

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 ESIA's 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 | Fully resourced E&S team Updated organisational chart | |

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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 ESMMP 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 | |