Environmental Report - Article 12.11 Lease Agreement Completed 2021 & Forecasts 2022





HYDROCARBON EXPLORATION AND EXPLOITATION PROGRAM IN THE OFFSHORE AREA "IONIAN"

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CHAPTER 1. INTRODUCTION

On October 10, 2019 the Greek State through Law 4629/2019 (Government Gazette A 154/10.10.2019) ratified the assignment of the rights for the exploration and exploitation of hydrocarbons at the offshore area of Western Greece (IONIAN Block) to the companies Repsol Exploration S.A. and Hellenic Petroleum S.A. and subsequently transferred to Repsol Greece Ionian S.L (approval of this transfer granted by the Minister of Environment and Energy by virtue of the Decision with Protocol Number 31241/40/27.03.2020) and Helpe Ionian S.A.

Article 12 of the lease agreement describes the requirements of the Greek State for environmental protection issues. This report is prepared in accordance with the requirements of paragraph 11 of the above article, which states:

"The Lessee shall include in each Annual Work Programme and Budget to be submitted to the Lessor, an environmental report on the work to be undertaken as provided in that document, as well as on the work undertaken in accordance with the preceding Annual Work Programme and Budget."

This environmental report describes the following:

- The environmental works undertaken by the operator of the program in the year 2021.
- The environmental works that are planned to be implemented in the year 2022, according to the relevant Annual Work Program of 2022.

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CHAPTER 2. DESCRIPTION OF ENVIRONMENTAL WORKS OF THE YEAR 2021

2.1. Work Program for the Year 2021

During 2021 the following works have been accomplished in preparation for the execution of the planned seismic works:

✓ Seismic Survey Preparatory works, including Tendering

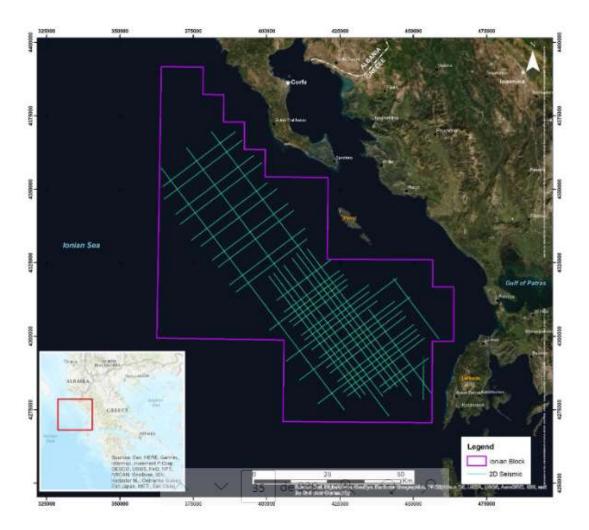


Figure 1. Map of the Proposed 2D Seismic Lines

2.2. Environmental Works 2021

No field works were performed within 2021, with potential effects on the natural and man-made environment of the area "Ionian". The environmental reports that consist contractual obligations were a) the Environmental Baseline Report (EBR) that was submitted to HHRM (protocol no. HHRM 6705/11.03.2020) and subsequently forwarded to DIPA (protocol no. DIPA 27887/1464/13.03.20) and b) the Environmental Action Plan (EAP) for the Geophysical Survey that was also submitted to HHRM (protocol no: HHRM 7461/24.07.2020). It is noted that although for the EAP there was a written positive recommendation by DIPA and HHRM (protocol nos. DIPA 73695/4484.28.05.2021 and HHRM 9971/31.05.2021), no such written recommendation for the EBR was ever issued by DIPA and/or HHRM and article 12.12 of the Lease Agreement states that *"The baseline report shall be submitted for review to the Lessor. If no objection is raised by the latter within twenty (20) Business Days, the report is deemed accepted."*.

The works implemented within 2021 consisted in:

• Seismic survey preparatory works including Tendering and contractors evaluation.

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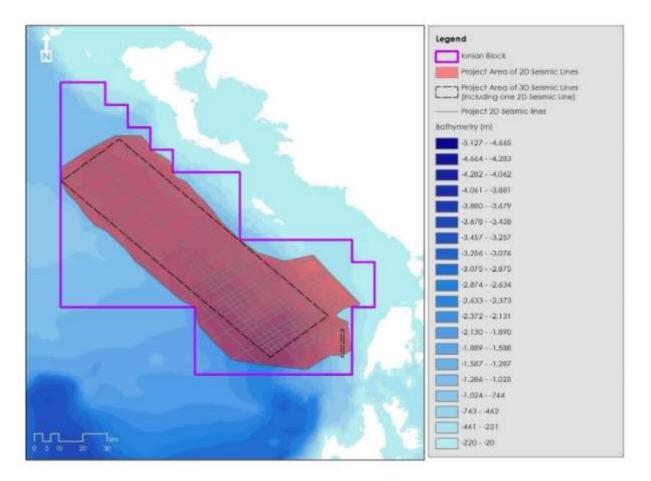


Figure 2. Study area considered for the purposes of the EAP

Environmental Action Plan

The Environmental Action Plan has been prepared following Legal requirements and international standards, covering:

- Monitoring Plan, before starting activities and during their execution. Main items of the monitoring team
- Roles and Responsibilities
 - Monitoring of the project will be carried by a Project Management, Safety and Environment supervision and coordination team, including Marine fauna observers, and Stakeholder Management team including a social coordinator and Fisheries Liaison Office
- Communication plan, including:
 - Communications to/from Repsol contractor

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- Communications plan from Repsol to Authorities, about the progress of activities, main findings, and the results of the monitoring program
- Communications plans and coordination from Repsol and/or Contractor sides to stakeholders, with specific Fisheries Liaison Officer (FLO) from Contractor side
- o Stakeholder Engagement Plan
- Reporting plan, including routine, incidents, and non conformances reporting
- Waste Management plan
- Evaluation of impact of field activities to the mapped vulnerable agents, grouped in :
 - Marine fauna
 - Protected areas
 - o Tourism
 - o economy
- Mitigation Plan for the risks identified
- Evaluation of residual risks after implementation of the Mitigation Plan

Below is a short summary of the risks identified for the planned activities of the project (figure 3), and for accidental hazards (figure 4), before implementation of the Mitigation Plan and after its implementation.

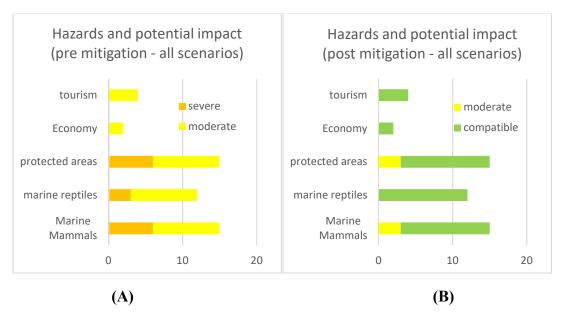


Figure 3. Summary of initial (A) and Residual (B) risks of the 2D seismic in "Ionian" block

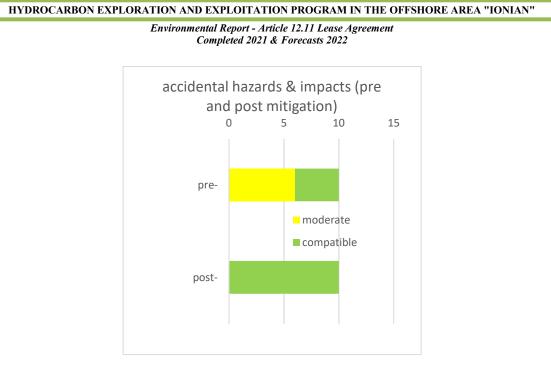


Figure 4. Summary of pre- and post-accidental risks of the 2D seismic in "Ionian" block.

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CHAPTER 3. DESCRIPTION OF ENVIRONMENTAL WORK PLANNING FOR THE YEAR 2022

3.1. Work Program for the Year 2022

According to the work programme for the year 2022, the following exploration program works are foreseen:

- ✓ Seismic survey preparatory works, including Tendering, contract negotiations and operational plans
- ✓ Seismic survey execution, subject to final contract award, seismic vessel availability and operational permits

3.2. Scheduled Environmental Works for the Year 2022

In parallel to the finalization of the seismic campaign tendering process, the selection of the seismic acquisition contractor and seismic vessel availability, the Environmental works will be the:

- Review and possible Updating of the Stakeholder Engagement Plan
- Preparatory works for contracts and operational planning

Environmental works corresponding to the planning and execution of the 2D seismic, will be in observance of the already approved EAP as is briefly presented in Chapter 2.2:

- Implementation of Mitigation planning as per EAP (including tendering of Monitoring Services, Supervisory and Liaison Officers, etc.)
- Implementation of Social and Environmental Monitoring plans