

ANNEX 12: CHANCE OF FINDS PROCEDURE FOR CULTURAL HERITAGE

Pioneer in integrated consulting services




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PRINOS OFFSHORE DEVELOPMENT PROJECT

Chance finds procedure for cultural
heritage

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| PRINOS OFFSHORE DEVELOPMENT PROJECT CHANCE FINDS PROCEDURES FOR CULTURAL HERITAGE | | | | |
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1 INTRODUCTION

This Management Plan outlines the mitigation measures and commitments and shapes the responsibilities, monitoring, auditing and implementation schedule in relation to Chance Finds for cultural heritage during the construction and operating phase of the Project.

Chance Finds are defined as potential cultural heritage objects that are identified outside a formal site reconnaissance - by competent Authorities - and encountered unexpectedly during project implementation. Chance Finds may be made by any member of the Project.

For the construction phase the Contractor is required to prepare its own specific Environmental and Social Management and Monitoring Plan (ESMMP) and especially the topic specific Management Plan for Chance Finds for cultural heritage setting out how it intends to meet and comply with specific Project commitments and mitigation measures and in line to Energean's HSE Management System which will be continuously updated. Policy and Standards. This Management Plan shall act as a reference from which the Contractor shall prepare a Chance Finds for cultural heritage Management Plan for the construction plan.

For the operation phase Energean will apply mitigation measures as outlined in this Management Plan. This Management Plan shall act as a reference from which Energean shall prepare a Chance Finds for cultural heritage Management Plan for the operation plan.

The ESMS Framework Document provides an explanation of the linkage between Energean HSE Policy and the Monitoring Plans.

2 SCOPE OF THE PLAN

This Management Plan has been prepared to outline the mitigation measures necessary to ensure that negative impacts to cultural heritage, focused in Chance Finds, as a result of Project activities (construction and operation) are prevented or, if this is not possible, as low as reasonably practicable (ALARP) during all project phases. The objectives of the Management Plan are to ensure that any cultural heritage management work undertaken complies with the Energean's HSE Policy, national legislations, best international practice and all relevant EBRD PRs, in order to avoid all potential damages to cultural resources

The scope of this CCP includes measures for impact avoidance and mitigation for Chance Finds procedures and applied to all working sites (onshore and offshore areas) that might be affected by the Project.

This Management Plan is related to the following documents:

- ESMMP;

- General construction management plan; and
- HSE MS

3 ROLES AND RESPONSIBILITIES

3.1. CONSTRUCTION PHASE

All actions identified in the Management Plan will be examined and agreed with the competent authorities. The competent authorities are:

- Kavala – Thasos Ephorate of Antiquites; and
- Ephorate of Marine Antiquites.

Energean will provide all information from discussions with competent authorities to the Contractor. The responsible person from Energean will be the Project Manager.

The Contractor will be responsible for any adverse cultural heritage impacts arising from the onshore and offshore activities and for putting in place any necessary measures to avoid or, if not possible, mitigate them. The Contractor will be responsible for:

- Elaborate and implement a Chance Finds procedure for Cultural Heritage;
- Assignment of a responsible person;
- Communicate the Management Plan to workers;
- Ensure compliance;
- Establish a communication line with the competent Authorities;
- Implement effective monitoring; and
- Reporting.

3.2. OPERATION PHASE

All actions identified in the Management Plan will be examined and agreed with the competent authorities. The competent authorities are:

- Kavala – Thasos Ephorate of Antiquites; and
- Ephorate of Marine Antiquites.

The responsible person from Energean will be the Operation Manager. Energean will be responsible for:

- Communicate the Management Plan to workers;
- Ensure compliance;
- Establish a communication line with the competent Authorities;
- Implement effective monitoring; and
- Reporting.

4 PROJECT STANDARDS

The management of any finds will be handled in accordance with national legislation and EBRD requirements. More specifically:

- National legislation: Law 3028/02, for protection of antiquities; and
- EBRD requirements: PR8 for Cultural Heritage and especially par.16 (Chance Find procedure)

5 IMPLEMENTATION SCHEDULE

5.1. CONSTRUCTION PHASE

During the construction phase, the implementation schedule for the Management Plan is:

| Activity | Timeline / milestone |
|--|----------------------------------|
| Assignment of Contractor's and Energean's responsible person | Prior to contract |
| Coordination and arrangement with Archaeological Entities in case this is required by the Environment Permit and in accordance with the provisions of Article 8 of Law 3028/2002 | Prior to contract |
| Contractor prepare a Chance Finds procedure for Cultural Heritage | Two months prior to construction |
| Competent Authorities elaborate an official site survey | Prior to construction |
| Establishment of communication line between the Contractor and competent Authorities | Prior to construction |
| Communicate the Management Plan to employees | Prior to construction |
| Monitoring of construction activities by an | During construction |

| Activity | Timeline / milestone |
|---|--|
| archaeologist (on-call basis) of the Contractor | |
| Reporting to Energean and competent Authorities | During construction, in case of Chance Finds |

5.2. OPERATION PHASE

During the operation phase, the implementation schedule for the Management Plan is:

| Activity | Timeline / milestone |
|---|---|
| Assignment of Energean's responsible person | Prior to commissioning |
| Energean prepare the final Chance Finds procedure for Cultural Heritage | One month prior to commissioning |
| Reporting to competent Authorities | During operation, in case of Chance Finds |

6 MITIGATION & MANAGEMENT CONTROLS

6.1. CONSTRUCTION PHASE

During the construction phase, the following management controls will be applied:

| Measure / commitment | Responsible | Means of verification |
|---|-----------------------------------|--|
| Monitoring of construction activities by an archaeologist in case it is deemed required in the Environmental Permit and pertinent legislation | Contractor's responsible person | Reporting |
| Alerting the personnel | Contractor's Construction Manager | Chance Finds verification by archaeologist |
| Cessation of work in the vicinity of any Chance Finds | Contractor's Construction Manager | Chance Finds verification by archaeologist |
| Notification to Authorities | Contractor's responsible person | Official correspondence |
| Specification of temporary storage and protection means of finds | Contractor's responsible person | Defined in Contractor's Management Plan |

6.2. OPERATION PHASE

During the operation phase, the following management controls will be applied:

| Measure / commitment | Responsible | Means of verification |
|---|-------------------------------|---|
| Cessation of work in the vicinity of any Chance Finds | Energear's responsible person | Verification according to final Management Plan |
| Notification to Authorities | Energear's responsible person | Official correspondence |
| Move the finding to the temporary storage | Energear's responsible person | Defined in final Chance Finds procedure |

7 MONITORING APPROACH & LIST OF MONITORING PROCEDURES

7.1. CONSTRUCTION PHASE

During the construction phase and in case of archaeological findings, the following monitoring procedures will be applied:

| Measure / commitment | Responsible | Periodicity |
|--|-----------------------------|-------------|
| Log of archaeological monitoring in case of findings | Contractor's archaeologists | Monthly |

7.2. OPERATION PHASE

During the operation phase and in case of archaeological findings, the following monitoring procedures will be applied:

| Measure / commitment | Responsible | Means of verification |
|----------------------|-------------------------------|-----------------------|
| Log of Chance Finds | Energear's responsible person | When occur |

8 TRAINING REQUIREMENTS

8.1. CONSTRUCTION PHASE

It is very crucial to ensure the triggering of the correct application of this process, as employees are not familiar to cultural heritage objects and finds. Contractor's archaeologist

will inform the construction managers and supervisors of ENERGEAN and of the Contractor for the identification of cultural heritage objects.

8.2. OPERATION PHASE

ENERGEAN will produce a leaflet, available to all facilities, for Chance Find procedures.

9 AUDITING & REPORTING

9.1. CONSTRUCTION REPORTING

During the construction phase in case of archaeological findings, the following auditing and reporting will take place:

| Audit / report | Parameter / indicator | Periodicity |
|---|-----------------------|-------------|
| Satisfactory implementation of current management controls for Chance Finds | 100% implementation | Monthly |
| Non-compliance report | Non-compliance | When occur |

9.2. OPERATION PHASE

During the operation phase and in case of archaeological findings, the following auditing and reporting will take place:

| Audit / report | Parameter / indicator | Periodicity |
|---|-----------------------|-------------|
| Satisfactory implementation of management controls for Chance Finds | 100% implementation | When occur |
| Non-compliance report | Non-compliance | When occur |