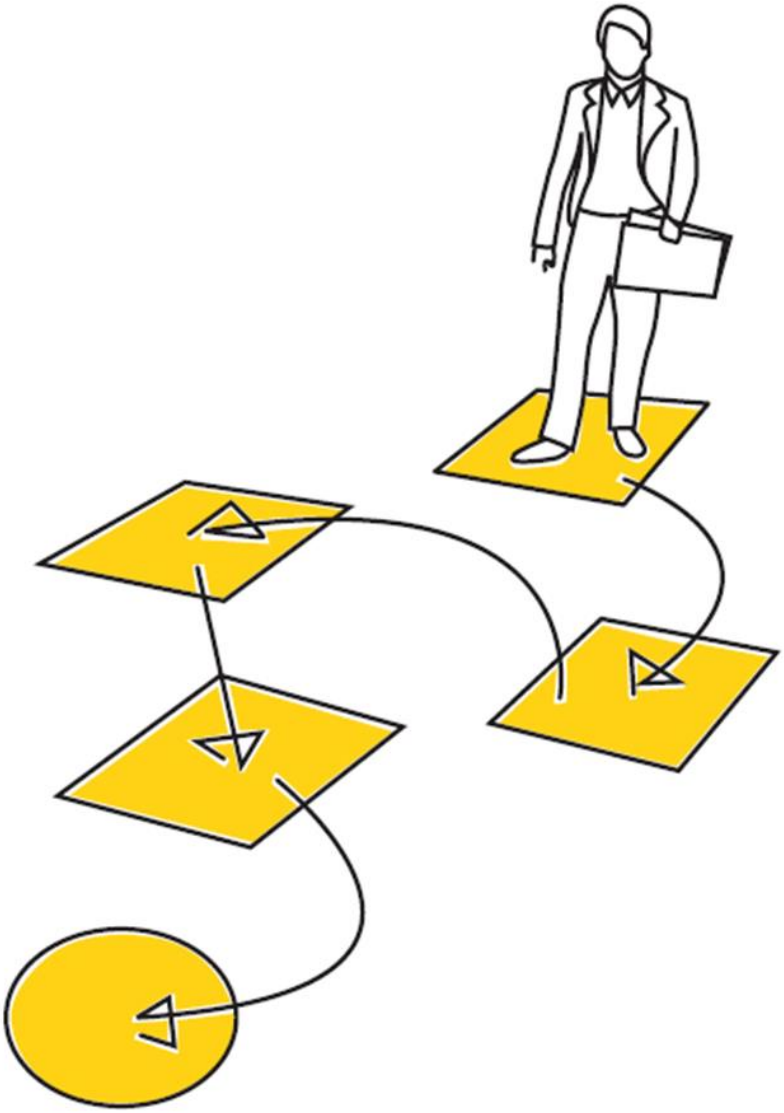
Report
2023 Annual Environmental Report - OCTP Phase 2



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REVISION SHEET

Rev.	Date	N. pages	Change Description	Prep.	Reviewed	Apr.
0	26/02/2024	49	First issue	J.E. Ahianyo	Anthony Osei-Ahenkorah	A. Pasquale

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1 OBJECTIVE

This report is in accordance with the requirements of the following documents:

- Environmental Protection Agency (EPA) Permit for the operation of the gas onshore receiving facility (ORF) at Sanzule with validity from 21st December 2022 – 20th December 2025 (Permit No. CE0021780945).
- Regulation 25 of the Environmental Assessment Regulations 1999 (LI 1652).

2 SCOPE

Eni Ghana Exploration & Production ("Eni Ghana") has issued this Annual Environmental Report (AER) to cover its Environmental activities from January through December 2023 for Phase 2 of the OCTP project.

3 REFERENCES

[Ref.A1]	"Eni Ghana IMS"
[Ref.A2]	Environmental and Social Impact Assessment Doc. 000415_DV_CD.HSE.0304.000_00
[Ref.A3]	pln ms hse 022 eni Ghana r00 - Environmental Management Plan for Production Phase of OCTP Phase 2
[Ref.A4]	ESL's Environmental Quarterly Reports for Onshore Receiving Facility
[Ref.A5]	EPA - Environmental Permit : CE0021780945

4 ACRONYMS

AER	Annual environmental reports
bbl.	Barrel
CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
EMS	Environmental Management System
EPA	Environmental Protection Agency
EPC	Engineering Procurement Construction
EPIC	Engineering Procurement Installation Construction
ERP	Emergency Response Plan
ESAP	Environment & Social Action Plans
FPSO	Floating Production Storage Offloading
GES	Gas Export Sealine
GNGC	Ghana National Gas Company

GNPC	Ghana National Petroleum Corporation
HSE	Health, Safety and Environment
HSEQ	Health, Safety Environment and Quality
IMS	Integrated Management System
ISO	International Standard Organization
JV	Joint Venture
LTE	Landfall End Termination
NAG	Non-Associated Gas
OCTP	Offshore Cape Three Points
ORF	Onshore Receiving Facility
OSRL	Oil Spill Response Limited
POD	Plan of Development
PTW	Permit to Work
TTIP	Takoradi-Tema Interconnecting Project
WTN	Waste Transfer Note
WBG	World Bank Group

5 DEFINITIONS

Company	Eni Ghana employees & assets engaged in the oil & gas operations
Contractor	An outside Company awarded a contract by the Company to perform a defined portion of work or to provide services or facilities
Environmental aspects	Elements of an organization's activities or products or services that can interact with the environment
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects
ESHIA	Environmental, Social, Health Impact Assessment. Process for predicting and assessing the potential environmental social and health impacts of a proposed project, evaluating alternatives and designing appropriate mitigation, management and monitoring measures
Incident	Any accident or injury that disrupt the normal operations development. In this definition "near misses" are included.

6 INTRODUCTION

The Offshore Cape Three Points (OCTP) development license is located approximately 60 km off the coast of the Western Region of the Republic of Ghana.
The license is for developing oil and gas and the joint venture (JV) is composed of Eni Ghana Exploration and Production Limited ("Operator") holding 44.444% participating interest (PI), Vitol Upstream Ghana Limited ("Vitol") holding 35.556% (PI), and Ghana National Petroleum Corporation (GNPC) holding 20% (PI) with 15% carried and 5% paid.

Figure 1 indicates the block area of the OCTP block.

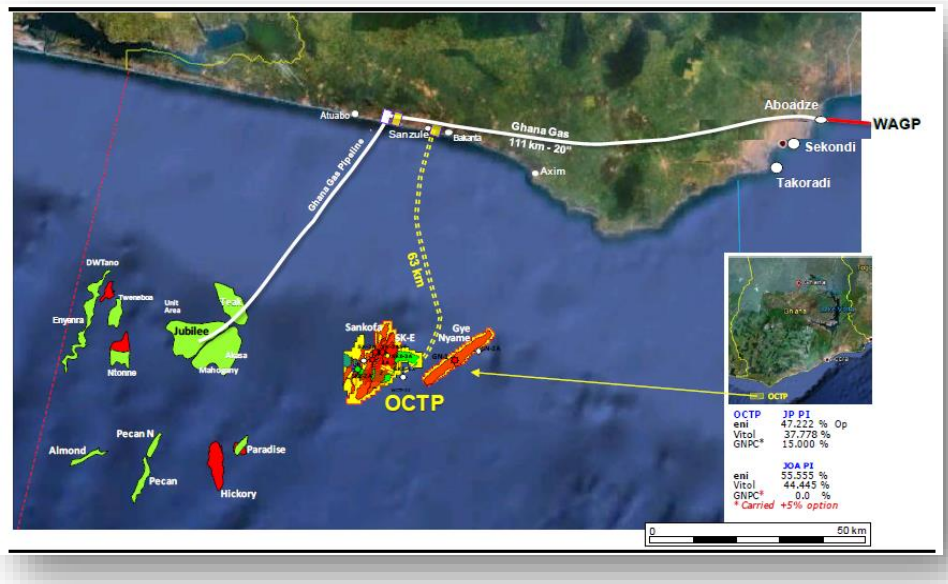


Figure 1: OCTP Block Area

The JV made three non-associated gas (NAG) discoveries: Sankofa Main Field in 2009, Gye Nyame Field in 2011, and Sankofa East Field in 2012. In addition, two oil discoveries were made: Sankofa East Field Cenomanian and Sankofa East Campanian, both in 2012 ("Oil Discoveries"). The estimated volumes in place associated with the discoveries are some 480 MMbbls of oil and 1.5 Tcf of non-associated gas.

The POD approved by the Petroleum Ministry on 30th December 2014 and its amendment approved on 11th May 2015 considered the integrated development of both oil and non-associated gas in 2 Phases:

- Phase 1: Oil Development Project. This phase consists of 15 subsea wells (10 oil producers, 2 water injectors and 3 associated gas injectors), subsea facilities, and a new conversion, double-hull floating production, storage and offloading (FPSO) unit that is located about 60 km offshore, south of Sanzule;
- Phase 2: Non-Associated Gas (NAG) Development Project. This phase consists of five (5) subsea wells, subsea facilities, gas treating facilities located on the FPSO unit, 63 km subsea gas pipeline, an Onshore Receiving Facility (ORF), and other associated onshore components. During operations, well fluids are collected at a dedicated production manifold located on the FPSO where the multiphase fluids will be sent to a slug catcher for initial separation. The gas separated from the other fluids (mainly condensates and water) are routed to a dew point control system to achieve the required export specification ensuring no flow assurance problems. The treated gas is then exported to shore via a new subsea pipeline. Onshore, the gas is received at an ORF and then sent to the existing Ghana National Gas Company (GNGC) sales pipeline.

The Phase 2 Gas Development Project Environmental Impact Assessment (EIA) process was undertaken by ERM. Submission of the Final EIS to Ghana Environmental Protection Agency (Ghana EPA) was done on July 8th 2015 and the first Environmental Permit for the Phase 2 Development released on July 24th 2015.

This AER provides the description of the Eni Ghana's environmental activities in 2023 for Phase 2 of the OCTP project.

6.1 ONSHORE RECEIVING FACILITY (ORF)

After NAG treatment on the FPSO (i.e. dew point control) gas is sent to the "ORF". The ORF which is located in the Sanzule area of the Ellembelle district in the Western Region is designed to compress a maximum of 405 MMSCFD, to handle the gas from the FPSO (181 MMSCFD plus 10% overdesign) in addition to gas potentially arriving into the export sealine from other pipelines under the charge of other potential operators. The ORF is designed to receive and compress also lean gas coming from the GNGC Atuabo gas plant, through the existing pipeline that will be commingled at Sanzule and sent again to the GNGC pipeline, allowing the necessary pressure to arrive at Aboadze Power Plant.

Eni Ghana's activities in 2023 for Phase 2 of the OCTP project were covered by One (1) Environmental Certificate. The Permits are:

- Environmental Protection Agency (EPA) Permit for the operation of the gas onshore receiving facility (ORF) at Sanzule with validity from 18th December 2019 – 17th December 2022 (Permit No. CE0021780607) expired, and a new permit was issued with validity of 21st December,2022 to 20th December,2025. (Permit no. CE0021780945)

6.2 STATUS OF ORF CONSTRUCTION

There were no construction activities in 2023. Below is an overview of the ORF.

Figure 2: Overview of ORF

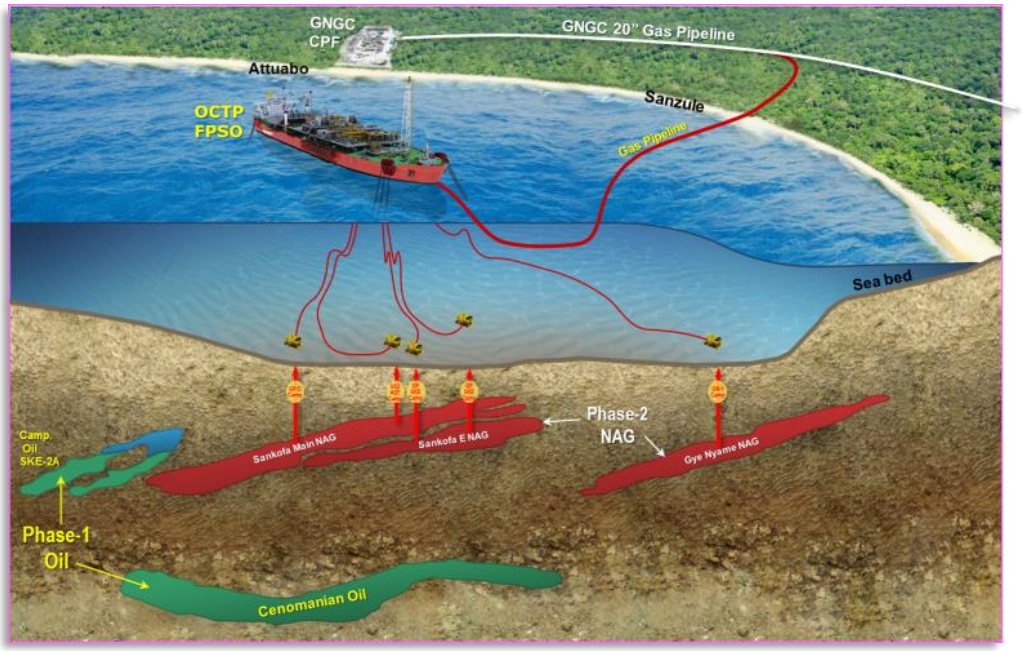


Figure 3: Schematic Layout-Phase 2

6.3 GAS PRODUCTION

In 2023, About 70656.91 MMscf of Non-Associated Gas was produced. Out of the total NAG produced, about 62,415.00 MMscf was exported as Sales Gas and about 6.838 MMscf flared on the FPSO JAK whereas about 13.77 MMscf of the gas was vented and 987.98 MMscf was used as fuel gas to run the ORF plant. This complied with sections 6.7 of the EPA Permits issued for Phase 2 operations (Permit no: CE0021780945)

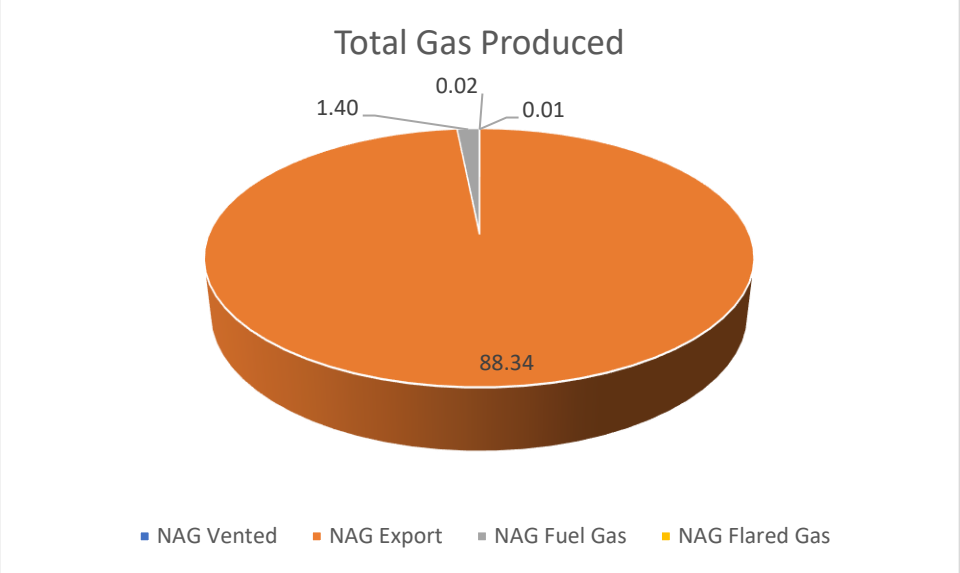


Figure 4: Graph of Total NAG Produced

7 ENVIRONMENTAL MANAGEMENT

7.1 ENVIRONMENTAL MANAGEMENT STRUCTURE

Eni Ghana is committed to follow and comply with all applicable legal and regulatory requirements for its operations. Above that, Eni Ghana considers environmental protection as an engine of a continuous improvement process that guarantees achievements over time. For this reason, Eni Ghana has developed a set of guidelines that clearly include Company's principles on managing Environmental matters. The HSE Department is in charge of Environmental Management. In order to manage environmental related risks, the Company implements a series of practices from the identification of risks and assessment of impacts to developing appropriate standards, implementation of environmental management plans, procedures, work instructions and control of effectiveness of these through continual monitoring and periodic auditing and inspections of procedures and operational sites to ensure compliance, communicate responsibilities and monitoring.

The Environmental management system is implemented through the Company's HSE Integrated Management System (IMS). Eni Ghana's HSE IMS is applicable to all Company's activities and within this framework, all Environmental Impact Assessment (EIA) studies, Environmental Management Plans and programs (including specific procedures and plans) and other formal documentation are implemented to assure that all requirements contained in

these documents are adequately managed. Since December 2010, Eni Ghana has been certified in accordance with the Environmental Management System-EMS (ISO 14001) standard. ISO 14001 is an internationally agreed standard that sets out the requirements for an environmental management system and helps organizations improve their environmental performance. This permits Eni Ghana to implement proactive environmental objectives and manage activities through the best practice tools. The EMS regularly confirms compliance by an independent authorized certification body, which verifies and endorses full alignment with the requirements of international standards for Environmental Management. In 2020, a Recertification Audit was conducted for ISO 14001.

Further, in 2023, top management provided leadership and direction to ensure the Company was operating in an environmentally responsible manner.

A number of management plans already developed, were updated and extensively implemented for specific environmental issues during the reporting year. Some of these plans include:

- HSE Policy
- Environmental Management Plan;
- Water Management Plan;
- Environmental Monitoring Program;
- Biodiversity Management Plan;
- Avian Biodiversity Action Plan;
- No Net Loss Implementation Plan (NNLIP)
- Sea Turtles Biodiversity Action Plan;
- Prevention & Control of Alien Invasive Species;
- Waste Management Plan; and

Among others, these plans deal with the below listed environmental issues:

- Water Pollution;
- Traffic Management;
- Sea Turtles;
- Emissions (air, Noise etc.);
- Traffic issues;

- Biodiversity Management;
- Wildlife Protection;
- Waste Management;
- Oil and chemical spills.

7.2 ENVIRONMENTAL MONITORING

Eni Ghana's operations have environmental aspects that have to be monitored adequately to ensure local environmental quality and ecological conditions are preserved. Monitoring programs were necessary to ensure discharges and emissions from operational activities meet regulatory limits for various environmental parameters. In order to carry out this essential environmental function efficiently, one contractor was in place to conduct onshore environmental monitoring. This was in order to ensure compliance with regulatory requirements, comply with WBG requirements as well as evaluate the effectiveness of operational controls and other measures intended to mitigate potential impacts.

In 2023, monitoring and environmental activities focused on:

- Groundwater quality;
- Surface water quality;
- Waste management;
- Air emissions;
- Noise emissions;
- Stack Emission Monitoring
- Conservation of flora and fauna;
- Re-vegetation

7.2.1 Ecosystem Services Monitoring

To ensure that Production activities do not disrupt ecosystem-provisioning services, Eni Ghana conducted monitoring of ecosystem services of the ORF and associated infrastructure through its Contractor ESL. The main objectives of this activity were to ensure that:

- Collection and/or selling of plant specimens by employees of the Company is forbidden.
- Collection and /or selling of Bushmeat by employees of the company is forbidden.

Community has access to the ecosystem services that is, provisioning services and regulating services (e.g. access water and harvesting wood within the Concession area).

Also there was an installation of over sixty (60) Artificial nest Boxes in 2023 after a field reconnaissance study in 2022 conducted by our Environmental Service contractor (Envaserv). The survey formed part of the No Net Loss Implementation plan, a requirement by the World Bank Group to ensure the project meets biodiversity and environmental requirements.

Also, a follow up survey was carried out in the last quarter of 2023 to ascertain the Bird Occupancy in the nest Boxes. Key findings from this survey included the positive levels of bird activity observed around most locations where the nest boxes were installed. Additionally, there is the recognition of the need for additional time to observe the colonization of the nest boxes by avian species as it is too early to draw conclusions about the effectiveness of their use.

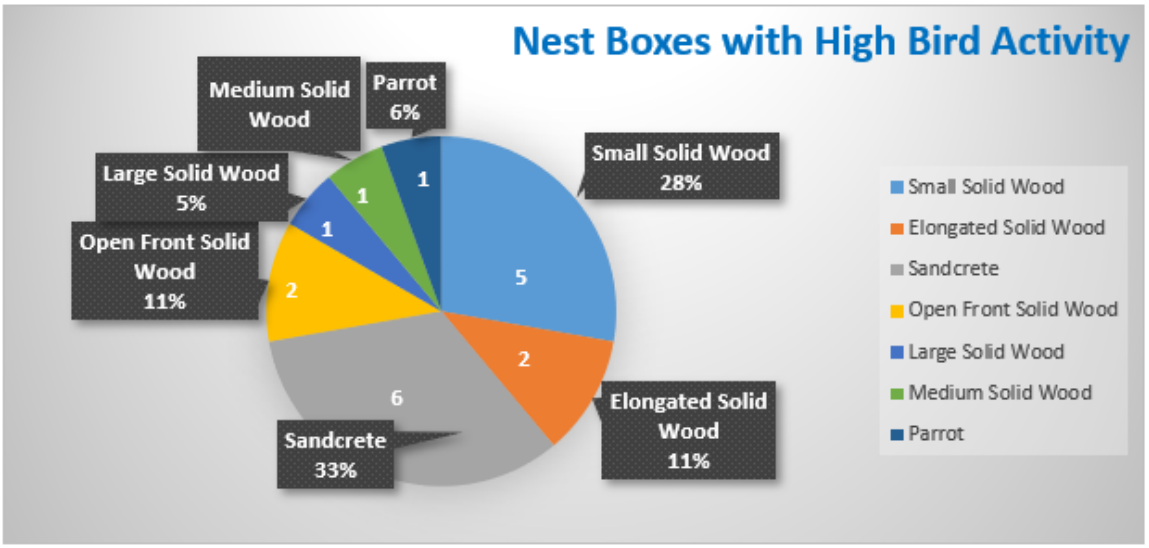


Figure 5: Follow up Survey on Artificial Nest Boxes

7.2.1.1 Plant Nursery

As part of the Reinstatement and Re-Vegetation Plan (RRP), the nursery activities, which started in 2017, continued in 2023. The well-constructed nursery covers an area of approximately one hundred and nineteen square meters. It has fixed shelves, which can take approximately one hundred and forty-four seedlings per pallet.

Maintenance activities were done on the nursery in 2023 to support the revegetation activity at the ORF. Below are some pictures of the maintenance activity on the nursery.

Figure 6: Plant Nursery Maintenance Activity

7.2.2 Re-vegetation Activities and Alien Invasive Species (AIS) Management

The primary operations carried out in 2023 in terms of ORF restoration and revegetation were the management of revegetated plots and plant performance monitoring. Regular maintenance was carried out to ensure that the seedlings properly establish and gaps resulting from seedling mortality filled up. This involved replacement of dead seedlings and removal of noxious weeds from the plots.

The monitoring of Alien Invasive Species (AIS) in 2023 was to ensure effective manual control of the most vigorous Alien Invasive Species. Several seedlings of Chromolaena odorata and Leucaena leucocephala were manually removed from several locations in the ENI Concession.

Figure 8 below presents some pictures from re-revegetation activities.

Figure 7: Pictures of re-vegetation activity

7.2.3 Avian Monitoring

The Amanzuri IBA in which the project is situated is an important wintering grounds for several birds including the Sanderlings. In a quest to monitor the impact of Eni Ghana's activities on the large population of birds that are present around the concession area, ESL Consulting Limited was contracted to perform periodic avian activities which included shorebird monitoring, forest birds monitoring, Vulture Monitoring and IBA SPR (Stress Pressure and Response) monitoring.

Various awareness session and refresher training were done for the Project Affected communities and ORF Personnel respectively. In complementing the activities, refresher training on Snake identification and awareness were conducted for personnel at the ORF.

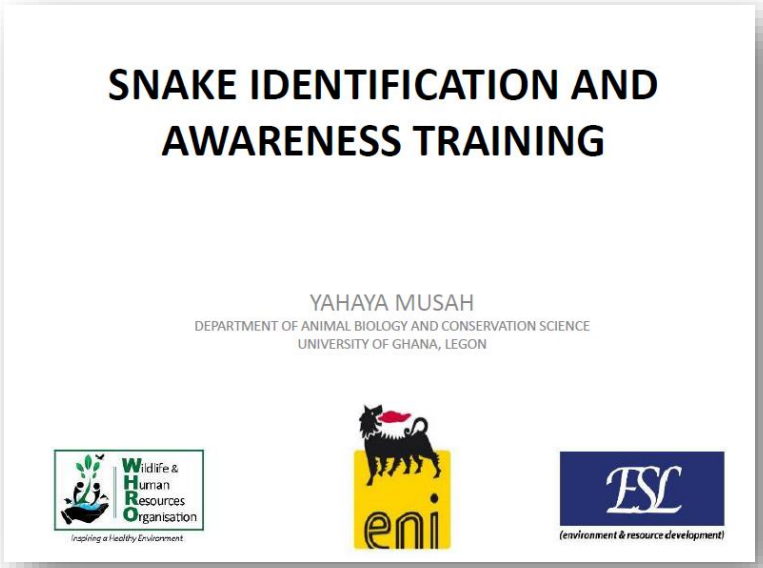


Figure 8: Snake Identification and Awareness Training

7.2.4 Sea Turtle Monitoring

ESL was again contracted to monitor the impacts of company's activities on sea turtles. This monitoring was conducted periodically, and it involved the following aspects:

- Beach monitoring activities during the peak nesting and shoulder season
- Monitoring just after sunrise for best viewing of crawls as turtle track signs begin to deteriorate as the sun dries up the sand;
- Undertaking night patrols to collect data and also to deter poachers and record any of their activities;
- Counting and photographing all crawls regardless of age. Photographs taken of adult females to confirm identification (care was taken not to alter nesting behaviour and use of camera flash was avoided);
- Movement by trained turtle volunteers along the beach at the level of the last high tide;

- Marking crawls that have been recorded by sweeping feet across the tracks. This avoided double counting in subsequent days.
- The use of sea turtle monitoring app
- Awareness session for the communities
- Habitat Assessment for sea turtle conducted in November 2023
- The hatcheries were maintained for the peak season monitoring of sea turtle.

Figure 9: Sea Turtle Monitoring

7.2.5 Air Quality Monitoring & Air Emissions

Air Emissions

Environmental monitoring contractor, ESL performed air quality monitoring on a quarterly basis. The following tables below illustrates results of air quality monitoring performed each quarter during 2023.

Further, during the reporting year, hydrocarbon used for power generation and for compression activities were monitored. Emissions generated because of fuel consumption were calculated using SHERPA, an excel based tool developed by the Eni Upstream for accounting air emissions.

The SHERPA tool collects, manages and consolidates air emissions allowing accounting for GHG emissions, in addition to other air pollutants (SOx, CO, NMVOCs, and NOx). Table 1 below summarizes air emissions data generated using SHERPA.

Fuel Gas used for the whole OCTP Project (FPSO and ORF) is recorded in the Phase1 Annual Environmental Report for 2023 (rep ms hse 199 eni ghana).

Table 1: Emissions Data

Site	Emission Source	CH_4 (t)	CO_2 (t)	CO_2 (t CO2 eq)	N_2O (t)	NO_x	SO_2	CO(t)	nmVOCs (t)
ORF	Venting	248.71	3	6,220.78	0	0	0	0	50.01
ORF	Diesel Generator	0.00	107.17	109.44	0.01	0.45	0.27	0.03	0.1

Non-Associated Gas (Flaring and Venting)

About 13.8 MMscf of Non-Associated Gas was vented in 2023 at the ORF. There is no flaring at the ORF.

Air Quality Monitoring

Monitoring data from air quality analysis performed in 2023 are presented in the following sections.

Parameter	*Permanent Accommodation Camp*	*ORF*	*Sanzule*	*Anwolakrom*	*Ghana EPA (1)* *(24hour time weighted average)*
	24-hr Average Concentration				
*January 2023**					
**Data not available due to delays in award of contract*					
June 2023					
NO2 (µg/m3)	*1.66*	*1.77*	*3.43*	*2.78*	*150(24-hour)*

SO2 (µg/m3)	*12.49*	*6.41*	*14.23*	*12.50*	*150(24-hour)*
PM10 (µg/m3)	*17.01*	*4.90*	*18.69*	*17.92*	*70 (24-hour)*
TSP (µg/m3)	*22.11*	*12.97*	*37.45*	*35.72*	*150 (24-hour)*
September 2023					
NO2 (µg/m3)	*2.17*	*2.05*	*3.59*	*3.79*	*150 (24-hour)*
SO2 (µg/m3)	*9.22*	*3.37*	*5.68*	*9.21*	*150 (24-hour)*
PM10 (µg/m3)	*8.80*	*22.89*	*42.32*	*64.89*	*70 (24-hour)*
TSP (µg/m3)	*20.0*	*41.04*	*85.49*	*129.8*	*150 (24-hour)*
December 2023					
NO2 (µg/m3)	*1.42*	*3.87*	*4.53*	*4.09*	*150 (24-hour)*
SO2 (µg/m3)	*3.12*	*2.12*	*7.87*	*4.91*	*150 (24-hour)*
PM10 (µg/m3)	*17.45*	*12.38*	*21.62*	*69.78*	*70 (24-hour)*
TSP (µg/m3)	*23.78*	*34.43*	*56.70*	*141.75*	*150 (24-hour)*

Table 2: Air Quality Monitoring

7.2.6 Groundwater Quality Monitoring

In order to identify the existence of trends in groundwater quality deterioration or improvement, because of on-going constructional activities on the ORF, groundwater was monitored.

Table 3 below summarizes results of groundwater analysis.

Parameter	**pH**	**Temperature**	**Conductivity**	**Salinity**	**Resistivity**	**ORP**	**Turbidity**	**TDS**	**DO**
Unit	*pH units*	*˚C*	*µS/cm*	*PSU*	Ωcm		*NTU*	*mg/l*	*mg/l*
*January 2023**									
GW 02	**Data not available due to delays in award of contract*								
June 23									
GW 02	*Because of the flood effect, all routes to the sampling sites were rendered almost inaccessible.*								
September 23									
GW 02	*7.30*	*28.26*	*303*	*0.66*	*1020*	*240*	*5*	*524*	*4.63*
December 23									
GW 02	*7.36*	*29.77*	*820*	*0.4*	*901*	*60*	*66*	*525*	*2.73*

Table 3: Groundwater Quality Monitoring

7.2.7 Stack Emissions Monitoring

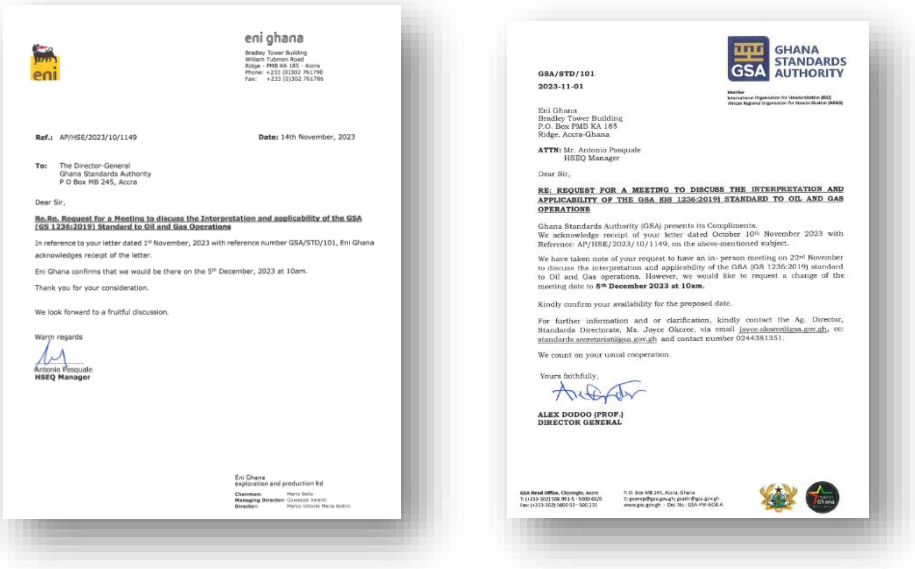
A summary of the results of point source emission levels for the Main Power Generators (MPGs) stack is presented in the below tables for the various Quarters in the reporting year.

Generally, the flue gas concentrations complied with the respective GS 1236:2019 standard limits except for carbon monoxide. The monitored flue gases flowed at a flue temperature of 466.0 °C from the stack of the MPG 1 and MPG 3.

Sample	*Main Power Generator 1 (MPG 1)*	*Ghana Standards Point Source Guideline (GS 1236:2019)*
January 2023		
SO2 (mg/Nm³)	*<0.01*	*100*
NOx (mg/Nm³)	*250.21*	*320*
CO (mg/Nm³)	*1296.28*	*100*
Temperature of flue gas (°C)	*452.0*	*NG*
Sample	*Main Power Generator 1*	*Ghana Standards Point Source Guideline(GS 1236:2019)*
June 2023		
SO2 (mg/Nm³)	*<0.01*	*100*
NOx (mg/Nm³)	*307.02*	*320*
CO (mg/Nm³)	*1361.59*	*100*
Temperature of flue gas (°C)	*454.2*	*NG*
Sample	*Main Power Generator 3 (MPG 3)*	*Ghana Standards Point Source Guideline(GS 1236:2019)*
October 2023		
SO2 (mg/Nm³)	*<0.01*	*100*
NOx (mg/Nm³)	*98.32*	*320*
CO (mg/Nm³)	*1069.5*	*100*
Temperature of flue gas (°C)	*428*	*NG*
Sample	*Main Power Generator 1 (MPG 1)*	*Ghana Standards Point Source Guideline (GS 1236:2019)*
December 2023		
SO2 (mg/Nm³)	*<0.01*	*100*
NOx (mg/Nm³)	*191.8*	*320*
CO (mg/Nm³)	*1353.4*	*100*
Temperature of flue gas (°C)	*473.2*	*NG*

Table 4: Stack Emissions monitoring for 2023

Eni Ghana engaged the Ghana Standard Authority (GSA) on the interpretation of the Point source guidelines related to the CO. The Authority advised Eni Ghana to consult the EPA on the guidelines as they provide the limits to the Technical Committee of which GSA is the secretariat to the Committee.



eni ghana

Bradley Tower Building
William Tubman Road
Ridge – PMB KA 185 – Accra
Phone: +233 (0)302 761790
Fax: +233 (0)302 761786

Ref.: AP/HSE/2023/10/1149 Date: 14th November, 2023

To: The Director-General
Ghana Standards Authority
P O Box MB 245, Accra

Dear Sir,

Re.Re. Request for a Meeting to discuss the Interpretation and applicability of the GSA (GS 1236:2019) Standard to Oil and Gas Operations

In reference to your letter dated 1st November, 2023 with reference number GSA/STD/101, Eni Ghana acknowledges receipt of the letter.

Eni Ghana confirms that we would be there on the 5th December, 2023 at 10am.

Thank you for your consideration.

We look forward to a fruitful discussion.

Warm regards

Antonio Pasquale
HSEQ Manager

Eni Ghana
exploration and production ltd

GHANA STANDARDS AUTHORITY

GSA/STD/101
2023-11-01

Eni Ghana
Bradley Tower Building
P.O. Box PMB KA 185
Ridge, Accra-Ghana

ATTN: Mr. Antonio Pasquale
HSEQ Manager

Dear Sir,

RE: REQUEST FOR A MEETING TO DISCUSS THE INTERPRETATION AND APPLICABILITY OF THE GSA (GS 1236:20191 STANDARD TO OIL AND GAS OPERATIONS

Ghana Standards Authority (GSA) presents its Compliments.
We acknowledge receipt of your letter dated October 10th November 2023 with Reference: AP/HSE/2023/10/1149, on the above-mentioned subject.

We have taken note of your request to have an in- person meeting on 22nd November to discuss the interpretation and applicability of the GSA (GS 1236:2019) standard to Oil and Gas operations. However, we would like to request a change of the meeting date to **5th December 2023 at 10am.**

Kindly confirm your availability for the proposed date.

For further information and or clarification, kindly contact the Ag. Director, Standards Directorate, Ms. Joyce Okoree, via email joyce.okoree@gsa.gov.gh, cc: standards.secretariat@gsa.gov.gh and contact number 0244381351.

We count on your usual cooperation.

Yours faithfully,

ALEX DODOO (PROF.)
DIRECTOR GENERAL

Figure 10: Correspondence between Eni Ghana and GSA

7.2.8 Effluent Monitoring

**Test were conducted but tanks were dislodged by approved Waste Management Contactor for offsite treatment. Liquid Effluent is monitored on a bi-annual basis.*

2nd Quarter

Microbiology of Treated Sewage Water

Sample ID	*Period*	*Total Coliform*	*Fecal Coliform*	*E. coli*
ORF	Q2 2023	465 x 10^2	100 x 10^2	64 x 10^2
Permanent Accommodation Camp	Q2 2023	558 x 10^2	186 x 10^2	90 x 10^2
Pilot Camp	Q2 2023	558 x 10^2	0	0
EPA GHANA 2016 GUIDELINES(MPN/100 ML)		**400**	**-**	**10**
IFC GUIDELINE (MAXIMUM LEVELS) (MPN/100 ML)		**400**	**-**	**-**

Physico-Chemical Measures of Treated Sewage Water

Sample ID	TSS (mg/l)	Total Nitrogen (mg/l)	Total Phosphorus (mg/l)	DO (mg/l)	BOD5 (mg/l)	COD (mg/l)	Oil & Grease (mg/l)
ORF	136	7.27	2.61	4.22	209	928	<1.00
PA	16	13.8	0.961	4.58	11.6	81.5	<1.00
PC	3	8.15	0.153	2.80	13.2	92	<1.00
EPA GHANA 2016 Guidelines	50	-	2.00	-	50	250	10.0
IFC GUIDELINES	**50**	**10.00**	**2.00**	**-**	**30**	**125**	**10.0**

**NB: Red fonts indicate values higher than EPA and IFC Guidelines*

4th Quarter

Microbiology of Treated Sewage Water

Sample ID	Period	Total Coliform	Fecal Coliform	E. coli
ORF	Q4 2023	14	2	1
Permanent Accommodation Camp	Q4 2023	0	0	0
Pilot Camp	Q4 2023	0	0	0
EPA GHANA 2016 GUIDELINES(MPN/100 ML)		**400**	**-**	**10**
IFC GUIDELINE (MAXIMUM LEVELS) (MPN/100 ML)		**400**	**-**	**-**

Physico-Chemical Measures of Treated Sewage Water

Sample ID	TSS (mg/l)	Total Nitrogen (mg/l)	Total Phosphorus (mg/l)	DO (mg/l)	BOD5 (mg/l)	COD (mg/l)	Oil & Grease (mg/l)
ORF	4	0.137	0.542	5.51	1.28	6.4	<1.00
PA	24	2.940	0.533	8.46	7.58	28.8	<1.00
PC	11	0.331	0.153	4.06	9.60	48.0	<1.00
EPA GHANA 2016 Guidelines	50	-	2.00	-	50	250	10.0
IFC GUIDELINES	**50**	**10.00**	**2.00**	**-**	**30**	**125**	**10.0**

Table 5: Effluent Monitoring Data for 2023

7.2.9 Noise Monitoring

Noise monitoring within ORF

Location	*Day-time*	*Night time*	*EPA Industrial Guideline*	*WBG/IFC Guidelines (2007)*
	Noise Level (dBA)			
*Quarter 1**				
No monitoring done for Quarter 1 due to delay of award of contract.				
Quarter 2				
ORF	*66.4*	*66.0*	*70*	*70*
Permanent Accommodation Camp	*53.6*	*48.2*		
Quarter 3				
ORF	*66.7*	*64.1*	*70*	*70*
Permanent Accommodation Camp	*55.9*	*51.9*		
Quarter 4				
ORF	*66.7*	*63.9*		

Permanent Accommodation Camp	*54.5*	*52.3*	*70*	*70*

Noise levels monitoring at nearest communities (Sanzule and Anwolakrom)

Location	*Day-time*	*Night time*	*EPA Residential Guideline*		*WBG/IFC Guidelines (2007)*	
			Day time	*Night time*	*Day time*	*Night time*
	Noise Level (dBA)					
*Quarter 1**						
No monitoring done for Quarter 1 due to delay of award of contract.						
Quarter 2						
Sanzule Cemetery	*57.8*	*56.5*	*55*	*48*	*55*	*45*
Anworlakrom	*54.6*	*52.5*				
Quarter 3						
Sanzule Cemetery	*56.2*	*54.4*	*55*	*48*	*55*	*45*
Anworlakrom	*54.1*	*53.5*				
Quarter 4						
Sanzule Cemetery	*56.5*	*55.1*	*55*	*48*	*55*	*45*
Anworlakrom	*55.7*	*53.5*				

Table 6: Noise Monitoring Data for 2023

A sensitization was organized for the communities to create awareness on the effect of noise pollution in the community. The was part of the recommendation from the Contractor Monitoring Reports.

Figure 11: Community Sensitization of Noise Pollution

A map showing the precise location of all monitoring points is illustrated in the figure below:

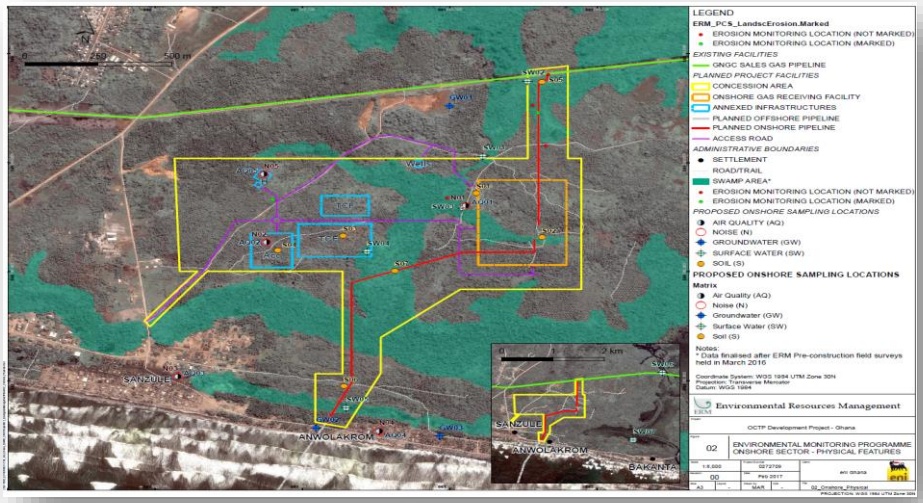


Figure 12: Map of ORF sampling points

7.2.10 Water Used & Discharged

Tables 7 & 8 below illustrates quantities of water used, purpose of use, and source of withdrawal and discharged volumes at the ORF.

Use	Source	Volume of Water Used (m^3)
Domestic	Company Water Wells	12,524

Table 7: Water Withdrawal

Type	Water Quantity Generated (m^3)	Disposal Option
Oily Waste water	175.000	Treatment
Septic Waste	749.000	Treatment

Table 8: Wastewater Treated

Month	Consumption (kWh)
January	1,064,517
February	970,479
March	1,058,596
April	1,038,244
May	1,091,957
June	967,702.
July	1,002,592
August	1,043,519
September	670,575
October	1,052,802
November	1,054,569
December	1,218,765

Table 9: Monthly Electricity consumption for ORF 2023

7.2.11 Waste Management

Waste generated during 2023 was managed as per Eni Ghana's Waste Management Plan for production phase of OCTP Phase 2. The primary aim of the waste management strategy is to protect the environment and human health against the potentially harmful effects of waste generated as a result of its activities. The strategy is based on key principles of pollution prevention such as:

- Reduction at source: the initial material is provided in precise quantity to avoid any production of waste;
- Re-use: the waste is re-used for another activity;
- Return: the waste is sent back to the vendor/supplier who will reuse or recycle it;
- Recycling: the waste is sent to be transformed for another use; and
- Treatment or disposal: ultimately the waste is disposed in an environmentally friendly manner by an approved 3rd Party waste contractor to approved waste disposal facility.

Eni Ghana employed a practice of segregating waste into six (6) waste categories i.e. (hazardous, general, plastic, wood waste and metal scrap and spill kit). To ensure effectiveness of the waste management strategy, appropriate identification and segregation of waste streams was adhered to. To facilitate this, color-coded containers as described in the figure below was at all operational sites.

Colour	Collection Location
GREEN	FOOD WASTE
BLACK	OILY WASTE
BLUE	PLASTIC WASTE
YELLOW	METAL WASTE
GREY	PAPER WASTE
RED	HAZARDOUS WASTE

Figure 13: Colour Coding for Waste Management

7.2.11.1 Waste Quantities Generated and Discharged

At the ORF, waste produced are stored temporarily in suitable bins placed at vantage points. Waste Contractor supervisor prepares Waste Transfer Note (WTN) which is then verified by the Company HSE Supervisor. The WTN prepared has the following details:

- Description of the waste (plastic, paper, source of waste).
- Name and signature of Contractor HSE Representative.
- Name and signature of waste disposal Company Representative.
- The quantity of waste transported (directly measured/estimated in volume (m3);
- Transportation Vehicle No.

The waste is hauled from site by the waste management contractor Zoil for collection and treatment of all other forms of waste for final disposal/treatment. Main treatment options used were:

- Recycling.
- Re-use;
- Disposal to Landfill.
- Treatment.

A waste register (waste log) and copies of all WTNs that have been produced from the site are maintained by on-site Company HSE personnel.

Sewage and wastewater from all facilities are collected once every week by the Waste Management Contractor and sent to a Sewage Treatment Facility within the Western Region for treatment. All sewage discharges are recorded in a Sewage record book. The table below presents quantities of waste generated during the reporting year.

Waste Type	Quantity Generated	Unit	Treatment Option	Contractor In Charge of Disposal
Wood waste	0.3403	Ton	Recycling	Zoil Service Limited
Paper/Cardboard waste	12.614	Ton	Recycling	Zoil Service Limited
Plastic waste	16.538	Ton	Recycling	Zoil Service Limited
Metal Scrap waste	1.9571	Ton	Recycling	Zoil Service Limited
Waste Oil	0	m3	Treatment	Zoil Service Limited
Hazardous waste	0.032	Ton	Treatment	Zoil Service Limited
Medical waste (Sharps)	0.181	Ton	Incineration	Zoil Service Limited
Food waste	36.897	Ton	Disposal to Landfill Site	Zoil Service Limited
Mixed waste	23.761	Ton	Disposal to Landfill Site	Zoil Service Limited
Air Filters	0.311	Ton	Treatment	Zoil Service Limited
Oily Waste Water	0	m3	Treatment	Zoil Service Limited
Oily Rags and Waste	1.821	Ton	Incineration	Zoil Service Limited
Septic Waste discharged	749	m3	Treatment	Zoil Service Limited

Table 10: Waste Generated at the ORF

7.2.12 Emission Management

During 2023, a campaign for fugitive emission management was performed in ORF plant and FPSO JAK, monitoring more than 21k potential emission points.

The activity was carried out directly by Eni Ghana personnel, avoiding any external cost, and allowed the Subsidiary to better monitor and preserve its assets as well as to better calculate the yearly fugitive emission contribution (reduction of approx. 90% vs value in budget).

SITE	"Desktop Study" (tCH4/yr.)	Actual 2022 Onsite Monitoring (tCH4/yr.)	Actual 2023 Onsite Monitoring (tCH4/yr.)	% Reduction against Desktop Study
ORF	81.4	74.3	29.4*	64 %
FPSO	109.8	60.4	6.1	94%

*28% of potential emission sources not monitored (due to GT3 – train 3 was out of service during survey but in-service during 2023 for the ORF Fugitive Campaign.

Further, another campaign related to methane reduction was completed in October 2023. A third party (Schlumberger) conducted methane emission on flaring, venting fugitive, and stationary combustion on Eni ghana Assets as part of the Oil and Gas Methane Partnership (OGMP 2.0).

7.3 ENVIRONMENTAL INITIATIVES

In 2023 new initiatives and additional managerial efforts were implemented to affect environmental aspects. These initiatives included:

- Fugitive Monitoring Campaign at the ORF
- OGMP 2.0 Level 4
- Implementation of No Net Loss Plan (Survey of Artificial Nest Restoration)
- Environmental Golden rules

Whiles the old initiatives remained ongoing

- Beach cleaning Initiative
- Plastic Waste recycling initiative
- Replacement of electricity source from diesel generators to ORF plant fuel gas turbines at Pilot Camp to reduce emissions.
- Implementation of Process Safety Management System PSMS
- Pact for safety

7.4 INSPECTIONS AND AUDITS

In line with ESHIA Phase 2, Eni Ghana provided periodic audits and inspections. HSE inspections were conducted on a regular basis at all operational site. These included both physical condition inspections as well as procedural audits. Eni Ghana assigned HSE supervisors at the onshore Receiving Facility (ORF) to ensure that Eni's expectations, compliance activities, and HSE procedures were adhered to. Tasks performed by HSE supervisors at the ORF included the following:

- Risk assessment process including Project Risk Register, Permit to Work (PTW), Task risk analysis (TRA), Tool Box Talks (TBTs), and Pre Job Meetings;
- Task risk analysis (TRA) done on activities such as lifting, chemical mixing, work at height, and working in confined spaces;
- Waste Management (Waste Segregation, Waste Inventories, issuing of WTN, monitoring and implementation of legal requirement for compliance;
- HSE daily and bi weekly meetings with contractors;
- Chemical Management (Handling, Storage, MSDS, Transportation, etc.);
- Monitoring of Operational Health and Safety standards.
- Ensuring good housekeeping.

Beyond routine inspection and monitoring activities conducted, both internal and external auditors to ensure compliance with regulatory requirements as well as with internal HSE standards carried out audits.

7.4.1 Internal Audit

The following internal audits were conducted in 2023:

- Level 1 HSE Technical Audit (Takoradi Logistics Base) – August 2023.
- Level 1 HSE Technical Audit (ORF) – August 2023.
- Level 1 HSE Technical Audit (FPSO) – August 2023.
- Level 1 Process Safety Audit Report – August 2023.
- HSE legal and Compliance Review – December 2023.
- Contractor HSE Audit (Rigworld) – July 2023.
- Contractor HSE Audit (Bajfreight) –April 2023.

7.4.2 External Audits

- In September 2023, WBG Env. & Soc. Audit (in person audit, site visit and review of AMR QMRs).
- In October 2023, RINA conducted a Recertification Audit for ISO 14001 & ISO 45001 standards and a certification audit for ISO 50001.

8 EMERGENCY PREPAREDNESS

Emergency preparedness and drills were conducted during the reporting period which included several level one drills at the ORF. These exercises were aimed at;

- Minimize in case of an emergency situation, as far as reasonably practicable, negative consequences to human life, environment, Eni Ghana assets and business, and eni reputation by an effective and efficient response.
- Ensure the availability of adequate information on emergency situations through a good communication system and at all levels.
- Ensure efficient management of pre-alarms and emergencies through all available and dedicated resources.

The Eni Ghana Emergency Response strategy and plan (ERSP) and Medical Emergency Response Plan details all stages and phases of the emergencies and procedure to respond accordingly.

In 2023, we had a water emergency- flooding at the Tie-in point, which exposed the pipeline at the LTE (Line Terminal End).

Emergency Scenario: The emergency scenario is a 1st level Noticeable outside water emergency - flooding and the tie-in point and Eroded (Exposed) pipeline at the LTE.

The main events of the scenario are:

- Notification of flooding at the tie-in point and pipeline exposure at LTE
- Activation of ERT on site ORF
- Activation of Eni Ghana HOERT
- Helicopter and drone aerial surveillance
- OSRL Boat survey at the Tie-in point
- No personnel sustained injuries

In detail, the emergency evolved through the following main phases:

Trigger event

- 3 days continuous heavy rainfall Impacted on Sanzule area
- On 26/07/2023, notification received by ORF ERT Leader about flooding at the Tie-in point with
- water ingress within the pit overflow.
- ORF ERT leader was notified by community liaison officers that, part of the Sanzule community close to the Eni Ghana pipeline is flooded.

Action Plan **Employer line: Eni Ghana E&P Ltd**	**Emergency: 1st Level (Noticeable outside) Full Scale Emergency (ORF)** **Date of the Emergency: 26/06/2023**				
No.	**Finding (FI) /*Observation (OB)***	**Action**	**Employer line Department Responsible**	**Due by**	**Status (O/C)[1]**
1 (FI)	There are no safety long boots to operate in the water in event of flooding.	Evaluate the utilization and availability of PPEs for this kind of emergency	HSE	31/12/2023	O
2 (OB)	In the emergency scenario, OSRL boat was activated from Eni Ghana Logistic base in Takoradi	Evaluate the possibility to move the boat in ORF during the raining season	Technical	31/03/2024	O
3 (OB)	Flooding led to swampy areas around the LTE, evaluate a system to better drain the water.	1. Daily drone survey of the area 2. Physical survey of the area by ORF team 3. Engineering study to look for ways to reinstate and prevent future eroding of the beam	ICT ORF ERT Engineering	open	Ongoing
4 (OB)	Unauthorized access into the water channels and exposed pipeline by community people	1. Daily drone survey of the area 2. Physical survey of the area by ORF team 3. Security patrol of the area 4. Barricade of the area 5. Put up safety signage at the place to warn off people 6. Sensitization for the community people	ICT ORF ERT Engineering Local content Security HSE	open	Ongoing

		7. Engineering study to look for ways to reinstate and prevent future water channels around the beam at the LTE			

APPENDIX 2. PROGRESS PICTORIAL REPORT

Eroded pipeline- LTE – 26/06/2023

Flooded Tie-in Pit- 26/06/2023

Flooded Tie-in Point – drone survey

Boat survey enroute tie-in point- drone shot

Boat survey to tie-in Point- 27/06/2023

Significant reduction in flooding around tie-in point

90% dry out of Tie-in Point – 02/07/2023

Tie-in Pit emptied. Pumped out water – 03/07/2023

Pipeline buried with caution signages posted - 04/07/2023

9 SUSTAINABILITY & COMMUNITY ENGAGEMENT ACTIVITIES

In 2023, Eni Ghana was committed to operating and acting in accordance with laws, rules of fair competition, honesty, integrity, transparency, and good faith, with due respect to the legitimate interests of its employees, shareholders, commercial and financial partners, industry associations, communities and legitimate institutions, governments, and their agencies. A fundamental value exhibited in 2023 was respecting the local communities and people impacted by its business. Proper management of the social impacts of its operations was critical to the growth and sustainability of the business. Broadly, milestones achieved in 2023 are listed below in the sections.

9.1 COMMUNITY ENGAGEMENTS

A series of interactions with communities' key influencer groups, individuals, and institutions in Accra, Takoradi and the Ellembelle were made, providing the possibility for stakeholders to become acquainted with the project, to understand its potential impacts and proposed mitigation and management measures and finally for the affected community and interested public, to raise concerns and issues. Key stakeholder activities related to Human rights engagement with parents and students in the AoI communities, launch of the 3 AstroTurf constructed for the communities, community-wide engagements to provide project updates, LDP steering committee engagements, focus group engagements with livelihood Project Participants and community health awareness campaign.

9.2 LIVELIHOOD RESTORATION PLAN

The OCTP Livelihood Restoration Plan (LRP) is a mitigation plan designed to restore the livelihood of all the affected households to at least pre-project level and increase the household's income- earning capacity, production levels, and standards of living.

LRP which targeted 205 affected households officially ended in December 2022. During the year under review, the close -out audit was undertaken by HPC- Italia, an independent auditor/ consultant in August 2023. The final report has been sent by the consultant and undergoing review, comments and inputs would be made and shared with HQ for their review, after which the report would be sent back to the consultant for incorporation before finalization.

9.3 LOCAL DEVELOPMENT PLAN - COMMUNITY INVESTMENT STRATEGY

The Local Development Plan - Community Investment Strategy (LDPj-CIS) document was prepared and approved by Eni Ghana, Vitol and WBG in order to present an outline of the OCTP community investment projects to be implemented in the Project area.

The major activities undertaken in the year were:

1. **Education**: To ensure improvement in quality of education within the communities of operation, the Education intervention supports eight basic schools within ten communities of our Area of Influence. In the year under review, Eni Ghana, and its JV Partners, together with implementing Partners for the school Infrastructure Projects successfully handed over three (3) completed Astroturf pitches located at Atuabo, Eikwe, and Sanzule to the Independent Management Committee, constructed for the ten (10) communities of our Area of Influence (AoI). A Monitoring Framework agreement was signed between Eni Ghana and community stakeholders (the Ellembelle District Assembly, the Atuabo Paramountcy and the School Management Committee (SMC) to officially inaugurate the school infrastructural project Steering and Technical committee, as the designated independent body to oversee the proper management of the School Infrastructure Projects.

   Still under the Education intervention, implemented by the partner Volontariato Internazionale per lo Sviluppo (VIS), the following specific activities were undertaken within the year under review; the maiden Human Rights engagement with parents of wards in the AoI communities, the formation of school Clubs ("Human Rights, Green Club and STEM") in all the eight (8) basic schools (primary and JHS) in our Area of operation, the advanced Competence trainings in math and English, a Special Needs training, sport and first aid were offered for both teachers and animators, promotion of the girl child education in the areas of Science, Technology, Engineering and Mathematics (STEM) field and the distribution of customized re-usable sanitary pads to female students formed part of the project milestones.
   In addition, the official launch of VIS scholarship award scheme took place for two-hundred and seventy beneficiaries' students of the Charlotte Dolphyne Technical Institute (CDTI).

Furthermore, VIS distributed ICT devices (laptops, projectors, and printers) to all the basic schools (primary and JHS) in the 10 communities of our Area of Influence (AoI). The refurbished school's library was also fully stocked, and a librarian was trained to oversee the proper storage of the books and use of the facility by the students.

Key interventions also included the construction of greenhouses at Old Bakanta and Ngalekyi-Baku as part of extra-curricular activities and training ground for gardening activities for both students and farmers.

Also, Eni Ghana initiated a self-assessment process of its performance based on the gender gap analysis tool, which led to the development of an action plan, referenced after the UN Convention on the Rights of the Child and the ABCDE of Rights.

A total of 2,151 students were successfully sensitized on Human Rights related issues. Overall, 1873 students from the eight (8) basic schools in our AoI and 278 students from the CDTI were enlightened on Human Rights concepts. A total of 2003 parents were also sensitized on human rights with a focus on corporal punishment.

Teachers participated in the Human Rights Based Approach sensitization, which has contributed to the adoption of new alternatives methods like guidance and counselling to reprimand the children, in replacement of corporal punishment.

2. **Monitoring, Maintenance and Close Follow Up on the Water Project:** Monitoring of the potable water facilities constructed in three communities (Sanzule, Bakanta and Krisan) of the OCTP Direct Area of Influence was carried out. Approximately five thousand (5000) inhabitants in the identified communities have access to the water facility. The project was completed and handed over to the communities, led by the water management board since June 2021.

3. **Economic Diversification:** For interventions under Economic Diversification, the major achievements chalked under the Building Business component was Ghana Enterprise Agency, the implementing Partner in collaboration with Eni Ghana, organizing a graduation ceremony to award certificate of participation and successful completion of entrepreneurship trainings to each of the Project's beneficiaries.

   Seven-hundred and sixty-five (765) beneficiaries successfully attended advanced technical skills training in various vocational fields. Under the intervention, 935

beneficiaries participated in various trainings, among them, the Entrepreneurship and Business Management. Nine hundred and forty-eight (948) beneficiaries went through Kaizen and Occupational Safety, Health and Environmental Management Training. Seven hundred and seventy-eight (778) beneficiaries went through a seminar on Compliance and Regulatory Support and seven hundred and sixty-five (765) received technical skills training in various trade areas. One hundred and forty-four (144) beneficiaries have also been trained in branding and packaging of their products and linked to companies manufacturing and dealing in quality packaging materials. In addition, the implementing partner for this project, conducted and successfully completed an 8-days intensive training on argon welding for 22 participants from the AoI. Twenty-one (21) beneficiaries were supported to formalize their businesses with the Office of the Registrar of Companies (ORC).

In the period under review, as part of continuous interventions to support the young graduands, the Project team continued monitoring their attendance at various craftsmen's workshops, to assist in the shortlisting of 200 beneficiaries to be enrolled in the cluster four "support package" component of the "EDGE" Project.

Major achievements chalked by the Project team under the livelihood component was featuring Project participants during the 39th National Farmers' Day Celebration organized at the District Level in Sanzule, in line with this year's theme "Delivering Smart Solutions for Sustainable Food Security and Resilience". The EDGE Project team together with the Implementing partner, Technoserve mobilized about 200 farmers to showcase their farm produce. By virtue of the successful Project outcomes, seven (7) of the "EDGE" Project participants received various awards for "Best Woman Farmer, Best Poultry Farmer, Best Aquaculture Farmer, Best Vegetable Farmer, Best Pig Farmer, Best Technology farmer and best Non-Traditional farmer". An MoU was also signed with three (3) marketing off-takers to help farmers have ready buyers for their produce. In addition, nine (9) producer associations were formed for vegetable and livestock farmers, registration of farmer groups in their respective cooperatives is on-going. Also, training modules centered on pest identification, pest control, and good agricultural practices (GAP) were provided to four hundred and twenty-eight crop farmers (428), whom 228 household farmers & 200 commercial, including installation of irrigation systems for one hundred and eighty-eight (188) commercial

farmers. In addition, under the livestock component, starter packs were distributed to one hundred and thirty-five (135) PPs, comprised of fifty-five (55) aquaculture PPs, twenty (20) poultry PPs, and sixty (60) piggery PPs.

In respect to cluster 4 "entrepreneurship support package" component of the EDGE Project, 18 out of 19 trade categories received support packages as determined by the project guidelines. Overall, (two hundred) 200 shortlisted Project participants who were beneficiaries of the earlier Building Business Project, received their starter packs in the form of tools to enhance their learning and revenue generation. Concurrently with the distribution of starter packs, coaching and mentoring were provided to beneficiaries in their respective trade categories (catering, electricians, dressmaking, hairdressing, bead making etc.) to ensure the efficient and sustainable management of beneficiaries' enterprises to generate revenue, besides reducing or closing the skill gap competence. Trainees will eventually be supplied with industrial and more complex machines to support them to set-up their own enterprises, after graduation.

4. **Access to Energy:** In the bid to reduce fuelwood consumption and as part of company contribution to the global move of transitioning to the use of cleaner fuels, Eni Ghana also initiated and embarked on the project to deploy 3,000 units of improved domestic biomass and LPG cookstove models to the 10 communities within company's AoI. In the year under review, 6 artisans from the 10 communities of AoI were selected and trained as part of knowledge transfer, to boost local skills capacity and the local cookstoves production in our AoI.

   A micro franchise agreement was signed between two (2) manufacturing firms ("Creative Metals Enterprise" and Eng-Solutions Limited") and 6 locally trained artisans. The Ghana Alliance for Clean Cookstoves & Fuels (GHACCO) shared the final close out report indicating official completion of the clean cooking Phase III project in January 2023. A close out meeting was held in February 2023 with the GHACCO project team to review project deliverables of the Clean Cooking Project - Phase Ill, as per the project plan agreed on.

9.4 FISHERIES MANAGEMENT PLAN

The Fisheries Management Plan (FMP) continued with collating and monitoring data of fishing canoes involved in incursions of the mandatory 500-meter exclusion zone to FPSO John Agyekum Kufuor (JAK) and other offshore oil and gas installations. In consultation with the Fisheries Management Coordinating Committee (FMCC), three (3) fishing sheds are under construction in three (3) identified communities (Sanzule, Krisan and Eikwe).

Fisherfolks in the six (6) coastal districts of the Ellembelle, Jomoro, Nzema East, Ahanta West, Shama and Takoradi Municipality were engaged to provide updates on the CTP Block 4 – EBAN 2A drilling campaign and sensitize the fisherfolk on the dangers of fishing in the 500m exclusion zone of the FPSO John Agyekum Kufuor. 200+ fisherfolk were reached during the sensitization engagements. The presence of the Ghana Navy vessel within the 500m zone of the FPSO since November 2021 has contributed to minimize the incursions rate onshore.

9.5 GRIEVANCE MECHANISM

Eni Ghana was committed to operating in accordance with national and international laws, rules of fair competition, honesty, integrity, transparency, and respect for the legitimate interests of its Stakeholders and partners. A fundamental value exhibited in 2023 was respecting and responding to the local communities and people impacted by its business.

Eni Ghana received three (3) grievances in 2023. The complaints were related to Labour, environmental and social impacts which were as a result of the OCTP operations. These complaints ranged from contractor workers demand for increase in salary, high electricity bills and non-functional school solar panels installed and flooding around areas bordering the Seh Swamp. Two (2) out of three (3) grievances closed, one (1) resolved with pending closure.

Six (6) grievances were received and managed by OCTP Contractors in 2023. Three (3) were labor-related, two (2) were related to the apprenticeship under LDPj- CIS Building Business intervention and one (1) on workers Unionization. Four (4) out of the 6 Grievances have been closed and reported to WBG and Partners, whiles remaining two (2) are ongoing.

In all, nine (9) grievances were received in 2023; 8 out of the nine has been resolved and closed in 2023. These complaints were related to environmental and social impacts which were as a result of the OCTP operations.

As part of improving the Grievance Mechanism awareness and accessibility, grievance handbooks were developed and distributed to ORF Local Contractors and FPSO workers to aid in easy comprehension of the Grievance Mechanism requirements and processes.

A QR code/ digital link for anonymous grievance was developed for local contractor workers to ensure easy accessibility, transparency, and Innovative grievance procedures. The QR code will enable workers to file complaints anonymously to reduce the tendency of victimization. Grievance Boxes and Posters describing the grievance access points have been situated in the FPSO and ORF.

As part of ensuring compliance and effective implementation of the Grievance Mechanism by Eni Ghana Contractors, Partners, and local stakeholders, training and education sessions were conducted for two hundred and eighty-two (282) Local Development Project Participants, one hundred and ten (110) OCTP Contractors workers and four (4) Contractors were trained on the Grievance Management Mechanism.

A survey was conducted to assess the Nzema language reading proficiency in the 10 communities. 105 of the 160 interviewees could read in the Nzema language. The Nzema version of the Grievance Handbook is to be developed in the coming year.

- Google Form Link

http://bit.ly/3zwFAG7

- Anonymous Grievance QR Code

Confidential/Anonymous Grievance Forms for Local Contractor Workers

This is a confidential/anonymous grievance form. Please take notice that all complaints submitted through this form will be handled confidentially, and the complainant's anonymity is guaranteed.

* Required

1. Employee Title/Department

2. Territory *

Mark only one oval

- Onshore Receiving Facility (ORF)
- Offshore
- Community
- Other

Grievance Mechanism Handbook, Complaint boxes, Anonymous Grievance QR Code

Training Session on Grievance Management Mechanism for ORF Local Contractor Workers.

Training and Education sessions on Grievance management Mechanism for Local Development Project Participants.

10 CONCLUSION

In 2023, Eni Ghana worked to:

- Decrease the negative impact and/or reasonably minimize environmental impacts from operations onshore.
- Comply with Company standards, EPA permit conditions and WBG requirements.
- Maximize safety for its personnel**.**

Eni Ghana worked with a number of regulators and parastatal organizations to further improve capacity in relation to the oil industry.

A wide range of environmental monitoring activities was conducted throughout 2023, including the fugitive campaign monitoring, OGMP 2.0 etc…

11 PLANNED ENVIRONMENTAL ACTIVITIES FOR 2024

Activities to be undertaken in 2024, which will aim at ensuring the Company compliance with environmental regulations and maintaining a good environmental performance within Company´s operations. These will include following:

- Waste Management activities and proper planning (Rig; FPSO; Logistic Base; ORF)
- Permit Process - EPA permits for light well intervention (Acids Works), Inspection maintenance and Repairs and geotechnical and geophysical surveys
- Compliance with IFC/WBG Requirements through Environmental monitoring activities:
- Avian, Sea Turtles & onshore & offshore monitoring activities
- Oil Spill Response Management and awareness training
- Continue the Implementation of No Net Loss Implementation plan and Additional Conservation Actions and implement the measures to offset quantified Net Loss
- Plastic waste recycling model implementation to continue in communities in the Area of Influence (AoI)
- Beach Cleaning Initiative
- Continue the implementation of cybertaker for Biodiversity Monitoring (sea turtle Monitoring) with the support of FFI
- Water Balance Improvement and optimization
- OGMP 2.0 (level 5) Implementation

- Maintain active engagement with Ghana EPA in relation to Environmental matters
- Fugitive Monitoring Campaign on FPSO and ORF
- Continue improvement of waste segregation at the Eni HQ office in Accra and all operative sites

Appendix A: Grievance Register

i. 2023 OCTP Grievance Management Register