



Midia Gas Development Project

Stakeholder Engagement Plan (SEP) – March 2022 – May 2023

Black Sea Oil & Gas SA

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ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Definition
AESIA	Additional Environmental and Social Information and Assessment
BSOG	Black Sea Oil & Gas
CLO	Community Liaison Officer
CSR	Corporate Social Responsibility
DDBRA	Danube Delta Biosphere Reserve Administration
EBRD	European Bank for Reconstruction and Development
EHSQ	Environmental, Health and Safety and Quality
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
EU	European Union
GSP	Grup Servicii Petroliere
GTP	Gas Treatment Plant
IESC	Independent Environmental and Social Consultant
IFI	International Financing Institutions
LPA	Local Public Authorities
LRP	Livelihood Restoration Plan
MGD/MGD Project	Midia Gas Development/Midia Gas Development Project
NGO	Non-Governmental Organisation
NTS	National Gas Transmission System
PR	Performance Requirement
SEP	Stakeholder Engagement Plan

1 INTRODUCTION

1.1. Scope and Objectives of the Stakeholder Engagement Plan

Stakeholder engagement is a key element in building strong, constructive and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts. It aims to inform stakeholders about the potential environmental and social impacts related to the project through appropriate disclosure of information, to ensure their perceptions of the proposed development are as accurate as possible, to consult with them to obtain feedback, and to provide a mechanism for resolving any concerns or complaints they might have.

The Stakeholder Engagement Plan (SEP) is a guiding document that maps the main categories of stakeholders who will be meaningfully engaged within the development and implementation of a project. This SEP highlights the way the company plans to communicate with these stakeholder groups who may be affected by or interested in BSOG operations and activities. It focuses on:

- Identification of stakeholders who are likely to be affected and have an interest to the project;
- Establishment of engagement methods that are suitable for each identified category of stakeholder;
- Documentation of previous engagement activities and stakeholder feedback;
- Development and implementation of the future stakeholder engagement programme, and methods of engagement;
- Introduction of the project's grievance mechanism;
- Monitoring and evaluation of engagement actions, and;
- Roles and Responsibilities

This SEP is prepared in relation to the Midia Gas Development (MGD) Project which is currently in the process of being implemented by Black Sea Oil & Gas SA (BSOG). It sets out the planned programme for disclosure of project information and consultation with stakeholders, as well as the methods for recording and addressing comments and grievances from various stakeholders.

While the local regulatory framework in Romania only requires an Environmental Impact Assessment (EIA), the project's initiator, BSOG, has decided to examine the social implications of MGD as per best international practice. In light of the planned Environmental and Social Impact Assessment (ESIA) process, this document establishes the basis of the stakeholder engagement programme for the whole project. BSOG is committing to support all the engagement activities included in the SEP and to allocate sufficient resources (human and financial) in order to ensure its implementation.

The SEP is a 'live' document that will be progressively developed through updated versions in line with the phases of the MGD Project. The SEP will be made publicly available on BSOG's website and will also be made accessible to local communities as part of the project information disclosure policy and programme as described below.

BSOG will respect individual stakeholders' Right to Privacy which is relevant to this SEP in regard to information relating to personal or private affairs and the protection of communications, including grievances.

The current version of SEP has been developed during the construction and operation phases, for the activities that took place in 2022 and 2023, including finalizing the works at the Gas Treatment Plant (GTP) and the start of the gas extraction process.

1.2. Brief Project Description

BSOG is the titleholder (together with Petro Ventures Resources SRL and Gas Plus Dacia SRL) and operator of two gas production licences at Ana and Doina gas fields in the XV Midia Shallow Concession, located on the continental shelf of the Romanian Black Sea.

The MGD Project produces and processes gas from the Ana and Doina fields located in the offshore XV Midia Shallow Block.

The MGD Project consists of a normally unmanned platform for the four drilled wells at the Ana field, a subsea well at Doina field (as a subsea development), with gas being routed to the Ana field platform via a subsea 18 km-long pipeline, a 126 km of offshore pipeline, a 4.3 km onshore pipeline crossing the territory of Corbu Commune – Vadu village and a GTP in the Vadu area where the gas is treated prior to delivery into the national gas transmission system (NTS).

The MGD Project is presented below.

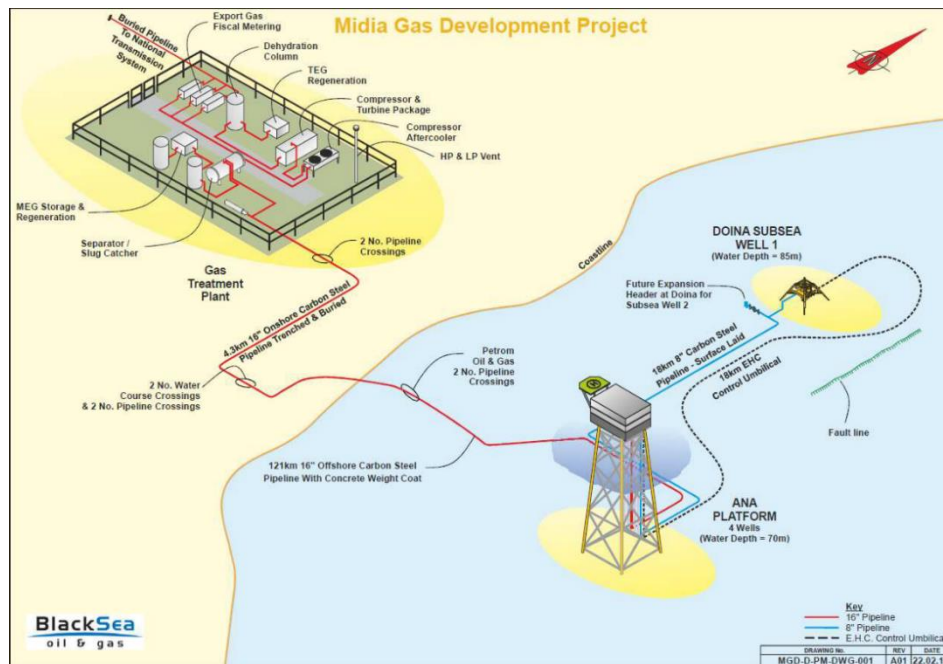


Figure 1 Concept for the Midia Gas Development Project

Two settlements are in proximity to the Project (Corbu Village and Vadu Village). Vadu is the nearest settlement, located approximately 1.9 km from the GTP.

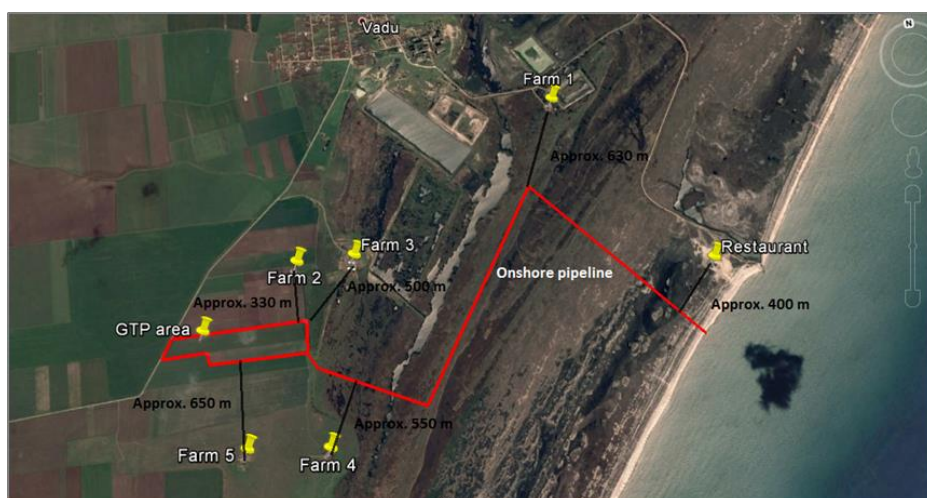


Figure 2 Settlements and structures located near the MGD Project

The onshore segment of the pipeline crosses:

- Natura 2000 areas of ROSCI 0065 Danube Delta; ROSPA 0031 Danube Delta and Razim-Sinoe Complex; ROSPA 0076 Black Sea, as well as the Economic area of the Danube Delta Biosphere Reserve (in Romanian: "Rezervația Biosferei Delta Dunării")

- seven local unpaved access roads (De541/31/A, De541/31/B, De 539/80, De 539/79, De 539/78, De 522/9 and De 265
- a crude oil pipeline and a natural gas pipeline owned by OMV Petrom SA
- two wastewater pipelines owned by Rompetrol and the
- Balta Mare and Balta de Mijloc wetlands.

A 16 m-wide corridor was required for the construction of the underground onshore pipeline segment. The project follows the international standards and national legal requirements for all crossings to ensure environmental and social impacts are mitigated. After the construction of the onshore pipeline segment the land was restored to its initial conditions.

1.3. Current project status and activities foreseen

1.3.1. Current project status

As of May 2023, the MGD offshore and onshore construction activities were fully completed. The project obtained all permits required for construction, including the Environmental Permit.

The gas production has started in 15th of June 2022.

The last construction activity, namely the trenching for the subsea cable, has been performed this year, between January - February 2023. This activity has been finalized on the 4th of February.

A photo report of the construction works carried out in 2022- 2023 can be found in ANNEX H. **Photo report of the activities carried out in 2022 -2023**

The impacts of the construction activities have been fully assessed in the Project ESIA package.

The land reinstatement activities for the beach section of the project and along the pipeline route took place between November – December 2021 and now the land is fully reinstated (see below pictures):



Image 1 Beach reinstatement, February 2022



Image 2 and 3 Onshore pipeline corridor – land reinstatement, February/October 2022

1.3.2. Activities foreseen

On March 13 and 14th, 2023 BSOG tested successfully the increased production capacity from 107 mmscfd to 121 mmscfd which is envisaged to start operating in Q4 2023.

2 REGULATIONS AND REQUIREMENTS

2.1. National Requirements

At national level, there are no specific requirements for preparing a dedicated Stakeholder Engagement Plan. Nevertheless, some provisions for stakeholder engagement are included in several regulations and procedures, including:

- The Romanian Constitution, which stipulates in article 31 (1) that “a person's right of access to any information of public interest cannot be restricted” and in article 31 (2) that “the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest”;
- Law no. 86/2000, for ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998 (Aarhus Convention).
- Law no. 544 of October 12th, 2011 regarding the free access to information of public interest, which defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania.
- Law no. 544/2011 stipulates further that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of the department for public relations or through the intermediary of the person appointed for this purpose.
- Government Decision no. 878/2005 on right to access to environmental information transposes EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive no. 90/313/CEE) and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- Emergency Government Ordinance no. 195/2005, related to the environmental protection, as amended from time to time, clearly stipulates in article 5 that the state recognizes the right of any person to an “ecologically healthy and balanced environment” and for this purpose, the state warrants, inter alia, free access to environment related information, including the right of any person to be consulted during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice.
- Further, article 20 of Emergency Government Ordinance no. 195/2005 clearly stipulates that the Competent

Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;

- Government Decision no. 445/2009 on environmental impact assessment pertaining to certain public and private projects. In accordance with the stipulations of this Decision, the relevant information has to be made publicly available by the investor and/or the national authorities during each of the EIA stages listed in article 6 of the same. Public Consultations and open disclosure of documentation connected with the Project have to be carried out and financed by the Investor in close connection with the guidance given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, art. 16 of the Decision). We note that the provisions of this Government Decision were followed in relation to the MGD Project when the regulatory process was performed. Starting with 09 January 2019 the provisions of this Decision were replaced by the ones of Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects.
- Order 1284/2010, the Methodology for Environmental Impact Assessment for Public and Private Projects, which details the necessary stages for the performance of the EIA procedure, as listed in article 6 of Government Decision no. 445/2009. We note that the provisions of this Order were followed in relation to the MGD Project when the regulatory process was performed. Like in case of Government Decision no. 445/2009, starting with 09 January 2019 the provisions of this Order were replaced by the ones of Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects.
- Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects. This law transposed the new EIA Directive and replaced Government Decision no. 445/2009 and Order no. 1284/2010.
- Order no. 2701/2010, the Methodology regarding the mechanism of information and consultation of the public on the occasion of preparing or revising the zonal planning and urbanism plans enacted by the Ministry for Regional Development and Tourism, which provides the legal framework for performing the information disclosure and public consultation as a prerequisite for approving any urbanism and zonal planning documents.
- Law no. 52/2003 on decisional transparency in public administration. This law has the role to enhance the accountability of government to the citizen and the beneficiary of the administrative decision, and to increase the involvement of citizens in decision-making processes of the administrative and legislative drafting process, to enhance transparency across government.
- Order no. 863/2002 on approval of the Methodological guidelines applicable to the stages of the environmental impact assessment procedure. Like in case of Government Decision no. 445/2009, starting with 09 January 2019 the provisions of this Order were replaced by the ones of Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects.
- Law no. 185/2016 regarding certain measures required for the implementation of petroleum operations by the titleholders of petroleum agreements relating to offshore petroleum blocks. The law clearly sets out the way in which landowners are to be engaged during the development and implementation of an offshore oil and gas project.

2.2. International Financing Institutions (IFI)' Requirements

According to the IFIs, stakeholder engagement is important for building strong, constructive and response relationships with all interested and impacted persons/institutions. EBRD's Performance Requirement 10 (PR10) states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project. Also, EBRD's Performance Requirement 8 (PR8) states that consultation with stakeholders and affected communities should be made in the context of cultural heritage issues.

In the event that national laws are insufficient or there are significant discrepancies between national and PR 10 provisions, then the following principles should be considered:

- Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation.
- The involvement of the stakeholders has to be adapted on the basis of the project impacts over them (direct/indirect) and their level of influence and interest towards the project. Vulnerable groups will be identified, and specific actions will be undertaken to ensure that the Project will not contribute to the existing vulnerabilities and possible barriers to their participation in the engagement process are eliminated;
- The involvement of stakeholders is a process which must take place in the early stages of the project, and

- continue throughout the entire life of the project; and
- Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.
- In line with EBRD's Performance Requirement 1 (PR1), together with PR10, engagement with the project stakeholders is an integral part of the project environmental and social impacts assessment, management and monitoring processes. PR1 requires the identification of the project's stakeholders and the design of a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the project. PR10 states that the process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project.

3 STAKEHOLDER IDENTIFICATION AND MAPPING

Mapping (classifying) stakeholders is an on-going process throughout the life of the project, with some parties being identified in the initial phase of the implementation, while others are added as they gain influence or interest in the project. Stakeholders are individuals or organizations that:

- Are directly or indirectly affected by a project (or company's operations);
- Have "interests" in a project or a company or its area of influence that determine them as stakeholders; and/or
- Have the potential to influence project outcomes or company operations.

In the current project context, several key stakeholders have already been identified, while others will be included in future project stages.

The stakeholder's identification process started at early Project preparation stages and was performed by BSOG employees during direct meetings with authorities, key stakeholders and representatives of local community (Corbu and Vadu). The stakeholders have been identified:

- During the preparation of the social baseline;
- Via direct meetings with the BSOG team;
- Based on the available documentation and research;
- Based on the observation notes made during the site visits; and
- Based on previous experience with similar oil and gas projects and on local knowledge.

As part of the Project environmental and social impact assessment process, BSOG has also performed a vulnerability assessment as detailed in the Additional Environmental and Social Impact Assessment (AESIA). This assessment was based on the analysis of the local context performed as part of the impact assessment process and summarized in the ESIA Package (including the project ESIA and AESIA reports). The assessment took into consideration the socio-economic profile of the community (looking at the structure of population, their level of education, age, ethnicity, etc) in order to be able to understand if there are vulnerable persons living in the impacted communities. Further on, the assessment looked at the project activities that may potentially generate situations of vulnerability (i.e. land acquisition, traffic, dust, noise, beach crossing, and offshore activities). According to the vulnerability assessment performed, there are no persons or groups of persons in the communities that may be differentially or disproportionately affected by the project construction and operation. Therefore, no **project vulnerable groups**¹ were identified in relation to the project. Nevertheless, the children enrolled in schools in Corbu and Vadu villages are considered as being **vulnerable persons**² in relation with the project and specific measures to address associated risks and impacts on them were defined and will be implemented during project execution in the frame of the environmental and social management system.

The following list presents the key stakeholders who were actively engaged in all projects (preparation, permitting, construction) phases:

- National Authorities – Ministry of Environment (through the Environmental Protection Agency of Constanta and Danube Delta Biosphere Reserve Administration), Ministry of Culture and National Identity (through the

¹ In line with the EBRD requirements we have defined **project vulnerable groups** and persons as "people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits".

² **Vulnerable persons** are defined as "people living below the poverty line, the landless, the elderly, women and children-headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and/or international law"

Direction of Culture of Constanta County), Ministry of Waters and Forests (through the Romanian Waters National Authority), National Committee of the Coastal Area, Romanian Intelligence Service, Ministry of Defence (through the General High Staff), Ministry of Interior, National Agency for Mineral Resources, Hydrographic Marine Directorate, Forests' National Authority, Office of Cadastre and Real Estate Publicity, National Energy Regulatory Authority.

- Regional/Local Public Authorities (LPAs) – Local Council and the Mayor's Office of Corbu, Environmental Protection Agency (EPA) of Constanta, Land Improvement Agency, Direction for Agriculture of Constanta, Direction of Public Health of Constanta, Prefecture of Constanta, Environmental Guard of Constanta, County Council of Constanta, State Inspectorate for Emergency Situations – Dobrogea.
- Other central authorities involved in the upcoming permitting process will also be considered as stakeholders and added in the updated version of the SEP.
- Beside the above, there are other categories of stakeholders who will be directly or indirectly engaged either at this stage or in future stages. These include the following key stakeholder groups for the overall project:
 - Fishermen and Fishery organisations representing those who perform fishing activities in the project area.
 - Landowners/users in the proximity of the project.
 - Persons living in houses located along the roads that will be used for transporting materials and equipment.
 - Tourists that are using Vadu beach.
 - Owners of the restaurants located on or near Vadu beach, in the proximity of the future construction corridor.
 - Women, children, elderly people and any other vulnerable people who live in the project affected villages including those villages affected by the project traffic, Transgaz pipeline project and by construction and operation of associated facilities and construction camp.
 - Other businesses in the region – especially other oil and gas companies that are present in the same general area as BSOG (either offshore or onshore).
 - Non-governmental organizations (NGOs) – active both at international/national and/or regional/local level that are working in the fields of environmental protection, gender equality and social protection, forestry, nature conservation and agriculture.
 - Media – represented by both national and local television, radio stations, newspapers and social media and other online publications.
 - Community Leaders and Opinion Makers – high profile local leaders (mayor, priest, etc.)
 - Public at large – all interested persons that have an interest in the project.

There are also two categories of stakeholders that are considered to be internal to BSOG which shall be taken into account. The first category is represented by BSOG employees and contractors and worker organisations, while the second one is represented by BSOG shareholders/investors.

By plotting influence together with impact/interest on a matrix diagram and taking due account of further criteria such as expertise (i.e. knowledge to contribute and legitimacy) and the stakeholders' willingness to engage, the relative needs of key stakeholders in terms of the level and type of consultation and engagement are determined and can therefore be properly planned by BSOG throughout the project lifecycle.

4 STAKEHOLDER ANALYSIS

Stakeholder analysis is achieved by assessing the position of each stakeholder in the context of the project preparation phase.

Each identified stakeholder has been analysed from following perspectives: the project impacts on them (direct / indirect impacts), their estimated interest in the project and their potential influence over the project. Table 3 presents the main outcomes of this analysis.

Table 1 Results of Stakeholder Analysis

External Stakeholder	Potential Interest on the project
Directly impacted stakeholders	
Affected communities (Corbu and Vadu villages)	Interested in understanding the benefits and project impacts, as well as measures to reduce the negative ones.
Local key opinion leaders (Mayor, Vice Mayor, members of the County Council, priest, school director and teachers)	Interested in obtaining timely and effective information on project implementation and maximize the BSOG engagement at community level, via their CSR programme
Fishermen organisations	Interested in understanding the restrictions for fishing, if the case and how to overcome such restrictions.
Tourists	Interested in using the beach and having no disturbance during their holiday. <i>(It should be noted that within the area of the Delta Danube Biosphere Reserve, informal touristic activities are taking place. BSOG is considering all touristic activities within the project area and tourists are considered key stakeholders, especially for the beach crossing section of the project)</i>
Local businesses (especially those focused on tourism) and other businesses in the area	Interested in understanding the impacts of the project on their business activities.
Land owners/users - neighbouring BSOG land	Interested in having no disturbances on their property during construction and operational periods.
Vulnerable groups: children, elderly people, disabled and any other vulnerable people who live in the project affected settlements including those affected from traffic and associated facilities	Reduce any risks for accidents during transportation
New neighbours to the GTP (farm, guest house)	Interested in understanding the impacts of the project on their business activities.
Indirectly impacted stakeholders	
National Authorities	Project to be developed and implemented according to national and international standards.
Regional/ Local Public Authorities	Project to be developed and implemented according to national standards. Local authorities are interested in obtaining benefits for the local community.
Non-Governmental Organisations	Interested in monitoring and oversight of how the project will comply with the environmental and social provisions and commitments.
Mass media	Interested in understanding the project and monitoring how all provisions are complied with, especially the ones related to environment and social safeguards.
Public at large	Interested in understanding the benefits and disadvantages of the project.
Employees of BSOG	Being informed about the project
Contractor employees	Receive timely payments Good working conditions

External Stakeholder	Potential Interest on the project
Employee Organisations (trade unions)	Protection of workers Good working conditions
MGD gas buyer (Engie)	Interested in buying gas from the project installation.
Main contractor (Grup Servicii Petroliere - GSP)/ Sub-contractors	Interested in fulfilling contractual obligations and respecting deadlines.
IFIs	Interested in implementing the project according to the time schedule and recovering loans - in case of creditors, and in maximizing investments - in case of investors.
Transgaz	Owner of the associated facility and operator of national gas transmission system.

Note: If you are not on the list and would like to be kept informed about the project, please liaise with BSOG by using the contact details provided in section 7 of this document.

5 PREVIOUS ENGAGEMENT ACTIVITIES

Previous engagement activities have been related mainly to (1) the permitting process that started in 2014 and successfully finalized in 2019 for the construction phase of the project, (2) the land acquisition process that was finalized in 2016, (3) the ESIA development process, (4) during construction works, and (5) implementation of Corporate Social Responsibility (CSR) programme.

BSOG Community relations team was initially appointed on 13 March 2017 and communicated to Corbu Municipality through a formal letter. The team initially comprised of: the Communications & CSR Manager, HSE Manager, Regulatory Manager. The BSOG Human Resources Manager also joined the team in December 2018 and this update was communicated to Corbu Municipality during a meeting with the Corbu Local Council members on 18th December 2018. In 2019 a Community Liaison Officer (CLO) has also joined the Community relations team.

BSOG has developed the first SEP in 2016. Since then, all its engagement activities are documented and properly recorded. This chapter presents the engagement activities performed by BSOG in 2022.

Annual report on stakeholder engagement activities performed are also disclosed on BSOG website: <https://www.blackseaog.com/environment/>.

As specific cultural feature of the project-area countryside, rural communities are led and influenced by key opinion leaders enjoying special respect from the community members. Such opinion leaders include the Mayor, Vice Mayor, members of the Local Council, school directors and teachers. During the engagement performed to date, the preference of the local community members was to express their enquiries with respect to the MGD Project through the key opinion leaders who typically acted as ambassadors between the community and the project.

BSOG's community engagement strategy acknowledged the above-indicated and held several meetings with such key stakeholders to present the MGD project, progress status, principles of running the business, implications for the community and understand the community needs.

Engagement activities for 2022 have mainly consisted of CSR activities developed together with the local community and with NGOs and other interested parties.

5.1. Engagement with project affected persons (PAPs)

Table below details all the engagement activities undertaken by BSOG during 2022:

Table 2. Engagement with Project Affected Persons during 2022- 2023

Stakeholder	Engagement method	Main results	Responsibility
Landowners/users located in the vicinity of the GTP	The landowners have been identified by BSOG	Landowners located in the vicinity of the GTP - no grievances have been received from the landowners. <u>Land users</u> – a reed farmer has notified BSOG in February 2022 and July 2022 regarding the poor waste management in the proximity GTP site which has affected the reed culture and some farming machineries. Discussions have been held with the farmer and official correspondence was established. BSOG has evaluated the damages and has compensated the land user for these.	BSOG Communications & CSR Manager Regulatory and PGA manager
Business unit	Phone, email, direct meetings	A complaint regarding high level of noise was received in December 2022 from the owner of the guest house located in the proximity of the project. BSOG has held several discussions with the owner and, in March 2023, has performed noise level measurements in the area. The measurements have concluded that the noise	BSOG Communications & CSR Manager Regulatory and PGA manager

Stakeholder	Engagement method	Main results	Responsibility
		levels on the location of the guest house are in the national threshold limits. The only exceedances were found in some of the points located on the GTP site. Currently BSOG is investigating solutions to reduce the noise level on the GTP site.	

5.2. Corporate Social Responsibility (CSR) programme

BSOG has designed and started implementation of its Corporate Social Responsibility (CSR) programme based on the Company's CSR policy (See ANNEX C. **CSR policy**). The BSOG CSR programme aims at developing positive community relations and create a social partnership with the representatives of the local community impacted by the Project.

The following community development actions have been performed in 2022:

- Vadu sustainable development project – VADUabil;
- DC83 Corbu-Vadu Road Rehabilitation

1. Vadu sustainable development project – VADUabil;

In 2021, BSOG has started the collaboration with Mare Nostrum NGO, the main environmental NGO working for protecting Romanian shores, on implementing a string of actions to protect Vadu beach and develop a plan for the sustainable development of the area.

The following activities have been performed under the project in 2022:

- **Development of the plan/strategy for sustainable development in Vadu** – the strategy has outlined the main issues in the community and potential solutions to these issues. Three consultations with the local community and authorities have been carried out.
- **„VADU-rabil!” campaign**– between June and August 2022, Mare Nostrum has developed a **public information campaign to raise awareness** among tourists about maintaining cleanliness on the beach and the importance of the Vadu area, as part of the Danube Delta Biosphere Reserve. The tourists have received the “Vadu souvenir” comprising of several items: cup holders, portable ashtrays and trash bags, to help them to maintain the beach clean. A guide: “Ghidul turistului bine - crescut” was developed and placed on the Vadu beach, in several locations. On the 5th of August the “Dolphin Day” was celebrated together with the tourists where they have learned about the impact of waste on beaches and biodiversity.
- **#60deminutepentruVadu** – between June and October several activities were organized in Vadu and Corbu schools. One of the workshops was dedicated to “Scoala Albastra” (in translation” The Blue School”). The activities for “The Blue School” have been organized on the 31st of October, the National Black Sea Day. The students have been engaged in different sea-related games.
- **“Adoptă plaja Vadu” program** – students have developed an album with pictures of the area to contribute to the promotion of the Vadu Beach. Other two activities developed within this campaign were the beach cleaning days developed together with BSOG employees (in April and October 2022)
- **Christmas Party for the children from Vadu** – a Christmas party was organized in Constanta.

A photo report of the above activities can be found in ANNEX D. **Photo report from the CSR activities 2022 – VADUabil project**

2. DC83 Corbu-Vadu Road Rehabilitation

The Company is engaged in several discussions with the Corbu Municipality for the rehabilitation of the DC83 Corbu-Vadu Road. BSOG has already initiated a tender for detailed design and the contractor was already selected. BSOG will be responsible for obtaining the permits, including the Construction permit in the name of the Municipality, for selecting the contractor and for covering all project related expenses. The cooperation agreement with Corbu Municipality was signed in May 2023.

The construction activity is to be finalized in December 2024.

5.3. Other engagement activities

Besides the above, the following engagement activities have also been performed:

ENGAGEMENT WITH THE MUNICIPALITY

In the reporting period (March 2022 – May 2023), BSOG has organized three meetings with the Municipality: in July and September 2022 and in January 2023. The meeting in July 2022 had the purpose of evaluating the project performance from the environmental and social perspective together with the Independent Environmental and Social Consultant consultants (IESC) and the meeting in September 2022 was focused on the rehabilitation of the DC83 Corbu-Vadu Road project. The meeting in January 2023 was organized with the technical experts of the Municipality and BSOG and with all responsible persons for the road rehabilitation project, to agree on the cooperation conditions.

As mentioned above, a cooperation agreement will be signed between BSOG and Corbu Municipality for the rehabilitation of the DC83 Corbu-Vadu Road.

ENGAGEMENT WITH TRANSGAZ

A conflict related to the transportation contract between Transgaz and BSOG has started last year and has reached the media. Several discussions have been carried out but, failing in reaching an agreement, the two entities addressed the court separately and opened a lawsuit. Several court hearings have been scheduled but most of them have been postponed waiting for a mutual agreement resolution. Currently the lawsuit is suspended.

ENGAGEMENT WITH OTHER STAKEHOLDERS

MGD Project 1st gas ceremony

The event was organized on the 28th of June with the occasion of the start of gas production in the MGD project in the Romanian Black Sea. The event was attended by high officials such as the Prime Minister and the Minister of Energy.

MGD Project ceremony with the collaborators

In September 2022, a ceremony was organized with all project partners and collaborators. The agenda included: welcoming message from the host, the MGD Project video documentary, a guided tour of the GTP, lunch and informal discussions.

Engagement with public at large - Media coverage and press releases

BSOG has also prepared press releases and media announcements, especially when a project milestone was achieved and whenever a public meeting was organised; Information on MGD Project progress have been published in national newspapers such as: Ziarul Financiar, ZF Corporate, Bursa, Profit.ro, Romanian Business Journal, Adevarul, Agerpres, Mediafax, etc.

Moreover, BSOG has benefited of a high media coverage during the event which marked the gas production in the Romanian Black Sea. 11 TV channels and 5 radio stations have broadcasted news about the event, 4 newspapers have published print editions and other 48 have published online news about the project. All these articles have picked up statements from all the speakers, while the main idea was that BSOG is the first company to extract gas from the Black Sea in the last 30 years.

BSOG is also making use of social media in order to be able to provide meaningful and timely information to any interested party (approximately 1 update/month). For further information you can access the LinkedIn profile (<https://www.linkedin.com/company/black-sea-oil-and-gas-sa/>), or YouTube channel.

Details regarding the social media coverage and press releases are included in ANNEX E. **Social media coverage and press releases in 2022**

Internal communication and engagement activities

Internal communication is done by using several channels: emails, newsletters staff meetings and intranet platform. In the reporting period (March 2022 – May 2023), one staff meeting has been organized in October 2022. The objectives of the staff meetings are to present the MGD project progress, accomplishments in 2022, objectives for 2023, internal means for disseminating the information, the staff logistics, team targets, etc.

Last year, a newsletter was sent to all employees every two- three months. The newsletter presents a general statement from the manager, stories from BSOG employees in relation to their work, changes in the team, updates from the site, industry news, etc.

To reach out to internal stakeholders, BSOG has developed an intranet platform where employees of BSOG and collaborators that receive access can visualize important documents and receive information on project development. Also, the intranet platform has an online feedback mechanism. Please see ANNEX F.

Feedback form on BSOG intranet for employees

With respect to the CSR mechanism, the employees are informed of the actions perform by the Company directly via regular meetings, or via e-mail. ANNEX G. **Employee engagement in CSR activities and internal announcements** presents the internal announcements for one of the CSR actions performed in 2022.

6 STAKEHOLDER ENGAGEMENT PLAN

6.1. Action Plan

The following action plan which has been designed for 2023 is presented below. The operation period has started in June 2022. During the operations period, BSOG will implement stakeholder engagement measures, based on the feedback and strategy established for such phase.

The objective of these external communications is to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation. The exact dates and venues of the proposed activities will be communicated in advance with the stakeholders.

Engagement activities which may be implemented during the operational phase are described in the table below:

Table 3 Engagement activities which may be implemented during the operational phase

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities ³
All	Website Press releases and social media coverage	To provide access to information in a timely and efficient manner	Project operation reports	BSOG website / EBRD website BSOG office / national and local newspapers	BSOG Communications & CSR Manager
IFIs	Reporting Direct meetings (when needed)	Ensure that information is provided on a timely and	Project Progress Reports Monitoring meetings, if needed	BSOG office IFI office	BSOG: Financial Director

³ Further information on the responsible person from BSOG is presented in the contact sheet attached to present document

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities ³
		efficient manner			
Local communities of Corbu and Vadu	CSR programme	Social licensing of the project	BSOG will continue to implement the CSR programme during operation period.	Corbu and Vadu – yearly programme	BSOG Communications & CSR Manager CLO
Land users/owners in the vicinity of the GTP	Direct meetings e-correspondence and phone calls (when needed)	Address their concerns	Engage with landowners if impacts have been identified Follow up on the impact on increased noise levels to the guest house located in the vicinity of the GTP	Vadu village Ongoing	BSOG Communications & CSR Manager Regulatory and PGA manager CLO
National / Local Authorities	Direct meeting	Inspections /Permitting	Information related to operation	BSOG offices / both in Bucharest and Vadu GTP	BSOG: Financial Director
Children and students	Study visit/ Camp	Information on GTP operation / research, educational purposes	Technical information on GTP operation and offshore operation	GTP	BSOG Communications & CSR Manager

CSR ACTIVITIES FORESEEN IN 2023

In 2023, BSOG will continue implementing CSR activities within the local community. The main focus areas of the CSR strategy will go in the same directions as in the previous years: education, environment and community development.

The project VADUrabil will continue in 2023 as well. Mare Nostrum has submitted the financing application to BSOG and the activities foreseen for 2023 have already started in April with a “Trainer Camp” where 15 students aged between 11-13, selected from the Danube Delta communities have participated in different activities having the objective of increasing the leadership skills, their proactivity, etc. During this camp, the participants have learned about the importance of the Danube Delta Biosphere Reserve, the issues which this is facing nowadays and potential solutions to these issues. The budget allocated for the activities foreseen in 2023 under this project is 37,540 EUR.

As mentioned above, BSOG is already engaged in several discussions with the Corbu Municipality for the rehabilitation of the DC83 Corbu-Vadu Road. The cooperation agreement between the Company and Corbu Municipality was signed in May 2023.

6.2. Record keeping

The project related activities that will require stakeholder engagement processes may help to identify a range of issues that are directly associated with the project or with more strategic issues. Each individual issue raised needs to be considered and addressed by BSOG and, where appropriate, individual responses compiled, and further meetings arranged. All environmental or social concerns raised by stakeholders specific to the MGD Project should be taken forward for consideration in the decision-making processes.

To help manage this, all responses received will be documented in a register and appropriate actions identified and tracked. The register will be maintained and updated as appropriate throughout the project. Minutes will also be produced from all consultation meetings and documented.

7 GRIEVANCE MECHANISM

The current grievance mechanism is referring only to external stakeholders and workers contracted by BSOG. The detailed grievance mechanism for external stakeholders is included BSOG internal procedure BSOG-GV-PRO-001-D02. A dedicated grievance procedure for internal stakeholder is included in HR Handbook available for BSOG staff.

Stakeholders have the right to be informed about the project development and implementation and they also have the right to raise concerns and suggestions during the decision-making process. Effective and timely response to grievances is essential for maintaining good community relations, and this includes potential issues related to the project and its associated impacts.

Any request, objection, complaints or proposal filed by any stakeholder related with the project is classed as a grievance. The stakeholders have the possibility to file anonymous grievances, which will be taken into account and resolved following the same basic steps as with non-anonymous grievances, with the mention that in this case the stakeholder will not receive a formal answer to its complaint. The anonymous grievances are recorded in the grievance register as any other regular grievance.

A stakeholder may raise a grievance related to any BSOG operation during the development and commissioning of the MGD project. Also, a stakeholder may also raise a grievance related to projects developed by other parties in proximity of the BSOG operational areas or other facilities that are considered as associated with BSOG operational areas. All these grievances will be recorded within BSOG grievance register and re-directed towards the other project developers. BSOG will provide written answer to the known persons who filed in such grievances informing that their grievance was redirected towards another project developer (offering also the contact details of the person/institution where the grievance was redirected).

The objectives of the BSOG grievance mechanism are to ensure that all grievances are promptly and effectively addressed, in a fair and transparent manner, throughout the Project lifetime. All complaints are investigated to establish their validity and to ensure that all accepted grievances are dealt with in a correct and prompt manner; where relevant, corrective actions are implemented to prevent any recurrence of problems.

The grievance mechanism is available at the level of BSOG and includes but is not limited to: a template (record form) for logging complaints and suggestions; a direct phone line made available for anybody interested in communicating about the project; an appropriate access via emails and direct meetings with responsible project persons before, during and after construction works; and an online complaint form.

The following elements are included in the external grievance mechanism for the current project:

- A simplified grievance template that is available in 4 locations (one at the mayor's office, , one at the Gas Treatment Plant in Vadu, one at Corbu Cultural Center and one at Vadu Cultural Centre). BSOG collects the lodged grievances once per week. ANNEX A. **Grievance Form** includes the Romanian language official template.
- A direct phone number and email address from BSOG community liaison officer is available to all interested parties for enabling them to contact BSOG's representatives whenever necessary (please also see ANNEX B. **BSOG CONTACT LIST** BSOG Contact List).
- Direct meetings with representatives of local communities where interested parties may raise their complaints and/or suggestions, verbal complains.
- An online complaint form that can be easily filled in by any interested party is posted on BSOG's website: <https://www.blackseaog.com/make-a-complaint/>
- Public statements: where statements made in the public domain (e.g. in the press, on television, on social media etc.) are considered to be grievances these are recorded and documented by the BSOG's Communication & CSR Manager for further processing per this procedure.

A complaint is considered to be valid if it is submitted using one of the above-mentioned channels. All valid complaints received are processed and registered in a dedicated grievance log. BSOG is keeping this grievance registries in order to track all grievances and to be able to present these registries upon any request from EBRD or other relevant entity. The period of time for registry keeping and the methods for archiving documents is established by internal procedures.

The central log includes the following information:

- Date lodged by complainant or date received;
- Contact details of complainant;
- General information;
- Actions to be undertaken;
- Due date;
- Decision;
- Feedback from the complainant;
- Results; and
- Closing date of the issue.

The BSOG Grievance Committee is responsible to review all aspects of each grievance and reach a decision on the next step. Where the committee does not reach a decision the BSOG CEO shall be responsible to determine the next steps which amongst others may involve additional experts/personnel being added to the BSOG Grievance Committee for a further review or may involve the BSOG CEO determining the decision to be implemented. BSOG will make all reasonable efforts to address the complaint upon acknowledgement of the grievance, progress chasing with the responsible person/department if actions are overdue and escalating any major problems to senior management. **All grievances are acknowledged within 7 days and responded to no later than 30 days.** Once a grievance is logged, the related E&S event(s) that caused the grievance will be tracked to ensure proper closed-out of the grievance and prevent similar grievances.

If the complainant is not satisfied with the solutions proposed/implemented by the to address the grievance, he/she may seek other legal remedies in accordance with the legal framework of Romania.

All stakeholders will be able to deliver complaints personally by post, e-mail, web site or facsimile. Any complaint may be delivered to the company at:

Black Sea Oil & Gas main office

Bucharest

Calea Floreasca nr. 175, etaj 10

Sector 1, 014459

Bucharest, Romania

Phone: +40 21 231 32 56

Contact person: Ana-Maria Pericleanu/Daniela Stroe

Web site: <http://www.blackseaog.com/en/home/>. Email: grievance@blackseaog.com

Community Liaison Officer: Elena Cretu

Corbu Commune

Phone number: 0790 69 08 57

E-mail: elena.cretu@blackseaog.com

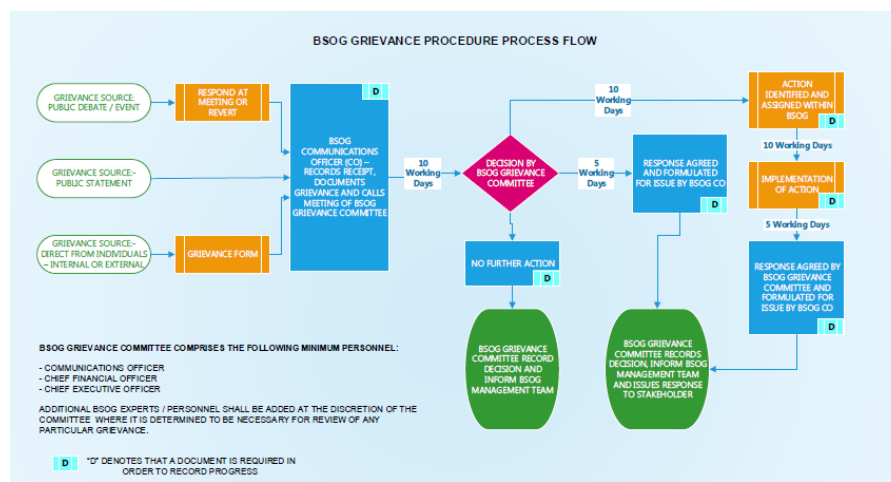


Figure 3 Overview of Grievance Mechanism

In 2022, BSOG has received and registered 24 complaints/requests for information. These are mostly (20) grievances referring to the delay in receiving the salaries from the employer responsible for the works

performed during the offshore operations for the MGD Project and they have requested BSOG's assistance in having the outstanding salaries paid by the contractor. All these grievances were received via email. Out of these, 15 were still opened at the moment of the SEP update (May 2023).

BSOG has been actively involved in trying to ensure that the contractor honours its salary commitments. In this regard, BSOG has sent letters to the contractor asking the management to urge the solving process the outstanding salaries and has made more than 200 calls (since August 2020 with key people such as the Deputy Director or the Crewing Agency Manager).

The grievances received in 2022 are summarized in the below table:

Table 4 Grievances received in 2022

Date	Stakeholder	Subject of complain	Communication channel	Steps and Resolution
02.02.2022	Presumed onshore pipeline neighbour	Request for information regarding the pipeline impact on the landowner lands	Email - Phone	<ol style="list-style-type: none"> 1) Grievance reviewed by the Grievance Committee 2) BSOG has checked the cadastral number of the lands situated in the proximity of the project and concluded that these are not in the area of influence of the project
16.02.2022 and 06.07.2022	Farmer located in GTP vicinity	Grievances regarding the poor waste management in the proximity GTP site which has affected the reed culture and some farming machineries	Phone	<ol style="list-style-type: none"> 1) The complaint was received at the check up call by the consultant developing the Livelihood Restoration Plan (LRP). 2) Grievance reviewed by the Grievance Committee 3) BSOG has paid the damages made to the farming machineries based on the evaluation of a specialized company. 4) BSOG has asked the GTP team to document the complaint and to clear the field of any waste so that the farmer can continue his activity in good order
09.12.2022	GTP neighbour – business unit	Grievance regarding the noise from the GTP impacting her business activity	Grievance Box - Phone - Email	<ol style="list-style-type: none"> 1) Grievance reviewed by the Grievance Committee 2) Several discussions and email exchanges have been done with the owner of the business unit 3) BSOG has performed noise measurements in 5 points at the GTP in March 2023 to identify the source and level of noise. The measurements have concluded that the noise levels on the location of the guest house are in the national threshold limits. The only exceedances were found in some of the points located on the GTP site. 4) BSOG will take the necessary measures to reduce the noise in the area – grievance is still opened
1 in January 4 in February 2 in March 2 in April 1 in May 7 in July 1 in November 2 in December	Contractor employees	Delay in payment of salaries	Email- Phone	<ol style="list-style-type: none"> 1) Grievance review by the Grievance Committee 2) BSOG confirms with the receipt of the grievance with the complainant 3) BSOG has sent letters to the contractor asking the management to urge the solving process the outstanding salaries and has made more than 200 calls (since August 2020 with key people such as the Deputy Director or the Crewing Agency Manager).



Image 5 Grievance box - Corbu Town Hall

8 MONITORING AND EVALUATION

The objective of the monitoring and evaluation process is the continuous improvement of the environmental and social performance of the company.

Subsequent to signing the financing contract, BSOG had to comply with the environmental and social provisions included in the financing agreements, to monitor the project's performance and to provide periodic environmental and social reports to the EBRD. In 2022, BSOG has prepared one Report for EBRD for the period 1st of January– 30th of June 2022. BSOG had the responsibility to facilitate any monitoring visit or audit requested by EBRD. The last monitoring visit of the IESC was carried out in July 2022 for Q1 and Q2 of 2022 and the IESC Monitoring Report was issued in 02.09.2021.

In 2022 the financing agreement between BSOG and EBRD has been closed but BSOG will continue to monitor the environmental and social impacts and issues associated with the project, as a good practice example.

In the monitoring and evaluation process for stakeholder engagement, all the consultations undertaken, all the issues raised, and the actions taken will be recorded. Also, this process implies the description of the lessons learned and any changes to the consultation process.

All queries in relation to the project will be filed in the comments registry, analysed and reported by BSOG project implementation team to management team on a two-month basis during project development and implementation.

Another important aspect is the manner in which the public is informed about the SEP. BSOG Communications & CSR Department will make publicly available the SEP on its website. Also, the SEP will be part of the annual environment and safety report of BSOG.

9 REPORTING

9.1. Internal Reporting

A review of stakeholder engagement will be presented on a regular basis within the BSOG project team

during the Annual Environmental, Health and Safety and Quality (EHSQ) report (including ISO 14000 provisions).

9.2. External Reporting

External reporting will include timely updates to relevant stakeholders regarding Project advancement. The main responsibilities for reporting are attributed to the Communication and CSR Manager. The following activities shall be undertaken as part of the external reporting process:

- Public disclosure of the SEP;
- Environmental reporting to national and local authorities including:
 - Annual and quarterly reports on project development for the National Agency for Mineral Resources, if needed;
 - Annual Environmental Report to EPA/ DDBRA on biodiversity;
 - Annual report on number of offshore operation hours for ACROPO.
- Mass media reports including:
 - Public announcements regarding the beginning of the construction, the implementation of certain activities, restrictions and the ceasing of certain activities;
 - Press releases;
 - Social media updates.

10 ROLES AND RESPONSIBILITIES

The main departments within BSOG responsible for implementing this Stakeholder Engagement Plan are Communication & CSR and Regulatory & PGA. Moreover, BSOG has employed a Community Liaison Officer within the local community. Some of these roles and responsibilities might change over time to reflect the changing needs of the stakeholder engagement process.

Communication and CSR Manager responsibilities:

- **Overall SEP implementation:** monitoring and reporting;
- **Website:** Provide access to relevant information about the project;
- **Focus group meetings, consultations and workshops:** organize focus groups, consultations and workshops in order to understand the community needs and identify the needs of vulnerable groups;
- **Mass media coverage/ Press releases/ Information disclosure:** offer relevant information to the mass media and third parties;
- **Grievance mechanism:**
 - Grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections) in the Grievance Analysis Report form (format included in Attachment 2) in readiness for the BSOG Grievance Committee meeting;
 - Maintain central log of all grievances ensuring it is kept up to date with current status;
 - Act as member of the BSOG Grievance Committee;
 - Prepare minutes of BSOG Grievance Committee Meetings, formally recording all decisions made by completing the Analysis, Analysis Results and Decision sections in the Grievance Analysis Report form for the case;
 - Prepare responses to grievance raisers and agree content with other members of the BSOG Grievance Committee;
 - Issue all responses to grievance raisers and ensure BSOG Management Team are informed.

Regulatory and PGA manager responsibilities:

- **Meetings with local authorities and official correspondence:** organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits;
- **Meetings with national authorities and official correspondence:** organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits;


Community Liaison Officer responsibilities:

- **Grievance mechanism:**

- represent community concerns and grievances to the company;
- report the concerns and grievances to the company fairly and consistently;
- deliver back the resolution to the issues raised;
- **Community engagement:**
 - build relationships based on trust and mutual respect;
 - secure and maintain broad and long-term community support for the company's activities.
 - Biannual report to BSOG on the activities performed.

Further details on responsibilities and specific tasks associated with the above-indicated roles as well as the lines of responsibility within the overall project organization are provided in the Environmental and Social Management Plan (ESMP) and in the Job descriptions. The ESMP defines the overall environmental and social management planning for the entire project.

ANNEX A. Grievance Form

Nr:		
Data:		

FORMULAR DE OBSERVAȚII ȘI SUGESTII	
Nume complet: Acest formular poate fi depus anonim, caz în care vă rugăm să reveniți pentru răspuns în 30 de zile de la depunere	
Informații de contact (vă rugăm să completați cum doriți să fiți contactat/ă):	Prin poștă: Adresa poștală: <hr/> Telefon: <hr/> E-mail: <hr/>
Vă rugăm să notați aici sugestiile și observațiile dvs. privind Proiectul MGD:	

Semnătura: _____
 Data: _____

Acest formular poate fi depus:

- direct în cutia de reclamații și sugestii a BSOG plasată în orice sediu al BSOG sau al contractorului principal sau la sediul Primăriei Comunei Corbu, Str. Principala nr. 38, județul Constanța,
- prin poștă în atenția dnei Ana-Maria Pericleanu, Communications & CSR Manager, Tel.: +40 (0) 724 254 909, adresa Calea Floreasca, nr. 175, et. 10, Sector 1, Bucharest, sau E-Mail: grievance@blackseaog.com

Cererea dvs. va fi înregistrată și vă vom răspunde în termen de maximum 30 de zile.

Black Sea Oil & Gas SA – Politica de confidențialitate a datelor cu caracter personal

Această Politică de confidențialitate vă informează cum Black Sea Oil & Gas SA și afiliații sau partenerii săi („BSOG” sau „noi”) colectăm, distribuim și folosim informațiile dvs. personale în legătură cu completarea unei sugestii sau reclamații legate de activitățile BSOG.

Respectăm confidențialitatea dvs. și ne angajăm să colectăm, să menținem și să utilizăm informații personale despre dvs. în mod responsabil și în conformitate cu această politică de confidențialitate a datelor cu caracter personal.

Colectarea și utilizarea informațiilor personale

Colectăm informații personale care vă identifică:

- Nume complet
- Email
- Număr de telefon
- Adresa de corespondență

BSOG are un interes legitim pentru a utiliza informațiile personale pe care le colectează pentru:

(i) a ține o evidență; și

(ii) asigura comunicarea cu persoana care a depus sugestia/plângerea pentru a primi soluționarea acesteia.

Perioada de retenție

BSOG va păstra informațiile dvs. personale atâta timp cât este necesar în scopurile prezentate în această politică de confidențialitate, precum și pentru a respecta obligațiile noastre legale;

La sfârșitul perioadei de păstrare, BSOG va șterge informațiile dvs. personale într-un mod în care acestea nu pot fi reconstruite sau citite.

Angajamentul nostru pentru securitate

Folosim tehnici de stocare și securitate a datelor actualizate pentru a vă proteja informațiile personale împotriva accesului neautorizat, a utilizării sau dezvăluirii necorespunzătoare, a modificărilor neautorizate sau a distrugerii ilegale ori a pierderii accidentale. Toți angajații noștri sunt obligați să respecte confidențialitatea informațiilor dvs.

Drepturile dumneavoastră

În legătură cu informațiile personale pe care le prelucrăm, aveți următoarele drepturi:

- dreptul de a fi informat cu privire la modul în care informațiile dvs. personale sunt procesate de BSOG;
- dreptul de acces la informațiile dvs. personale;
- dreptul de a rectifica informațiile dvs. personale dacă sunt inexacte sau incomplete;
- dreptul de a șterge (elimina sau șterge) informațiile dvs. personale atunci când acestea nu mai sunt necesare în raport cu scopul pentru care au fost prelucrate inițial;
- dreptul de a restricționa procesarea dacă considerați că interesul legitim al BSOG a depășit drepturile dvs. sau informațiile dvs. personale sunt ilegal procesate;
- dreptul la portabilitatea datelor care vă permite să mutați, să copiați sau să transferați date cu caracter personal din BSOG către orice altă persoană indicată de dvs.

Informații de contact

Dacă doriți:

- să accesați informații personale referitoare la dvs;
- să solicitați corectarea sau ștergerea informațiilor dvs. personale;
- să vă opuneți prelucrării sau să solicitați o restricție privind utilizarea informațiilor dvs. personale;
- pentru a ridica orice altă preocupare cu privire la utilizarea informațiilor dvs. personale;
- atunci vă rugăm să ne contactați folosind formularul nostru de contact și vom lua măsuri rezonabile pentru a rezolva aceste probleme cât mai curând posibil.

Controlor de date

Controlorul de date este: Black Sea Oil & Gas SA

Dacă aveți întrebări în legătură cu această politică, vă rugăm să ne contactați la adresa:

Calea Floreasca, nr 175, etaj 10, Sector 1, București, România;

Telefon: +40 21 231 3256


Fax: +40 21 231 3312

Email: dpo@blackseaog.com

ANNEX B. BSOG CONTACT LIST

Overall SEP implementation Grievance Mechanism Mass media coverage Public Consultations	<p>Ana-Maria Pericleanu Communications & CSR Manager</p> <p>Black Sea Oil & Gas SA 175 Calea Floreasca St. 10th floor District 1, Bucharest T: +40 212 313 256 F: +40 212 313 312 M: +40 724 254 909 Ana-Maria.Pericleanu@blackseaog.com</p> <p>www.blackseaog.com</p> <p>Elena Cretu Community Liaison Officer Corbu village Phone number: 0790 69 08 57 E-mail: elena.cretu@blackseaog.com.</p> <p>Daniela Stroe - Grievance Mechanism HR Manager</p> <p>Black Sea Oil & Gas SA 175 Calea Floreasca St. 10th floor District 1, Bucharest, 014459, RO T: +40 212 313 256 F: +40 212 313 312 M: +40 731 199 444 Daniela.Stroe@blackseaog.com</p>
Contractors	<p>Mark Beacom CEO</p> <p>Black Sea Oil & Gas SA 175 Calea Floreasca St. 10th floor District 1, Bucharest T: +40 212 313 256 F: +40 212 313 312 M: +40 729 199 316</p> <p>Mark.Beacom@blackseaog.com www.blackseaog.com</p> <p>Daniela Gătin Financial manager — Reporting</p>
Regulatory / Permitting aspects Public debates	<p>Oana Ijdelea Email: Oana.Ijdelea@blackseaog.com</p>

ANNEX C. CSR policy

<h1>CSR POLICY</h1> <p>BSOG-CO-POL-001-D01</p>	
<p>BSOG's CSR policy is rooted in the Company's core values of safety, perseverance, pioneering, team work and accountability and aims to meet the expectations of the Company's stakeholders that BSOG runs its business guided by international standards and best industry practices.</p> <p><u>Employees & people</u></p> <p>BSOG values diversity and seeks to provide all staff with the opportunity for employment, career and personal development on the basis of ability, qualifications and suitability for the work as well as their potential to be developed at the job, while working towards our business objectives.</p> <p>We seek to guarantee that all employees are treated fairly and with dignity and consideration for their goals and aspirations.</p> <p><u>Health & Safety</u></p> <p>We are committed to conducting our operations safely and responsibly, which means supporting local communities and protecting the environment, as well as looking after the health and safety of our employees and contractors hired by BSOG.</p> <p>Our goal is to maintain a zero-accident record and we are continually looking for ways to improve our Health and Safety Management System.</p> <p><u>Community</u></p> <p>We seek to make positive contributions to the local economy by improving and maintaining the wellbeing of the community local to our operations. To this end, we work to establish long-term relationships with the local community, understand its needs and assist the community help itself.</p> <p>Our CSR activities focus on education, community development and environmental protection and are conducted in partnership with local people, NGOs, local authorities and other stakeholders. BSOG is committed to making a positive, sustainable impact in these areas.</p> <p><u>Corporate Governance</u></p> <p>BSOG is committed to ensuring that its daily operations are conducted in all respects according to rigorous ethical, professional and legal standards.</p> <p>To this end, BSOG has put in place a system of procedures that enhances the transparency of its business through the strict compliance with the applicable laws and regulations and has zero tolerance to bribery and corruption.</p> <p><u>Environment</u></p> <p>BSOG recognizes that minimising environmental impact and the prevention of environmental incidents are essential to the operation of our business. We continuously improve our performance by setting and reviewing environmental objectives and targets and monitoring our progress.</p>	
<p>Mark Beacom Chief Executive Officer Black Sea Oil & Gas</p>	<p>Signed:</p> <p>Date: 27.02.2019</p>

ANNEX D. Photo report from the CSR activities 2022 – VADUrabil project



Image 1 and 2 Meetings held with the local community for the development of the plan/strategy for sustainable development in Vadu, April and September 2022



Image 3 and 4 „VADU-rabil!” campaign, July/August

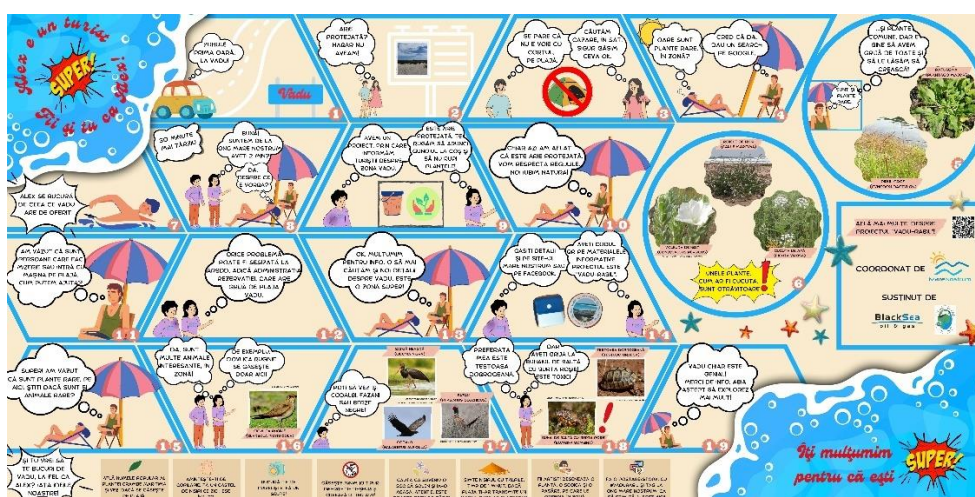


Image 5 „VADU-rabil!” campaign - Ghidul turistului bine-crescut



Image 6 and 7 #60deminutepentruVadu - Meetings with the students and Blue School activity

Fotograf: Zgîrcea Teodora

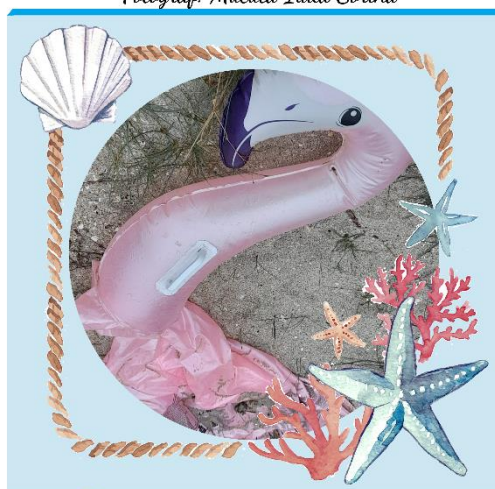


Proiect implementat de
Mareșulșurii

VADU-rabil!

Susținut de
BlackSea
oil & gas

Fotograf: Mucuta Iulia Sorina



Proiect implementat de
Mareșulșurii

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Susținut de
BlackSea
oil & gas

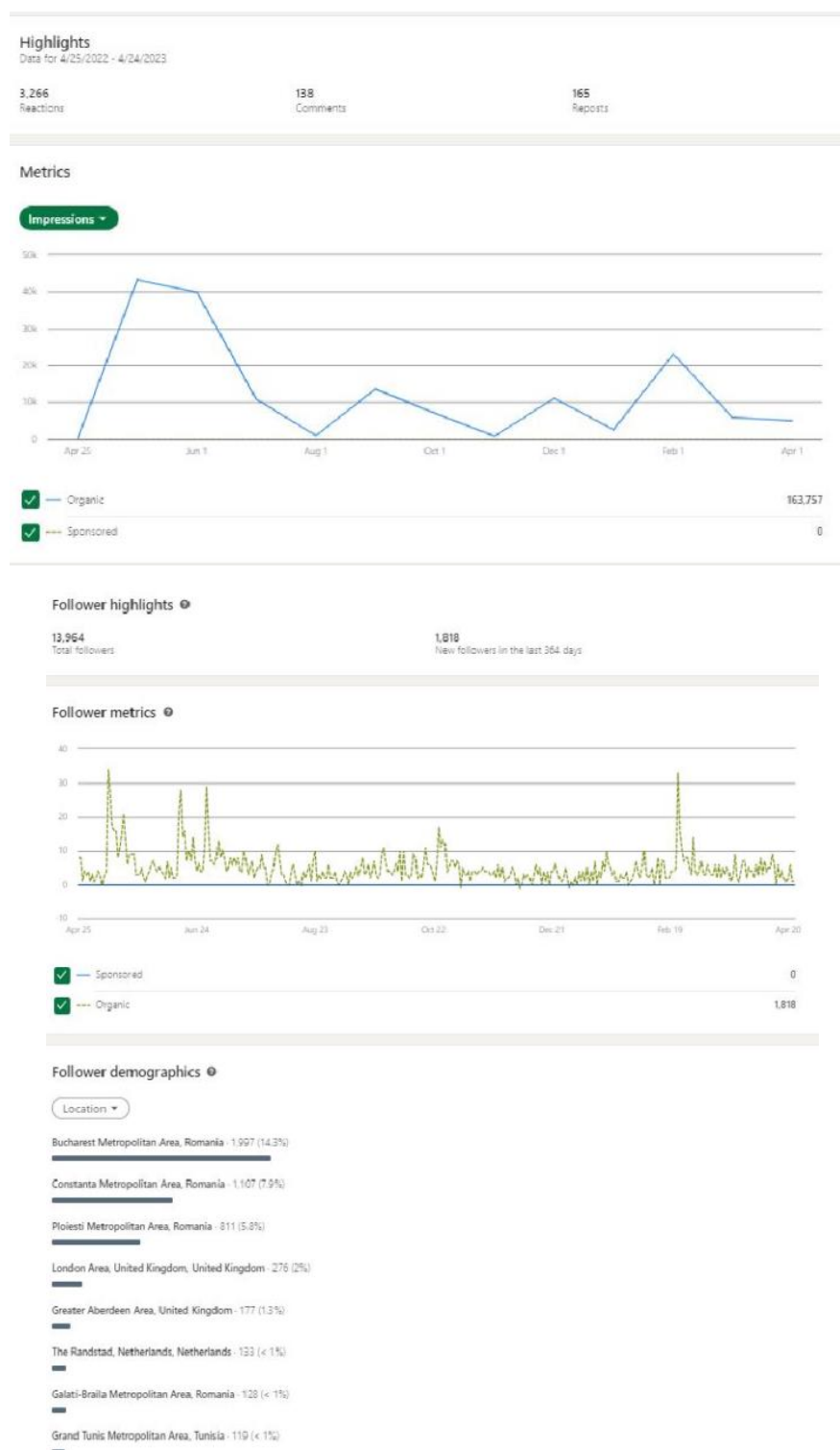
Image 8 and 9 Adoptă plaja Vadu” – pictures from the album developed by the students



Image 10 Christmas Party for the children from Vadu, December 2022

ANNEX E. Social media coverage and press releases in 2022

LinkedIn Statistics (data retrieved on 24.04.2023)



Mass Media coverage for 2022 - selection:



BSOG extrage gaze la maximum din Marea Neagră, 3 mil. mc zilnic, dar nu oprește arbitrajul internațional cu statul român

Mihai Nicuț - mar, 28 iun. 2022, 19:02

Trimite pe: [f](#)

Black Sea Oil and Gas (BSOG) extrage deja trei milioane de metri cubi de gaze zilnic din Marea Neagră, după ce Proiectul Midia (MGD) a început să livreze gazele în rețeaua națională acum două săptămâni, dar compania nu a oprit arbitrajul cu statul român, intentat pentru că trebuie să plătească impozitul suplimentar pe gaze.



ENERGY

ZF exclusive. A new surprise: With the war close, the American giant Carlyle has decided on a strategic review of the newly launched Black Sea gas project and is looking for a partner who will continue to take on the risk of the investment. At stake are reserves of 10 bcm **worth over 12 billion dollars today**

In 2015, Carlyle paid \$42.5 million to enter the Black Sea, and to bring the gas to the surface it invested over \$400 million



Authors: Cristian Hostiuc, Roxana Petrescu

13.10.2022, 19:44 1805

After a 12-year development, the Americans from Black Sea Oil & Gas (BSOG), backed up by the American giant Carlyle, began in June this year to extract the first new gas from the Black Sea.



Home > Economic

Gabriel Pecheanu CORBU, (28.06.2022, 12:15)

Moment istoric: se începe producția de gaze la Midia

„Este un moment istoric pentru industria energetică din România: începerea producției de gaze în cadrul Proiectului de Dezvoltare Gaze Naturale Midia”, a spus premierul Nicolae Ciuică, la ceremonia de începere a producției de gaze naturale în cadrul Proiectului MGD, operaționalizat de Black Sea Oil & Gas.

[Distribuie](#)

3484 afișări



„Participăm, așa cum a spus și CEO-ul acestui proiect, la un eveniment istoric. Este un moment istoric pentru industria energetică din România: începerea producției de gaze în cadrul Proiectului de Dezvoltare Gaze Naturale Midia. Este primul proiect nou de exploatare a gazelor naturale din zona românească a Mării Negre, așa cum s-a specificat, în ultimii 30 de ani, iar luna aceasta, primele cantități de gaze naturale au fost introduse în piața autohtonă. România face astfel un pas decisiv pentru garantarea securității energetice, într-un moment de coticitură și în contextul în care Europa și piețele mondiale iau măsuri rapide pentru a-și aproviziona cetățenii și economiile cu energie. Faptul că acest proiect va genera un miliard de metri cubi de

EXCLUSIVE: [Carlyle and EBRD have requested the opening of a data room for the only new offshore project in the Black Sea with a view to selling BSOG or partnering with another player](#)

ENERGY



Written by: Florin Rusu

07.11.2022, 21:00hrs

The shareholders of Black Sea Oil & Gas (BSOG) - Carlyle equity fund and the European Bank for Reconstruction and Development (EBRD) - requested the competent authorities in Romania to open a data room for the Midia Gas Development (MGD) project, the only new offshore gas exploitation project in the Black Sea, with a view to partner with a third party or even to sale the company, official sources told Profit.ro.



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Energy



2 minute read · June 28, 2022 4:10 PM GMT+3 · Last Updated 10 months ago

Black Sea gas platform launched off Romania despite war risks

By Luiza Ilie



[1/2] A view of Black Sea Oil&Gas onshore gas treatment plant, in Vadu, Constanta county, Romania, June 28, 2022. Inquam Photos/George Calin via REUTERS

< 1 2 >

VADU, Romania, June 28 (Reuters) - A new Black Sea offshore gas platform was officially launched off Romania on Tuesday and plans to extract gas despite risks posed by war in Ukraine, including mines detected in waters nearby.

Americanii de la **BSOG**, cu gigantul Carlyle în spate, au reușit ce nu a făcut statul român în 30 de ani: primele gaze noi din Marea Neagră au intrat în sistem

● „Dacă aplaudăm mereu după împărații străini, noi nu vom reuși să mai facem nimic“

ROXANA PETRESCU

La Caragele, în Buzău, la mari adâncimi există o pungă de gaze de 200 de miliarde de metri cubi, cam cât se estimează că ar fi în Marea Neagră. Acest gaz de pe uscat stă de ani de zile aproape nederanjat, în posesia statului român, prin Romgaz.

Între timp, după o dezvoltare de 12 ani, americanii de la **Black Sea Oil & Gas (BSOG)**, care are în spate colosul Carlyle, au reușit să finalizeze proiectul **Midia Gas Development (MGD)**, prima dezvoltare complet nouă făcută în platoul continental al Mării Negre în ultimii 30 de ani.

Momentul în care americanii au finalizat proiectul este extraordinar: producția internă este pe minus, astfel că nevoia de noi resurse este tot mai pronunțată, legislația abia a fost schimbată în favoarea investitorilor, iar preturile sunt la cer și cel mai probabil acolo vor rămâne ani de zile.

„Încurajăm investițiile străine“, a spus premierul Nicolae Ciucă, prezent la evenimentul prin care s-a marcat finalizarea proiectului **MGD** al americanilor de la **BSOG**, întrebând fiind de ce nu a fost posibilă o astfel de investiție și din partea statului român în ultimii ani pe zona de explorare și producție de hidrocarburi. „Avem nevoie să atragem investiții pentru că acestea sunt singurul colac de salvare“, a mai spus Ciucă. Premierul a mai precizat că odată cu finalizarea proiectului **MGD**, România face un pas decisiv spre asigurarea resurselor interne necesare acoperirii consumului, într-un moment de coitură, marcat de războiul din Ucraina.

„Vom ajunge să asigurăm circa 90% din necesarul de consum prin resurse interne într-un moment în care furnizarea de gaze la nivel mondial este pusă în pericol“, a mai spus Ciucă, dând asigurări că România are o abordare pro-business în domeniul energiei.



- „Dacă aplaudăm mereu după împărații străini, noi nu vom reuși să mai facem nimic.“ **Gabriel Comănescu, proprietar Grup Servicii Petrolifere**
- „De peste 10 ani lucrăm la acest proiect, am interacționat cu multe guverne și cu multe autorități, dar am schimbat discursul de la imposibil la crearea unui drum pe care pot merge și alți investitori.“ **Mark Beacom, CEO Black Sea Oil & Gas (BSOG)**
- „Este gaz de foarte bună calitate (gazul din proiectul **MGD**), ridică media de calitate a întregului sistem.“ **Ion Sterian, directorul general al Transgaz**
- „Am discutat despre situația de la Caragele (perimetru aflat în portofoliul Romgaz). Se extrag de acolo cantități de gaze din 2020, dar vom demara o procedură de licitație pentru ca din 2024 să extragem și mai multe gaze.“ **Virgil Popescu, ministrul energiei**
- „Avem nevoie să atragem investiții pentru că acestea sunt singurul colac de salvare.“ **Nicolae Ciucă, premierul României.**

Virgil Popescu, ministrul energiei, prezent la rândul său la eveniment, a precizat că oricum licența de explorare și exploatare era a investitorului american, astfel că investiția trebuia făcută de acesta.

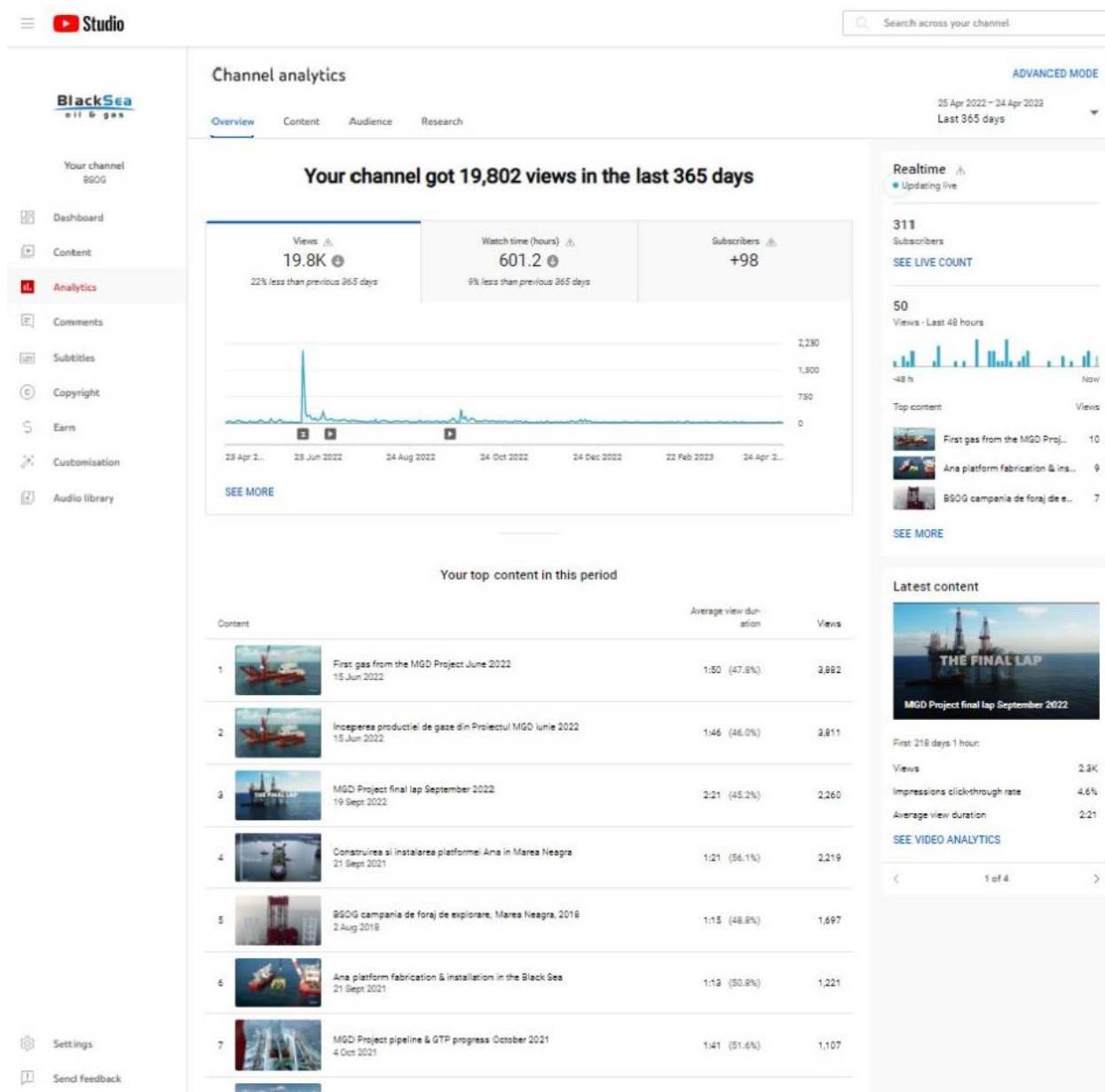
„Admir răbdarea, tenacitatea și perseverența investitorului de a crede că până la urmă legea va fi modificată astfel încât să finalizeze această investiție, să se țină de cuvânt“, a mai spus Virgil Popescu.

Dar în timp ce **BSOG** a finalizat acest proiect după 12 ani, din care patru au fost marcați de blocajul generat de Legea Offshore, iar doi au fost de pandemie, anul acesta aducând și un război la orizont, statul român stă degeaba cu resurse remarcabile de gaze îngropate, altele decât cele din proiectul **MGD**. Mai mult, în ultimii 30 de ani statul român nu a finalizat nicio investiție energetică nouă, lucru care a făcut din România un importator net de energie,

adâncindu-i și dependența de gaze de import. De exemplu, pe uscat, la Caragele, Buzău, este o pungă de gaze de 200 de miliarde de metri cubi care așteaptă să fie exploatată de Romgaz. Condițiile sunt extrem de delicate, spun specialiștii din piață, dar cu toate acestea echipamentele există. Doar pentru o comparație, consumul de gaze al României s-a ridicat anul trecut la circa 12 miliarde de metri cubi.

Mai multe detalii pe fcorporate.ro

Youtube Statistics (retrieved on 25.04.2023)



ANNEX F. Feedback form on BSOG intranet for employees

← → ↻ <https://forms.office.com/Pages/ResponsePage.aspx?id=Uw86ugw5c0mESTwUQW-Kv7uW-KMCmZxAvUNrUF1YjUFUMUw0RiUNRNzVYQ1FZTDI3VjRBNVlQSOjLQI4u>

Apps Gaoxing Documenta

Give us your feedback

Please use this form to share your suggestions on improving the way the company is operated.

Hi, Ana-Maria, when you submit this form, the owner will be able to see your name and email address.

* Required

1. Please enter your function below: *

2. Please select the activity/department you wish to comment on *

3. Please enter your comments or suggestions in the textbox below *

4. What outcome do you expect? *

ANNEX G. Employee engagement in CSR activities and internal announcements

CSR action on Vadu beach, Friday, October 7th



Ana-Maria Pericleanu

To: Bianca Sontu; Florentina DUȚĂ; Andreea Andrei; Delia Trancu; Claudiu Micu; Oana David; Daniela Stroe; Mark Beacom; Daniela Gatin; Ileana Stefanescu; Calin Benu - ITAdviser; Oana Manu; Andreea Teodorescu; Simona Lita; Claudia Serban; Daniela Vlad; Marian Nedelcu; ojidelea@ijdelea.ro



Reply

Reply All

Forward



Fri 9/23/2022 11:38 AM

Dear all,

On the 7th of October (Friday) we are back to Vadu beach for the last session this year of marine litter collection with Mare Nostrum NGO.

If you enjoyed the last CSR action on Vadu beach with treasure hunt, biodiversity awareness raising and waste collection, will have a remake.

Here is what we have in **plan for October 7th**:

- Treasure hunt – about half an hour
- Regular waste collecting – about 2 hours
- A surprise guest on the beach – about half an hour
- Buffet lunch in the area
- Another surprise visit

Other details:

- Transportation to Vadu and back will be covered by BSOG as well as the lunch. Estimated departure time from Bucharest 7:00am, return to Bucharest 7:00pm.
- Mare Nostrum will provide all the necessary equipment and take care of disposing the waste in a responsible manner.
- We will team up with the people of Mare Nostrum and some teenagers from Corbu coordinated by Elena Cretu, our community liaison officer.

Should the weather forecast be unfriendly, we will postpone the activity for a different date.

If you like how this sounds, let me know and I will send you the full logistics for the day.

Thank you,

ANNEX H. Photo report of the activities carried out in 2022 -2023

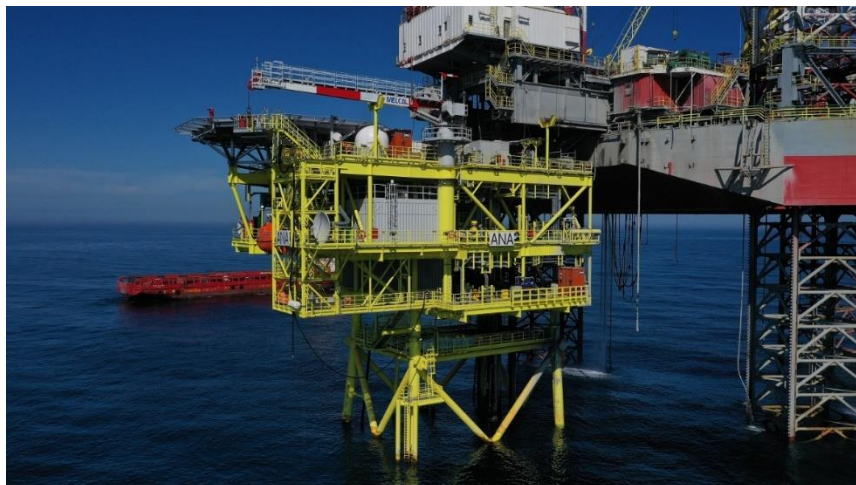


Image 1 Ana Platform wells drilling, April 2022



Image 2 Offshore trenching operations, January 2023



Image 3 and 4 Gas Treatment Plant in Vadu during construction, February/May 2022



Image 5 Gas Treatment Plant in operation, September 2022