

Prinos CO2 Project

Draft Environmental and Social Action Plan (ESAP)

3 October 2025

No.	Action	Responsibility, Resources,	Timetable	Target Evaluation Criteria for Successful Implementation	Status Update
ESR1 Assessment and Management of Environmental and Social Risks and Impacts					
1.1	<p>Develop an ESIA for Phase 2 of the Project that meets EBRD's Environmental and Social Policy (ESP 2024) and E&S Requirements (ESRs).</p> <p>The ESIA will include:</p> <ul style="list-style-type: none"> • Non-Technical Summary • ESIA report and annexes • Updated Stakeholder Engagement Plan • Updated E&S Management and Monitoring Plans/frameworks (ESMMP/F) • Updated and new topic specific ESMMP/Fs • Updated ESAP <p>Disclose the ESIA for 60 days online and in the Project area in English and Greek.</p> <p>Develop and disclose (English and Greek) a Public Consultation Report which documents the disclosure of the ESIA and consultation outcomes.</p>	EnEarth E&S team E&S consultant	ESIA disclosed and 60 days disclosure complete prior to first disbursement	<p>ESIA for Phase 2 satisfactory to EBRD and its advisors.</p> <p>Disclosed in line with EBRDs' ESP and Directive on Access to Information.</p> <p>Public Consultation Report developed and disclosed.</p>	

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1.2	<p>Develop and implement a Project specific E&S Management System (ESMS). The ESMS will cover the construction and operational phases of the Project. It will be cascaded down to all contractors and include specific requirements on contractor management.</p> <p>The ESMS will include a management of change process which will consider design changes, changes in mitigation or monitoring, etc. EBRD will be consulted on material design changes. Such changes may require updates to ESAs and ESMPs.</p>	EnEarth E&S team	3 months prior to construction works (including drilling) commencing	Project specific ESMS in place	
1.3	As part of the Phase 2 ESIA, update the Cumulative Impact Assessment to consider the full Project development	EnEarth E&S Consultant	Prior to first disbursement	Updated Cumulative Impact Assessment in line with EBRD ESP as part of Phase 2 ESIA	
1.4	Include in contractor (including drilling contractors) and supplier tender and contract documents appropriate E&S requirements in line with legislation and EBRD's ESP.	EnEarth procurement team	As part of tender and contract documents	Appropriate E&S requirements in contractor and supplier tender and contract documents	
1.4	<p>Develop Project topic (e.g. for waste, noise, contractor management, etc.) specific, detailed ESMMPs in line with EBRD ESRs.</p> <p>Contractor ESMMPs will align with such ESMMPs.</p> <p>See other ESAP actions for specific plans and respective timetables.</p>	EnEarth E&S team	<p>2 Months prior to construction for construction (including drilling) related aspects.</p> <p>2 months prior to commissioning for operational related aspects.</p>	ESMMPs in line with EBRD ESRs.	
1.5	Establish a Project E&S team to overview the E&S aspects of the Project and to deliver this ESAP. The team will include a stakeholder engagement manager or similar.	EnEarth HR and E&S team	By financial close	<p>Fully resourced E&S team</p> <p>Updated organisational chart</p>	

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1.6	Develop a supply chain management system in line with ESR 1, 2 and 6.	EnEarth procurement team	By financial close	Supply chain management system	
1.7	Include monitoring provisions in the Project ESMS and ESMMPs	EnEarth E&S team	As part of ESMS and ES MMP development	Monitoring provisions in the Project ESMS and ESMMPs	
ESR2 Labour and Working Conditions					
2.1	Develop and disclose (English and Greek) publicly a Labour Management Plan for all workers (including contractors) specific to Project.	EnEarth HR team	As part of Phase 2 ESIA	Labour Management Plan developed and disclosed	
2.2	Tailor Energean's corporate HR policies to the Project that apply to all workers and cover all ESR 2 requirements (child labour, GBVH forced labour, non-discrimination etc.). HR policies apply to all workers, including contractors.	EnEarth HR team	Prior to construction	Updated HR policies disclosed internally	
2.3	Develop a Code of Conduct specific to Project for all workers and contractors.	EnEarth HR team	Prior to construction	Code of Conduct in place Agreed with all workers	
2.4	Develop a Worker Accommodation Management Plan aligned to EBRD/IFC guidance (integrated into Labour Management Plan or standalone), including procedures for any accommodation provided by contractors.	EnEarth HR team and E&S teams	Prior to construction	Worker Accommodation Management Plan	
2.5	Develop a Workers' Grievance Mechanism aligned with ESR2	EnEarth HR team	Prior to construction	Grievance Mechanism implemented, accessible to all worker types, monitored and reported	
ESR3 Resource Efficiency and Pollution Prevention and Control					

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3.1	Develop a Water (including produced water) Management Plan to ensure compliance with corporate policy, EU/Greek water quality standards, and ESR3.	EnEarth E&S team	As part of Phase 2 ESIA	Water Management plan	
3.2	Develop a Greenhouse Gas emissions inventory and report on this annually to the EBRD. Emissions will be calculated in line with good international practice and in agreement with EBRD.	EnEarth E&S team	As part of Phase 2 ESIA then updated and reported annually	Greenhouse Gas emissions inventory	
3.3	Complete a Climate Change Risk Screening (and Assessment if required)	EnEarth E&S team E&S Consultant	By mid November 2025	Climate Change Risk Screening/Assessment report satisfactory to EBRD	

ESR4 Health, Safety, and Security

4.1	Consolidate Energean HSE documents into a Project Occupational Health and Safety Management System (OHSMS). This should be integrated into/engage with the ESMS.	EnEarth HSE Manager / E&S Consultant	Prior to construction (including drilling) works commencing	OH&S Management System approved; site-specific risks addressed	
4.2	Develop an Emergency Preparedness and Response Plan (EPRP), or similar.	EnEarth HSE Manager / Emergency Response Consultant	Prior to construction (including drilling) works commencing	EPRP approved; drills and training planned	
4.3	Conduct a Gender Based Violence and Harassment (GBVH) Risk Screening and develop appropriate GBVH policies and procedures	EnEarth HR and E&S teams	Prior to construction (including drilling) works commencing	Risk screening complete . GBVH policies and procedures	
4.4	Adapt the Energean HSE Infrastructure and Equipment Plan to the Project.	EnEarth HSE Manager / Technical Team	Prior to construction	Updated HSE Infrastructure and Equipment plan approved; infrastructure risks addressed	

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			(including drilling) works commencing		
4.5	Develop a Traffic Management Plan (TMP)	EnEarth HSE and Logistics teams	Part of Phase 2 ESIA	TMP developed and approved; coordination with local traffic authorities	
4.6	Develop Natural Hazard Protocols within the EPRP	EnEarth E&S team	Prior to construction (including drilling) works commencing	Natural hazard risks assessed; protocols integrated into EPRP	
4.7	Develop offshore hygiene protocols	EnEarth E&S team	Prior to construction (including drilling) works commencing	Protocols implemented; compliance monitored through inspections	
4.8	Develop a Security Management Plan (standalone or within Construction/Operation Management Plans, depending on risk).	EnEarth E&S team	Prior to construction (including drilling) works commencing	Security Management Plan approved; roles and responsibilities defined	
4.9	Develop and implement a Community Health and Safety Plan (including worker influx as necessary).	EnEarth E&S team	As part of Phase 2 ESIA	Community Health and Safety Plan (including worker influx as necessary)	
ESR5 Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement					
5.1	Further assess the potential for ESR5 related impacts to fisheries or other residents. If impacts are identified, a Livelihood Restoration Plan/Framework (LRP/F) will be developed.	EnEarth E&S Consultant / Stakeholder Engagement Manager	During the Phase 1 ESIA disclosure period. Supplementary E&S report updated.	Further assessment of ESR 5 assessment in Phase 1 ESIA disclosure package. Supplementary E&S report updated as necessary.	

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			LRP/F, if required, developed during ESIA disclosure period.	LRP, if required, implemented with associated monitoring and reporting	
ESR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources					
6.1	Update the Phase 1 ESIA package to include a comprehensive assessment of ecosystem services.	EnEarth E&S Consultant	By end November 2025	Updated ESIA including ecosystem services	
6.2	Conduct a Critical Habitat (CH) and Priority Biodiversity Feature (PBF) Assessment, including assessment of impacts to CH and PBF if identified. The Assessment will be disclosed with the Phase 1 ESIA package.	EnEarth E&S Consultant	Report submission: 1 week post ESIA disclosure	Critical Habitat and Priority Biodiversity Feature Assessment report satisfactory to the EBRD and disclosed in English and Greek.	
6.3	If CH and PBF are identified, update the Biodiversity Management Plan (BMP) in accordance with EBRD requirements, including a plan to achieve no net loss and/or a net gain of biodiversity as required by ESR10.	EnEarth E&S Consultant	By end October 2025	BMP in place and disclosed in English and Greek.	
6.4	As part of the ESMS and ESMMPs, develop an Invasive and Alien Species (IAS) Management Plan which outlines strategies and actions to prevent, control, or eradicate non-native species that pose a threat to the environment.	EnEarth E&S Consultant	Part of Phase 2 ESIA	IAS Management Plan	
ESR8 Cultural Heritage					
8.1	Prepare a full Chance Finds Procedure.	EnEarth HSE and Legal teams; input	Prior to construction commencing	Procedure developed and integrated into contractor documentation	

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		from cultural heritage specialists			
ESR10 Information Disclosure and Stakeholder Engagement					
10.1	Implement the Stakeholder Engagement Plan (SEP).	Stakeholder Engagement Manager / Communication Team	During ESIA disclosure and Project development	Stakeholder engagement data demonstrates frequency of engagement and issues raised during engagement.	
10.2	Develop and disclose (English and Greek) a Public Consultation Report which documents the disclosure of the Phase 1 ESIA package and consultation outcomes.	Stakeholder Engagement Manager / Communication Team	Report by 3 December 2025. Disclosure by end of 2025	Public Consultation Report available and disclosed.	
10.3	Establish internal quarterly reporting on stakeholder engagement effectiveness, including metrics such as grievance resolution rates, and participation outcomes.	Stakeholder Engagement Manager / Monitoring & Reporting Officer	Quarterly, starting from construction phase	Quarterly stakeholder engagement reports; grievance log trends and satisfaction metrics tracked	
10.4	Develop and implement a formal schedule for reviewing and updating the Stakeholder Engagement Plan (SEP) at key project milestones (e.g., prior to and post-construction, mid-operation, pre-decommissioning). Ensure SEP updates are disclosed to stakeholders.	Stakeholder Engagement Manager	Prior to construction and reviewed annually	SEP review schedule included in SEP; documented updates aligned with project milestones	
10.5	Implement the grievance procedure for external stakeholders in line with EBRD ES10, to include, inter alia, anonymous and confidential grievance channels.	Stakeholder Engagement Manager	Ongoing	A Grievance Log maintained to reflect the status of each grievance and actions taken	

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				Grievance results reported annually	