



CO₂ Storage Unit in Prinos

Draft Supplementary Environmental and Social Report

03/10/2025

(Blank Page)

Copyright Notice

This document has been prepared exclusively for the purposes of the project “CO₂ Storage Unit in Prinos”. The contents of this document may be used by EnEarth solely for the purposes of the Project.

Project	CO ₂ Storage Unit in Prinos
STUDY STAGE	Draft Supplementary Environmental and Social Report (SESR)
DATE	18.09.2025
VERSION	v.01
REVISION	v.01
ENVIRONMENTAL CONSULTANT	LDK CONSULTANTS A.E. – WSP SA
PROJECT ENTITY	ENEARTH GREECE
PREPARED BY	LDK – WSP Study Team
REVIEW	Costis Nikolopoulos, LDK Project Manager Anna Borroni, WSP Project Director
APPROVAL	Costis Nikolopoulos, Project Manager
APPROVAL	Vasilis Tsetoglou, HSE Director
PROJECT ENTITY REPRESENTATIVE	Katerina Sardi, Chief Executive Officer – Country Manager

Blank Page

TABLE OF THE CONTENTS

1	Introduction	7
1.1	Project background and description	7
1.2	Overview of Supplementary Environmental and Social Report (SESR) purpose and scope	10
1.3	Applicability of EBRD Environmental and Social Policy 2024	10
1.4	Areas of Focus under the SESR	10
2	Critical Habitat and Biodiversity Feature Assessment (ESR6)	12
3	Social Impact Assessment (ESR2, ESR4, ESR10)	13
3.1	Workforce Expectations	13
3.2	ESR 2: Labour and Working conditions	15
3.2.1	Legal and Institutional Framework	16
3.2.2	Corporate Policies and Management Systems	19
3.2.3	Project-Specific Workforce Arrangements	21
3.3	ESR4: Health, Safety, and Security	24
3.3.1	Legal and Institutional Framework	24
3.3.2	Corporate Policies and Management Systems	26
3.3.3	Project specific measures	28
3.4	ESR10: Stakeholder Engagement	29
4	Assessment of Applicability of ESR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	31
5	Social Risks Identification and Management	37
5.1	ESR2: Labour and Working Conditions	37
5.1.1	Workforce Planning, Labour Conditions and Contractor Oversight	37
5.1.2	Retrenchment and Workforce Transition	38
5.1.3	Gender-Based Violence and Harassment (GBVH)	38
5.1.4	Accommodation Arrangements	38

5.2	ESR 4: Health, Safety and Security	39
5.2.1	Health, Safety and Security Framework	39
5.2.2	Community Health and Safety	40
5.2.3	Security Personnel and Community Interaction	40
5.3	ESR 10: Stakeholder Engagement and Vulnerable Groups	41
5.4	ESR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	41
6	Mitigation Measures	42

TABLE OF TABLES

Table 3-1: Workforce expectations Phase 1 _____ 13

Table 6-1: Summary of Key Social Risks, Mitigation Measures, and Management Responsibilities 42

TABLE OF IMAGES

Image 1-1: Satellite view of the Project	7
Image 1-2: Schematic Representation of Project Phase 1 and potential proposed amendment	9
Image 4-1: Existing and new zone subject to specific restrictions related to fishing and/or vessel anchoring and/or passage	34

LIST OF ABBREVIATIONS

ABBREVIATION	EXPLANATION
ALARP	As Low as Reasonably Practicable
CLO	Community Liaison Officer
CMAPP	Corporate Major Accident Prevention Policy
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EPC	Engineering, Procurement and Construction
EMSA	European Maritime Safety Agency
EPCI	Engineering, Procurement, Construction, and Installation
ESIA	Environmental and Social Assessment
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirement
EU	European Union
FAR	Fatal Accident Rate
GBVH	Gender-Based Violence and Harassment
GDPR	General Data Protection Regulation
H&S	Health and Safety
HEREMA	Hellenic Hydrocarbons and Energy Resources Management Company
HSE	Health, Safety and Environment

ABBREVIATION	EXPLANATION
HSF- ΦΑΥ	Health and Safety File
HSP- ΣΑΥ	Health and Safety Plan
ILO	International Labour Organization
IMO	International Maritime Organization
ISPSS	International Ship and Port Facility Security
JMD	Joint Ministerial Decision
KPI	Key Performance Indicator
LRI	Labour Rights Index
LTIF	Lost Time Injury Frequency
OHS	Occupational Health and Safety
PBF	Priority Biodiversity Feature
PSV	Platform Supply Vessel
SDG	Sustainable Development Goal
SEPE	Greek Labour Inspectorate
SESR	Supplementary Environmental and Social Report
SMS	Security Management System
TRIR	Total Recordable Injury Rate
ΓΣΕΒΕΕ	General Confederation of Professionals, Craftsmen and Merchants of Greece
ΓΣΕΕ	General Confederation of Greek Workers
ΣΕΒ	Hellenic Federation of Enterprises

1 Introduction

1.1 Project background and description

The CO₂ 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 CO₂ 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.



Image 1-1: Satellite view of the Project

The Project (Phase 1) concerns the installation of a carbon dioxide (CO₂) storage unit at Prinos, with a nominal capacity of one million tonnes (1 MTPA) of CO₂ per year. The CO₂ 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. CO₂ will arrive mainly via third-party pipelines, while some quantities will also be received as CO₂ 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 CO₂ storage project include:

- **Onshore installations:** Modification of a designated area within the existing footprint at the Sigma plant for construction of the CO₂ reception manifold and the unloading and compression area.
- **Offshore CO₂ 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 CO₂ from a new subsea pipeline and CO₂ cargo in containers, for the injection of CO₂ 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) CO₂ 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 CO₂ sources and the main reception processes during operation of the CO₂ storage project will be as follows:

- Supply of a CO₂ 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 CO₂ 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 CO₂ cargoes into the onshore reception manifold is also envisaged, via a compression station during unloading from the trucks.

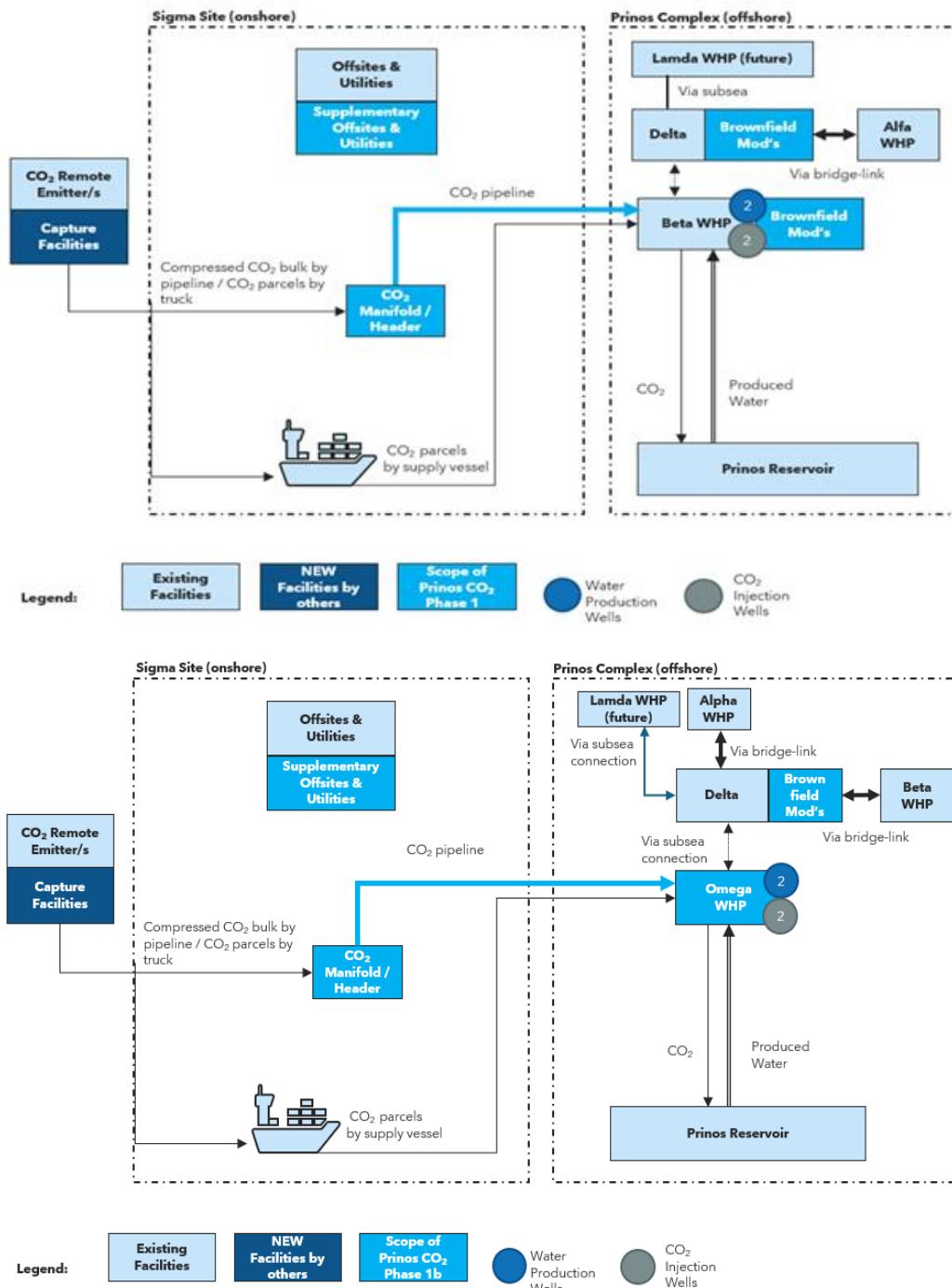


Image 1-2: Schematic Representation of Project Phase 1 and potential proposed amendment

The Project owner (Operator) is **EnEarth Greece Single-Member S.A.** (Address: 32 Kifisis Ave., 151 25 Marousi, Tel.: 2108174200). EnEarth is a Greek corporation whose primary purpose is to develop CO₂ 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 Supplementary Environmental and Social Report (SESR) 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 SESR confirms the applicability of the EBRD ESP 2024 to the project and further assesses critical habitat and priority biodiversity features as well as potential additional social risks and impacts.

1.3 Applicability of EBRD Environmental and Social Policy 2024

As noted above, the SESR confirms that the EBRD ESP 2024 applies to the Prinos CO₂ 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:

- **ESR2: Labour and working conditions**, addressing workforce management, occupational health and safety, and contractor oversight.
- **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 further assessed for relevance, particularly regarding potential impacts on fisheries and local livelihoods.

2 Critical Habitat and Biodiversity Feature Assessment (ESR6)

A Critical Habitat and Priority Biodiversity Feature (PBF) Assessment, as required under EBRD PR6, is being prepared separately based on existing data and submitted as a standalone document.

3 Social Impact Assessment (ESR2, ESR4, ESR10)

3.1 Workforce Expectations

This section presents the expected workforce requirements for the Project Phase 1, during both the construction and operations phases, based on current planning and information available at this stage. It draws on indicative estimates provided by EnEarth and Energean and reflects typical workforce numbers for comparable projects. Final numbers will be confirmed following the award of Engineering, Procurement, and Construction (EPC) / Engineering, Procurement, Construction, and Installation (EPCI) contracts and detailed execution planning.

The overview provides the context for the subsequent assessment of the Project's compliance with EBRD ESR 2, ESR 4, and ESR 10.

The table below provides an overview of expected workforce by activity, indicates whether personnel will be company employees or contractor staff, highlights potential for local workforce participation, and clarifies the status of current estimates.

Table 3-1: Workforce expectations Phase 1

PHASE	ACTIVITY	ESTIMATED WORKFORCE	SOURCE (COMPANY / CONTRACTOR)	LOCAL WORKFORCE (INDICATIVE)	NOTES / COMMENTS
Construction – Wells	Phase I: 4 wells, Phase II: 11 wells	17 local staff (15 onshore, 2 offshore)	Company / Local subcontractors	All	Existing Energean/EnEarth staff and local hires; number may increase if rig contractor agrees to use local personnel.
		120 brought in with rig and Platform Supply Vessel (PSV) crew	Contractor	Minimal (unless agreement reached)	Brought in with the rig; potential to include local personnel if skills and agreements allow.

PHASE	ACTIVITY	ESTIMATED WORKFORCE	SOURCE (COMPANY / CONTRACTOR)	LOCAL WORKFORCE (INDICATIVE)	NOTES / COMMENTS
Construction - Facilities	Onshore plant construction	150–200 (estimate based on similar projects)	EPC contractor	TBD – potential for significant national/local subcontracting	Final number to be confirmed post-tender; EnEarth will encourage EPC to use local/national subcontractors.
	Offshore platform installation (heavy-lift vessel)	75–100 (2 shifts)	EPCI contractors	Limited	Final numbers depend on vessel type and contractor method; expertise likely sourced internationally.
	Hook-up and commissioning	75–100	EPCI contractors	Limited	Likely similar workforce as platform installation; details refined post-tender.
	Pipelay (typically 20 km)	200 onboard vessel incl. management, marine crew, welders, riggers (2 shifts) + 10 onshore logistical support	EPCI contractors	Limited	Crew housed on vessel; onshore support possibly local. Support vessels for survey and supply also expected.
	Shore approach and pre-pipelaying activities	100	EPCI contractors	Moderate	May include local contractors - EPCI contractors will be encouraged to use local and national subcontractors

PHASE	ACTIVITY	ESTIMATED WORKFORCE	SOURCE (COMPANY / CONTRACTOR)	LOCAL WORKFORCE (INDICATIVE)	NOTES / COMMENTS
	Jetty construction and onshore works (subcontracts)	TBD (part of 150–200)	Local subcontractors	Significant	Greek market has strong capacity for this scope (marine facilities, jetties, refineries).
Construction – Project Owner's Team	Project management, supervision, oversight	80–90	Company (EnEarth/Energean)	Mostly local or current staff	Will include current/former Energean staff under matrix support arrangement.
Operations Phase	Operations and maintenance	70–75	Company (EnEarth/Energean) + specialist contractors	Significant local workforce	Includes transition of project staff to operations; specialist contractors as required.

Based on current planning, the total workforce demand is expected to peak during the construction phase, with numbers exceeding 600 in total.

An overall estimate of total workforce during peak construction is summarised as follows:

- Wells: 137 personnel (17 local staff + 120 rig and SPV crew)
- Onshore facilities: 150–200 personnel
- Offshore installation (platform + hook-up): 150–200 personnel
- Pipeline installation and shore approach: 310 personnel (including onboard and onshore support)
- Owner's team (project management): 80–90 personnel
- Estimated peak construction workforce: 600–650 personnel (including company and contractor staff)

During the operations phase, the workforce is expected to stabilise at 70–75 personnel, supported by specialist contractors as needed. A substantial proportion of this workforce will be drawn from existing staff of the Group and personnel based in the local area, reflecting EnEarth's commitment to local employment where skills and capacity are available.

3.2 ESR 2: Labour and Working conditions

3.2.1 Legal and Institutional Framework

The Project will be implemented within a robust national legal framework. The Labour Rights Index (LRI) aims at an active contribution to the Sustainable Development Goals (SDGs), by providing necessary (complementary) insights into de jure provisions on issues covered in particular by SDG 8 (Decent Jobs), SDG 5 (Gender Equality), SDG 10 (Reduced Inequalities) and SDG 16 (Strong Institutions). Greece's LRI overall score in 2024 was 96 out of 100. The overall score for Greece is higher than the regional average observed across Eastern Europe (88). Within the Eastern Europe, the highest score is observed for Greece and Hungary¹.

Key legislative provisions are presented below:

- **Human Resources Policies and Working Relationships:** According to Greek law, companies with more than 70 employees must establish internal employment regulations aligned with labour laws and collective agreements. These regulations must be approved by the local Labour Inspectorate and cover aspects such as working conditions, leave entitlements, disciplinary procedures, and health and safety measures (Law 3850/2010, as amended by Law 5053/2023).
- **Child Labour and Forced Labour:** Employment of individuals under 18 is governed by strict regulations that include limitations on age (prohibited under 15), working hours and conditions (cannot engage in hazardous work or night shifts). Key Legislation includes Law 1837/1989; Law 2956/2001 (amended 4921/2022); Ministerial Decision 1390/1989; Law 2918/2001; Ministerial Decision 130621/2003. Article 22 of the Greek Constitution explicitly bans forced or compulsory labour. Greece has also ratified ILO conventions banning forced labour and enforces labour exploitation laws through the Labour Inspectorate. The framework aligns with EU directives and international human rights obligations, providing criminal penalties for human trafficking and labour exploitation.
- **Non-Discrimination and Equal Opportunity:** Greece has established robust legal protections against discrimination in the workplace, particularly through Law 4443/2016. Discrimination based on race, colour, national or ethnic origin, religion, disability, age, sexual orientation, gender identity, and other characteristics is explicitly prohibited. This includes protections related to hiring practices, working conditions, salaries, promotions, and training. Additionally, Greek legislation requires all employers to submit the ERGANI E4 annual staff list, which includes information on all employees (permanent and seasonal) broken down by location, activity, and gender. This legally mandated record enables monitoring of workforce composition,

¹ <https://labourrightsindex.org/lri-2024-documents/greece.pdf>

including gender balance, and provides the basis for ongoing compliance with national labour regulations.

- **Workers Organizations:** The Greek Constitution recognizes the right to form unions and engage in collective action (Article 23); Law 1876/1990 established the principle of free collective bargaining, allowing unions to negotiate terms directly with employers. Greece has ratified the ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organise (1948) in 1962 and Convention No. 98 on the Right to Organise and Collective Bargaining (1949) in 1962. Greece is also a signatory to the European Social Charter, which reinforces these rights at a broader level. Trade unions in Greece include primary unions, secondary federations and tertiary confederations. The private sector workers are represented by ΓΣΕΕ. There is no national data or monitoring authority or mechanism, but unionization rates are generally estimated to be very low for the Greek private sector (between 10 and 25%).
- **Wages, Benefits and Conditions of Work:** The standard working week is set by law at 40 hours, typically spread over five days, which translates to a maximum of 8 hours per day. A six-day workweek can be implemented, where the total working hours amount to 48 hours per week, with a maximum of 8 hours per day. Compensation for overtime is set at an additional 40% of the regular hourly wage. Rights of employees regarding breaks and rest periods are defined by Greek labour law and aligned with EU directives on transparent and predictable working conditions. Night work is generally defined as any work performed between 10 pm and 6 am, with employees entitled to additional compensation (at least a 25% premium) due to the nature of night shifts. Law 4808/2021 also requires employers to register overtime in the ERGANI system before it is carried out to ensure legality.
- **Violence and Harassment (including gender-based violence and harassment -GBVH):** With regard to violence and harassment in the workplace, Greece has implemented a multi-faceted approach to address workplace violence and harassment with a strong legislative framework, institutional mechanisms, reporting and support mechanisms as well as efforts to raise awareness to promote a culture of zero tolerance and encourage victims to report incidents without fear of retaliation. Violence and harassment in the workplace, including gender-based violence at the workplace, are addressed in Greece through a combination of legislation, institutional mechanisms, and support services. Law 4808/2021-specifically articles 2 to 23-incorporates the International Labour Organization (ILO) Convention 190, adopted by the Conference on June 21, 2019, into Greek law, thereby strengthening protections against violence and harassment in the work environment. The purpose is to promote a general environment of zero tolerance to violence and harassment in order to facilitate the prevention of such behaviours and practices, contributing to the creation of a working environment which respects, promotes and realizes in practice the right of every person to a world of work free of violence or harassment. The protective provisions of the Law cover workers and those employed in the private sector, regardless of their contractual status, including those employed on a project contract, those employed through third party service providers, salaried personnel, as well as persons attending training, including trainees and apprentices, volunteers, people applying for work and workers in the informal economy (art. 3, Law 4808/2021). The Law is also applicable to employees with a private law employment relationship in the public sector,

as defined in article 14 of L.4270/2014 and those employed in the public sector according to the definitions of article 3 par. 2 of L.4808/ 2021.

- **Mechanisms to address Workplace Concerns:** In accordance with Greek labour legislation and in particular Law 4808/2021, all employers, regardless of size, are legally required to adopt internal procedures that allow employees to raise concerns or file complaints related to labour conditions, including violence and harassment in the workplace. These procedures must be accessible, confidential, non-retaliatory, and fair. Article 10 of the Law mandates the establishment of an internal complaint mechanism that enables workers to report incidents of harassment, discrimination, or rights violations either directly to their employer or to designated bodies. Additionally, the Law requires employers to inform and train employees on the existence and use of such mechanisms and to demonstrate due diligence in the handling and resolution of complaints. All complaints must be dealt with in a timely and impartial manner, with documented processes to ensure accountability and legal compliance. Workers also retain the right to submit complaints externally to the Labour Inspectorate (SEPE), which acts as the primary enforcement body for labour law in Greece. Complaints can be submitted anonymously or confidentially, and the Inspectorate is mandated to investigate and mediate disputes or, where necessary, impose sanctions. Additional support services specifically dedicated to violence and harassment in the workplace include both a national helpline and counselling centres and shelters for victims of gender-based violence.
- **Dismissals:** The legal framework in Greece governing dismissals, both individual and collective, is based on a series of laws that define the conditions, procedures, employee rights, and employer obligations. Key provisions include Law 1387/1983 on collective dismissals, which establishes workforce thresholds and dismissal numbers beyond which special procedures for informing and consulting employees and their trade unions are required, and Law 4808/2021 (Article 66), which specifies cases in which dismissal is prohibited, provides protection against abusive or unjustified terminations, and allows for judicial review of such decisions. Termination of employment must be in writing, comply with the prescribed notice periods, and include severance compensation based on length of service, while special protections apply to vulnerable groups such as pregnant women and employee representatives. Employers are also required to notify dismissals electronically through the ERGANI system within specific deadlines. In cases of unlawful or abusive dismissal, employees may appeal to the courts within three months, seeking annulment or additional compensation. Overall, this framework seeks to balance the need for business flexibility with the protection of employees' job security, while ensuring transparency and fairness in dismissal procedures.
- **Workforce Data Protection:** The legal framework for data protection of workforce records in Greece is primarily governed by Law 4624/2019, which implements the EU General Data Protection Regulation (GDPR) and incorporates EU Directive 2016/680. Employers are required to inform employees clearly about the purpose of collecting and processing their personal data and their right to withdraw consent. Processing of employee data must be necessary for employment relations, such as recruitment, contract performance, legal obligations, social security, and labour law compliance. Special categories of personal data (e.g., health data) may

be processed if essential for employment purposes, with explicit consent or based on collective labour agreements.

- **Workforce accommodation:** Greek legislation relevant to worker accommodation encompasses both occupational health and safety (OHS) requirements and general housing regulations. Greek labour and OHS regulations mandate that employers provide adequate and suitable accommodation and sanitation facilities that respect the specific needs of their workforce. While there is no single law dedicated solely to separate sanitation or accommodation for female workers, these requirements stem from a combination of occupational health and safety standards, gender equality mandates, and broader labour protections aligned with EU directives. Employers are obligated to ensure that facilities (including restrooms, changing areas, and living accommodations) are appropriate, safe, and segregated by gender where necessary to protect privacy, health, and dignity. This includes providing separate sanitation facilities for women in both workplace and accommodation settings. These requirements are reinforced by legal provisions prohibiting discrimination and mandating equal treatment in labour conditions, such as Law 4808/2021 which ILO conventions on labour rights and anti-harassment measures. Enforcement of these provisions is carried out through the Greek Labour Inspectorate and relevant health and safety authorities, with non-compliance subject to administrative sanctions. Additionally, regulations on short-term rentals expected to be effective 1 October 2025, establish mandatory standards for properties offered for temporary lodging. These include requirements for civil liability insurance, fire safety equipment, adequate ventilation and natural lighting, air conditioning, and other measures to ensure safe and decent living conditions. While no standalone law specifically governs worker accommodation, these regulations directly affect the quality of housing available to transient and temporary workers, including those engaged by the Project.

3.2.2 Corporate Policies and Management Systems

EnEarth, as the Project Owner and Operator, applies the established policies, culture, and management systems of the Energean Group. Aligned with PR2, labour and working conditions for the Project are governed by an Environmental and Social Management System (ESMS), which EnEarth is establishing by adopting and tailoring the existing Energean Group ESMS. As a newly introduced operator, EnEarth is phasing in its own system; until fully operational, the Energean ESMS provides the governing framework, supported by a documented transition plan, capacity-building, and management review milestones. This framework applies to both employees and contractors.

Key elements of the corporate framework include:

- **Human resources policies**, including the Code of Conduct (applicable to the Board of Directors, every full or part-time employee, Energean's affiliated companies and controlled joint ventures; The Code is also applicable to all third-party contractors, agencies or consultants who act as agents or work on behalf of Energean.), Disciplinary Policy and Procedures, and Hybrid Work Policy, set out clear standards of behaviour, employment practices, and working arrangements.

- The **Human Rights Policy and Modern Slavery Statement** explicitly prohibit child labour, forced labour, and exploitative practices.
- The **Diversity, Equity and Inclusion Policy and the Equal Opportunities Policy** promote non-discrimination, equal opportunity, and inclusion in recruitment, promotion, and workplace culture. EnEarth fully implements these group-wide policies related to gender equality, diversity, and inclusion. The Group's commitment is reflected in its' workforce composition and progress: as of 2024, it has 610 employees, 140 of whom are women (23%), up from 15% in 2021. In 2024, the gender pay gap at median hourly wage rates stands at 18% in favour of female employees. At the Board level, the Nomination and Governance Committee ensures diversity is a core consideration in appointments to ensure balanced and representative leadership. Regarding workers who are not nationals of the country, they can be employed in line with legal provisions. The same employment contract terms apply, which are based on the relevant collective agreement. Workers who are not nationals of the country are identified through the recruitment process where government issued documents must be presented.
- Employment contracts follow the **National General Collective Labour Agreement** (Εθνική Γενική Συλλογική Σύμβαση Εργασίας - ΕΓΣΣΕ), that has been signed by major employer organizations, including the Hellenic Federation of Enterprises (ΣΕΒ), the General Confederation of Professionals, Craftsmen and Merchants of Greece (ΓΣΕΒΕΕ), and the General Confederation of Greek Workers (ΓΣΕΕ) and is considered to enhance workers' rights. Trade unions in Greece include primary unions, secondary federations and tertiary confederations. The private sector workers are represented by ΓΣΕΕ. The organization does not have data on the unionisation rate of employees. There are no national data or monitoring authority or mechanism, but rates are generally estimated to be very low for the private sector (between 10 and 25%).
- Policies addressing **workplace violence and harassment, including GBVH**, are well established, with a dedicated procedure for risk assessment, a Harassment and Bullying Policy, and a Non-retaliation Policy ensuring that individuals who report incidents are protected.
- A system of **grievance and reporting mechanisms** is also in place, including a Grievance Procedure Policy, a formal Workers Grievance Mechanism, an **Open Door Policy** to encourage informal communication, and a Whistleblowing Policy and procedures that provide confidential channels to report misconduct.
- The Disciplinary Policy and Code of Conduct further define **lawful and fair processes for dismissal**, ensuring compliance with national legislation. The Disciplinary also sets out the process in place to appeal against any disciplinary action, including dismissal.
- Workforce-related records are safeguarded under a robust **data protection framework** through a Data Privacy Policy, Data Retention Policy, and Data Privacy Notice, in compliance with EU and national legislation (e.g. GDPR).
- With regard to **Supply Chain Management**, Group's corporate procurement framework is governed by a comprehensive Group Procurement Policy, a detailed Procurement Process Manual and External Audit Tender Policy. These documents establish clear principles and structured procedures to ensure transparent, fair, and effective procurement activities across all Group entities. The primary objective is to obtain best value for money while managing risks and ensuring compliance with legal, environmental, social, and ethical standards.

The Group employs a systematic supply chain management approach integrating multiple layers of oversight and control. This includes rigorous vendor registration and qualification processes to ensure that all suppliers meet stringent technical, financial, legal, compliance, health, safety, and environmental criteria. All prospective vendors undergo due diligence, including review of certificates, corporate governance, and social responsibility policies, with involvement from functions such as Compliance, Legal, and Health, Safety and Environment (HSE). Annual vendor performance evaluations are conducted to monitor delivery quality, compliance with contractual obligations, and adherence to Environmental, Social, Governance (ESG) and labour standards, with the possibility of excluding underperforming vendors from future procurement.

Procurement planning is synchronized with organizational budgeting, ensuring strategic alignment and demand visibility. Various procurement methods are deployed based on the complexity and value of purchases, including formal competitive tenders (RFP/RFQ), direct awards with necessary justifications, and urgent purchase protocols when required. The Procurement Process mandates segregation of duties, authorization matrices, and well-defined roles to avoid conflicts of interest and preserve the integrity of procurement decisions.

Critically, the policy includes explicit commitments to socially responsible procurement, requiring vendors and supply chains to comply with relevant labour rights, health and safety regulations, and environmental protection standards. The Contracts and Procurement Function actively monitor contract execution, contractor performance, and compliance with social and ethical standards throughout the vendor relationship lifecycle, from contract establishment to closeout.

This robust policy framework and operational system provide Energean Group with effective oversight of labour rights and ethical practices within its supply chain, supporting sustainable business practices and minimizing risks associated with labour violations or unethical vendor conduct.

Together, these policies and the phased ESMS implementation create a strong internal governance framework that supports legal compliance, mitigates risks, and promotes a safe, inclusive, and rights-respecting work environment.

3.2.3 Project-Specific Workforce Arrangements

The Project's workforce strategy is designed to comply with Greek labour legislation and apply the Group's corporate policies, while also addressing the specific operational requirements of both the construction and operations phases. Although workforce planning will be further refined as tendering progresses, current estimates and arrangements already provide a basis for assessing how the principles of ESR 2 will be applied in practice to ensure fair labour and working conditions

Workforce Composition and Phasing

As detailed in Section 3.1, the workforce needs will vary significantly across the different project phases:

- **Construction Phase:** Total workforce demand is expected to peak at approximately 600–650 personnel, combining onshore and offshore activities. This includes approximately 17 local staff and 120 rig and PSV crew members for wells, 150–200 onshore construction workers for facilities, 75–100 offshore platform installation crew, and 200 personnel for pipelaying

activities. A portion of these roles will be covered by specialised international contractors, particularly for offshore and pipelaying operations where local expertise is limited.

The Owner's team is expected to include approximately 80–90 staff directly assigned to the project during the construction phase, supported as needed by additional Energean personnel from other departments or functions to provide specialised expertise and resources.

Following the completion of well construction, no retrenchment is expected for EnEarth employees. The 17 local staff engaged for well construction will return to their positions within the wider Asset workforce once their support for the wells is no longer required. EPC and EPCI contractor personnel, who are employed by their respective contractors, will be de-mobilized, in line with standard project practices. For the EnEarth owner's team, some staff will transition to the Operations phase, while others may be redeployed within EnEarth to new projects or ongoing operations. Overall, workforce planning ensures continuity and internal reassignment where possible, while external contractor staff conclude their engagement without any retrenchment implications for EnEarth.

- **Operations Phase:** Workforce requirements will decrease substantially, with approximately 70–75 personnel needed for ongoing operations. This will include permanent project staff, supported as necessary by specialist contractors.

Local Employment and Workforce Sourcing

EnEarth's workforce and procurement strategy is fully aligned with the Energean Group's Procurement Policy, which promotes local content, local employment, and engagement with communities in areas affected by operations. The Policy sets expectations for suppliers and contractors to maximise local procurement and workforce participation and encourages them to establish partnerships that generate local employment and business opportunities. Reflecting this approach, EnEarth aims to make the greatest possible use of local workforce and subcontractors, particularly for onshore activities and support services.

During well construction, approximately 17 local personnel (15 onshore and 2 offshore) are expected to be engaged. Although no agreement currently exists with the rig contractor to integrate local staff into rig operations, opportunities may arise depending on contractor willingness and the availability of suitably skilled workers. For the construction of onshore facilities and jetty infrastructure, EPC contractors will be encouraged to subcontract locally, leveraging Greece's strong expertise in marine construction, civil works, and logistics. While national capacity in large-scale offshore oil and gas operations remains limited, local contractors are expected to provide ancillary services such as diving, catering, and logistics support, thereby strengthening local economic linkages and reinforcing the Project's contribution to sustainable local development.

Recruitment, Gender Inclusion, and Non-Discrimination

Recruitment and workforce management for the Project will adhere strictly to the Greek regulatory framework and the Group's policies on equal opportunity and non-discrimination, ensuring that all personnel under EnEarth's direct management are selected and evaluated solely based on merit and qualifications.

According to available studies, only 3% of offshore oil and gas sector's workforce is women² and female participation in maritime and seafaring roles remains very low globally, with women representing only about 1.2% of the seafarer workforce worldwide in 2021 according to the International Maritime Organization (IMO)³. In all cases, EPC and EPCI contractors will be required to provide gender-sensitive recruitment data, with EPC contractors adhering to their internal ESG standards, which may include specific gender ratio targets. EPCI contractors will be asked to estimate the proportion of female workers and to ensure the provision of appropriate facilities to meet gender-specific needs. For offshore positions on rigs and PSV staffed by EPCI contractors, no permanent female personnel are currently planned; however, EnEarth will mandate suitable facilities for all workers, including legally mandated separate sanitation and accommodation amenities for female personnel.

Gender inclusion extends beyond recruitment to ongoing workforce monitoring. Data collected via the ERGANI E4 system, complemented by internal reporting, will enable detailed tracking of workforce composition by gender, job activity, and contractual status. This comprehensive monitoring will support compliance oversight and facilitates early identification of potential gender-related barriers or imbalances.

Accommodation Arrangements (Onshore and Offshore)

Accommodation strategies are expected to vary by activity and workforce group:

- **Wells:** During well construction, the 17 individuals identified will reside within the local community of Kavala, where they currently live and arrange their own accommodations privately. For the rig and PSV crew, prior to crew changes, the personnel typically stay overnight in a community hotel arranged by the contractor. EnEarth will coordinate transportation from the airport to the hotel as necessary.
- **Facilities Construction:** the EPC contractor is responsible for staff accommodation, which may include establishing temporary accommodation camps for Jetty and Onshore works. Offshore works will be supported by dedicated vessels providing accommodation and catering for continuous 24-hour operations.
- **Owner's Team:** The Owner's team will stay in local hotels for short-term visits or rent temporary accommodation in Kavala for longer durations. A proportion of the team is local and will continue to reside in their own homes within Kavala, as is currently the practice.

Kavala's housing market is affordable and diverse, offering hotels, short-term rentals, and apartments that can accommodate both local and temporary Project personnel. Costs for housing, utilities, and daily expenses are moderate, allowing workers to secure suitable accommodation without creating pressure on

² <https://www.utmconsultants.com/the-push-for-a-more-diverse-offshore-sector/>

³ <https://www.imo.org/en/ourwork/technicalcooperation/pages/womeninmaritime.aspx>

local housing affordability. Overall, the availability, accessibility, and diversity of accommodation options support responsible workforce management and minimize potential social impacts

Worker Grievance Management Mechanisms

EnEarth has established a Workers' Grievance Management Procedure consistent with national legal requirements and ESR 2 standards. The mechanism is designed to be accessible, confidential, non-retaliatory, and fair, enabling workers (including contractors' staff) to raise concerns or complaints related to labour conditions, discrimination, or harassment. All complaints are required to be addressed promptly and impartially, with documented processes in place to ensure accountability. Workers also retain the right to access external remedies, including submission of complaints to the Labour Inspectorate.

3.3 ESR4: Health, Safety, and Security

3.3.1 Legal and Institutional Framework

General OHS Framework

The Greek legislation on Occupational Health and Safety (OHS) is fully harmonized with the corresponding EU regulations through the incorporation of both Framework Directive 89/391/EEC and specific directives derived from it. The core of the relevant legislative framework in Greece, which includes numerous individual laws (particularly in the form of presidential decrees) addressing general and specific occupational risks or workplaces, is the Code of Laws for Health and Safety at Work Law 3850/2010 as amended by L. 5053/2023 which introduced updates to Health and Safety (H&S) regulations such as additional requirements for risk assessments and prevention strategies and stricter penalties for non-compliance. This code establishes the legal principle of the employer's exclusive responsibility (employer responsibility for ensuring the health and safety of workers and third parties in all aspects of work) and outlines the basic requirements for employers and employees, as well as related institutions providing protection and prevention services. The law mandates written risk assessments, provision of appropriate personal protective equipment, engagement of safety technicians and occupational physicians, H&S Committee for Employees, etc. and preventive and emergency preparedness measures.

It should be noted that the provisions of the aforementioned Code and generally the provisions regarding the health and safety of workers apply, unless otherwise specified (e.g., specific rules for maritime and offshore works subject to additional regulatory frameworks), to all businesses, operations, and activities in both the private and public sectors, covering all employees employed by an employer under any employment relationship, including trainees and apprentices.

According to the provisions of the Law, employers are obligated to ensure the health and safety of employees concerning all aspects of work and to take measures that ensure the health and safety of third parties (principle of employer responsibility). They must utilize the services of a safety technician and an occupational physician (enterprises, with more than 50 employees or those exposed to specific occupational hazards), provide appropriate personal protective equipment, and in any case, must have a written

assessment of existing workplace risks to H&S, including those concerning groups of workers exposed to specific risks.

Key articles include:

- Art. 37 that outlines the general obligations of employers regarding the health and safety of their employees and requires employers to take all necessary measures to ensure a safe working environment, including risk assessments, preventive actions, and the provision of information and training to employees;
- Art. 38 that among others, requires employers to take measures to avoid or minimize the exposure of employees to hazards, as far as is practically possible, to provide protective equipment, to monitor the concentration or intensity of hazards in the workplace at regular intervals, to conduct regular checks and maintenance of equipment, devices, or systems, to foresee and take specific urgent measures for cases of emergencies, to install warning and safety signage and to maintain records of the results of checks conducted;
- Art. 42 that focuses on the employer's responsibilities to ensure the health and safety of employees and third parties within the workplace;
- Art. 45 on first aid, fire safety, evacuation of premises by workers, serious and immediate danger that requires among others having trained personnel available to provide immediate assistance in case of injury or health emergencies, the implement fire safety measures, which include the installation of fire alarms, extinguishers, and other necessary equipment to prevent and respond to fire hazards as well as the development and communication of clear evacuation procedures to all employees.

Complementing this legislative framework, PD 305/1996, mandates a Health and Safety Plan (HSP- ΣΑΥ) and Health and Safety File (HSF- ΦΑΥ) in specific cases during the execution of technical works in Greece as well as in cases where the work to be carried out poses particular risks to the safety and health of workers.

The HSP specifies the rules applicable to the worksite, taking account of the activities at the site and other issues (e.g. determination of storage areas, arrangement of the sanitary amenities, etc.) and includes the measures to be taken in any specific project, as well as any other prerequisite to be applied at the worksite, to improve working conditions and to avoid work accidents and occupational diseases. The HSF should update and aggregate all the elements of the HSP, to reflect how activities will be implemented. It includes data on occupational H&S matters to be considered such as maintenance, conversions, cleaning works, etc. and refers to the safe execution of various tasks, the risk avoidance from using the public utilities (water, electricity, gas, steam, etc.), fire safety, etc.

Enforcement of OHS legislation is conducted by the competent Labour Inspectorates, empowered to inspect workplaces, monitor compliance, and impose penalties for violations.

Specialized Maritime and Offshore OHS Regulation

Offshore CO₂ storage operations in Greece are implemented within a robust OHS framework, adapted from existing offshore oil and gas regulations. While there is no legislation exclusively for CO₂ storage, offshore works are subject to specific regulatory regimes addressing the unique risks of marine environments. The Hellenic Hydrocarbons and Energy Resources Management Company (HEREMA) is the competent authority overseeing safety in offshore activities, including platform operations, vessels, and subsea infrastructure.

HEREMA is also responsible for assessing major hazard reports and ensuring compliance with safety standards through inspections and enforcement actions.

Under Law 4409/2016, which transposed EU Directive 2013/30/EU (Offshore Safety Directive), minimum safety requirements are established for offshore hydrocarbon operations, focusing on preventing major accidents and limiting their consequences. Licensing and concessions require demonstration of compliance with these standards. For CO₂ storage, these requirements provide a strong basis for project safety, complemented by project-specific risk assessments and environmental impact studies in line with Greek law and international best practice.

The national offshore safety readiness initiative, “Philippos 2025”, conducted in the Kavala Gulf, demonstrated coordinated emergency preparedness involving HEREMA, the Hellenic Coast Guard, Port Authority, and international agencies such as the European Maritime Safety Agency (EMSA). Key elements of the regulatory framework include:

- Emergency response protocols,
- Marine pollution prevention,
- OHS on offshore platforms and vessels,
- Environmental protection measures.

3.3.2 Corporate Policies and Management Systems

Community Health, Safety, and Security are managed through Enearth’s integrated HSE and Security Management Systems, which are being adopted from the Energean Group and implemented project-wide to ensure consistent oversight and risk management across all operations.

Energean has in place a comprehensive HSE governance framework that aligns with international standards as well as Greek and EU legal requirements. Key elements include:

- HSE and Social Responsibility Policy: Sets corporate values and expectations related to health, safety, environment, and sustainable development.
- Corporate Major Accident Prevention Policy (CMAPP): Approved by the Board, this policy addresses the identification, management, and minimization of major hazards, aiming for ALARP (As Low As Reasonably Practicable) risk levels.
- Contractor HSE Policy: Contractors are required to adhere to the Group’s HSE standards, legal obligations, and international best practices. Their safety performance is monitored via KPIs, audits, and compliance checks.
- H&S Management System: The Group uses a structured H&S Management System (Plan-Do-Assess-Adjust cycle), with tiered documentation (policies, standards, procedures, method statements, etc.).
- Training, Medical Fitness, Health Monitoring: All employees and contractors hold medical fitness certificates suitable to their roles; there is a programme of regular health monitoring and training.

- Stop-Work / Hazard Reporting Policy: Energean has a “stop work” policy that empowers any worker (employee or contractor) to halt activities without penalty if they believe a safety risk exists.

Energean tracks and reports on H&S performance via leading and lagging indicators, including:

- Lost Time Injury Frequency (LTIF), Total Recordable Injury Rate (TRIR), Fatal Accident Rate (FAR) for employee and contractor work hours.
- Number of safety observations, audits, walk-throughs, drills and exercises.
- Incident and near-miss reporting and investigation.

These policies and systems are designed to apply to all operations, including contractor-managed works, offshore and onshore settings, and extend across all employment types (employees, contractors, partners).

Although no standalone community H&S policy could be found, EnEarth is expected to leverage Energean’s demonstrated corporate experience in implementing Community H&S commitments through project-specific management plans and integrated operational procedures in line with applicable regulatory requirements and international best practice. Energean’s Community H&S framework aims to identify, prevent, and mitigate potential risks and impacts to local communities that may arise from its activities, including those associated with offshore operations, construction works, traffic movements, exclusion zones, emissions, and emergency scenarios. Key components of this approach include:

- Establishing clear roles, responsibilities, and procedures for Community H&S
- Implementing proactive mitigation measures such as controlled access to work areas, vessel traffic management, scheduling activities to respect sensitive community periods, and noise and nuisance reduction measures.
- Maintaining effective stakeholder engagement and grievance mechanisms to ensure that community concerns are promptly addressed and incorporated into ongoing risk management.
- Continuous monitoring of KPIs, including security incidents, social grievances, and public health data, with findings used to inform adaptive management.
- Close collaboration with competent authorities and emergency services to enhance preparedness and ensure coordinated response in the event of incidents.
- Embedding robust emergency preparedness and response procedures and “Stop Work” policies to ensure immediate action in the event of unsafe conditions.
- These measures are supported by Energean’s corporate governance framework, including oversight from the Environment, Safety & Social Responsibility Committee.

Energean also maintains a comprehensive Security Management System (SMS) as a corporate framework that integrates company-wide security policies and procedures to manage security risks effectively. The SMS includes site-specific plans such as the Kavala Security Plan, which outlines physical and procedural security controls to protect onshore facilities, personnel, and critical assets. The company’s port facility complies fully with the International Ship and Port Facility Security (ISPS) Code, supported by dedicated security assessments and plans. Key elements of the SMS include incident reporting, audits, training, and drills to ensure effective implementation.

Recognizing risks related to the use of private security personnel, Energean implements robust mitigation measures including thorough vetting, mandatory training on human rights and proportional use of force

aligned with EBRD ESR4, clear conduct protocols, grievance mechanisms, and regular oversight audits. These measures aim to prevent excessive force, ensure respectful community interactions, and uphold accountability. It is worth noting the Greek legal framework governing private security services established by Law 2518/1997, explicitly prohibits employees of private security firms from carrying or owning firearms, as stated in Article 5 of the law.

3.3.3 Project specific measures

The Project operates within a comprehensive and robust legal and institutional framework, ensuring compliance with all applicable regulations. These legal requirements are reinforced by Energean Group's corporate policies and standards. In addition, the Project implements tailored, project-specific measures to address occupational and community health, safety, and security considerations effectively.

The Project is expected to develop a HSP- ΣΑΥ and HSF in compliance with national legislation. These documents will set out the H&S framework applicable during construction, including hazard identification, preventive measures, roles and responsibilities, and emergency response arrangements. The documents cover among others, OHS risk identification and planning, contractor oversight, emergency preparedness and communication of safety-related information.

A comprehensive Environmental and Social Impact Assessment (ESIA) has been undertaken for Phase 1, identifying potential environmental and social risks, impacts, and mitigation measures across all phases of the project (Phase 1) and forming the basis for regulatory permitting. In parallel, a Quantitative Risk Assessment (QRA) has been carried out to evaluate hazards associated with CO₂ injection, storage integrity, and related operational scenarios. These analyses inform the project's risk management strategy and align with international best practice for CCS operations.

The Project also incorporates advanced monitoring strategies, including seismic imaging and geophysical methods, to track subsurface CO₂ movement, verify storage integrity, and enable early detection of any anomalies. Monitoring is integrated into both regulatory oversight and operational management systems to ensure that performance data directly informs decision-making and adaptive management.

Community H&S will be managed through EnEarth's relevant Management Systems, which it adopts from the Energean Group. This includes incorporation of ISPS-aligned controls where applicable.

Emergency Preparedness and Response will be embedded through documented procedures, regular drills, coordination with relevant authorities, community notifications (e.g., NAVTEX/NOTAM when relevant), incident reporting, and clear escalation protocols.

At the project level, the SMS provides structured guidance for implementing consistent security policies, site-specific procedures, incident reporting, and emergency preparedness measures. The Project establishes marine safety exclusion zones around offshore facilities, enforces vessel traffic management plans to minimize navigational risks and fisheries interactions, and implements noise and nuisance controls during construction and operation phases. Where private security personnel are used, strict vetting, targeted training, proportional use-of-force policies, and monitoring will be enforced in line with EBRD ESR4 requirements.

These community health, safety, and security measures are integrated with the Project's grievance mechanisms and will be periodically reviewed and updated at key milestones to ensure continued effectiveness throughout the Project lifecycle.

3.4 ESR10: Stakeholder Engagement

An updated Stakeholder Engagement Plan (SEP) Assessment, including a project-specific Community Grievance Management Mechanism as required under EBRD ESR10, has been submitted as a standalone document.

Screening and Engagement of Vulnerable Groups

In line with EBRD ESR10, EnEarth recognises the importance of identifying and engaging vulnerable groups to ensure that stakeholder participation is inclusive, equitable, and responsive to differentiated needs and potential impacts. For the purposes of the Project, vulnerable groups are defined as individuals or groups who, due to their age, gender, physical or mental condition, economic status, or other circumstances, may be more adversely affected by Project activities or may have more limited capacity to access information, express their views, or participate in decision-making processes. Indicative groups considered include people living below the poverty line, single-parent households, families with members with disabilities, elderly persons, and children.

The methodology used to screen for the presence of vulnerable groups combines desk-based review, site-based verification, and stakeholder engagement. Specifically, the approach includes:

- **Desktop review of demographic and socio-economic data:** Analysis of publicly available socio-economic and demographic data to identify the potential presence and distribution of vulnerable populations in the Project area of influence.
- **Site visits and field observations:** Periodic visits to the Project area and adjacent areas to confirm the presence of community infrastructure (e.g. schools, elderly care facilities, social housing) and to observe any potential proximity of vulnerable groups to Project activities.
- **Consultation with local authorities and other relevant organisations:** Engagement with municipal authorities and community organisations to validate the presence of potentially vulnerable groups and understand their specific needs or concerns.
- **Feedback from stakeholder engagement:** Information gathered through the ongoing stakeholder engagement process, including formal consultations and informal discussions, to identify previously unrecognised vulnerable individuals or groups and emerging issues.

A significant factor supporting this screening process is the long-standing presence of Energean in the Kavala region, where it has maintained operations for decades. This long-term presence has fostered close relationships with local authorities, institutions, and community representatives, providing EnEarth with a deep understanding of local socio-economic conditions and community dynamics.

At the current stage of the Project, no vulnerable groups have been identified as being disproportionately affected. This reflects the nature and location of the Project's activities:

- The core project infrastructure and operations are offshore, substantially reducing direct exposure or risk to coastal or inland populations.
- Onshore works are confined to existing industrial areas and port facilities, where public access is already restricted and where no residential or socially sensitive uses are present in the immediate vicinity.
- Engagement activities to date, including public meetings, presentations, press releases, and online publications, have reached the general community effectively and have not highlighted specific concerns from vulnerable groups.

Nevertheless, EnEarth remains committed to ensuring that engagement remains accessible and inclusive. Particular attention is given to enabling participation by people with disabilities or other access barriers. Measures include:

- Ensuring that venues for meetings and presentations are physically accessible.
- Providing project information in accessible formats (e.g. large print, plain language summaries) upon request.
- Exploring the use of digital channels and remote participation options to facilitate access for those with mobility constraints.
- Continuing coordination with local community actors to disseminate information through established networks and reach individuals who may not access mainstream communication channels.

EnEarth also facilitates multiple accessible grievance channels that stakeholders can use to raise concerns or provide feedback: mail, post, online platforms, telephone, and in-person submissions.

The Community Liaison Officer (CLO) will play a key role in facilitating inclusive and effective community engagement, with particular attention to vulnerable groups, leveraging established relationships and local knowledge to support the ongoing screening methodology.

The screening process will remain iterative throughout the Project lifecycle. Should future phases introduce new activities or identify new groups that could be disproportionately affected, EnEarth will adapt its SEP accordingly, including the development of targeted communication and mitigation measures to ensure that all stakeholders can meaningfully participate in the Project's engagement process.

4 Assessment of Applicability of ESR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

According to available information, the entire area of the Kavala Gulf is considered a fishing ground, especially for species such as anchovy and sardine. The quantities of bivalve molluscs (mussels, oysters), crustaceans (shrimps, crayfish, crabs), and pelagic fish (sardine, anchovy, bogue, amberjack, tuna) are particularly abundant. However, it is important to note that there are designated exclusion zones and seasonal restrictions in the area.

In Greece, exclusion zones such as fisheries restriction and anchoring prohibition areas are established by national and local authorities under regulatory frameworks related to navigation safety and marine environmental protection. Key responsible bodies include the Ministry of Maritime Affairs and Insular Policy, which regulates navigational rules and vessel safety; local Port Authorities, which define site-specific exclusion zones within port areas to ensure operational efficiency and safety; and legislative instruments including Ministerial Decisions and European Union regulations that provide the legal basis for prohibitions in sensitive or critical marine areas.

The criteria for defining exclusion zones balance safety considerations, environmental protection, and navigational management, with emphasis on protecting sensitive marine ecosystems, preventing pollution, reducing accident risks, and managing fisheries resources sustainably.

Key fishing prohibitions in the jurisdiction area of the Port Authority of Kavala, cover limits on fishing within specific distances from the coast, prohibited use of certain fishing gear (e.g., mechanized trawling in parts of the gulf) and bans on fishing in zones with marine vegetation like *Posidonia oceanica*, to protect marine ecosystems and ensure sustainable fishing practices in the Kavala Gulf region. A list of official prohibitions is listed below⁴:

- Fishing with any kind of static fishing gear (nets, traps, longlines) is prohibited annually from June 15 to September 15 within 300 meters from the coast.
- Entry of any person, vessel, submarine, or floating craft is prohibited in the safety maritime zone around offshore platforms and submarine pipelines within 500 meters year-round.
- Fishing is prohibited above seabeds with marine vegetation, especially *Posidonia oceanica* and other marine phanerogams.

⁴ <https://alieia.hcg.gr/prohibitions/local/KABALA.php>

- Trawling is forbidden within 2 nautical miles from the coast of Thrace and Eastern Macedonia from March to November every year.
- Mechanized trawl fishing is prohibited in the Kavala Gulf (specific delimitation lines) from April to October annually.
- Mechanized trawl fishing is banned within 3 nautical miles from the estuaries of Nestos and Strymonas rivers.
- Amateur fishing from shore with rod, line, or nets is prohibited in specific harbor zones of Thasos and Keramoti during certain periods.
- Various restrictions apply to drag nets and similar fishing gear within the first depth contour lines (20-30 meters) in the marine areas of Keramoti, Eastern Thasos, Northwestern Thasos, and Strymonikos Gulf.
- Fry, spearfishing, and operation of fishing boats have specific spatial and temporal restrictions.
- Fishing from shore and above vessels with any fishing gear is prohibited within the central port zone of Kavala; amateur fishing with rod and line is permitted in certain limited areas and times.

With regard to the Prinos complex, the existing zone subject to specific restrictions related to fishing and/or vessel anchoring and/or passage that is estimated to cover an area of 49.54 Km². The new facilities fall almost exclusively within the said restriction zone area.

The estimation of the potential additional exclusion zone related to the project Phase 1, reflects a larger than the actual buffer zone around the Omega platform, based on the potential positioning area of the Omega platform, rather than a single central point. Therefore, in a "worst-case scenario", assuming that the newly proposed additional restriction zone is 500m from the potential location of the Omega Platform and 500m on either side of the new pipeline (that largely overlaps with the existing restriction zone), the overall maximum restricted zone would represent a modest expansion from 49.54 km² to 54.00 km² (about 9% increase of restricted areas in total). This increase is approximately 0.97% of the total Gulf of Kavala area (recorded about 461 km²)⁵. The final exclusion area is expected to be even smaller, as the final actual position of the Omega platform will lead to a more limited exclusion zone. As can be seen from the map below, much of the proposed area overlaps with existing restrictions associated with hydrocarbon activities at Prinos, so any incremental change in fishing access is expected to remain minimal.

⁵ Sylaios, G., Kamidis, N. & Stamatis, N. (2012). Assessment of Trace Metals Contamination in the Suspended Matter and Sediments of a Semi-enclosed Mediterranean Gulf. *Soil and Sediment Contamination: An International Journal*, 21(6), 673-700. doi:10.1080/15320383.2012.691128

The figure below shows both the existing zone where restrictions on fishing, vessel anchoring, or navigation apply and the precautionarily estimated new zone.

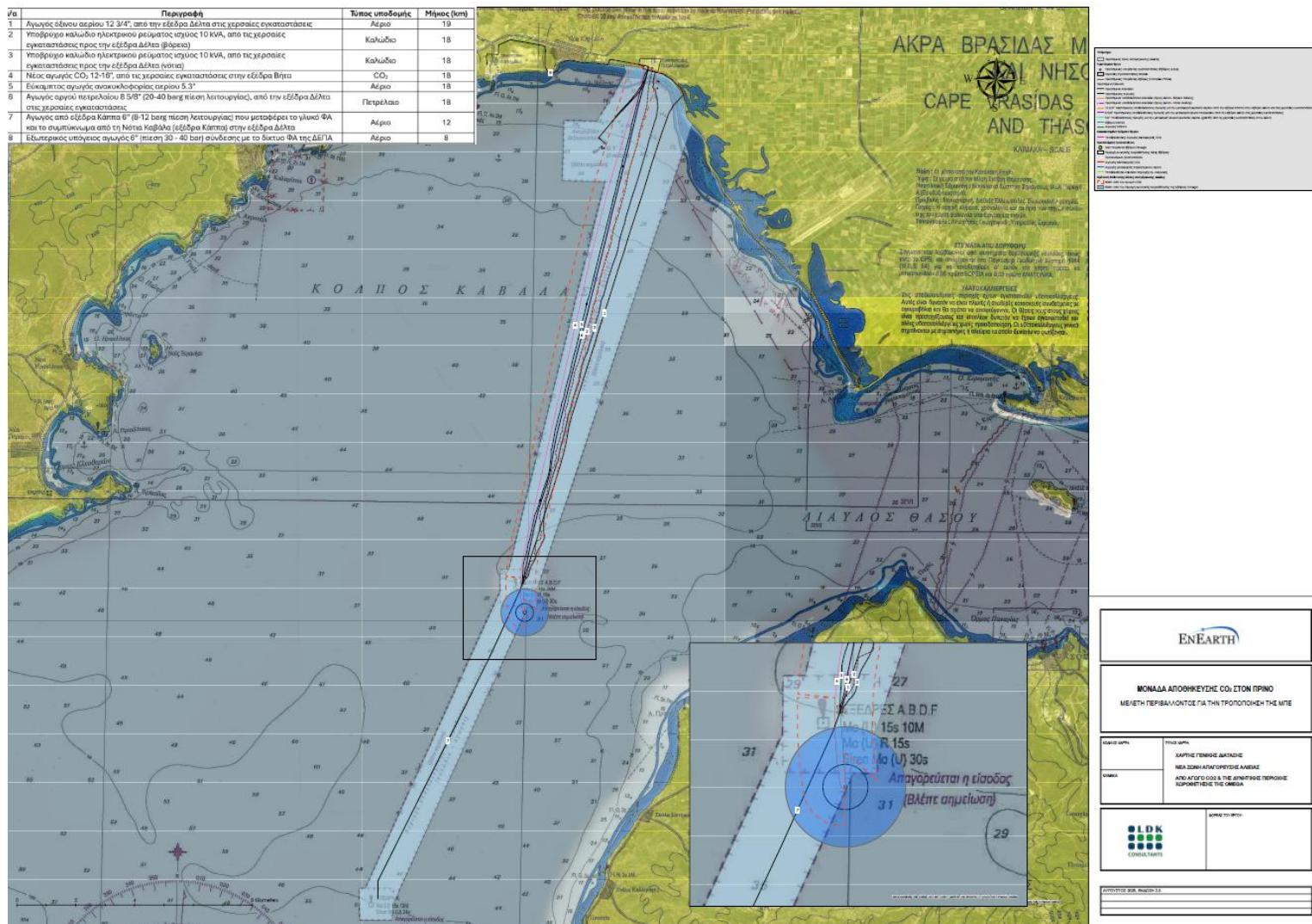


Image 4-1: Existing and new zone subject to specific restrictions related to fishing and/or vessel anchoring and/or passage

The map illustrates the spatial distribution of fishing activity in the wider Kavala Gulf, highlighting both existing and cautiously estimated new exclusion zones associated with the Project. It provides a visual indication of how much of the marine area remains accessible to fishing and supports the assessment that the Project will have negligible effects on fishing activities and livelihoods.

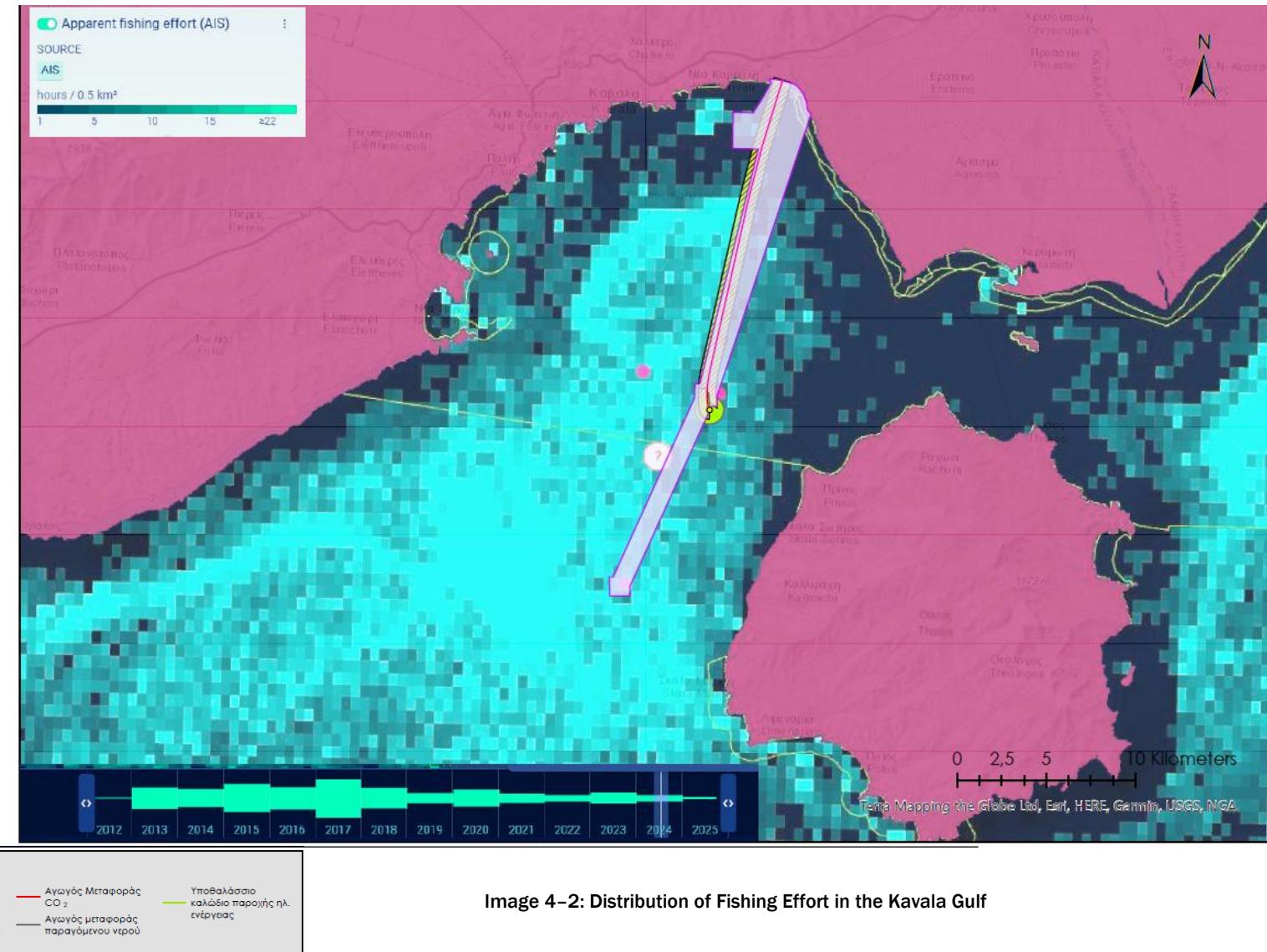


Image 4-2: Distribution of Fishing Effort in the Kavala Gulf

The distribution of fishing effort clearly illustrates that extensive fishing grounds remain fully accessible across the wider gulf, particularly in pelagic, and offshore areas. Combined with seasonal prohibitions already in place and the expected smaller final exclusion footprint once the Omega platform's position is finalised, any incremental change in fishing access is negligible.

As a result, no significant effects on fishing activities or local livelihoods are anticipated during construction or operation of Phase 1. The Project does not trigger EBRD ESR 5 on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement, as there are no involuntary resettlement and no material restriction on resource use.

A Fisheries Liaison Officer (FLO) has been appointed as the primary liaison with local fishing communities to facilitate ongoing communication and address fisheries-related concerns. Engagement activities with fisheries stakeholders have already taken place and will be continuous to ensure that any emerging concerns are promptly addressed, promoting sustainable coexistence of Project operations and fishing activities.

5 Social Risks Identification and Management

5.1 ESR2: Labour and Working Conditions

5.1.1 Workforce Planning, Labour Conditions and Contractor Oversight

The assessment of ESR2 confirms that the Project is being developed within a robust legal and institutional framework that provides comprehensive protections for labour and working conditions, fully aligned with EU directives and ILO conventions. Greek labour law prohibits discrimination, child and forced labour, and workplace violence and harassment, while safeguarding freedom of association and collective bargaining rights. Institutional mechanisms such as the Labour Inspectorate, the ERGANI digital labour system, and specialised services for occupational safety and equality strengthen compliance and accountability.

At the corporate level, EnEarth is adopting and tailoring Energean Group's ESMS, policies, and culture. Until EnEarth's own system is fully operational, the Energean ESMS provides the governing framework, supported by a documented transition plan, capacity-building measures, and management review milestones. This framework applies equally to employees and contractors and embeds clear terms and conditions of employment, equal opportunity provisions, and grievance mechanisms. Competence and training are assured through induction, role-specific instruction, verification of qualifications for safety-critical tasks, and contractor training oversight.

At the project level, total workforce demand during construction is expected to peak at approximately 600–650 personnel across all activities, including approximately 17 local staff and 120 rig and PSV crew members for wells, 150–200 workers for onshore facilities construction, 75–100 offshore platform installation crew, and around 200 pipelaying personnel. In the operations phase, workforce requirements will decrease to approximately 70–75 personnel. EnEarth's workforce strategy emphasises recruitment based on merit and maximising local employment where possible, particularly for onshore and support activities, while specialised contractors will be engaged for activities requiring specific expertise.

Labour conditions and workforce welfare will be safeguarded through several key mechanisms:

- Inclusive and non-discriminatory recruitment processes, aligned with the Group's diversity and equal opportunities policies.
- A multi-channel worker grievance mechanism that allows anonymous reporting, protects against retaliation, and ensures timely resolution linked to corrective and preventive actions.
- Comprehensive competence assurance and training programmes, including induction, safety training, and verification of qualifications for safety-critical roles.
- Robust contractor oversight, extending Energean's labour standards through pre-qualification criteria, contractual clauses, site inspections, and performance monitoring.
- Workforce monitoring and reporting, including gender-disaggregated data through ERGANI E4 submissions, to identify potential barriers and track inclusion outcomes.

While female participation in offshore operations may remain limited due to sector-wide constraints, EnEarth will actively encourage EPC and EPCI contractors to adopt gender-sensitive recruitment practices and provide appropriate facilities for all workers. These factors, along with the reliance on specialised contractors for certain technical tasks, are considered typical and manageable risks for projects of this nature and will be addressed through continuous oversight, capacity-building, and adherence to the Group's ESG standards. Workforce composition will be monitored through the ERGANI E4 system and internal reporting to track gender balance and identify potential barriers to inclusion.

Potential risks associated with contractor oversight, including non-compliance with working hours, occupational health and safety obligations (also see Section 5.2), or access to grievance mechanisms, are considered low. These are mitigated by integrating the Group's labour and working conditions requirements into procurement (pre-qualification requirements, contractual clauses) and contractor management processes, monitoring and oversight mechanisms, and training. All workers, including contractor personnel, will have access to the multi-channel Worker Grievance Mechanism.

5.1.2 Retrenchment and Workforce Transition

Risks associated with retrenchment are considered minimal. The project involves temporary workforce peaks during well construction and facility construction phases. Following completion of well construction, the 17 local staff engaged will return to their roles within the wider Asset workforce, while EPC and EPCI contractor personnel will be demobilised in line with standard industry practice. A portion of the Owner's team will transition to the operations phase, with others redeployed within EnEarth or the Egean Group. These measures ensure workforce continuity and internal reassignment wherever possible. Should demobilisation occur, it will follow a fair and transparent process in full compliance with Greek labour law, including written notice, severance entitlements based on years of service, and protections for vulnerable groups (e.g., pregnant workers, union representatives). Processes will be transparent, lawful, and non-discriminatory, with opportunities for appeal.

5.1.3 Gender-Based Violence and Harassment (GBVH)

The risk of GBVH is considered low but will continue to be actively managed, particularly in offshore and remote working environments. The Group's policies explicitly prohibit harassment and violence and include robust reporting, investigation, and protection mechanisms. Contractors will be required to implement equivalent measures. Targeted training, awareness-raising, gender-sensitive recruitment, and provision of appropriate facilities (e.g., separate sanitation and accommodation areas) will further mitigate GBVH risks.

5.1.4 Accommodation Arrangements

Accommodation arrangements support compliance with ESR 2 and safeguard worker welfare. Greek labour and OHS legislation require employers to provide safe, appropriate, and gender-sensitive facilities, including separate sanitation and accommodation where needed. New regulations on short-term rentals (effective October 2025) set additional safety and quality standards for temporary housing. Accommodation strategies

vary by workforce group and activity: local well construction staff will reside in their own homes in Kavala; rig and PSV crew typically stay in contractor-arranged hotels; EPC contractors may establish temporary camps for jetty and onshore works; and offshore crews will be housed on dedicated vessels. Kavala's affordable and diverse housing market ensures adequate accommodation without exerting pressure on local housing affordability, thereby minimising potential social impacts and ensuring alignment with ESR2.

5.2 ESR 4: Health, Safety and Security

5.2.1 Health, Safety and Security Framework

The Project operates within a comprehensive national framework for occupational health and safety (OHS), fully harmonised with EU legislation.

HSE (incl. Community HSE) risks are managed through EnEarth's integrated HSE and Security Management Systems, which are being adopted from the Energean Group and implemented project-wide. The Group's governance framework is aligned with Greek and EU legislation as well as international standards. Key elements include:

- HSE and Social Responsibility Policy – sets corporate commitments on HSE and sustainable development.
- Corporate Major Accident Prevention Policy (CMAPP) – approved by the Board, addressing identification and mitigation of major hazards to achieve ALARP risk levels.
- Contractor HSE Policy – requiring all contractors to comply with HSE standards and subjecting them to audits, KPIs, and compliance checks.
- H&S Management System – based on a Plan-Do-Assess-Adjust cycle with tiered documentation (policies, standards, procedures, method statements).
- Stop-Work Policy and Hazard Reporting – empowering any worker to stop work without penalty if unsafe conditions are identified.
- Training, Medical Fitness and Health Monitoring – ensuring all personnel, including contractors, are medically fit, trained, and competent.

The Security Management System (SMS) provides a corporate framework for consistent application of security procedures across all project sites, including the Kavala Security Plan for onshore facilities. The Kavala port facility complies fully with the International Ship and Port Facility Security (ISPS) Code, supported by regular assessments, drills, and audits. The Group also monitors H&S performance using leading and lagging indicators such as LTIF, TRIR, FAR, safety observations, drills, incident reports, and near-miss investigations.

5.2.2 Community Health and Safety

The offshore nature of the project and the location of onshore activities within existing industrial areas significantly reduce potential community health and safety impacts. Nevertheless, residual risks remain, primarily associated with increased marine traffic, offshore construction and operations, and jetty works. These include the potential for navigational interference, marine accidents, noise, light, and dust nuisance, and – although very low – risks from accidental releases.

Mitigation measures are embedded within the project design and management systems, including:

- Establishment and enforcement of marine safety exclusion zones around offshore facilities.
- Implementation of vessel traffic management plans to reduce navigational risks and interactions with fisheries and other marine users.
- Application of noise, light, and nuisance control measures during construction and operations.
- Integration of emergency preparedness and response procedures, including regular drills, coordination with competent authorities, community notification mechanisms (e.g. NAVTEX/NOTAM), and clear escalation protocols.
- Continuous stakeholder engagement and communication throughout construction and operations to share safety-related information, clarify planned activities, and maintain trust.

These measures are considered sufficient to maintain community H&S risks at low levels and will be reviewed periodically and updated at key project milestones (e.g. Phase 1b Omega platform installation, pipeline tie-in, and Phase 2 jetty construction).

5.2.3 Security Personnel and Community Interaction

The use of private security personnel introduces potential risks, including excessive use of force, poor community relations, and inadequate oversight. These risks are considered low and are effectively mitigated through the Group's SMS and adherence to EBRD ESR 4 requirements. Key mitigation measures include:

- Vetting and selection of security providers to ensure competence, integrity, and compliance with legal and human rights standards.
- Mandatory training on human rights, conflict sensitivity, and proportional use of force, aligned with the Voluntary Principles on Security and Human Rights.
- Clear codes of conduct and operating procedures governing security personnel interactions with community members.
- Oversight mechanisms, including audits, reporting, and incident investigation, to ensure accountability and continuous improvement.
- Accessible grievance mechanisms for reporting and resolving community concerns related to security personnel.

Greek law (Law 2518/1997) prohibits private security personnel from carrying firearms, further reducing potential risks and reinforcing safe, non-violent community interactions.

5.3 ESR 10: Stakeholder Engagement and Vulnerable Groups

The Project's stakeholder engagement is governed by a dedicated SEP and Grievance Mechanism, ensuring transparent, inclusive, and ongoing dialogue. Engagement activities to date (including among others ESIA Phase 1 public consultation, public meetings, press releases, and online disclosures) have reached stakeholders effectively, with no critical concerns raised.

Vulnerable groups are screened through a combination of demographic review, site visits, consultation with local authorities, and feedback from engagement activities. Due to the offshore nature of operations and the location of onshore works in existing industrial areas and thanks to Energean / EnEarth's long-standing presence and strong local relationships, the screening found no groups are expected to be disproportionately affected at this stage.

Engagement will remain accessible and inclusive through physically accessible venues, accessible information formats, and digital participation options, supported by a dedicated CLO. The screening process will continue throughout the project lifecycle, with the SEP updated as needed. Overall, the risk of exclusion or adverse impacts related ESR 10 is negligible.

5.4 ESR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Based on the assessment, the Project Phase 1 does not trigger ESR 5, as no land acquisition, physical displacement, or significant restrictions on resource use are expected. Offshore activities occur within the existing Prinos concession, while onshore works are confined to the Sigma industrial site.

A precautionary assessment suggests an overall maximum increase in the marine exclusion zone (from 49.54 km² to 54.00 km²) to accommodate the Omega platform and new pipeline, though the final area is expected to be smaller and largely overlapping with existing restrictions. This increase is approximately 0.97% of the total Gulf of Kavala area (recorded about 461 km²). Analysis of fishing effort distribution in the Kavala Gulf demonstrates that extensive fishing grounds will remain fully accessible across the wider marine area. Even under a "worst-case scenario", the proposed exclusion zone represents a very small fraction of the total fishing grounds and does not intersect with the most heavily used areas. Combined with existing seasonal restrictions on certain fishing activities, the incremental change in access is expected to be minimal to negligible, and no adverse impacts on fisheries or local livelihoods are anticipated during construction or operation.

A Fisheries Liaison Officer (FLO) has been appointed as the primary point of contact with local fishing communities to ensure continuous engagement, address concerns, and support the sustainable coexistence of Project activities and fishing operations. Standard maritime notifications (e.g., NAVTEX) and stakeholder engagement under the SEP will be used to communicate any temporary access restrictions.

6 Mitigation Measures

The Project's Phase 1 social risk profile is considered low across all ESRs assessed, with no significant adverse impacts anticipated. Most identified risks are typical of offshore industrial projects and are effectively managed through a combination of:

- Compliance with Greek and EU legal and regulatory frameworks;
- Adoption and implementation of the Group's policies, management systems, and procedures, which EnEarth is tailoring for project-specific application;
- Project-level measures and plans, including those developed under the ESIA and conditions of environmental permitting;
- Continuous stakeholder engagement and adaptive management based on feedback and monitoring results.

Mitigation measures are embedded within the project's design, ESMS, and associated management plans. They will be periodically reviewed and updated at key project milestones, such as contractor onboarding and the commencement of each new phase, to ensure they remain effective and proportionate throughout the project lifecycle.

Table 6-1: Summary of Key Social Risks, Mitigation Measures, and Management Responsibilities

RISK AREA	ESR REF	KEY MITIGATION MEASURES	MANAGEMENT RESPONSIBILITY
LABOUR AND WORKING CONDITIONS	ESR 2	<ul style="list-style-type: none"> • Application of Regulatory Framework and Energean Group ESMS and policies, including equal opportunities, diversity, anti-harassment, and grievance procedures. • Contractor pre-qualification, contractual clauses, and oversight to ensure compliance with labour standards and working conditions. • Multi-channel Worker Grievance Mechanism with anonymous reporting and protection against retaliation • Competence assurance, induction, safety training, and qualification verification. • Workforce monitoring (including gender-disaggregated data) and reporting through ERGANI E4. 	EnEarth HR and HSE Teams, Contractors
RETRENCHMENT	ESR 2	<ul style="list-style-type: none"> • Internal reassignment of core personnel where possible. • Standard demobilisation of contractor staff in line with industry practice. • Transparent and lawful procedures for any workforce reductions, including notice, severance, and appeal mechanisms. • Protections for vulnerable groups (e.g. pregnant workers, union reps). 	EnEarth HR, Contractors

RISK AREA	ESR REF	KEY MITIGATION MEASURES	MANAGEMENT RESPONSIBILITY
GBVH (GENDER-BASED VIOLENCE AND HARASSMENT)	ESR 2	<ul style="list-style-type: none"> Strict adherence to legal requirements and prohibition of GBVH through corporate policies. Targeted training, awareness programmes, and gender-sensitive recruitment. Provision of separate sanitation and accommodation facilities. Contractor requirements to implement equivalent measures and policies. Monitoring of workforce composition and gender balance. 	EnEarth HR and HSE Teams, Contractors
WORKFORCE ACCOMMODATION	ESR 2	<ul style="list-style-type: none"> Compliance with Greek labour and OHS requirements for safe and adequate facilities. Provision of gender-sensitive sanitation and accommodation. Use of dedicated offshore vessels, contractor-arranged hotels, or local housing without pressure on affordability.- Monitoring of accommodation quality and compliance. 	Contractors, EnEarth HSE Team
COMMUNITY HEALTH AND SAFETY	ESR 4	<ul style="list-style-type: none"> Establishment of marine safety exclusion zones. Vessel traffic management plans to minimise navigational risks and fisheries interactions. Noise, light, and nuisance control measures during construction and operations. Emergency preparedness and response plans, including drills and coordination with authorities. Timely community notifications (e.g. NAVTEX/NOTAM) and safety-related communication. 	EnEarth HSE Team, Marine Operations, Contractors
SECURITY PERSONNEL AND COMMUNITY INTERACTION	ESR 4	<ul style="list-style-type: none"> Vetting and background checks for private security personnel. Mandatory training on human rights, proportional use of force, and conflict sensitivity. Clear codes of conduct and operating procedures. Oversight mechanisms (audits, reporting, investigations) and grievance channels. Compliance with Law 2518/1997 prohibiting armed security personnel. 	EnEarth Security Team, Contractors
STAKEHOLDER ENGAGEMENT AND VULNERABLE GROUPS	ESR 10	<ul style="list-style-type: none"> Implementation of SEP and accessible grievance mechanism. Continuous stakeholder engagement through meetings, press releases, and online updates. Screening of vulnerable groups through demographic review, site visits, and engagement with authorities. Accessible venues, formats, and digital participation options. Adaptive updates to SEP as project phases evolve. 	EnEarth SEP and Grievance mechanism team incl. CLO
FISHERIES AND MARINE USERS	ESR 5	<ul style="list-style-type: none"> Exclusion zone expansion limited to less than 9.01% (worst-case), expected to be smaller and largely overlapping with existing restrictions, , resulting in negligible change to fishing access. Standard maritime notifications for temporary access controls. Appointment of a Fisheries Liaison Officer (FLO) to support continuous engagement. Ongoing dialogue and feedback mechanisms to address emerging concerns. Commitment to further ESR 5 screening if future design changes introduce new restrictions. 	EnEarth Marine Operations, SEP and Grievance mechanism team incl. FLO

© LDK Consultants, 2025. All rights reserved.

“LDK Consultants” refers to the LDK Group of companies

