

Hydrocarbon Exploration Program - Exploration Well Asopus-1 in Block 2 - Ionian Sea

ECF-3008

Cultural Heritage Management Plan (CHMP)

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LIST OF ABBREVIATIONS

ABBREVIATION	EXPLANATION
CHMP	Cultural Heritage Management Plan
ESBS	Environmental & Social Baseline Survey
ESMS	Environmental & Social Management System
EUA	Ephorate of Underwater Antiquities
OIM	Offshore Installation Manager
UNESCO	United Nations Educational, Scientific and Cultural Organization

1 Introduction

This Cultural Heritage Management Plan (CHMP) defines the commitments, responsibilities, implementation arrangements, and Chance Find Procedure applicable to the exploration drilling operations phase of the Project.

A Chance Find refers to any object, feature, or material of potential cultural heritage significance that has not been previously identified through formal archaeological investigations by the competent authorities and is discovered unexpectedly during Project activities. Such discoveries may be made by any member of the Project workforce.

During the exploration drilling operations phase, Energean will implement the mitigation measures applicable to the Project set out in this CHMP. **This document constitutes the CHMP for the exploration drilling operations phase and will be implemented by Energean and relevant contractors in accordance with applicable operational procedures and contractual requirements.**

The Environmental and Social Management System (ESMS) Framework Document describes the relationship between Energean's Health, Safety and Environment (HSE) Policy and the associated monitoring plans, providing the overarching framework for the implementation and performance monitoring of this CHMP.

2 Technical And Legal Background

The project forms part of an offshore hydrocarbon exploration programme and involves evaluating subsurface geological formations through exploration drilling. To support environmental studies, geohazard assessment and engineering design, a comprehensive marine geophysical survey programme was undertaken within the study area. The resulting datasets provided a suitable basis for the identification, assessment, and management of underwater cultural heritage resources.

The northern Ionian Sea occupies a region of considerable archaeological and historical significance. Situated between the Greek mainland, the Ionian Islands and the Strait of Otranto, the area forms part of a broader maritime corridor that has facilitated communication, navigation and exchange between the Adriatic and the wider Mediterranean for millennia. As a result, the seabed of the region has the potential to preserve a wide range of archaeological remains, including shipwrecks, anchors, cargo assemblages and other evidence of past maritime activity.

2.1 Project and Study Area

The Asopus-1 well is located in the northern Ionian Sea, approximately 44 km west of the island of Othonoi and adjacent to the maritime boundary between Greece and Italy. Block 2 occupies a strategically important position within the wider Corfu-Otranto corridor, one of the principal maritime gateways connecting the Adriatic basin with the eastern Mediterranean. This location has historically facilitated maritime communication, trade, and navigation and forms the basis of the archaeological significance of the wider region. The proposed Asopus-1 well is situated within the surveyed area at a water depth of approximately 842.5 m. The location lies within a deep-water marine environment characterised by limited modern seabed disturbance and regional potential for archaeological remains due to its position within a long-established maritime communication corridor.

2.2 Archaeological Resources Relevant to the Project

No archaeological sites or targets were identified within the immediate project footprint or within the 500 m assessment area surrounding the proposed well location. Consequently, no direct impacts on known underwater cultural heritage resources are anticipated.

Within the wider surveyed area, approximately 8.3 km northeast of the proposed Asopus-1 drilling location, the archaeological assessment identified a single underwater cultural heritage site. Target T057 has been interpreted as a probable **ancient shipwreck site associated with what may represent a cargo of transport amphorae and partially buried archaeological remains**. The site lies outside the defined areas of seabed interaction associated with the Project.

The immediate vicinity of the proposed well location does not show archaeological sites or targets. The available geophysical and visual inspection datasets provide a high degree of confidence that no

known underwater cultural heritage resources occur within the project footprint. Although the presence of previously unidentified buried archaeological remains cannot be entirely excluded, the likelihood of underwater cultural heritage findings is considered low, even during the Chance Find Procedure. Subject to

the implementation of appropriate mitigation measures and a Chance Find Procedure, no significant effects on underwater cultural heritage are anticipated,

2.3 Legislative and Policy Framework

The protection and management of underwater cultural heritage within Greece is governed principally by **Law 4858/2021, the Code of Legislation for the Protection of Antiquities and Cultural Heritage**, as amended and in force. In general, under the provisions of this legislation, all antiquities located within Greek territory, territorial waters and areas under Greek jurisdiction are afforded legal protection, irrespective of whether they have been previously identified or formally designated.

Responsibility for the protection, management and archaeological investigation of underwater cultural heritage rests with the **Ephorate of Underwater Antiquities (EUA)**, which constitutes the competent authority for the assessment and management of submerged archaeological resources.

The present management plan has been informed as a matter of international good practice by the principles of the **UNESCO Convention on the Protection of the Underwater Cultural Heritage (2001)**. Applicable requirements for the Project are established by Greek legislation, Project approvals and competent-authority directions.

The present plan seeks to ensure that cultural heritage considerations are integrated into project planning and implementation and that any archaeological resources identified within the study area are appropriately protected and managed.

3 Cultural Heritage Management

3.1 Purpose and Scope

The purpose of this Cultural Heritage Management Plan (CHMP) is to provide a framework for managing and protecting underwater cultural heritage resources during the implementation of the proposed Asopus-1 exploration well.

The CHMP has been developed based on the archaeological assessment referenced in the ESIA and applies to the Project activities identified in the Project Description (ESIA Chapter 6) as involving planned seabed or shallow subsurface interaction. It establishes procedures for the management of known archaeological resources; the reporting of previously unidentified cultural heritage remains and communication with the competent authorities.

The plan shall be implemented throughout the duration of project activities and reviewed if new archaeological information becomes available or if significant changes to project design occur.

3.2 Management Objectives

The objectives of the CHMP are to:

- Avoid unauthorised disturbance of known underwater cultural heritage resources and manage any potential discoveries in accordance with applicable legal and permit requirements;
- Facilitate compliance with applicable cultural heritage legislation and regulatory requirements;
- Establish procedures for the reporting and management of archaeological discoveries;
- Define communication pathways between project personnel and the competent authorities;
- Ensure that any previously unidentified archaeological remains encountered during project implementation are reported, assessed and managed in accordance with the Chance Find Procedure and applicable competent-authority requirements.

The following sections define how the CHMP will be implemented during the exploration drilling operations phase, including responsibilities, pre-drilling obligations, contractor requirements, reporting routes and review arrangements.

3.3 Management Responsibilities

The Project Operator shall designate an appropriate Project role (Head of HSE, Greece) to oversee implementation of the CHMP, including coordination with relevant contractors and the competent authority.

Contractors and personnel **whose activities could encounter or observe potential archaeological material** shall comply with the applicable requirements of this plan and promptly report any suspected discovery through the defined Project reporting route.

The Ephorate of Underwater Antiquities shall remain the **competent authority** responsible for the management and protection of underwater cultural heritage resources and shall be consulted where required.

Where archaeological advice is considered necessary, an **appropriately qualified maritime archaeologist** should be consulted to assist in the assessment and management of archaeological discoveries.

3.4 Legal and Regulatory Responsibilities

Project activities shall be undertaken in accordance with the applicable Greek legislation governing the protection of cultural heritage, underwater antiquities, and archaeological resources. The Project Operator and each Contractor shall conduct activities within their respective areas of control in accordance with applicable cultural heritage legislation, Project approval conditions, and competent-authority requirements. Where suspected cultural heritage may be affected, the relevant activity shall be managed in accordance with the Chance Find Procedure.

The CHMP shall be read and implemented in conjunction with all relevant permits, approvals, and conditions issued by the competent Greek archaeological authorities. Any breach of these requirements may result in the suspension of works and legal sanctions under Greek legislation.

3.5 Obligations of the Project Operator Prior to Drilling

Prior to the commencement of drilling activities, the Company shall submit to the Hellenic Ephorate of Underwater Antiquities the results of the detailed seabed survey of the marine area at the proposed Asopus-1 well location for review with respect to the potential presence of underwater cultural heritage. Based on the results of this review, and if deemed necessary by the Ephorate, an on-site underwater archaeological survey using technology (ROV, SSS, Sub bottom profiler) shall be provided in the marine area where the exploration drilling is planned to take place.

Prior to the commencement of drilling activities, relevant findings and applicable requirements from the archaeological assessment should be communicated to personnel responsible for planning, supervising or conducting Project activities involving seabed interaction.

Any additional geophysical, environmental or engineering datasets acquired before drilling that provide materially relevant new seabed information for areas subject to planned Project disturbance shall be reviewed to determine whether they materially change the archaeological baseline or require further archaeological assessment.

Project personnel engaged in activities involving seabed interaction or subsea observation should be informed of the applicable cultural heritage controls and made aware of the procedures to follow in the event of a suspected discovery.

3.5.1 On-site Archaeological Presence

No full-time on-site archaeologist is proposed, given the limited seabed footprint of the proposed activity and the prior Environmental & Social Baseline Survey (ESBS). The ESBS included a 100.2 km² high-altitude geophysical survey area and a 37.5 km² low-pass AUV imaging survey, the latter undertaken using dense 3 m line spacing to support visual ground-truthing of potential cultural heritage targets. The survey coverage extended beyond the 500 m archaeological assessment area and informed the archaeological assessment, subject to any competent-authority or Project approval requirements. In the absence of continuous

archaeological supervision, relevant personnel shall be informed of the observable indicators of potential archaeological material and the internal reporting actions applicable to their roles.

3.6 Contractor Obligations

Each Contractor shall implement the requirements of this CHMP applicable to its scope of work and personnel. In particular:

- Relevant personnel under the Contractor's control are informed of and comply with the CHMP requirements applicable to their roles.
- Cultural heritage awareness shall be included in relevant pre-activity briefings for personnel involved in planned seabed interaction or responsible for reviewing subsea observations that could identify a suspected archaeological find.
- In the event of a suspected archaeological discovery within the area of the Asopus –1 well location, the Contractor shall implement the actions assigned to it under the Chance Find Procedure, including stopping any activity under its control that could disturb the suspected find and promptly reporting it through the defined Project reporting route.
- Communicate and flow down the applicable requirements of this CHMP to subcontractors performing activities within its scope that could interact with or observe the seabed.
- Maintain records of the cultural heritage briefings, observations, reports and actions within its scope and provide them to the Project Operator in accordance with Project document-control requirements. The Project Operator shall maintain the official record of regulatory notifications and correspondence with authorities.

Failure to comply with the CHMP may result in suspension of the affected activity in accordance with Project procedures or contractual requirements. Non-compliance may also constitute a breach of applicable legislation or Project approval conditions, depending on the circumstances.

3.7 Chance Find Procedure

Although no archaeological remains were identified within the immediate project footprint, the possibility of encountering previously unidentified archaeological material cannot be completely excluded. This is particularly relevant in offshore environments, where archaeological remains may be partially or wholly buried beneath seabed sediments.

Should material of possible archaeological significance be encountered during project activities within the area of the Asopus-1 well location, the following Procedure shall be implemented:

1. Should material of possible archaeological significance be encountered, the affected activity shall be stopped to the extent necessary to avoid disturbance, and the Chance Find Procedure shall be implemented. Suspected archaeological material shall not be recovered, moved, handled or otherwise disturbed unless required for immediate safety reasons or authorised by the competent authority.
2. Record the location and nature of the find and apply practicable controls to avoid further disturbance.

3. Obtain photographic and/or video documentation of the discovery where practicable.
4. Inform the Offshore Installation Manager and the designated Project representative through the defined Project reporting route.
5. Obtain advice from an appropriately qualified maritime archaeologist where required to support notification, preliminary interpretation or the response requested by the competent authority.
6. The designated Project representative shall notify Energean's Head of HSE and the Ephorate of Underwater Antiquities within the timeframe required by applicable law, permit conditions or agreed notification arrangements, providing the available relevant information.
7. The suspended seabed-disturbing activity shall not recommence within the affected area until authorised by the Project Operator, taking into account the OIM/Master's independent authority and any direction received from the competent authority.

Potential archaeological discoveries may include shipwreck remains, anchors, amphorae, ceramic assemblages, timber remains, architectural features, concentrations of artefacts, and any other material of possible archaeological or cultural heritage significance.

3.8 Maritime Archaeologist

The Project Operator shall identify a means of obtaining advice from an appropriately qualified maritime archaeologist, if required, following a suspected discovery or a material change in relevant seabed information.

Where engaged, the maritime archaeologist shall provide the specific advice required by the circumstances, which may include reviewing relevant information, supporting assessment of a suspected discovery and advising on proportionate response measures. Formal communication with the competent authority shall remain under the control of the designated Project representative unless otherwise agreed.

3.9 Reporting and Consultation

Any suspected archaeological discoveries shall be managed, documented, and notified in accordance with the Chance Find Procedure. Consultation with the Ephorate of Underwater Antiquities regarding the significance of a discovery; any required investigation and appropriate management measures shall be coordinated by the designated Project representative. Communications, assessments and management actions related to the discovery shall be retained in accordance with Project document-control requirements.

3.10 Review and Update

The CHMP should be reviewed and updated where necessary if:

- New archaeological discoveries are made;
- Additional geophysical or seabed investigations provide new, material information relevant to the cultural heritage assessment or the planned disturbance footprint;
- Project activities are modified in a manner that may affect cultural heritage resources;
- New information becomes available regarding archaeological potential of the project area.

Material updates shall be incorporated into applicable Project procedures and submitted to or discussed with the competent authority only where required by law, approval conditions or the nature of the change.

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