

Environmental and Social Supplementary Lender Information Memorandum (SLIM)

Rovuma LNG

PREPARED FOR



Mozambique Rovuma Venture

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AoI	Area of Influence
BAP	Biodiversity Action Plan
BMEP	Biodiversity Monitoring and Evaluation Plan
BOMP	Biodiversity Offsets Management Plan
CCPP	Combined Cycle Power Plant
CIP	Contractor Implementation Plan
CSO	Civil Society Organisation
DUAT	<i>Direito de Uso e Aproveitamento da Terra</i> / Right of Use and Enjoyment of Land
E&S	Environmental and Social
EIA	Environmental Impact Assessment
eLNG	Electrified liquefied natural gas
EMML	ExxonMobil Moçambique, Limitada
EMP	Environmental Management Plan
ENH	Empresa Nacional de Hidrocarbonetos E.P.
Eni	Ente Nazionale Idrocarburi / Eni S.p.A.
EPCC	Exploration and Production Concession Contracts
EP4	Equator Principles IV
E&S	Environmental and social
ESA	Ecosystem Services Assessment
ESDD	Environmental and Social Due Diligence
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FEED	Front-End Engineering Design
FID	Final Investment Decision
GHG	Greenhouse Gas

Acronym	Description
GIIP	Good International Industry Practice
GoM	Government of the Republic of Mozambique
HRIA	Human Rights Impact Assessment
IESC	Independent Environmental and Social Consultant
IFC PS	International Finance Corporation Performance Standards
JOA	Joint Operating Agreement
KOGAS	Korea Gas Corporation
LNG	Liquefied Natural Gas
MoC	Management of Change
MOF	Materials Offloading Facility
MRV	Mozambique Rovuma Venture S.p.V.
NGO	Non-government Organisation
SIR	Supplementary Information Report
SPE	Special Purpose Entity
TEPMA1	TotalEnergies Exploration and Production Moçambique Área 1, Lda
TCFD	Task Force on Climate-related Financial Disclosures

GLOSSARY OF TERMS

Term	Description
Afungi LNG Park	The designated onshore industrial area on the Afungi Peninsula established within the DUAT for development of LNG infrastructure. It accommodates Area 1 (also referred to as TEPMA1 as defined below) and Area 4 LNG developments, including exclusive facilities and shared/common infrastructure such as marine export facilities, logistics areas, utilities, roads, the airstrip, accommodation and operational support facilities.
Area 4 Concessionaire	The parties holding interests in the Area 4 EPCC: MRV (70%); ENH (10%); XRG (10%); and KOGAS (10%)
Area 4 EPCC	Area 4 Exploration and Production Concession Contract, as supplemented by the Coral South Supplemental Agreement and the Designated Operator Supplemental Agreement.

Term	Description
Area 4 JOA	Area 4 Joint Operating Agreement, as supplemented and novated, to which MRV, ENH, XRG and KOGAS are parties.
DUAT	<i>Direito de Uso e Aproveitamento da Terra/</i> Right of Use and Enjoyment of Land, as established in the Mozambique's 1997 Land Law and the 2004 Constitution Legal right to use and benefit from land in Mozambique (i.e. grants land-use rights and defines project boundary).
CNODC	CNODC Dutch Cooperatief U.A., a company existing under the laws of The Netherlands and a shareholder of Mozambique Rovuma Venture S.p.A., holding approximately 28.6% of MRV and a 20% indirect participating interest in the Area 4 EPCC.
eLNG	Electrified LNG configuration using electric-drive liquefaction for improved efficiency and lower emissions.
EMDA	ExxonMobil Development Africa B.V., a company existing under the laws of The Netherlands, holding approximately 35.7% of MRV and a 25% indirect participating interest in the Area 4 EPCC.
EMML	<i>ExxonMobil Moçambique, Limitada</i> , MRV's designated operator conducting development of the Project.
EMP	The regulatory Environmental Management Plan approved under the Mozambican EIA process, distinct from the Project's broader ESMP implementation framework.
ENH	<i>Empresa Nacional de Hidrocarbonetos E.P.</i> , a party to the Area 4 EPCC and Area 4 JOA, holding a 10% participating interest in the Area 4 EPCC.
Eni	<i>Eni S.p.A.</i> , a company existing under the laws of Italy, holding approximately 35.7% of MRV and a 25% indirect participating interest in the Area 4 EPCC.
ESMP	The single primary Rovuma LNG Environmental and Social Management Plan (2026) - <i>referenced as current version at time of drafting this memorandum.</i>
ESMPs	Series of documents that includes the Rovuma LNG ESMP and topic-specific E&S management plans.
First Mover	The designated operator responsible for leading and executing the development and management of shared and common project facilities, including oversight of associated environmental, social, and resettlement activities on behalf of all participating parties.

Term	Description
Impact Envelope	The defined range of environmental and social risks and impacts identified through the EIA within the Project's area of influence (AoI), including direct, indirect and cumulative impacts, their spatial extent, magnitude and significance, and associated mitigation and management measures. It provides the reference framework for determining whether Project changes remain consistent with the approved assessment or require further assessment, mitigation or management in line with the IFC PS1 mitigation hierarchy and adaptive management approach.
KOGAS	Korea Gas Corporation, a party to the Area 4 EPCC and Area 4 JOA, holding a 10% participating interest in the Area 4 EPCC.
MoC	Project's operational framework and related ongoing process as outlined in the ESMP and informed by OIMS 7.1-Managing Changes and the EIA).
MRV	<i>Mozambique Rovuma Venture</i> , an Italian incorporated joint venture and the designated operator under both the Area 4 EPCC and the Area 4 JOA, holding a 70% participating interest in the Area 4 EPCC.
Pre-FEED	Early engineering stage prior to FEED
Project	Development of the Midstream and Upstream components onshore, nearshore, and offshore environments for Area 4, conducted by EMLL in conjunction with its nominated contractors.
Sponsors	The Project is sponsored by the Area 4 Parties, including the shareholders of MRV (Eni, ExxonMobil Development Africa B.V. and CNODC) together with ENH, XRG and KOGAS.
TEPMA1	TotalEnergies EP Mozambique Area 1 Limited, a fully owned subsidiary of TotalEnergies and the Area 1 operator within the Afungi LNG Park. TEPMA1 is responsible for Area 1 activities and interfaces with Area 4 in relation to shared and common facilities.
XRG	ADNOC's (Abu Dhabi National Oil Company) international investment company a party to the Area 4 EPCC and Area 4 JOA, holding a 10% participating interest in the Area 4 EPCC and forming part of the Area 4 Concessionaire alongside MRV, ENH and KOGAS.



Key Messages

The key messages presented below summarise the central themes of this Memorandum and explain how the Rovuma LNG Project maintains a current understanding of potential environmental and social risks and impacts, translates assessment findings into management actions, and supports ongoing alignment with regulatory and lender requirements.

1. E&S understanding is maintained through a structured Management of Change (MoC) framework

The Project has not relied solely on the 2014 Environmental Impact Assessment (EIA). Environmental and Social (E&S) understanding is maintained through a structured MoC process that screens design and activity changes against the approved baseline and impact envelope, identifies any new or changed impacts, and determines proportionate assessment, management and regulatory responses.

2. Dynamic assessment, supported by lender due diligence, keeps impact understanding current and evidence-based

Regulatory assessments, thematic and technical studies, and lender due diligence / gap assessment processes operate as complementary assessment streams. Lender due diligence provides independent review, validation and gap identification, helping confirm whether the Project remains aligned with lender expectations, International Finance Corporation (IFC) Performance Standards, Equator Principles and Good International Industry Practice (GIIP). Together, these outputs maintain a current understanding of potential E&S risks and impacts and identify where mitigation, monitoring or management measures need refinement.

3. Assessment findings, including lender due diligence outputs, are translated into practical ESMS, ESMP and contractor controls

The Environmental and Social Management System (ESMS) provides the mechanism for consolidating regulatory requirements, technical evidence, lender due diligence findings and lender expectations into implementable requirements. These are operationalised through the Environmental and Social Management Plan (ESMP), topic-specific plans, contractor implementation plans, procedures, monitoring, reporting and assurance processes.

4. The most recent Environmental Management Plan (EMP) revision, Environmental Licence renewal and forward work programmes support ongoing adaptive management

The most recent EMP revision (EMP Rev. 2, 2026) and Environmental Licence renewal represent important regulatory milestones, confirming alignment between the current Project design, updated impact understanding and applicable regulatory requirements. However, these milestones are not endpoints. Monitoring, inspections, audits, incident

reporting, stakeholder engagement and grievance processes provide feedback on implementation effectiveness and trigger corrective, preventive or adaptive actions where needed.

5. Current and planned strategies and activities form part of the adaptive management approach

Current and planned biodiversity, socio-economic, stakeholder engagement, grievance management and human rights activities form a core part of the Project's adaptive management approach. They continue to strengthen the evidence base, test whether mitigation and management measures remain effective, and support ongoing alignment with applicable Mozambican regulatory requirements, IFC Performance Standards, Equator Principles and GIIP as the Project progresses towards execution.

EXECUTIVE SUMMARY

Through a consolidated, evidence-based narrative, this Memorandum brings together the Rovuma LNG Project's key assessments, regulatory processes, lender due diligence, baseline updates and management instruments to show how potential E&S risks and impacts have been progressively understood, tested and managed over time. It demonstrates the connection between Project evolution, updated impact understanding, ESMS and ESMP implementation, and adaptive management responses, providing lenders and interested stakeholders with a clear basis for understanding how ExxonMobil Moçambique, Limitada (EMML) continues to maintain alignment with applicable Mozambican regulatory requirements, lender standards and GIIP.

PURPOSE AND PROJECT CONTEXT (SECTIONS 1 AND 2)

- This Memorandum provides a consolidated lender-facing narrative on how potential E&S risks and impacts for Rovuma LNG have been identified, assessed and managed over time. It also demonstrates how the ESMS provides the overarching framework for translating assessment findings into management measures, monitoring requirements and adaptive actions throughout the Project lifecycle.
- The Project has evolved since the 2014 EIA through design refinements, updated baseline understanding, regulatory processes and lender-aligned E&S workstreams.
- Section 2 explains the Project configuration, including Core Project Components, Associated Facilities, shared and common facilities, and the design change to an electrified LNG configuration.

MANAGEMENT OF CHANGE AS THE OPERATIONAL FRAMEWORK (SECTION 3)

The Project uses a structured MoC process to maintain continuity with the approved EIA while responding to design, execution and contextual changes.

- MoC screening compares proposed changes with the approved baseline and impact envelope.
- It identifies new or changed potential impacts and determines the appropriate assessment, management and regulatory response.
- Outputs are carried into EMP updates, ESMP requirements and implementation controls.

UNDERSTANDING POTENTIAL IMPACTS THROUGH DYNAMIC ASSESSMENT (SECTION 4)

- Section 4 explains the conceptual framework used to understand potential impacts, including the source–pathway–receptor model, Area of Influence (AoI) and impact envelope.
- Impact assessment is treated as a dynamic process, supported by updated baselines, thematic studies, regulatory assessments and lender reviews.

- Three complementary assessment streams inform the current E&S understanding: i) regulatory assessment, ii) thematic and technical studies, and iii) lender and gap assessment processes.

REGULATORY AND LENDER ALIGNMENT (SECTIONS 4.3.1 TO 4.3.3)

- The Supplementary Information Report (SIR) process provides the regulatory assessment mechanism within the MoC framework, evaluating design and execution changes against the approved EIA, EMP and impact envelope to determine whether additional assessment, mitigation measures, management actions or EMP updates are required.
- Thematic and technical studies provide topic-specific evidence on biodiversity, climate and Greenhouse Gas (GHG), human rights, socio-economic conditions and other key E&S themes.
- Lender due diligence and gap assessment processes provide independent review and support alignment with applicable Mozambican regulatory requirements, IFC Performance Standards (IFC PS), Equator Principles and GIIP.

MANAGING POTENTIAL IMPACTS (SECTION 5)

- Section 5 explains how assessment findings are translated into practical management through the ESMS framework including the ESMP, topic-specific management plans and contractor controls.
- The ESMS consolidates regulatory requirements, technical study inputs, lender due diligence findings, management plans and lender expectations into a single management framework.
- The ESMP, topic specific plans and contractor controls define implementation responsibilities, monitoring, reporting and assurance requirements, with feedback from monitoring, audits, incidents, stakeholder engagement and grievances used to inform corrective and adaptive actions.

PRE-FINAL INVESTMENT DECISION (FID) READINESS AND FORWARD IMPLEMENTATION (SECTION 6 AND APPENDIX A)

- Section 6 explains how the Project's E&S assessment, management planning, lender-aligned controls and assurance mechanisms support the transition from pre-FID readiness into construction / execution.
- Forward implementation is described as a pathway from assessment evidence and ESMS / ESMP requirements into topic-specific plans, Contractor Implementation Plans, site-level procedures, monitoring and adaptive management.
- Appendix A illustrates implementation readiness through the biodiversity strategy and socio-economic workplan, structured around baseline evidence, impact analysis, strategy development, implementation planning, and monitoring and evaluation.

1. INTRODUCTION

The Rovuma LNG Project is a large-scale, liquefied natural gas (LNG) development located in northern Mozambique and forms part of the broader development of gas resources within the Rovuma Basin (“the Project”). ExxonMobil Moçambique Limitada (“EMML”), as delegated operator of Area 4 on behalf of Mozambique Rovuma Venture (“MRV”), is in charge of managing the Project’s potential environmental and social (E&S) risks and impacts.

The Project was originally approved under an Environmental Impact Assessment (EIA) in 2014 with subsequent approvals/renewals as required under Mozambican law. Since that time, the Project has undergone a series of design refinements, updates to baseline understanding, and changes in contextual conditions, including evolving security considerations, technological advancements, and developments in regulatory and international requirements. These changes have been managed within an established framework that maintains continued alignment between project design, impact assessment, and mitigation measures.

To support the effective identification and management of potential risks and impacts over time, EMML has implemented an iterative and adaptive versatile to E&S management, supported by successive updates to E&S baseline studies, impact assessments, and E&S management planning embedded within the broader Environmental and Social Management System (ESMS).

This ***E&S Supplementary Lenders Information Memorandum*** (“Memo”) has been prepared to provide a clear, consolidated narrative of the Project’s evolution, bringing together key information developed over more than a decade of project planning and preparation.

1.1 JOINT VENTURE STRUCTURE

The Rovuma LNG Project is being developed within the Area 4 concession framework. MRV, ENH, XRG and KOGAS together form the Area 4 Concessionaire under the Area 4 EPCC, with MRV holding the majority participating interest and acting as the designated operator under the Area 4 EPCC and Area 4 JOA.

For the purposes of this Memo, the key relevance of the joint venture structure is the distinction between ownership interests and Project delivery responsibilities. The Area 4 Parties, including MRV’s shareholders and the other Area 4 participants, sponsor the Project, while EMML conducts the development of the Project as MRV’s designated operator. Further details on each party and defined term are provided in the Acronyms and Abbreviations and Glossary of Terms tables.

1.2 PURPOSE OF DOCUMENT

The purpose of this Memo is to provide a structured, evidence-based overview of how potential E&S risks and impacts associated with the Rovuma LNG Project have been identified, assessed, and managed over time. The document is not intended to be a detailed technical summary of all E&S studies, assessments, or management plans prepared for the Project. Instead, it is designed to:

- Highlight the sequence of key studies, assessments, and management instruments developed across the Project lifecycle;
- Explain the process and rationale through which EML has maintained a current and robust understanding of potential E&S risks and impacts;
- Demonstrate how the Project's E&S framework has been updated proactively to reflect changes in project design, context, and applicable requirements; and
- Illustrate alignment with applicable Mozambican national regulations, the International Finance Corporation (IFC) Performance Standards (PS), and broader Good International Industry Practice (GIIP).

This document has been prepared by Environmental Resources Management Mozambique, SU, LDA (ERM) based on information provided by EML and its consultants. It is intended as an information memorandum and does not constitute a technical assessment, regulatory submission, or standalone E&S due diligence (ESDD) report.

2. PROJECT DESCRIPTION & CURRENT STATUS

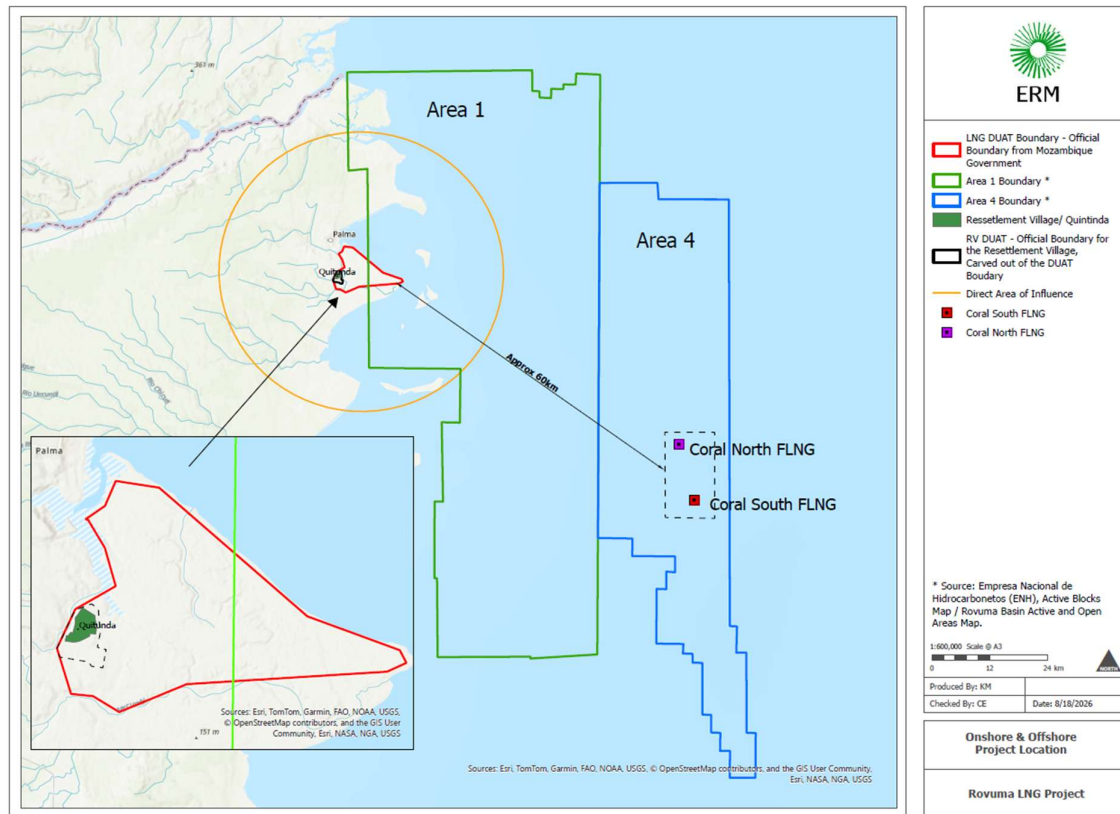
2.1 PROJECT OVERVIEW AND LOCATION

The Project comprises an onshore and a nearshore portion located at the Afungi Peninsula, Cabo Delgado Province, designated by the Mozambican National Land Authority for the development of the Afungi LNG Park, an offshore portion located in deep water off the northern coast of the country, and pipelines and other facilities that interconnect the two.

The Area 4 field is located approximately 50 km from the coastline of the Republic of Mozambique measured from the western limit of the concession with water depths of 1,500–2,600 m and covering an area of approximately 10,207 km².

The onshore site (Afungi LNG Park) is an area of ~7,000 ha located 2,200 km north of the capital city of Maputo and 200 km north from the town of Pemba. This area is shared with the Area 1 concessionaire operated by TotalEnergies EP Mozambique Area 1 Limited (TEPMA1), a fully owned subsidiary of TotalEnergies (**Figure 2-1**).

The GoM has granted a title for the right of use and exploitation of land for the Afungi LNG Park to a Special Purpose Entity (SPE) created by Area 1, Area 4 and ENH. The right of use and exploitation of land for the onshore development is known as a DUAT (*Direito de Uso e Aproveitamento da Terra*). This area includes exclusive, common and shared areas to Area 1 and Area 4.

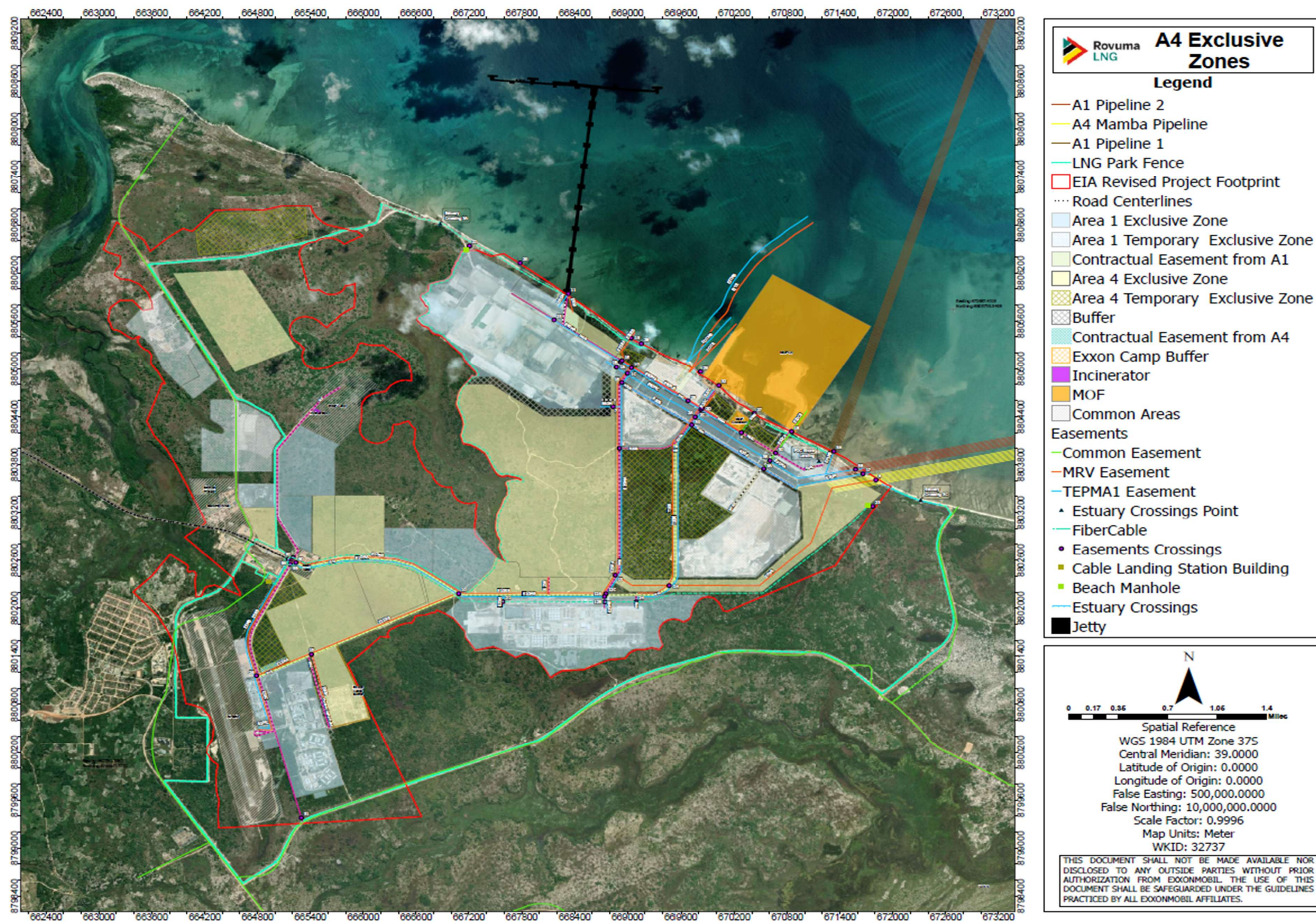


Source: ERM, July 2026.

FIGURE 2-1 AREA 4 AND ROVUMA LNG FOOTPRINT¹

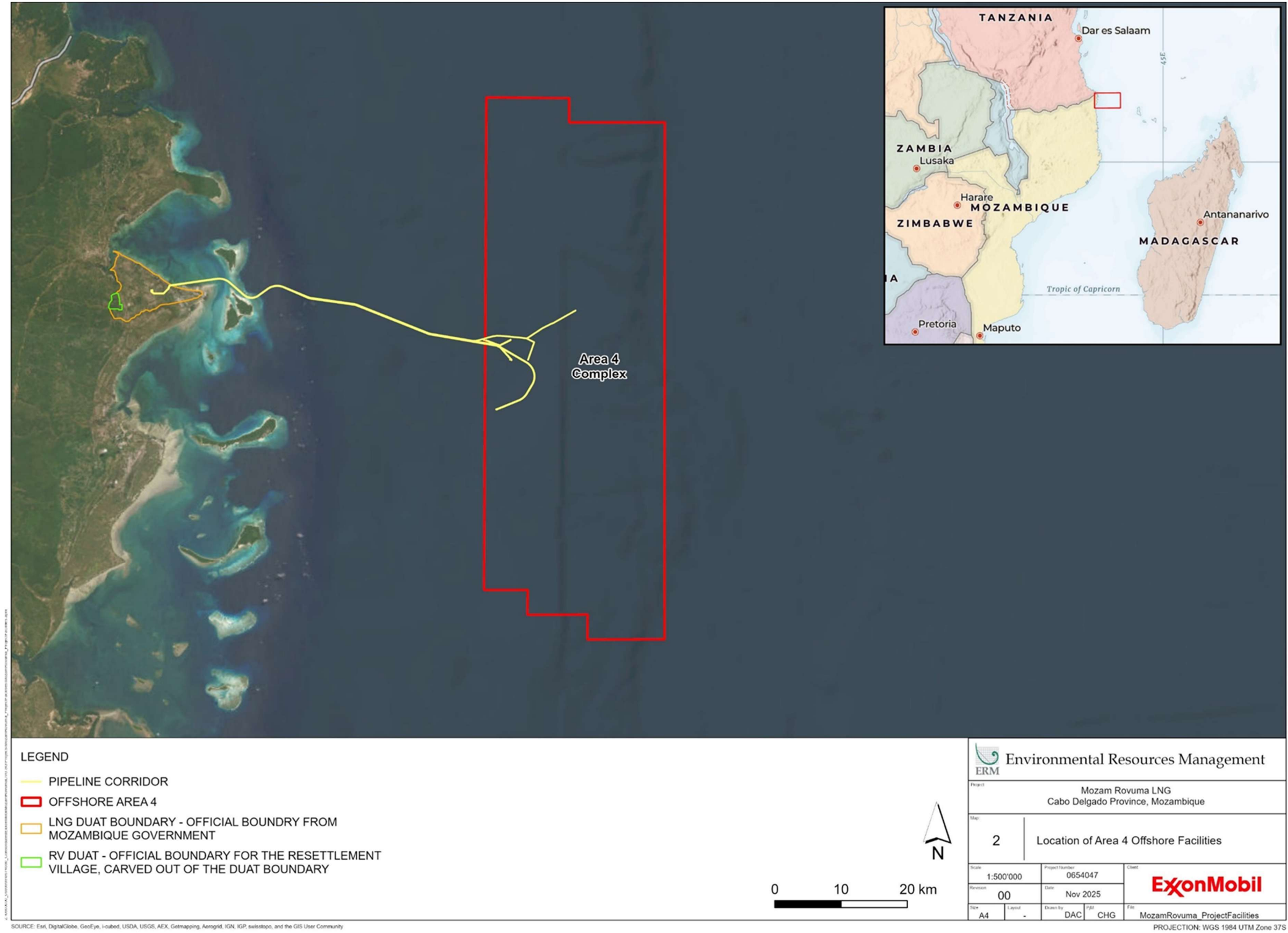
The Project's scope of work includes a Midstream element (**Figure 2-2**) and an Upstream supply element (**Figure 2-3**). The Midstream (onshore) components of the Project are debt financed (project financing), while the Upstream supply portion (offshore) will be funded by equity from the Sponsors. As such, in alignment with IFC Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts) (PS1), the Midstream is defined as the "(core) Project" and the Upstream Supply Project, Shared/Common (including Resettlement) and 3rd party facilities as Associated. As designated Operator of both the Midstream and Upstream, EML ESMS applies to both Midstream and Upstream.

¹ Disclaimer: The indicative location and layout of the onshore and offshore facilities in Figure 2-1 are presented for illustrative purposes and are subject to verification and update during detailed engineering



Source: ExxonMobil, April 2026.

FIGURE 2-2 AREA 4, AREA 1 AND SHARED/COMMON NEARSHORE FACILITIES (MIDSTREAM)



Source: ERM, November 2025.

FIGURE 2-3 AREA 4 EXCLUSIVE OFFSHORE FACILITIES (UPSTREAM SUPPLY PROJECT)

2.2 PROJECT COMPONENTS AND CONFIGURATION

The Project comprises integrated Midstream, Upstream Supply, Shared/Common and Associated facilities and activities. This section provides a concise overview of each component group and its role in the overall Project configuration. **Figure 2-4** provides the detailed component and interface view, distinguishing Midstream / Onshore Activities as Core Project Components, and showing the Upstream Supply Project, Area 1 and Area 4 Shared/Common Facilities, resettlement-related activities and third-party facilities as Associated Facilities.

2.2.1 MIDSTREAM ACTIVITIES

The Midstream facilities comprise the Core Project Components financed through Area 4 project financing. They include the onshore LNG processing, storage, export and supporting infrastructure required to receive offshore feed gas and associated liquids and convert these into LNG and stabilised condensate for export.

At a high level, the Midstream scope includes gas receipt, treatment and liquefaction; LNG and condensate storage; loading and export facilities; and the early works, permanent and supporting infrastructure needed for construction and operation.

2.2.2 UPSTREAM SUPPLY PROJECT

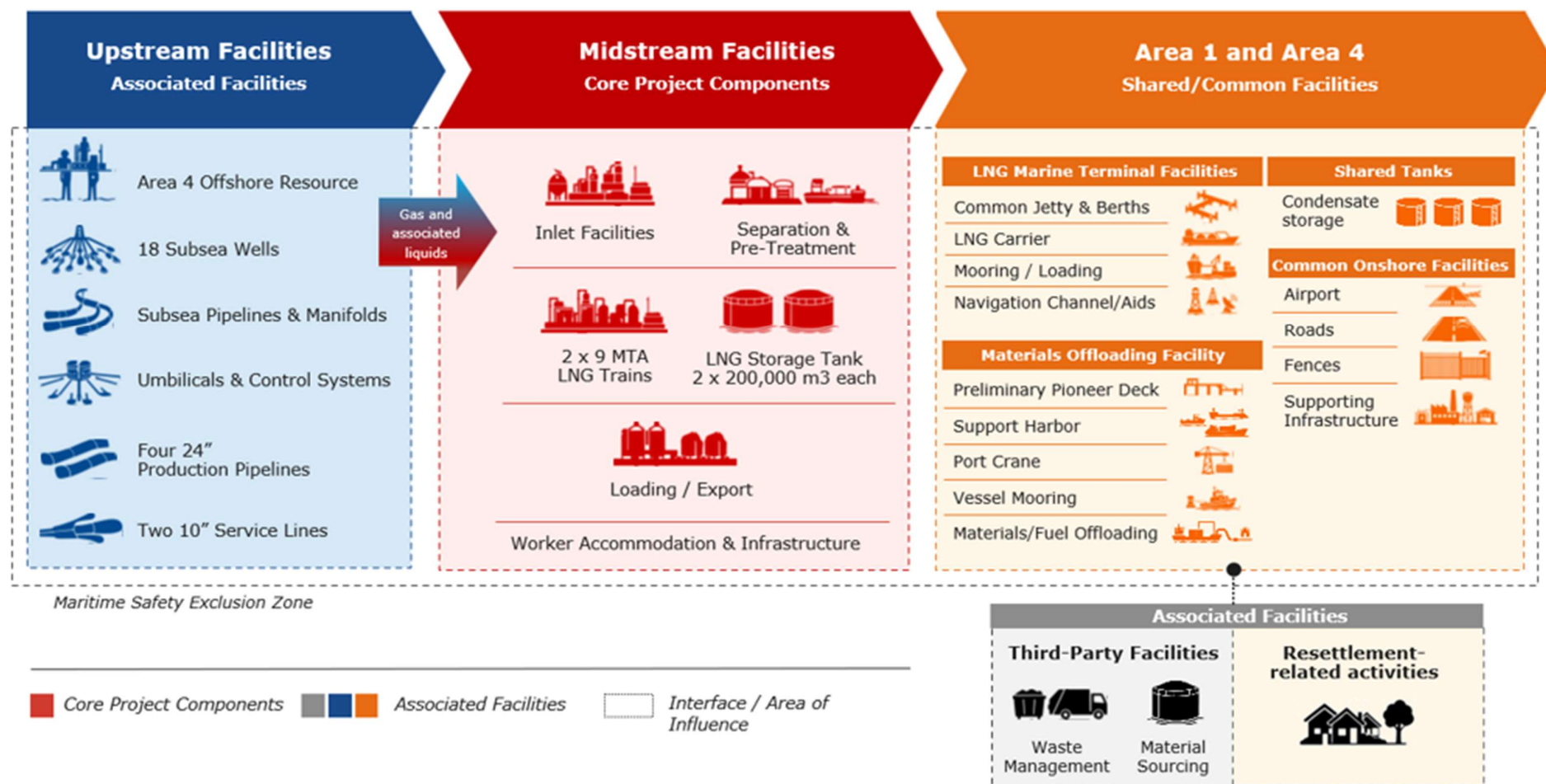
The Upstream Supply Project comprises the offshore and nearshore facilities that collect gas from the Area 4 resource and transport it to the onshore LNG facility. It includes subsea wells, production pipelines, manifolds, umbilicals, control systems and service lines required for subsea production, flow assurance and feed gas delivery to the Midstream facilities.

2.2.3 AREA 1 AND AREA 4 SHARED AND COMMON FACILITIES

Area 1 and Area 4 will jointly use selected nearshore and onshore facilities within the Afungi LNG Park to support construction, logistics, export and operations. These include common onshore infrastructure such as roads, security fencing, the airstrip and supporting utilities, as well as shared marine and logistics infrastructure such as the LNG Marine Terminal, Materials Offloading Facility and condensate storage arrangements.

2.2.4 ASSOCIATED FACILITIES AND ACTIVITIES

Associated Facilities and activities support, enable or are linked to the development of the LNG facilities but will generally be funded from Area 4 sponsor equity. These include the Upstream Supply Project, shared and common facilities, resettlement-related activities and relevant third-party facilities or services as depicted in the following figure.



Source: ERM, July 2026.

FIGURE 2-4 PROJECT COMPONENTS AND INTERFACES

2.3 EVOLUTION OF PROJECT DESIGN AND TECHNOLOGY

Since approval of the EIA in 2014, the Project has undergone design evolution, driven by advances in LNG technology, optimization of the execution strategy, and a focus on enhancing energy efficiency, reducing GHG emissions intensity, and improving constructability.

2.3.1 ELECTRIFIED LNG CONFIGURATION

The transition to an eLNG configuration is centred on the replacement of conventional gas turbine-driven LNG trains with electrified liquefaction powered by an integrated on-site Combined Cycle Power Plant (CCPP), which provides both electricity and process heat at higher overall energy efficiency compared to conventional large train designs. The design is complemented by modular LNG trains, enhanced heat integration, lower-energy gas treatment enabled by the low-CO₂ feed gas, recovery of off-gas streams to eliminate routine flaring, and recovery and reuse of hydrocarbons from the reservoir CO₂ treatment stream as fuel gas, thereby removing the need for a thermal oxidiser.

Together, with a future-ready platform for renewable power integration, hydrogen utilisation and Carbon Capture and Storage (CCS) these design enhancements reduce fuel consumption and improve GHG emissions intensity.



Key Potential Benefit of Transitioning LNG to an eLNG Configuration

- **Industry-leading carbon performance:** Electrified liquefaction powered by a high-efficiency combined CCPP alongside other design features significantly reduces GHG intensity, benchmarked as lower than comparable LNG projects assessed as cited by Wood Mackenzie LNG Emissions Tool, 2025.
- **Higher energy efficiency:** Electrified compression, heat integration and combined cycle power generation reduce fuel consumption while maximizing LNG output and operational efficiency.
- **Improved project delivery:** Modular construction reduces on-site work, lowers schedule risk and supports faster, more predictable project execution.
- **Enhanced safety and security:** Reduced construction footprint and workforce requirements minimize personnel exposure and operational risks in a challenging operating environment.
- **Flexible, scalable development:** Standardized eLNG modules support phased expansion, optimized capacity growth and greater adaptability to market demand.
- **Future-ready decarbonization platform:** The electrified configuration creates a potential pathway for renewable power integration, hydrogen utilization and CCS.

2.3.2 MODULAR CONSTRUCTION APPROACH AND SUPPORTING INFRASTRUCTURE

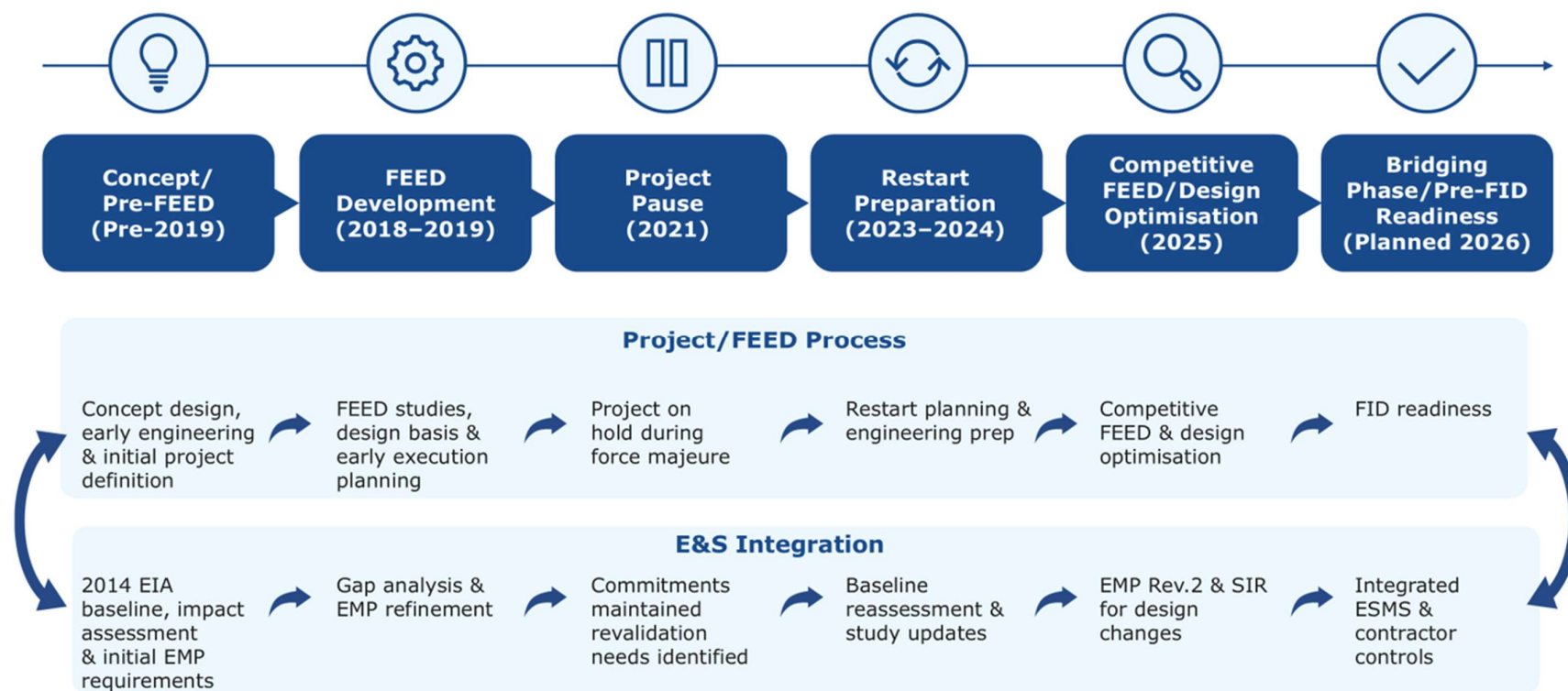
The Project adopts a modularised construction approach, with key LNG process modules fabricated offsite and transported to Mozambique for installation, reducing onsite construction complexity, labour requirements and execution risk while supporting schedule certainty.

2.4 CURRENT PROJECT STATUS

The Project is currently finalising the Front-End Engineering Design (FEED) phase, where engineering design, environmental modelling, and lender-aligned E&S documentation are converging to support Final Investment Decision (FID) planned for the second half of 2026.

Source: ERM, July 2026.

Figure 2-5 below summarises the Project's progression from concept and pre-FEED through to planned pre-FID readiness. It illustrates that E&S requirements were not developed as a separate or retrospective exercise, but were progressively informed by design evolution, updated baseline information, supplementary studies, management of change screening, E&S management plan revisions and lender due diligence. This continuum demonstrates the link between engineering decisions, impact assessment, mitigation refinement and the integration of updated requirements into the ESMS, ESMPs and contractor controls.



Source: ERM, July 2026.

FIGURE 2-5 FEED LIFECYCLE AND LINKAGES TO E&S ASSESSMENT AND MANAGEMENT

3. MANAGEMENT OF CHANGE AS THE OPERATIONAL FRAMEWORK

Project changes associated with Area 1 are governed through ExxonMobil's Operations Integrity Management System (OIMS), including OIMS System 7.1 – Managing Changes. The Project-specific application of this process is documented in the 2026 Rovuma LNG ESMP, including the classification of E&S-related changes, the MoC interface, and related external reporting requirements.

Specific to the regulatory process, the EIA MoC framework provides a structured process jointly developed and applied by the Area 1 and Area 4 licence holders for screening proposed changes against the approved EIA and baseline prior to implementation. It provides for:

- Proposed changes are clearly defined relative to the approved Project baseline;
- Potential new impacts or changes in the significance of existing impacts are identified and assessed;
- Cumulative effects and interactions with previous changes are considered; and
- The appropriate level of assessment, management and regulatory response is determined in a proportionate manner.

The MoC process is used to identify, assess and manage changes to project design and activities, including evaluation of potential environmental and social implications and determination of any required updates to ESMPs, impact assessments, control and mitigation measures. This iterative and adaptive approach has been supported by a combination of regulatory processes, updated technical studies and lender-driven assessments, which together inform the Project's integrated understanding of potential impacts.



Source: ERM, July 2026. | Illustrative Graphic of MoC process for SLIM.

FIGURE 3-1 MANAGEMENT OF CHANGE AS THE OPERATIONAL FRAMEWORK

The procedure categorises changes according to their E&S implications and determines the appropriate management pathway, ranging from internal operational controls through to regulatory engagement and formal submission, such as Technical Notes, Supplementary Information Reports (SIRs) or EMP updates. Any new or revised requirements arising from this process are incorporated into the Project's ESMPs and associated EMP commitment register, ensuring traceability and providing inputs to the broader E&S management framework described in Section 5. Through this structured and proportionate framework (**Figure 3-1**), the MoC framework maintains alignment between evolving Project design, applicable regulatory requirements, lender expectations and practical impact management.

4. UNDERSTANDING POTENTIAL IMPACTS

4.1 CONCEPTUAL FRAMEWORK FOR IMPACT ASSESSMENT

The concepts presented below are central to the Project's approach to understanding potential impacts as aligned with IFC PS1.

4.1.1 SOURCE–PATHWAY–RECEPTOR FRAMEWORK

Potential impact identification is based on a source–pathway–receptor framework, which provides a systematic basis for tracing how project activities may generate pressures, how those pressures may be transmitted, and which environmental or social receptors may be affected. Within this framework:

- Project activities or sources, such as construction works, emissions (air pollutants, GHGs, noise), water discharges or land disturbance, may generate environmental or social pressures;
- Pressures are transmitted through pathways (e.g. air dispersion, water movement, noise propagation or socio-economic interactions); and
- Receptors may include environmental components, such as habitats, water resources or biodiversity, and social receptors, such as communities, livelihoods and infrastructure.

The interaction between source, pathway and receptor determines the nature and significance of potential impacts. Mitigation measures are then applied in line with the mitigation hierarchy, with residual impacts forming the basis for the Project's impact profile, as shown in **Figure 4-1**.

4.1.2 AREA OF INFLUENCE AND BASELINE CONTEXT

The Project's AoI (Figure 2-1), as defined in the Baseline Chapter² of the 2014 EIA, provides the spatial baseline for understanding the receiving environment within which E&S potential impacts may occur. The AoI encompasses the Afungi LNG Park, the adjacent marine and coastal environment, and the surrounding social and economic setting, including communities, access routes and associated infrastructure. At the time of the EIA, the AoI was characterised largely by natural coastal habitats and dispersed rural communities with livelihoods based on fishing and subsistence activities. Since 2014, development in part associated with TEPMA1 within the Afungi Peninsula, together with related regional changes, including natural and project induced in migration, has altered parts of the AoI, with some areas transitioning to more developed and actively managed conditions.

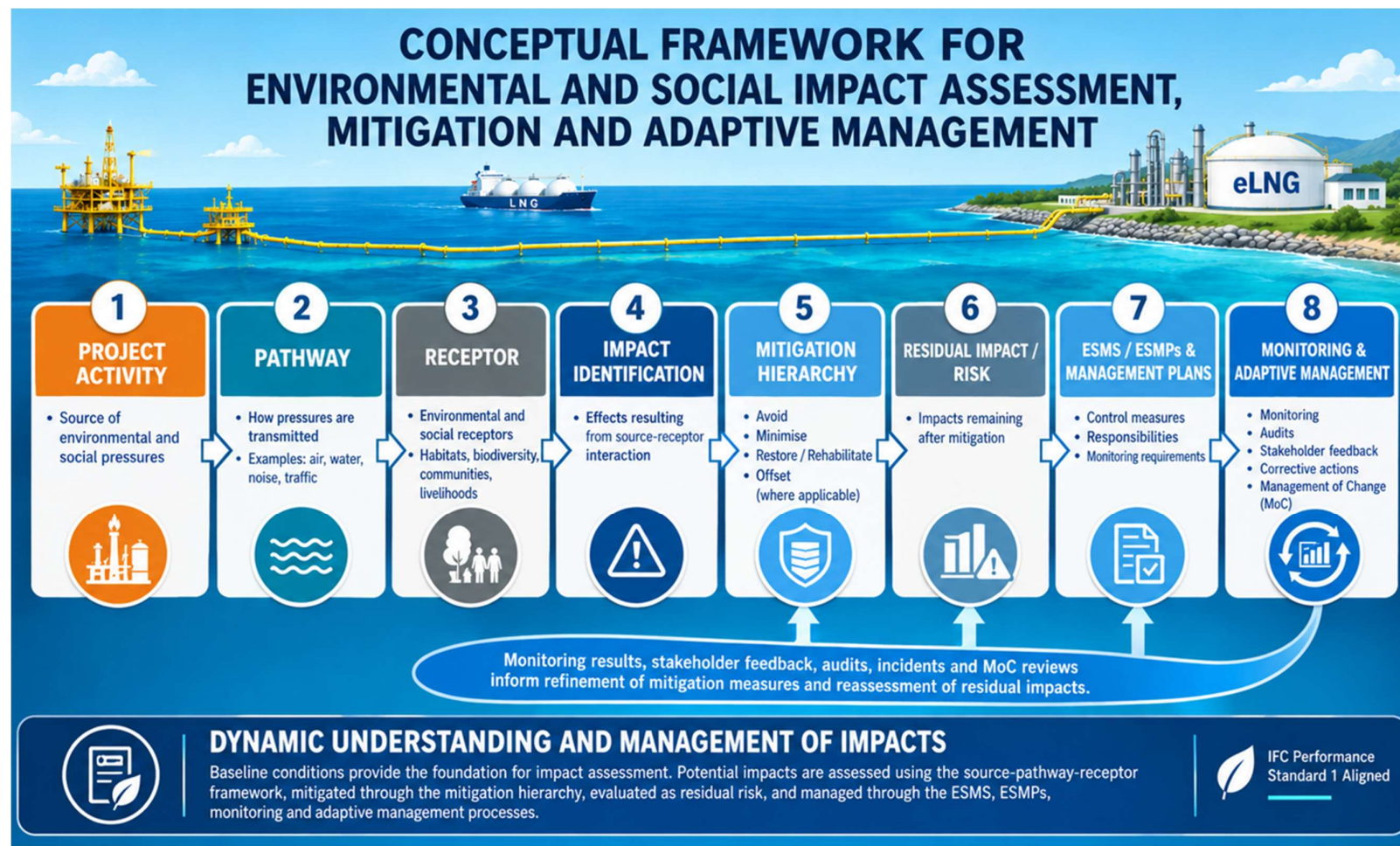
While the 2014 EIA defined AoI remains the baseline reference point, EML has progressively refined its understanding of changing conditions, including indirect, induced and cumulative effects. This approach of ongoing data collection supports the continued identification and management of potential E&S risks as the Project evolves.

² Section 6-5-1 (*Areas of Influence*) | Figure 6-3 (*Areas of Direct Influence*)

4.1.3 IMPACT ENVELOPE

The “impact envelope” refers to the range and magnitude of potential E&S impacts assessed in the 2014 EIA, including their spatial extent, intensity and significance. It defines the bounds within which Project changes may remain consistent with the approved assessment. Changes are screened against this envelope to determine whether they: i) Introduce new potential impacts; ii) Result in an increase in impact significance; or iii) Remain within the previously assessed range.

This concept provides continuity between the 2014 EIA and subsequent updates and underpins the approach to impact reassessment described in later sections.



Source: ERM, July 2026.

FIGURE 4-1 CONCEPTUAL FRAMEWORK FOR E&S IMPACT ASSESSMENT

4.2 PROJECT APPROACH TO E&S IMPACT MANAGEMENT

The Project applies a structured, iterative approach to E&S impact assessment to understand how Project activities interact with the receiving environment and communities within the AoI, and how potential impacts are identified, assessed and managed. Consistent with IFC PS1 and GIIP, this approach links the 2014 EIA, updated baseline information, design changes and management responses into a continuous assessment process that informs updates to Project management plans and controls.

4.2.1 EVOLUTION AND IMPLEMENTATION OF IMPACT ASSESSMENT OVER TIME

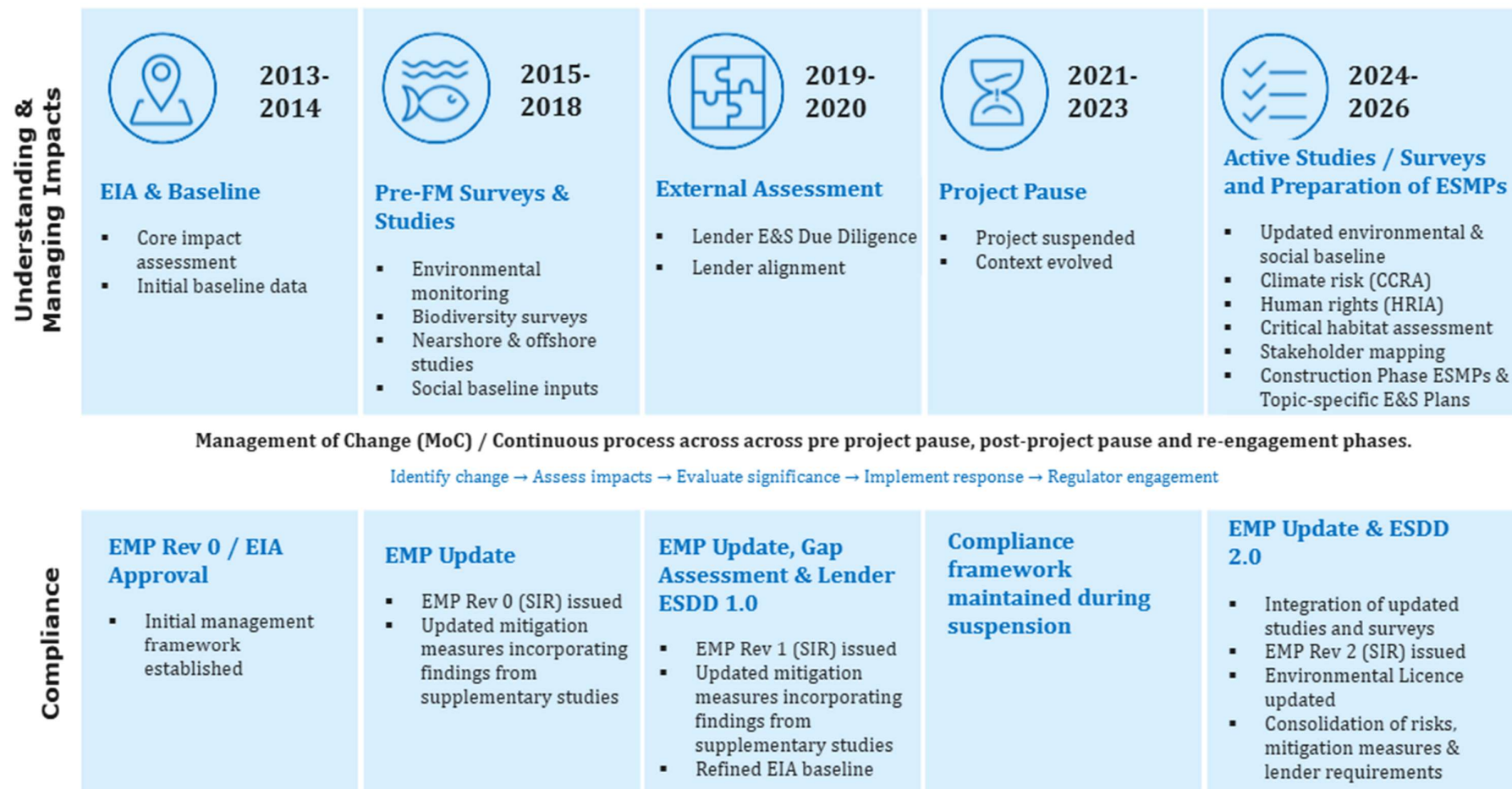
The Project's understanding of potential E&S impacts has evolved since the 2014 EIA, reflecting changes in design, baseline conditions, execution context and lender expectations. This has been managed through supplementary studies, targeted reassessments, regulatory updates and lender-facing reviews, rather than reliance on a single assessment point.

The 2014 EIA established the baseline, impact envelope, mitigation framework and basis for the Project's initial ESMPs and environmental approvals. Subsequent work has built on this through baseline surveys, thematic studies, supplementary assessments, EMP revisions, updated management plans and controls, lender E&S due diligence and lender-facing information packages. Key updates have included reassessment of E&S conditions after the Project pause, review of design refinements against the original impact envelope, and preparation of updated regulatory and lender documentation, including the most recent 2026 EMP revision and associated environmental licence approvals.

Between 2020 and renewed restart preparation, the Project experienced a pause, COVID-19 restrictions, security conditions and logistical constraints, including limited workforce mobility, site access and supply chain continuity. Before restart, Mozambican requirements relating to DUAT compliance, E&S approvals, resettlement obligations and shared infrastructure governance required baseline revalidation and confirmation that mitigation and management measures remained appropriate.

Internal gap assessments and phased lender due diligence by the IESC, first in 2019/2020 and again from 2024, have provided independent review of legacy E&S requirements, approved EIA/EMP documentation, recent studies, SIR outcomes, ESMP revisions, ESMS implementation arrangements and contractor-facing controls. Findings are integrated through the MoC framework and the Project's ongoing assessment and management programme.

Collectively, these activities show how the 2014 EIA remains the reference point for assessing Project evolution, while allowing updated information, design refinements, regulatory requirements and lender expectations to be reflected in the current E&S assessment and management framework. **Figure 4-2** provides a consolidated overview of this evolution and shows how baseline studies, supplementary assessments and targeted investigations have informed EMP updates, environmental approvals, ESMP updates and lender-facing documentation.



Source: ERM, July 2026.

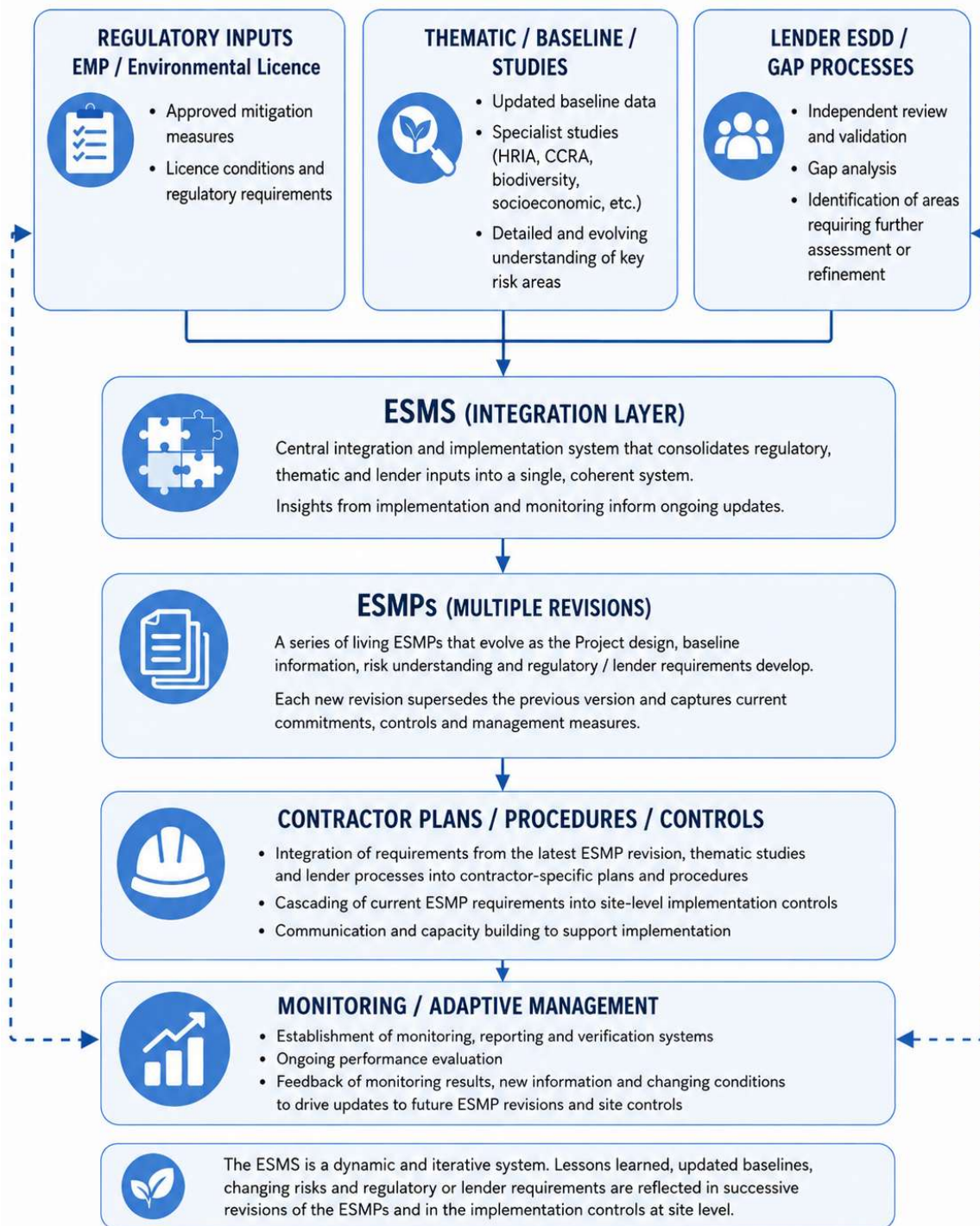
FIGURE 4-2 EVOLUTION OF ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT FOR THE ROVUMA LNG PROJECT

4.2.2 DYNAMIC ASSESSMENT

Appropriate to the scale and complexity of the Project, E&S impact assessment is treated as an ongoing process rather than a one-off exercise. As Project design, baseline conditions and contextual factors evolve, impact understanding is updated to remain current, proportionate and evidence based.

EMML's current approach to impact assessment provides a practical mechanism for keeping the Project's E&S risk profile up to date. The approach is aligned with internal standards, applicable Mozambican regulatory requirements and IFC PS1, and uses the best available information to identify, assess and manage potential impacts where Project design, baseline data or contextual conditions change. This process is supported by updated baseline studies, thematic assessments and lender-driven reviews, which together strengthen the Project's overall understanding of potential E&S risks and impacts.

In practice, changes in Project design, baseline understanding, E&S conditions, and stakeholder or regulatory inputs are screened to determine whether additional assessment or mitigation refinement is required. This keeps assessment outputs directly connected to management measures, including EMP updates, ESMP requirements and contractor implementation controls, and provides the basis for the MoC framework described in the following section.

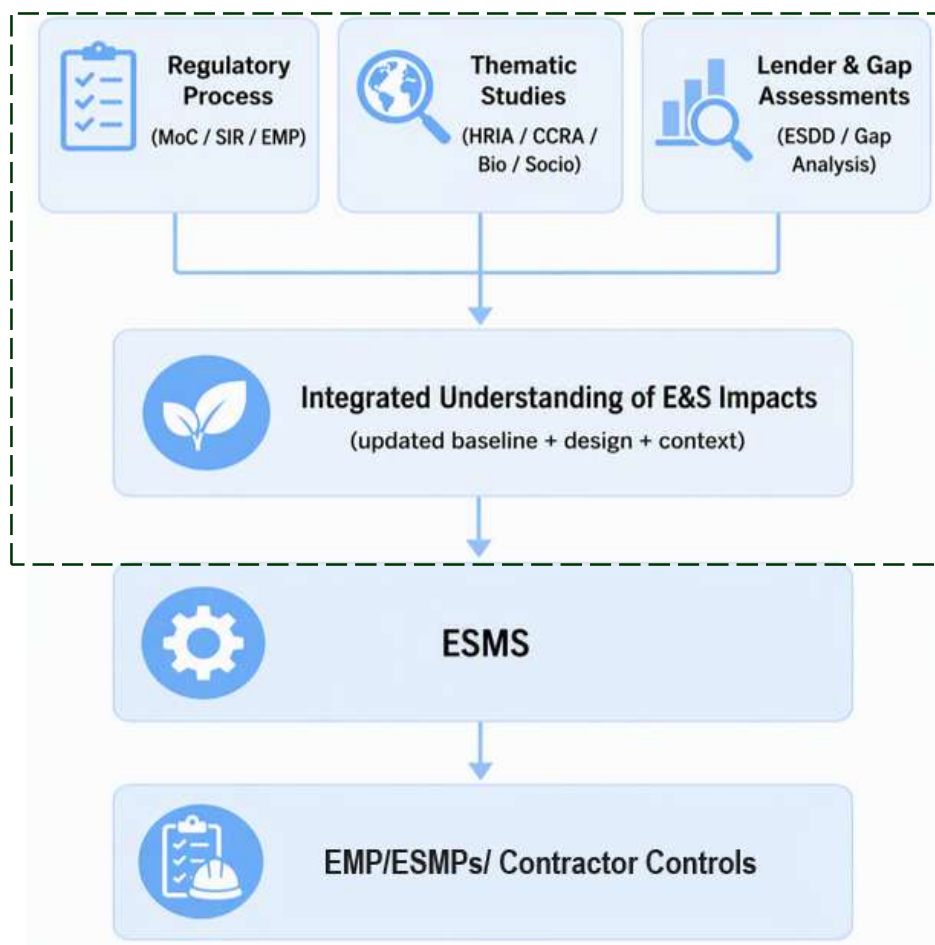


Source: ERM, July 2026.

FIGURE 4-3 PROJECT FRAMEWORK DYNAMIC ASSESSMENT AND ADAPTIVE MANAGEMENT

As set out in the preceding sections, the Project applies a structured and iterative approach to understanding potential E&S risks and impacts, aligned with IFC PS1 and supported by the EIA MoC framework. However, the Project's current understanding of potential impacts is not derived

from a single process or assessment instrument. Instead, it reflects the outcome of multiple complementary and interrelated assessment streams, which have been developed and refined over time. Operating in parallel and serving distinct but interconnected purposes, these assessment streams illustrated in **Figure 4-4**: regulatory processes, thematic studies and lender due diligence processes.



Source: ERM, July 2026.

FIGURE 4-4 THREE ASSESSMENT STREAMS INFORMING THE DYNAMIC UNDERSTANDING OF IMPACTS

As shown in **Figure 4-4**, the three assessment streams contribute different but complementary inputs to the Project's understanding of potential impacts. Regulatory processes assess discrete changes against the approved EIA baseline and support compliance with applicable national regulatory requirements; thematic and technical studies provide current, topic-specific evidence on E&S conditions and sensitivities; ESMPs integrate changes and appropriate management & mitigation measures and contractor requirements; and lender and gap assessment processes provide independent review, verification and identification of areas for refinement. No single stream provides a complete picture on its own.

The Project therefore integrates the outputs of these streams into a consolidated and evolving understanding of potential E&S risks and impacts, which is maintained through the ESMS. The ESMS provides the mechanism for keeping this understanding current over time, enabling new information, design changes, regulatory outcomes and lender findings to be brought together and translated into updated management plans, ESMP requirements, monitoring frameworks and contractor controls during implementation.

The following sections summarise each assessment stream, focusing on its purpose, key themes and contribution to the Project's overall impact assessment and management framework, rather than providing detailed technical descriptions of individual studies.

4.2.3 REGULATORY ASSESSMENT

The Supplementary Information Report (SIR) is the Project's principal regulatory assessment mechanism for evaluating design and execution changes against the approved EIA and EMP. Developed in accordance with the EIA MoC framework, both Area 1 and Area 4 adopt this procedure to confirm whether changes remain within the existing impact envelope and identify any additional assessment, mitigation or EMP updates required to maintain alignment with regulatory approvals.

The SIR applies a focused and repeatable process (**Figure 4-5**) where relevant changes are defined relative to the approved baseline, assessed using updated E&S information, and evaluated to determine whether they introduce new potential impacts or alter the significance of impacts previously assessed in the EIA. Where a change requires further management response, the SIR identifies proportionate mitigation, monitoring or management measures for incorporation into EMP updates and related implementation controls.

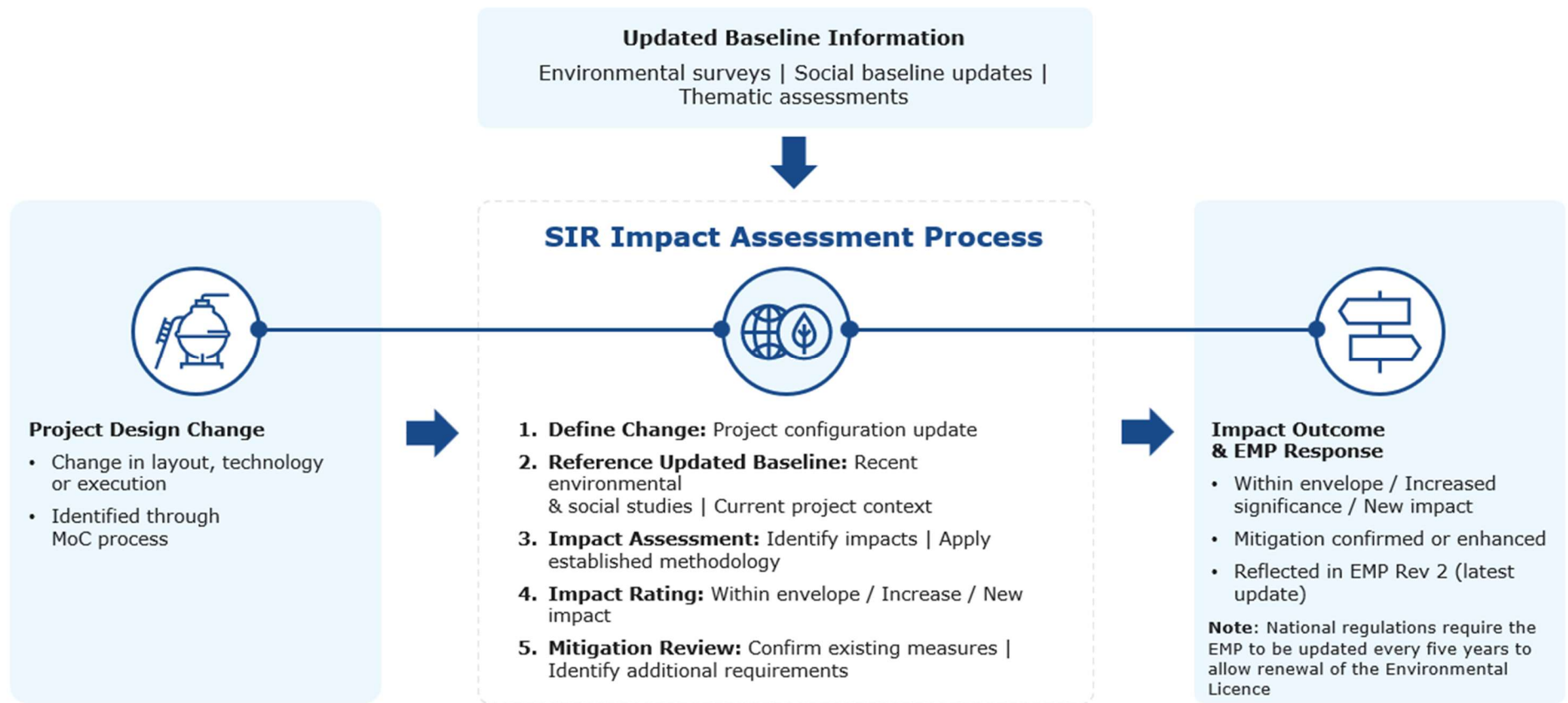
For the current Project configuration, the SIR has focused on those E&S risk areas where design or execution changes required confirmation against the approved EIA baseline and impact envelope. The principal thematic areas, assessment focus and corresponding management responses are presented in

Table 4-1 below.



Managing Project Change Through the SIR Process

The SIR process provides the regulatory mechanism for linking Project design evolution to updated impact assessment and management responses. By assessing changes against the 2014 EIA baseline and impact envelope, it enables proportionate mitigation and management measures to be defined and carried forward through EMP updates and related implementation controls.



Source: ERM, July 2026.

FIGURE 4-5 IMPACT ASSESSMENT PROCESS

TABLE 4-1 KEY THEMATIC AREAS ASSESSED THROUGH THE 2025/2026 ROVUMA SIR PROCESS

Thematic area		Key design / change driver	Assessment focus	SIR outcome / management response
	Air quality and GHG emissions	Transition to eLNG supported by the CCPP.	Air emissions, GHG emissions intensity and standards compliance.	Emissions remain within applicable regulatory or lender standards and the assessed impact envelope; eLNG improves higher overall energy efficiency and lowers GHG emissions intensity; relevant mitigation has been carried into EMP Rev. 2.
	Noise and vibration	Modular eLNG design and updated plant layout.	Noise levels at receptors during normal and emergency conditions.	Noise effects remain within the assessed envelope, with localised variations. Minor management refinements have been included in the updated EMP where needed.
	Marine and water environment	Revised discharges, water treatment and dredging activities.	Water quality, discharge behaviour, sediment dispersion and sensitive habitats.	Potential impacts remain broadly consistent with previous assessment, with some refined activity-level ratings. Updated monitoring, adaptive management and targeted EMP controls have been included.
	Land, groundwater and terrestrial environment	Changes to construction methods, borrow pits, leachate management and groundwater use.	Soils, hydrology, wetlands, groundwater, ecosystem services and community water resources.	Potential impacts are localised and manageable, with residual effects within acceptable thresholds. Additional monitoring, groundwater protection, adaptive abstraction and rehabilitation controls are reflected in EMP Rev. 2.
	Marine activities and receptors	Floating accommodation vessels and increased marine traffic.	Marine ecology, water quality, fisheries and coastal communities.	Additional pressures are introduced, but potential impacts remain localised and manageable with standard controls. Discharge management, operational controls and stakeholder engagement provisions are included in the updated EMP framework.

4.2.4 THEMATIC AND TECHNICAL STUDIES

Thematic and technical studies provide topic-specific evidence on evolving baseline conditions, risk drivers and management requirements. They complement the regulatory assessment process by providing the detailed information needed to refine impact understanding and support proportionate management responses.

These studies include updated baseline surveys, targeted thematic assessments and specialised technical studies addressing key potential E&S risk areas across the Project lifecycle.

Table 4-2 presents the principal study areas at a high level, focusing on their contribution to the broader assessment and management framework rather than detailed technical findings.

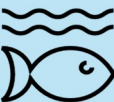
Additional supporting studies and assessments are commissioned where needed to address specific risk pathways, validate impact predictions or refine mitigation, monitoring and adaptive management requirements.



Maintaining a Current Understanding of Potential E&S Risks and Impacts

Thematic and technical studies provide the detailed evidence base for maintaining a current understanding of potential E&S risks and impacts and supporting regulatory assessment. Additional studies are undertaken where needed to address emerging information needs, validate impact predictions and refine mitigation, monitoring, adaptive management, EMP/ESMP requirements and contractor-level controls through the ESMS.

TABLE 4-2 KEY THEMATIC AND TECHNICAL STUDIES SUPPORTING THE E&S ASSESSMENT FRAMEWORK

Study theme		Key studies / inputs	Assessment focus	Contribution to assessment and management framework
	Human Rights Impact Assessment (HRIA)	HRIA and related HRDD (Human Rights Due Diligence) inputs	Actual and potential human rights impacts associated with communities, workers, security arrangements and contractors	Informs mitigation, monitoring and management responses related to stakeholder engagement, grievance management, security and human rights, labour conditions and access to remedy.
	Climate Change and GHG Assessment	CCRA, GHG Plan, physical and transition risk analyses, emission reduction pathways	GHG emissions profile, GHG emissions intensity, physical climate risks, transition risks and potential decarbonisation opportunities	Supports climate risk management, emissions reduction strategies, resilient design, lender alignment and integration into monitoring and management processes.
	Biodiversity and Ecosystem Studies	Updated terrestrial and nearshore marine baseline surveys, CHA, RIA, ESA and related technical studies	Ecological receptors, habitat sensitivity, priority biodiversity features, ecosystem services and residual impact pathways	Supports application of the mitigation hierarchy and informs the biodiversity strategy, Biodiversity Action Plan (BAP), Biodiversity Management Plan (BMP), Biodiversity Offset Management Plan (BOMP), Biodiversity Monitoring and Evaluation Plan (BMEP), offset planning and monitoring requirements.
	Socioeconomic and Stakeholder Studies	Updated socioeconomic and community health baseline, household survey, stakeholder mapping, community profiles and economic impact assessment	Demographics, livelihoods, community health, access to resources, community perceptions, stakeholder interests and Project-related economic contributions	Supports refinement of social and socioeconomic impact pathways, stakeholder engagement priorities, livelihood initiatives, influx considerations and broader social performance management.

4.2.5 LENDER AND GAP ASSESSMENT PROCESSES

Lender due diligence and gap assessment processes form the third assessment stream supporting the Project's current understanding of potential E&S risks and impacts. These processes provide independent review of the Project's E&S assessment and management framework and support alignment with applicable lender requirements, the IFC PS, the Equator Principles and GIIP.

The ESDD process, undertaken by the IESC on behalf of the prospective lenders, has been progressed in phases to review both legacy Project documentation and the updated Project configuration and management systems. The ESDD considers the adequacy of E&S assessments, management systems, mitigation measures and implementation arrangements against applicable lender standards and expectations.

In this context, lender due diligence supports the Project by:

- reviewing the completeness and robustness of existing E&S documentation, performance standards requirements, management measures and implementation arrangements;
- identifying gaps, clarifications or updates required to support alignment with the IFC PS, the Equator Principles, GIIP and lender expectations;
- informing targeted studies, baseline updates, refinement of impact conclusions, and updates to mitigation, monitoring, management and assurance requirements within the EMP, ESMP, ESMS and related implementation controls.

ESDD and gap assessment outputs therefore provide a structured basis for validating the Project's E&S framework, identifying priority actions and tracking closure of lender-related findings over time.



Independent Review Strengthens Lender Alignment

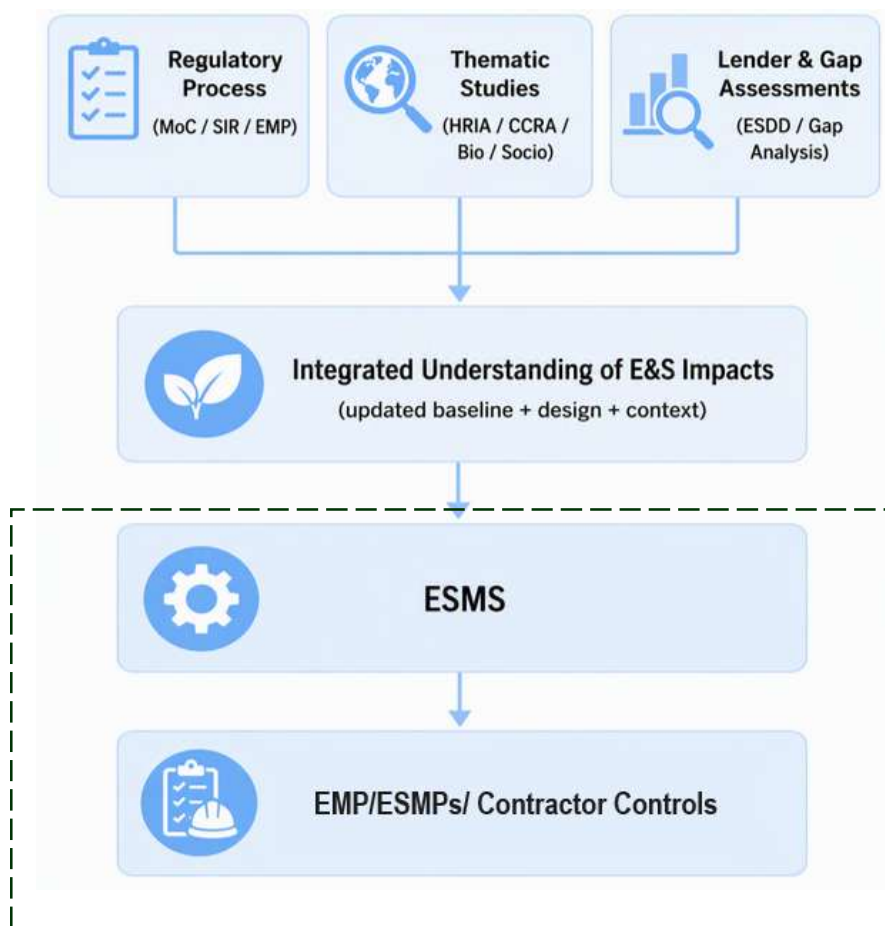
Lender due diligence and gap assessment processes provide independent review and lender-aligned feedback within the integrated impact assessment framework. Their findings are consolidated through the ESMS and translated into EMP updates, ESMP requirements, targeted studies, contractor requirements, monitoring processes and implementation controls.

5. MANAGING POTENTIAL IMPACTS

This section explains how the Project translates the understanding of potential impacts as described in Section 4 into practical E&S management. It outlines the role of the ESMS, ESMP, contractor controls and monitoring processes in managing potential impacts, verifying performance and supporting adaptive management as Project design, site conditions and regulatory or lender expectations evolve.

5.1 INTEGRATED AND ADAPTIVE MANAGEMENT

Integrated and adaptive management provides the link between the Project's dynamic understanding of potential E&S impacts and the management instruments used to control them during implementation. As illustrated in **Figure 5-1**, assessment outputs, applicable regulatory requirements, technical studies and lender inputs are translated through the ESMS into the ESMPs, contractor implementation controls, monitoring requirements and feedback processes. These instruments provide a structured mechanism for testing whether mitigation measures and controls are effective, identifying performance gaps or emerging risks, and translating findings into corrective, preventive or adaptive actions as Project conditions evolve.



Source: ERM, July 2026.

FIGURE 5-1 ADAPTIVE MANAGEMENT INSTRUMENTS INFORMED BY DYNAMIC ASSESSMENT OF IMPACTS

5.2 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)

The Project's Environmental and Social Management System (ESMS) provides the overarching framework through which potential E&S risks and impacts are managed, integrated and operationalised across the Project lifecycle. It provides the mechanism for translating the understanding of potential impacts developed through the assessment streams described in Section 4.3 into practical management measures, implementation controls, monitoring processes and adaptive management responses.

Within the ESMS, inputs from regulatory processes, thematic and technical studies, ESMPs, and lender and gap assessment processes are consolidated into a single management framework. Regulatory processes provide the basis for maintaining alignment with the approved EIA, EMP and Environmental Licence; thematic and technical studies provide updated, topic-specific evidence on baseline conditions and key risk areas; ESMPs provide the management and mitigation measures as well as contractor controls; and lender-driven processes provide independent review, validation and identification of gaps requiring further assessment or refinement.

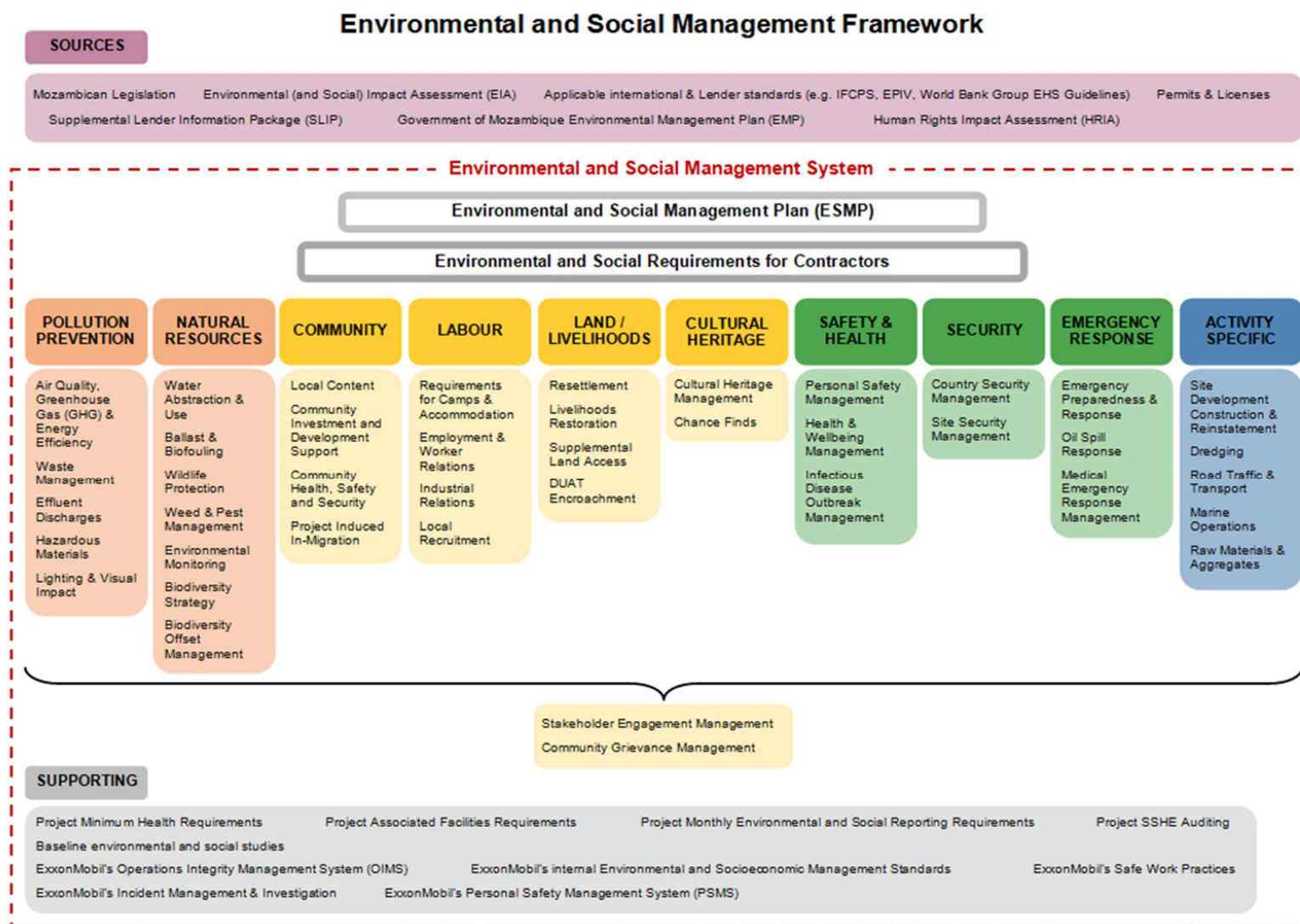
The ESMS translates these inputs into structured management instruments and controls. Within this framework, the Rovuma LNG ESMP and associated topic-specific management plans represent the primary project-wide guidance documentation on implementation, consolidating relevant requirements from the EMP, thematic studies, applicable lender or other requirements and processes and other assessment inputs into management measures, performance expectations and implementation requirements. In practice, this includes:

- Integration of requirements from the EMP, thematic studies and lender processes into the ESMPs;
- Cascading of ESMP requirements into contractor-specific plans, procedures and implementation controls;
- Establishment of monitoring, reporting and verification systems
- Application of adaptive management processes to respond to evolving conditions and new information; and
- Updating management plans and controls as the Project moves from construction into operations.

Monitoring, reporting, verification and feedback processes are embedded within the ESMS to confirm whether mitigation measures and controls are being implemented and remain effective. Monitoring results, inspections, audits, incident reporting, stakeholder feedback and grievance trends provide ongoing inputs to the ESMS, enabling non-conformances, performance gaps and emerging risks to be identified and addressed through corrective and preventive actions.

The ESMS is therefore not a static set of documents, but a dynamic and integrated system, through which applicable regulatory requirements, technical evidence and lender expectations are continuously brought together and translated into practical actions across the Project.

Figure 5-2 below illustrates the role of the ESMS in integrating these inputs and delivering E&S management across the Project as referenced in the Rovuma LNG ESMP.



Source: EML, 2026.

FIGURE 5-2 ROVUMA LNG ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM DOCUMENT FRAMEWORK

5.3 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS (ESMP)

The ESMP³ provides the critical link between the integrated assessment of impacts and the practical execution of management measures at site level.

As described in Section 4.1, the ESMS consolidates inputs from multiple sources. The ESMPs serve as the mechanism through which these inputs are brought together and operationalised, ensuring that all relevant applicable regulatory requirements are captured in a consistent and implementable form. In this role, the ESMPs perform several key functions:

- It provides a consolidated framework of E&S management measures, integrating applicable regulatory requirements, study findings and lender requirements into a single, coordinated set of controls;
- It translates these requirements into defined management actions, performance expectations and implementation expectations applicable across the Project;
- It establishes the basis for assigning responsibilities and accountabilities to EML, contractors and subcontractors; and
- It forms the foundation for monitoring, reporting and verification that mitigation measures are effectively implemented and maintained.

5.3.1 DISTINCTION FROM EMP

The ESMP is therefore distinct from the EMP in its function and position within the overall framework. While the EMP defines the approved regulatory requirements, the ESMPs translate these requirements (together with additional inputs from thematic studies and lender processes) into a comprehensive implementation framework. From this framework, requirements are cascaded into topic specific implementation and site level controls (plans, procedures and method statements) to be applied during construction and operations by the contractors and / or operator.

The ESMPs are not static, but are updated as necessary to reflect changes in Project design, updated baseline conditions and the evolving understanding of potential E&S risks. Through this process, the Project's management approach remains aligned with the assessment processes described in Section 4 and the ESMS framework described in Section 5.2.

5.3.2 E&S REQUIREMENTS FOR CONTRACTORS AND TOPIC SPECIFIC E&S PLANS

Topic-specific E&S plans sit beneath the overarching ESMP within the ESMS document framework shown in **Figure 5-2**. The ESMP establishes the Project-wide management requirements, performance expectations and implementation principles, while the topic-specific plans translate these requirements into more detailed controls for individual E&S disciplines and risk areas. In this way, the plans provide the cascade from the ESMPs to practical implementation by defining the standards, procedures, roles, monitoring requirements and interfaces that contractors and Operators are required to apply at site and activity level.

³ The term ESMP as used here refers to both the single overarching system document and the topic-specific E&S management plans which provide instructions to Contractors and the Operator on implementation.

As illustrated in **Figure 5-2**, these plans cover the following broad aspects: pollution prevention and control; natural resources; community; labour; land and livelihoods; cultural heritage; safety and health; security; emergency response; and other discipline-specific requirements, including material sourcing, marine operations, traffic and transportation, and site reinstatement.

The topic-specific plans therefore function as the intermediate implementation layer between the ESMP and contractor-level controls. They enable ESMP requirements to be disaggregated by topic, assigned to responsible parties and incorporated into Contractor Implementation Plans, procedures, method statements, training, monitoring and reporting arrangements. This structure supports consistent application of Project requirements while allowing controls to be tailored to the specific activities, locations and phases in which risks arise.

6. BRIDGING FEED / PRE-FID READINESS AND FORWARD IMPLEMENTATION

This section focuses on the Bridging FEED / pre-FID (Final Investment Decision) readiness phase and the transition to forward implementation. It confirms that the key E&S assessment, management planning and lender-aligned readiness requirements for the current phase have been substantially addressed, and that the systems, controls and feedback mechanisms needed for execution are in place.

As the Project moves from pre-FID readiness into construction / execution, the focus shifts to implementation, verification and adaptive management. The ESMS, ESMP, topic-specific E&S plans and contractor-level controls provide the implementation framework, supported by monitoring, inspections, audits, incident reporting, stakeholder engagement and grievance processes that enable corrective, preventive and adaptive action.

This phase-based approach should be read alongside the FEED lifecycle and linkages to E&S assessment and management (**Figure 2-5**) and the ESMS document framework (**Figure 5-2**), which show how Project-level requirements cascade from the ESMS and ESMP into topic-specific plans, Contractor Implementation Plans, procedures and site-level controls.

For lender review, FID represents a readiness gateway rather than the end of the E&S process. The due diligence phase checks that assessment, planning and lender-aligned controls are sufficiently developed to support execution, with defined mechanisms for managing, verifying and adapting E&S performance as construction progresses.

Appendix A provides a concise overview of how this works relative to the Project's biodiversity strategy and socioeconomic workplan as implementation-ready workstreams within the broader ESMS and ESMP framework. They are provided as indicative examples to illustrate how priority biodiversity and social requirements are structured from baseline evidence and impact analysis through strategy development, planning and implementation, and monitoring and evaluation to support lender-aligned execution.

6.1 PRE-FID READINESS AND TRANSITION TO EXECUTION

During Bridging FEED / pre-FID readiness, the Project has focused on confirming that E&S requirements are current, appropriately captured and capable of implementation during construction. This has included consolidating regulatory requirements, lender due diligence findings, updated technical inputs and ESMP requirements into the ESMS framework described in Section 5.

The execution phase will implement the construction-ready controls defined through the completed studies and the ESMS/ESMP framework. Readiness is supported by a clear management framework that embeds these controls into project and contractor plans, procedures, training, monitoring, and reporting, supporting effective implementation and oversight.

For lender purposes, forward implementation can be understood as a sequence from assessment evidence, through ESMS and ESMP requirements, into topic-specific plans and CIPs, then into site-level procedures and controls, with monitoring and assurance providing the feedback loop for corrective and adaptive action.

Forward implementation will be managed through a combination of:

- Project-led strategies and management plans that retain EMML oversight of key E&S programmes, including biodiversity, stakeholder engagement and social performance;
- Contractor Implementation Plans (CIPs) and supporting management plans that translate ESMP requirements into contractor-specific commitments, procedures, responsibilities and resources;
- Method statements, work instructions and operational procedures that define the controls to be applied to specific construction and execution activities;
- Permit-to-work systems, task-level risk controls and supervision arrangements that embed E&S requirements into day-to-day implementation; and
- Monitoring, inspection, audit and reporting processes that verify performance, identify gaps and trigger corrective, preventive or adaptive actions.

Together, these instruments demonstrate that ESMP requirements can be translated into practical, and measurable actions during construction, rather than remaining as high-level objectives.

Responsibility for implementation is clearly defined across the Project. EMML retains overall accountability for E&S governance, oversight and assurance, while contractors are responsible for embedding applicable ESMP requirements into execution planning, procedures, training, supervision and routine activity management.

6.2 MONITORING, ASSURANCE AND ADAPTIVE MANAGEMENT DURING EXECUTION

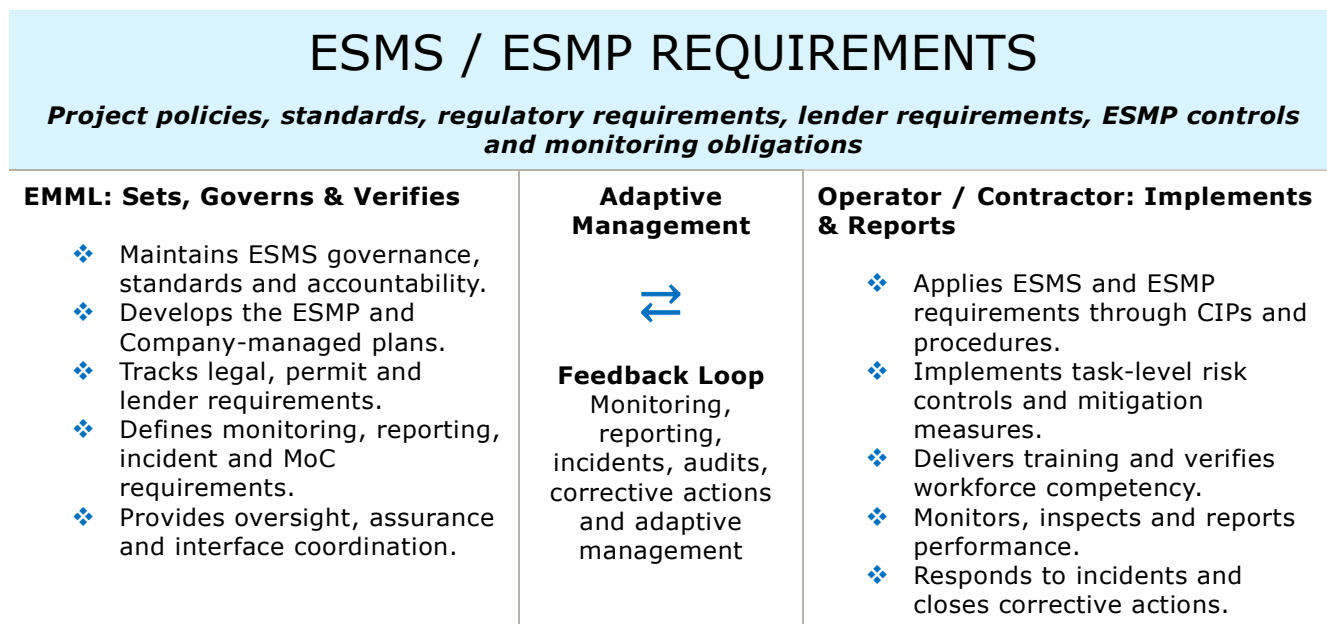
As the Project moves into construction / execution, monitoring and assurance will confirm whether pre-FID readiness management and mitigation measures are implemented effectively. The ESMS and ESMP establish the monitoring, reporting, inspection, audit, incident management and

corrective action requirements to be applied through EML oversight and contractor implementation systems.

Where facilities are operated by another party, including TEPMA1-Operated shared or common facilities, that Operator remains responsible for day-to-day implementation of applicable E&S, health and safety controls in accordance with laws, permits, agreements and Project standards. EML's engagement is defined through contractual and interface arrangements, influencing and providing input through review of relevant plans and reports, assurance activities and escalation of material issues as captured in an Associated Facilities Management Plan.

Monitoring information, inspection findings, incidents, stakeholder feedback and grievances will be reviewed through the ESMS feedback loop. This enables non-conformances, emerging risks and opportunities to improve controls to be identified and addressed through corrective, preventive or adaptive actions.

Clear roles and responsibilities are central to the transition from readiness to execution. As shown in **Figure 6-1**, EML retains overall accountability for E&S governance, standards, oversight and assurance, while Operators and Contractors translate ESMS and ESMP requirements into activity-level implementation, monitoring and reporting. The adaptive management feedback loop connects these roles by ensuring that monitoring results, incidents, audit findings and stakeholder feedback inform corrective, preventive or adaptive action.



Source: ERM, July 2026.

FIGURE 6-1 ROLES, RESPONSIBILITIES AND ADAPTIVE MANAGEMENT FEEDBACK LOOP DURING EXECUTION

APPENDIX A PLANNING AND IMPLEMENTATION OF BIODIVERSITY STRATEGY AND SOCIO- ECONOMIC WORK PLAN

Biodiversity

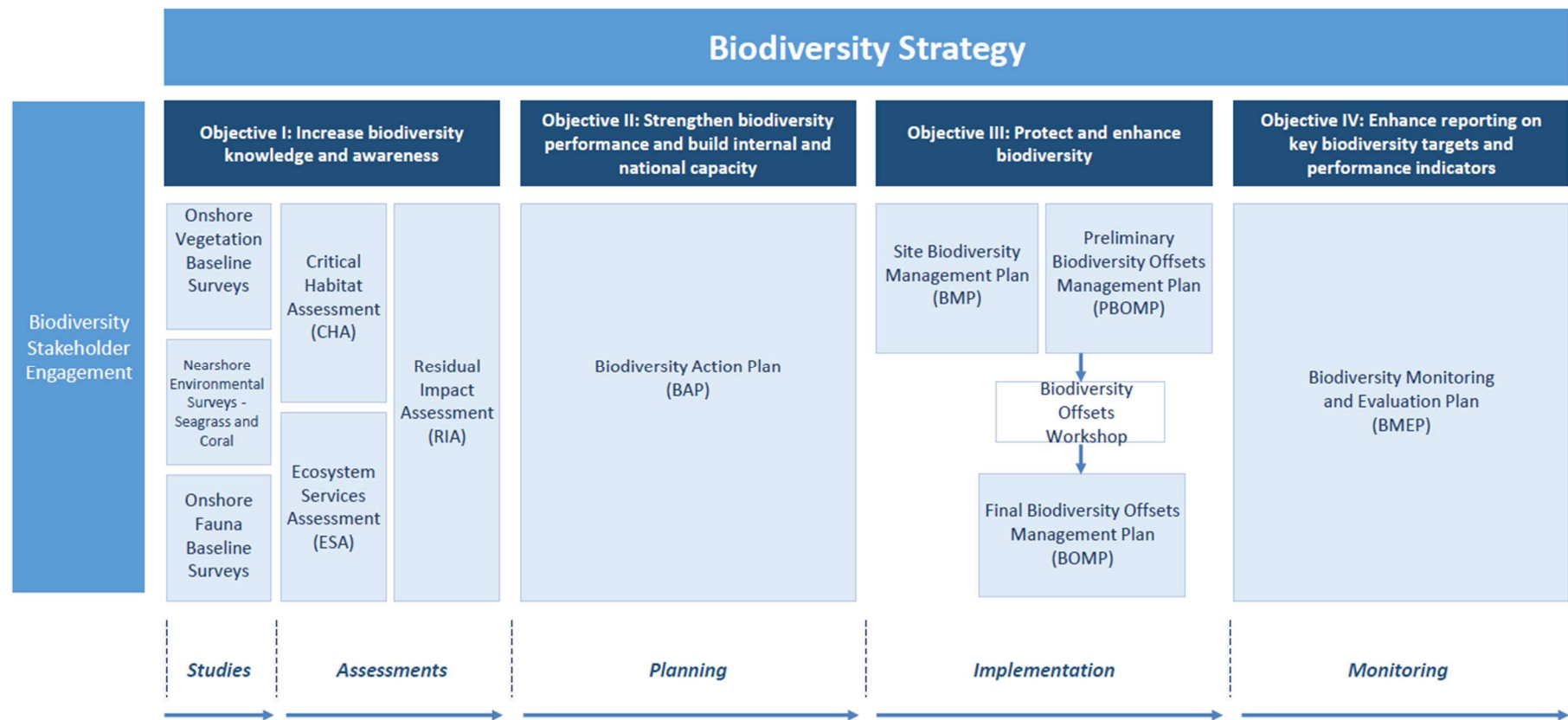
Strategy for Implementation

The Project's current and planned biodiversity strategy provides a structured basis for assessing and managing potential risks to biodiversity intended for implementing the mitigation hierarchy, while supporting alignment with IFC PS 6 and applicable Mozambican regulatory requirements. Current inputs identify priority biodiversity features and ecosystem service receptors, evaluate critical habitat, assess residual impacts, and define management and offset requirements to support no net loss and, where applicable, net gain outcomes. Current and planned deliverables translate these into implementation-ready mitigation, offset, monitoring and reporting requirements within the wider ESMS and ESMP framework.

The Biodiversity Strategy provides a clear pathway for moving from improved knowledge to measurable biodiversity outcomes through the implementation of four successive objectives as illustrated below:

- **Objective 1** - onshore and nearshore studies (e.g. updated terrestrial and marine baseline surveys, Critical Habitat Assessment, Residual Impact Assessment and Ecosystem Services Assessment) strengthen the Project's understanding of priority biodiversity features, sensitive habitats, ecosystem service receptors and residual impact pathways.
- **Objective 2** - action planning through the Biodiversity Action Plan (BAP), implementation schedules, roles and responsibilities, and capacity-building measures translates this evidence base into practical actions that strengthen biodiversity performance and support internal and national capacity.
- **Objective 3** - implementation of the Biodiversity Management Plan (BMP) and Biodiversity Offset Management Plan (BOMP) gives effect to the mitigation hierarchy through site-level controls, habitat management, restoration, offset design and long-term conservation measures aimed at protecting and, where feasible, enhance biodiversity.
- **Objective 4**, the Biodiversity Monitoring and Evaluation Plan (BMEP) establishes the indicators, targets, monitoring protocols and reporting arrangements needed to track performance, verify outcomes and support adaptive management.

Stakeholder engagement is embedded across all four objectives, enabling regulatory authorities, communities within the area of influence, technical specialists and institutional stakeholders to inform each phase of the Biodiversity Strategy, while the objectives collectively provide a structured framework for managing biodiversity risks and opportunities in line with IFC PS6 through progressive implementation of the mitigation hierarchy, capacity strengthening and transparent performance reporting.



Source: EMLL, 2026.

FIGURE 6-2 RLNG BIODIVERSITY STRATEGY

Socioeconomic

Workplan for Implementation

The Project's current and planned socioeconomic workplan provides a structured basis for maintaining a current understanding of social conditions and translating social risk management requirements into implementation-ready actions within the ESMS and ESMP framework. Current inputs draw on updated socioeconomic baseline studies, stakeholder mapping and engagement outcomes, grievance trends, human rights impact assessment and due diligence, resettlement and livelihood restoration interfaces, community investment priorities and industrial relations planning. These inputs support the identification of potential social receptors, vulnerabilities, impact pathways and emerging risks and opportunities, and are progressively translated into targeted strategies, implementation controls, monitoring requirements and adaptive management responses aligned with IFC Performance Standards, the Equator Principles, GIIP and applicable Mozambican regulatory requirements.

The socio-economic workplan demonstrates readiness for implementation by setting out a staged pathway from evidence generation to performance verification. In line with the accompanying infographic, the workplan is structured around five interrelated phases:

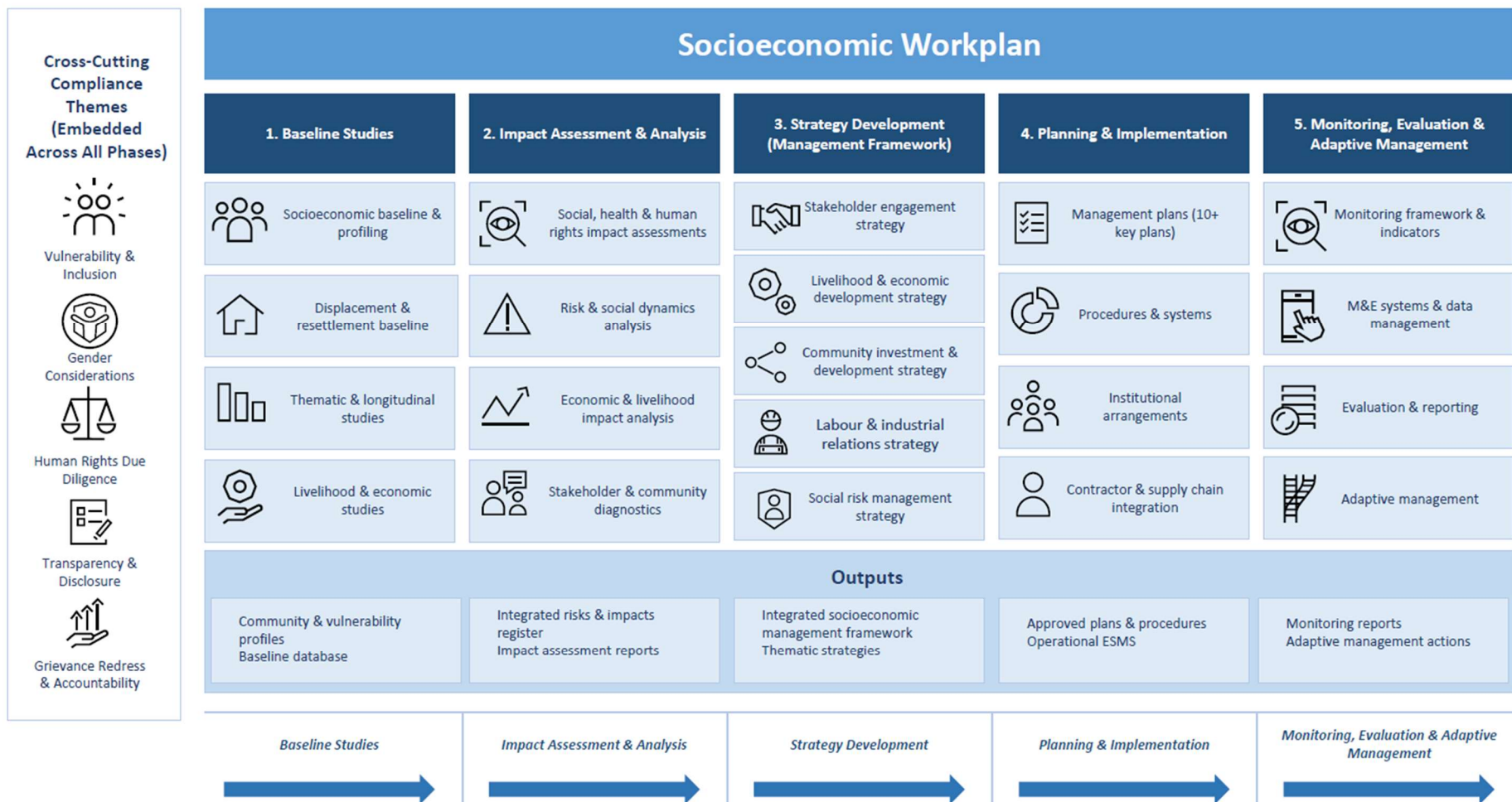
- **Phase 1: Baseline Studies**, which draws on the updated socioeconomic characterization, household surveys, updated economic impact assessment, community health assessment, community profiles, human rights impact assessment, stakeholder mapping and engagement inputs to support a current picture of demographics, livelihoods, vulnerability, service access, community health, local economic activity and in-migration pressures within the AoI;
- **Phase 2: Impact Assessment and Analysis**, which uses this evidence base, together with grievance trends, stakeholder feedback, HRIA findings, resettlement and livelihood restoration interfaces and MoC screening, to assess social receptors, impact pathways, sensitivities and emerging risks;
- **Phase 3: Strategy Development**, which translates assessment findings into targeted approaches for stakeholder engagement, grievance management, social performance, human rights due diligence, community investment, industrial relations, resettlement and livelihood restoration;
- **Phase 4: Planning and Implementation**, which embeds these strategies into the ESMS, ESMP, topic-specific plans, Contractor Implementation Plans, procedures, roles, resources, disclosure activities, village liaison officer engagement and implementation schedules; and

- **Phase 5: Monitoring and Evaluation**, which establishes the indicators, reporting arrangements, assurance processes and adaptive management feedback loops needed to track baseline changes, grievance resolution, stakeholder commitments, HRDD actions, livelihood restoration outcomes, workforce and local content performance, and emerging community risks. Together, the five phases provide a practical, lender-focused framework for implementation, supporting alignment with applicable Mozambican regulatory requirements, IFC Performance Standards, the Equator Principles, and GIIP.

Examples of how the key social workplan elements are addressed across the five phases include:

- **Social baseline updating**, provide the current evidence base, supplemented by targeted surveys, routine monitoring, stakeholder feedback and engagement outcomes to track changes in livelihoods, community health, vulnerability, service access, population movement and potential in-migration pressures;
- **Continuous Stakeholder engagement**, where structured stakeholder mapping, consultation with communities and authorities, engagement with CSOs and NGOs, and coordination across Project components are used to validate baseline findings, identify emerging risks and opportunities to inform mitigation responses;
- **Grievance management**, where accessible channels for raising concerns, structured resolution processes, analysis of recurring issues and community-level disclosure through a dedicated, on the ground community affairs team provide a continuous feedback loop for adaptive management;
- **Human rights due diligence**, where the standalone HRIA, prepared by independent experts, identifies salient risks related to communities, workers and security with findings translated into actions within the ESMS and topic specific ESMPs.;
- **Resettlement and livelihood restoration**, where the Project engages through an established interface framework with the Area 1 Operator of Resettlement, anchored in the approved 2017 RP, applicable Mozambican regulatory requirements, IFC PS1 and PS5, and the Equator Principles; and
- **Community investment and industrial relations**, where social performance priorities are translated into programmes that support community resilience, local services, economic diversification, local content, workforce management, training and worker welfare.

Collectively, these examples demonstrate how the workplan moves from baseline evidence and impact analysis through strategy development, implementation planning and monitoring, providing a practical and lender-aligned basis for managing social risks and opportunities during execution.



Source: ERM, July 2026.

FIGURE 6-3 RLNG SOCIOECONOMIC WORKPLAN