans may be approved or required. These will be incorporated into the ESMMP, and the roles and responsibilities matrix will be updated accordingly to ensure comprehensive governance and alignment with national legislation, EBRD Environmental and Social Requirements, and good international industry practice.

Table 5-2: Project-Specific Environmental and Social Management Plans (ESMPs), Roles, and Responsibilities across Phases

Management Plan	Project Phase(s)	Primary Responsibility	Supporting Functions	Contractors' Role	Oversight & Reporting
Stakeholder Engagement Plan & Community Grievance Mechanism	Continuous (all phases)	Stakeholder Engagement Manager	HSE Manager; Environmental & Social Team; Communications	Channel community concerns; align contractor-level	Project Director; reporting to regulators and stakeholders

Management Plan	Project Phase(s)	Primary Responsibility	Supporting Functions	Contractors' Role	Oversight & Reporting
				mechanisms with Project SEP	
Construction Management Plan	Construction	Construction/Technical Manager	HSE Manager; Site Supervisors	Implement site-specific controls, HSE requirements, monitoring and reporting	Project Director
Waste Management Plan	Construction & Operations	HSE Manager	Contractors; Site Supervisors	Implement segregation, storage, transport, and disposal measures in line with WMP	Project Director; regulatory reporting
Biodiversity Management (integrated in Appropriate Assessment)	Construction, Operations, Closure	HSE Manager	Environmental Specialists;	Comply with restrictions (timing, exclusion zones, habitat protection measures)	Project Director; reporting to competent authorities
Energean Greece Emergency Management Plan	Continuous (all phases)	HSE Manager	Emergency Response Coordinators; HSE Team	Maintain site-level emergency response, participate in drills, immediate incident reporting	Project Director; interface with authorities
Worker's Grievance Mechanism	Continuous (all phases)	HR Manager	HSE Manager; Social Team	Ensure contractor-level grievance channels align and feed into Project WGM	Project Director
Chemical Use Plan	Construction & Operations	HSE Manager	Technical/Operations Manager	Proper handling, storage, and use of chemicals; spill prevention	Project Director; regulatory reporting

Management Plan	Project Phase(s)	Primary Responsibility	Supporting Functions	Contractors' Role	Oversight & Reporting
CO_2 Monitoring and Corrective Action Plan	Operations & Closure	Technical/Operations Manager	HSE Manager; Environmental Specialists	Support monitoring activities (data provision, site access)	Project Director; reporting to HEREMA

6 Training and Capacity Building

Capacity building is an essential element of the Environmental and Social Management and Monitoring Plan (ESMMP), ensuring that all personnel, including contractors and sub-contractors, are fully aware of their roles, responsibilities, and obligations under the Prinos CO_2 Storage Project. The training framework builds upon Energean's established management system procedures (e.g. Training Philosophy, Competence Assurance, Toolbox Talks, and Contractor HSE Management) and its structured Training Matrix, which already covers oil and gas operations, onshore and offshore facilities, and contractor requirements. This provides a solid basis for the Project, given the operational continuity between Energean's oil and gas activities and the Prinos CO_2 Storage Project, while being adapted to meet EBRD Environmental and Social Requirements.

6.1 Training Matrix

The Training Matrix will be adapted to reflect the specific needs of the CO_2 storage project, while retaining core trainings already in place for oil and gas operations. Key topics include:

- **Core oil and gas trainings relevant to CO_2 storage:**
    - Permit to Work system, toolbox talks, and risk assessment cards (TRAC).
    - PPE use, SCBA and escape hoods, chemical handling and spill response.
    - Firefighting, emergency response, evacuation drills.
    - Confined space entry, working at heights, H_2S awareness (adapted to CO_2 context).
    - Waste management and environmental management system awareness.
    - Marine operations (lifeboat drills, vessel safety).
- **Project-specific trainings for CO_2 storage:**
    - CO_2 leakage scenarios, early detection, and emergency response protocols.
    - CO_2 monitoring methods (subsurface, soil gas, marine).
    - Corrective measures and containment risk management.
    - Biodiversity protection and monitoring linked to offshore activities.
    - Stakeholder engagement and community grievance mechanism access.
    - GBVH prevention and response, in line with EBRD ESR2.
    - Labour and working conditions, including contractor and vessel accommodation standards.

The matrix will identify training needs by role, frequency, and delivery method, and will be updated regularly to reflect project progress.

6.2 Site Induction and Toolbox Talks

All personnel, including contractors and sub-contractors, will undergo a mandatory site induction covering project-specific requirements, codes of conduct, emergency protocols, and grievance mechanisms. Regular toolbox talks will reinforce awareness, communicate lessons learned, and address high-risk activities.

6.3 Contractor Capacity Requirements

Contractors will be required to comply with the Training Matrix and provide evidence of relevant training for their personnel prior to mobilisation. EnEarth will verify contractor training records as part of its oversight responsibilities. Where gaps are identified, targeted capacity-building (e.g. CO_2 risks, GBVH prevention, fisheries mitigation) will be delivered to ensure full alignment with ESMMP commitments and EBRD Environmental and Social Requirements.

7 Monitoring and Evaluation

Monitoring and evaluation are essential to ensure that the Prinos CO_2 Storage Project is implemented in compliance with national legislation, EBRD Environmental and Social Requirements, and approved environmental and social commitments. At this stage, a framework monitoring approach is presented. Detailed monitoring parameters, methodologies, and frequencies will be finalized and aligned with the approved Environmental Terms (ETs) and any additional requirements arising from the Supplementary Environmental and Social Study.

The framework below outlines the key thematic areas, the indicative scope of monitoring, the responsible parties, and the reporting lines. This ensures that responsibilities are clearly assigned and that monitoring results are properly integrated into project governance and reporting structures.

Table 7-1: Indicative Environmental and Social Monitoring Areas, Responsibilities, and Reporting Framework

Thematic Area	Indicative Scope of Monitoring	Responsible Party	Reporting
Air Quality	CO_2, particulates, and other relevant pollutants during construction and operations	Contractor (monitoring) / EnEarth HSE Manager (oversight)	HSE Monthly Report to EnEarth; Annual Report to Authorities
Noise & Vibration	Onshore and offshore noise levels, vibration impacts	Contractor / EnEarth HSE Team	Monitoring Reports; Integrated into Annual Environmental Report
Marine Environment	Seawater quality, sediment, biodiversity surveys (as per ESIA/ETs)	Specialist Contractor under EnEarth supervision	Technical Reports to EnEarth; Submission to Authorities as required
Waste Management	Hazardous and non-hazardous waste generation, handling, and disposal	Contractors / EnEarth Waste Officer	Waste Logs; Annual Waste Summary to Authorities
Occupational Health & Safety	Safety performance, incident reporting, training records	Contractors / EnEarth HSE Manager	Monthly HSE Reports; Incident Notifications
Community & Social	Grievance mechanism use, stakeholder engagement activities, local employment statistics	EnEarth Stakeholder Engagement Manager	Quarterly Social Performance Reports; Annual Disclosure
Biodiversity	Monitoring of sensitive habitats and potential impacts on protected species	Specialist Consultant / EnEarth HSE Manager	Biodiversity Monitoring Reports; Integration into Annual Report
Emergency Preparedness	Drills and response capacity checks (onshore/offshore)	Contractors / EnEarth HSE Manager	Drill Records; Corrective Action Reports

Note: This monitoring framework builds upon Table 12-5 of the Phase 1 ESIA and incorporates the refinements set out in Table 7-3 of the Modification Report for the amendment of the Phase 1 ESIA. It will be refined and finalized following the issuance of the Environmental Terms (ETs). Should additional

parameters be required, these will be incorporated to address any new risks or regulatory requirements during project implementation.

8 Continuous Improvement and Auditing

Continuous improvement is a core principle of the Prinos CO_2 Storage Project's Environmental and Social Management and Monitoring Plan (ESMMP). By embedding feedback loops and structured review processes, Enearth ensures that environmental and social risks are managed proactively and that good practices are systematically applied. This culture of improvement builds on Energean's established management system, which provides a framework for lessons learned, incident investigation, auditing, and document control. Enearth will adopt and adapt this framework to the specific requirements of the CO_2 storage project, ensuring alignment with Greek legislation, EU requirements, and international good practice.

8.1 Lessons Learned

The Project will adopt a structured approach to capturing and applying lessons learned, ensuring continuous improvement throughout its lifecycle. Lessons learned will be collected from monitoring results, stakeholder engagement, grievance mechanisms, incident investigations, and contractor performance. Non-conformance reports and "Opportunities for Improvement" forms will be used to document issues, assign corrective actions, and track them to closure. Incident investigations will identify root causes, and outcomes will be shared across teams to avoid recurrence. Community feedback, captured through the Stakeholder Engagement Plan and grievance mechanisms, will be formally reviewed and integrated into project decision-making.

8.2 ESMMP Update Triggers

The ESMMP is a live document and will be updated when significant changes occur.

Triggers include:

- Mobilization of new contractors or subcontractors,
- Significant grievances, community concerns, or incidents,
- Changes in project scope, schedule, or technical design,
- Amendments to national legislation, EU requirements, or permit conditions,
- Findings from internal audits, inspections, or management reviews.

Each update will be documented, version-controlled, and communicated to all relevant staff and contractors.

8.3 Version Control and Review Schedule

Enearth will apply a structured document control and management system to ensure that the ESMMP and its associated management plans remain accurate and up to date.

Key features include:

- **Version control**: Each revision will carry a unique version number, date, author, and approval signature. Superseded versions will be archived but remain accessible for reference.

- **Approval process**: Updates must be reviewed by the HSE Manager and approved by the Project Director before release.
- **Distribution**: The current version will be circulated to all staff, contractors, and subcontractors through established communication channels.
- **Review schedule**:
    - Pre-construction: Finalisation and disclosure of the ESMMP,
    - Post-mobilization: Early review after construction mobilization,
    - Annual reviews during operations,
    - Ad hoc reviews triggered by incidents, audits, grievances, or regulatory changes. The Document Control and Management Procedure provides the framework for these processes, ensuring that the ESMMP remains reliable, traceable, and auditable throughout the project lifecycle.

8.4 Auditing

Auditing is central to ensuring compliance and driving improvement.

Enearth will implement:

- **Internal audits**: Regular audits and site inspections led by the HSE Manager and supporting teams, focusing on compliance with ESMMP requirements, internal standards, and contractor obligations.
- **External audits and inspections**: Enearth will cooperate fully with any inspections or audits by regulatory authorities or other third parties, and will ensure timely resolution of any findings.
- **Audit frequency**:
    - At least one comprehensive internal audit annually,
    - Quarterly site inspections by HSE staff,
    - Additional audits aligned with major project milestones or emerging risks.
- **Audit methodology**: Audits will follow the HSE Audit Procedure, including planning, execution, reporting, corrective action, and verification. Non-conformances will be categorized by severity, assigned to responsible functions, and closed out within agreed timelines.
- **Follow-up and reporting**: Audit outcomes will feed into the Management Review Procedure, ensuring that senior leadership has oversight of performance trends, systemic issues, and opportunities for improvement.

8.5 Leadership Reviews and Oversight

Senior management, led by the Project Director, will conduct periodic management reviews of the ESMMP. These reviews will consider audit results, lessons learned, grievance trends, and overall performance indicators. Corrective and preventive actions will be assigned and tracked, ensuring accountability at the highest level.

The processes described above are summarized in the Table below, which provides an overview of how continuous improvement and auditing will be applied under the Prinos CO_2 Storage Project. The table sets out the main processes, the typical triggers for their activation, the roles responsible for implementation, and the reporting channels through which outcomes will be communicated. This framework ensures that responsibilities are clear, actions are traceable, and the ESMMP remains an effective and adaptive management tool throughout the life of the project.

Table 8-1: Processes, triggers, responsibilities, and reporting channels for maintaining and updating the ESMMP

Process	Trigger	Responsible Role(s)	Reporting Channel
Lessons Learned	Monitoring results, grievances, incidents, contractor reports	HSE Manager; Line Managers; Contractors	Internal ESMS reporting; Management Review
ESMMP Update	Contractor mobilization, scope change, new regulation, audit findings	HSE Manager (review); Project Director (approval)	ESMMP revision log; circulation to all staff/contractors
Version Control	Any update or revision of ESMMP/MPs	Document Controller; HSE Manager	Controlled document system; distribution list
Internal Audits	Scheduled (annual, quarterly) or ad hoc	HSE Manager; Audit Team	Audit reports; Non-Conformance Reports
External Audits/Inspections	Regulatory, ISO, or third-party requirements	Project Director; HSE Manager	Audit findings report; Corrective Action Plans
Management Reviews	Annual or following significant findings/incidents	Project Director; Senior Management	Management Review Minutes; ESMS Action Tracker

9 Annexes

9.1 Workers Grievance Management Procedure - Annex

1. Introduction

1.1. Purpose and Scope

EnEarth recognises that a positive working environment and good working relationships have a significant impact on our Workers well-being and engagement. We recognise that the working environment can also lead to better performance, improved employee retention and reduced stress-related sickness absence.

The Workers Grievance Management Procedure aims to provide all workers with a process to raise complaints, grievances or disputes related to working conditions, treatment, or other employment-related issues, in line with EBRD ESR 2 and national Greek labour laws.

The purpose of the Procedure is to address, manage, resolve and document grievances raised by all direct, contracted, and third-party workers engaged on the EnEarth project.

1.2. Principles

The Workers Grievance Management Procedure has the following principles:

- **Accessibility:** The mechanism is available to all workers, irrespective of location (onshore or offshore), employment status (direct employee, contractor, subcontractor, or supply chain worker), or literacy level. Multiple entry points and language options will be provided.
- **Transparency:** The process, including steps, timelines, and roles, is clearly communicated to workers at induction and reinforced through ongoing communication.
- **Responsiveness:** Grievances are acknowledged, investigated, and resolved within defined timelines. Progress updates are provided to the complainant throughout.
- **Protection from Retaliation:** Workers are encouraged to raise concerns without fear of reprisal. Any form of retaliation against a complainant will not be tolerated and will trigger disciplinary measures. Relevant Non-Retaliation Policy communicated to workers at induction and reinforced through ongoing communication.
- **Confidentiality:** Sensitive information is managed discreetly. Where requested, the complainant's identity is protected.
- **Cultural Appropriateness:** The mechanism reflects the cultural and linguistic context of the workforce, ensuring workers feel safe and understood when raising concerns. Main languages used for communicating, training and handling workers grievances are Greek and English.
- **Continuous Improvement:** The mechanism is reviewed regularly and updated based on worker feedback, monitoring data, and lessons learned.

These principles apply throughout the project lifecycle and extend to all contractor and subcontractor workers engaged in the project.

2. Grievance Resolution Process: Steps

All incoming grievances will be recorded, tracked and managed by the Grievance Coordinator in a centralized grievance management database the so-called Stakeholder and Grievance Management Tool (SGMT), that allows an ongoing information flow and enables EnEarth to understand and monitor its impacts over the course of the Project.

This Worker Grievance Management Process is aimed at providing effective grievance response. However, if the Complainant is not satisfied with the outcomes of the resolution process, then they may appeal, and a further review will be conducted by the Grievance Management Committee.

This Procedure does not replace the statutory rights of the Complainants to undertake legal proceedings or to approach an independent, objective appeal mechanism. These rights remain unaffected by their participation in the EnEarth grievance management process.

2.1. Channels for submitting a grievance

Workers may submit grievances verbally, in writing, electronically, or anonymously through a range of dedicated channels. All channels are available in both English and Greek language and can be accessed at both onshore and offshore facilities, with the exception of HR Office Walk in/ Open Door Hours, which is available only at onshore HR offices.

- **Dedicated Hotline**: A phone line available Monday to Friday, 09:00–17:00, monitored by the Grievance Coordinator.
- **SMS / WhatsApp / Viber Line**: Messaging options particularly suitable for offshore workers with limited connectivity. All messages are monitored by the Grievance Coordinator.
- **Email Address**: A central HR/HSE grievance inbox monitored by the Grievance Coordinator.
- **In-Person Drop-Boxes**: Secure, locked boxes placed in accessible worker areas (canteens, crew rooms, site gates). Submissions may be made anonymously. The boxes are checked and logged by the Grievance Coordinator.
- **Direct Line Manager/ Supervisor**: Workers may raise concerns directly with their supervisor. Supervisors are responsible for documenting and forwarding grievances to the formal mechanism.
- **HR Office Walk-In/ Open Door Hours**: Workers may speak directly with HR representatives during business hours at onshore facilities. Offshore workers also have the option to approach HR representatives during their scheduled site visits or to contact them directly by phone for immediate support.
- **Digital Portal**: An online grievance submission form, accessible via QR code on posters and cards distributed across work sites. The portal allows anonymous submissions and is monitored by the Grievance Coordinator.

The aggrieved worker shall detail the nature of the grievance without unreasonable delay.

The Grievance Coordinator screens for relevance (labour/ workplace-related issues) and categorises grievances (e.g. health and safety, pay, discrimination, working conditions).

All grievances are logged in the Stakeholder and Grievance Management Tool (SGMT).

2.2. Acknowledgement

- Acknowledgement provided within 7 working days.
- Immediate actions taken if grievance involves safety, security, or urgent welfare concerns.

2.3. Assessment

The grievance is reviewed to determine its nature, severity, and appropriate handling route (e.g., informal resolution, investigation, escalation).

2.4. Investigating and Responding to Grievances

- Investigation led by Grievance Coordinator and depending on the grievance category involving relevant work-stream managers.
- Evidence gathered through documentation, interviews, and site inspections.
- Upon receiving the grievance, the designated investigating person, will talk with the Complainant to ensure the matter is fully understood.
- Following an official request, the worker facing allegations may be invited to a meeting with the designated investigating person in which case they have the right to be accompanied by a colleague or other chosen companion. The worker's chosen companion will be able to address the meeting to put or sum up the worker's case, as well as confer with the worker during the meeting. They may not, however, answer questions on the worker's behalf or prevent EnEarth from explaining their case. EnEarth reserves the right to refuse to accept a companion whose presence may undermine the grievance process.
- The designated investigating person, the Complainant and the worker facing the allegations, along with their companion, shall make every effort to attend the meeting. In all cases the Complaint is linked to the Labour Management Plan, or in any other way involves allegations about labour conditions, the HR Representative will also attend the meeting to take notes and provide guidance. If any of the workers involved fail to attend the grievance hearing without explanation or in the opinion of EnEarth have made insufficient efforts to attend, then the hearing may proceed in their absence.
- If a further investigation of the matter is required, then the meeting should be adjourned to a later date before a decision is taken about how to deal with the Grievance.

2.5. Resolution

- Findings and proposed resolution presented to Complainant.
- Resolution options discussed, with Complainant's feedback documented.
- The Grievance Coordinator should also inform the Complainant of their right to appeal if they are not satisfied with the action taken.
- Any action taken should be monitored and reviewed to ensure it effectively deals with the issue. If EnEarth decides to proceed with disciplinary action against any person, then the formal disciplinary procedure will be followed.

2.6. Appeal

- Complainants have the right to appeal within 10 working days where they feel their grievance has not been satisfactorily resolved.
- Appeal will be referred to the Grievance Management Committee.
- The request for an appeal must state the grounds for the appeal and can be submitted through any of the channels offered in writing.
- The Grievance Management Committee will arrange a further meeting to discuss the appeal within a reasonable time of receiving the request for an appeal. The Complainant will be informed of the time and place of appeal in advance.

- The appeal hearing is not a re-hearing of the original appeal but a consideration of the specific areas of dissatisfaction in relation to the original grievance.
- The Complainant has the right to be accompanied at the appeal meeting and the outcome of the appeal meeting shall be communicated to the worker in writing within 30 working days. Decisions made at this point are final and the grievance procedure is concluded.

2.7. Closing the Grievance Resolution Process

When the Complainant has accepted the proposed resolution, and is satisfied with the remediation measure implemented, the Grievance Coordinator will request the Complainant to sign a grievance close out form. Grievance will be formally closed in the Stakeholder and Grievance Management Tool (SGMT).

2.8. Monitoring

All grievances are logged and tracked, trends are reviewed monthly to identify systemic issues and improve practices. Lessons learned shared with management for systemic improvements.

2.9. Managing Anonymous Grievances

Anonymous grievances are recognised as an important way for workers to raise concerns, particularly in cases where cultural sensitivities may prevent them from identifying themselves. To ensure fairness and credibility, anonymous grievances will be treated with the same seriousness as named complaints.

While direct communication with the complainant may not be possible, EnEarth will communicate outcomes through the digital portal where reference codes allow anonymous complainants to check status.

Grievance is formally closed in the Stakeholder and Grievance Management Tool (SGMT), with corrective or preventive actions documented.

3. Roles and Responsibilities

3.1. Roles and Responsibilities

The roles and responsibilities of key personnel involved in EnEarth's Grievance Management Process are detailed below:

Table 9-1: Roles and responsibilities in the Worker Grievance Management process

Role	Responsibility
Project Manager	Overall accountable for Project implementation including grievance management.
Grievance Coordinator	Responsible for ensuring effective operation of grievance management process including registration, investigation and resolution of grievances. Conduct grievance reporting. Analyse trends and prepare reports on grievance management progress
Human Resources Department (HR)	Responsible for ensuring transparent employment practices at EnEarth and ensuring a clear and well communicated complaint/grievance process for EnEarth employees.
Grievance Management Committee	Responsible for the appeal process, normally comprised of Country Manager, Head of Legal, Head of HSE and Head of HR.
Work - Stream Manager	Provides support to grievance management process and technical assistance required during review and verification of grievance resolution outcomes. Budget and decision-making support for grievance management work-stream.

3.2. EnEarth Grievance vs Contractor Grievances

For the purposes of clarity: EnEarth has the overall accountability for all its activities and operations in the Project whilst the Contractors have specific responsibilities in relation to managing grievances arising from their activities. The Contractors are therefore required to implement a robust and appropriate Worker Grievance Mechanism based on EnEarth GMF.

EnEarth also requires the Contractors to liaise closely with EnEarth's Grievance Coordinator to ensure a robust Grievance Management Process.

Contractor related grievances are managed according to the Contractor's Worker Grievance Mechanism. For cases where the Contractor is unable to effectively manage a grievance, EnEarth's Grievance Coordinator provides assistance to the Contractor.

All high and medium severity grievances closed by Contractors without mutually agreed remediation will be reviewed by EnEarth Grievance Coordinator.

EnEarth Grievance Management Process: Overview

EnEarth has adopted a two-tier grievance management approach which allows grievances to be resolved as they arise and as effectively as possible.

Internal grievance resolution process is implemented by the Grievance Coordinator.

However, in cases where the Complainant is still not satisfied with the outcomes of the internal resolution process the Complainant may appeal and the Grievance Management Committee will take over the process. Figure 1 below provides the overview of EnEarth grievance management approach.

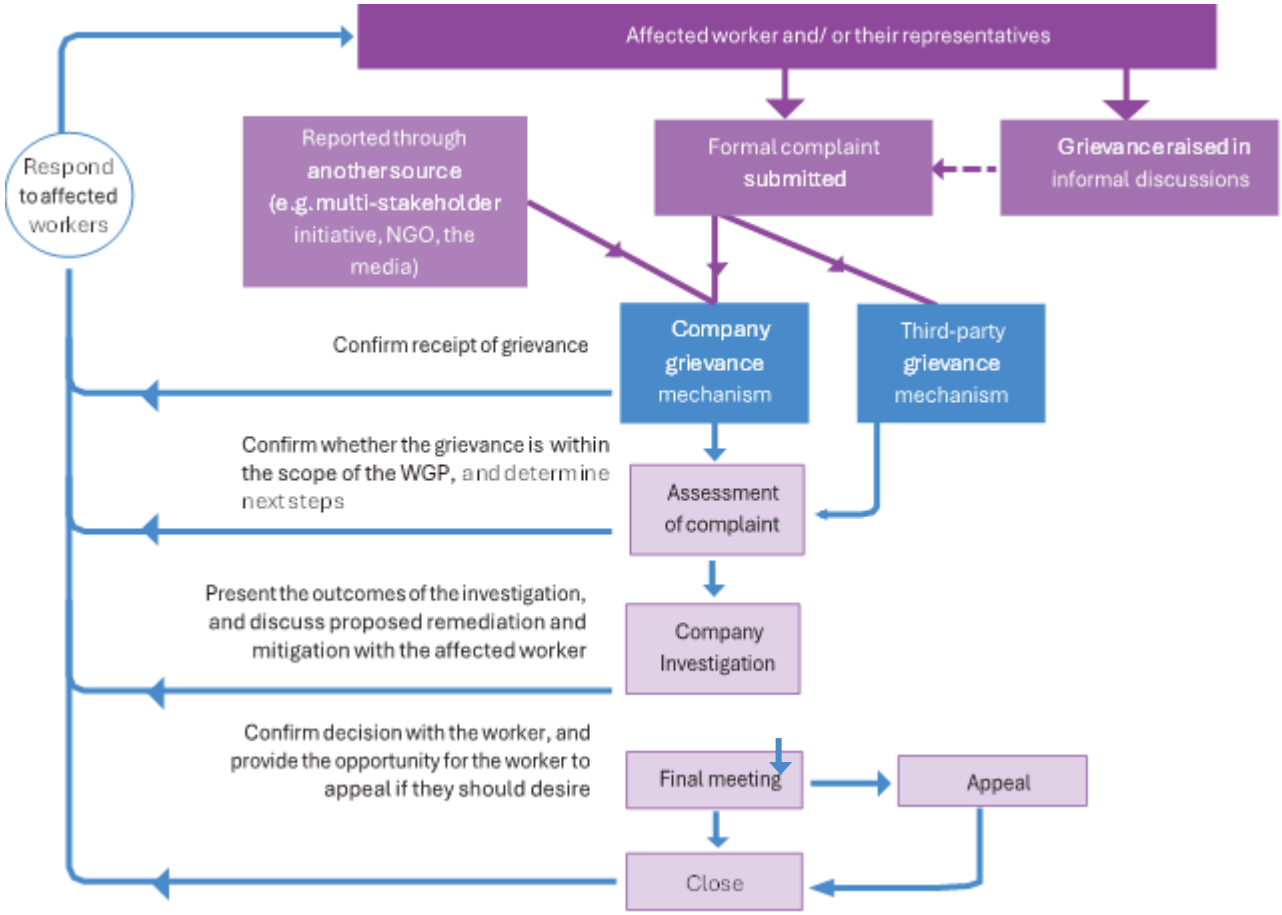


Figure 9-1: Enearth Grievance Management Process - Overview

4. Monitoring, Reporting and Reviews

EnEarth is committed to preventing the recurrence of grievances. Therefore, the Grievance Coordinator will periodically review the grievance management process to eliminate systemic problems and to ensure that the resolution process is working efficiently and produces effective outcomes.

Biannual external reviews of EnEarth GMF may take place. The overall Grievance Management Process performance will be monitored and evaluated against the indicators below.

Table 9-2: Grievance reporting indicators

Commitment	Indicator (the target is 100%)
Efficiency (Timely resolution)	▪ Total number and percentage of grievances received, logged, acknowledged, processed, resolved and closed within set time frame of 30 days (low severity) and 60-90 days (medium and high severity) ▪ Number and percentage of grievances closed versus open ▪ Number and percentage of outstanding non-resolved grievances
Trends (Qualitative data)	▪ Number and percentage of grievances received per categories ▪ Number and percentage of grievances received per severity level ▪ Number and percentage of grievances resolved versus rejected ▪ Number and percentage of grievances per receiving organization (EnEarth and Contractors)
Effectiveness (Awareness, usage, satisfaction of complainants)	▪ Number and percentage of stakeholders satisfied with solution ▪ Number and percentage of stakeholders satisfied with level and timing of information they received during a grievance process ▪ Number and percentage of cases requesting external review or alternative third-party arbitration
Contentious improvement (Commitment to integrate procedural lessons learned)	▪ Qualitative indicators shall be reported monthly and include root cause analysis, specific case examples and lessons learned.

The above indicators will be used by the Grievance Coordinator in preparation of monthly, biannual and annual reports. The regular grievance reporting, and analysis will inform revisions to the grievance mechanism and EnEarth Grievance Management Framework more broadly. EnEarth will also monitor the efficacy and relevance of the Third-Party Grievance Mechanism and adjust the procedures and the grievance management tool, as required.

5. Training

EnEarth recognises that a grievance mechanism is only effective if workers are fully aware of it, trust it, and understand how to use it. Training and disclosure activities will therefore be continuous, inclusive, and adapted to the diverse workforce (onshore, offshore, direct employees, contractors, and subcontractors).

Induction and Onboarding

- All new workers, including contractor and subcontractor staff, will receive training on the grievance mechanism during their induction.
- The session will explain the purpose, steps, available channels, timelines, and protections against retaliation.
- Workers will receive printed or digital materials in their preferred language (English or Greek) and will sign an acknowledgement confirming they understand how to use the mechanism.

Ongoing Training

- Regular refreshers will be used to reinforce awareness of the mechanism, particularly during:
    - High-risk operational phases (e.g., offshore drilling, shutdowns, new project mobilisations).
    - Times of organisational change (e.g., contractor rotation, new shift arrangements).
- Refresher training will be provided at least annually to all workers.

Contractor and Subcontractor Training

- All Contractor and Subcontractor management teams are responsible for ensuring their workers are trained in the grievance mechanism.
- EnEarth will provide a train-the-trainer program for Contractors to ensure consistent communication.
- Contractors must maintain attendance logs of grievance mechanism training and submit them to EnEarth's Grievance Coordinator.
- Contractors must integrate grievance mechanism awareness into their own inductions and site briefings.

Communication Materials

- Posters, leaflets, and digital content will be developed in all relevant languages (Greek and English).
- Materials will include visual graphics to assist workers with limited literacy.
- Contact details for grievance channels (hotline number, email, QR codes, drop-box locations) will be displayed in high-visibility areas.
- Updated materials will be distributed whenever grievance channels or focal points change.

Supervisor and Manager Training

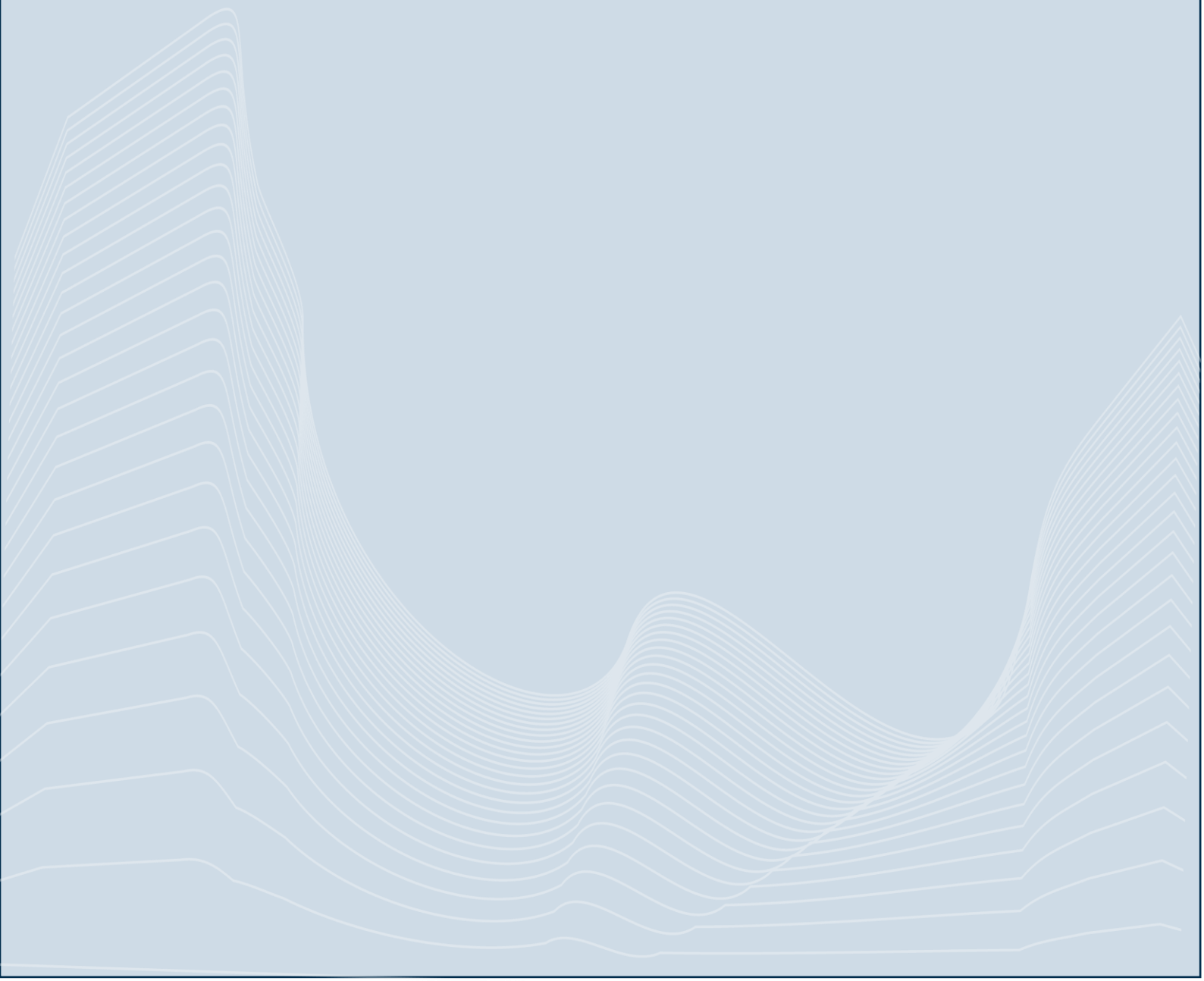
- Supervisors and line managers will receive additional training on how to:
    - Respond appropriately when a grievance is raised verbally.
    - Avoid discouraging or retaliating against Complainants.
    - Ensure all grievances are formally logged in the mechanism.

- Managers will be evaluated on their responsiveness to grievances as part of performance reviews.

Cultural and Gender Sensitivity in Training

- Training will be tailored to reflect the cultural and linguistic diversity of the workforce.
- Female grievance focal points will be available for workers who prefer raising sensitive issues (e.g., harassment, gender-based concerns) with a woman.
- Training will address workers' rights under national labour laws.

Grievance Submission: https://www.enearth/Υποβολή-αναφορών



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