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MOZAMBIQUE ROVUMA LNG PHASE 1

BIODIVERSITY STRATEGY

MZFF-00-EM-HX-PLN-0003

Rev	Date	Revision Description	Originator	Reviewer/Endorser	Response Code	Approver
0	05-Aug-2026	Issued for Use				
B	01-May-2026	Issued for Review				
A	12-Sep-2025	Issued for Review				

Document Control No.	Country	Facility	Location	Originator	Discipline	Doc Type	Sequence	Sheet
	MZ	FF	00	EM	HX	PLN	003	

REVISION MODIFICATION LOG

Revision	Section	Description

HOLD LIST

Revision	Section	Description

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

1. ACRONYMS AND GLOSSARY

1.1. Acronyms

Acronym	Definition
ADNOC	Abu Dhabi National Oil Company
APA	Área de Protecção Ambiental
AZE	Alliance for Zero Extinction
BAP	Biodiversity Action Plan
BBOP	Business and Biodiversity Offsets Programme
BES	Biodiversity & Ecosystem Services
BMP	Biodiversity Management Plan
BMEP	Biodiversity Monitoring and Evaluation Plan
BOMP	Biodiversity Offset Management Plan
BSEP	Biodiversity Stakeholder Engagement Plan
BSES	Biodiversity Stakeholder Engagement Strategy
CBD	Convention on Biological Diversity
CHA	Critical Habitat Assessment
CIP	Contractor Implementation Plan
CNODC	China National Oil and Gas Exploration and Development Corporation Dutch Cooperatief U.A.
CSBI	Cross-Sector Biodiversity Initiative
DUAT	Direito do Uso e Aproveitamento da Terra
E&R	Environmental and Regulatory
E&S	Environmental and Socioeconomic
EBSA	Ecologically or Biologically Significant Area
ECA	Export Credit Agency
EIA	Environmental Impact Assessment
EMDA	ExxonMobil Development Africa B.V.
EMML	ExxonMobil Moçambique, Limitada S.A.
EMP	Environmental Management Plan
ENH	Empresa Nacional de Hidrocarbonetos, E.P.
EOO	Extent of Occurrence
EPA	Environmental Protection Area
EPC	Engineering, Procurement, and Construction
EPCC	Engineering, Procurement, Construction, and Commissioning
EPIV	Equator Principles IV
ESA	Ecosystem Services Assessment
ESMP	Environmental and Social Management Plan

Acronym	Definition
ESMS	Environmental and Social Management System
FFI	Fauna & Flora International
GIIP	Good International Industry Practice
GIS	Geographic Information System
GoM	Government of Mozambique
GHG	Greenhouse Gas
HRIA	Human Rights Impact Assessment
ICMM	International Council on Mining and Metals
IFC	International Finance Corporation
IFCPS	International Finance Corporation Performance Standards
IFI	International Financial Institution
IOGP	International Association of Oil and Gas Producers
IMMA	Important Marine Mammal Area
ISRA	Important Sharks and Rays Area
IUCN	International Union for Conservation of Nature
JOA	Joint Operating Agreement
KBA	Key Biodiversity Area
LMT	LNG Marine Terminal
LNG	Liquefied Natural Gas
MOF	Materials Offloading Facility
MRV	Moçambique Rovuma Venture S.p.A.
MAAP	Ministério da Agricultura, Ambiente e Pescas (Ministry of Agriculture, Environment and Fisheries)
MTA	Million Tonnes Per Annum
NBSAP	National Biodiversity Strategy and Action Plan
NG	Net Gain
NGO	Non-Governmental Organization
NNL	No Net Loss
OIMS	Operations Integrity Management System
PBOMP	Preliminary Biodiversity Offsets Management Plan
PIIM	Project Induced In-Migration
PS6	Performance Standard 6
PSMS	Personnel Safety Management System
RIA	Residual Impact Assessment
RSA	Republic of South Africa
SIBMOZ	Sistema de Informação de Biodiversidade de Moçambique

Acronym	Definition
SLIP	Supplemental Lender Information Package
SME	Subject Matter Expert
SSHE	Safety, Security, Health, and Environment
TBC	The Biodiversity Consultancy
TIPA	Tropical Important Plant Area
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNEP-WCMC	United Nations Environment Programme – World Conservation Monitoring Centre
WCS	Wildlife Conservation Society
WDPA	World Database on Protected Areas

1.2. Glossary

Term	Definition
Avoidance	The first step of the mitigation hierarchy comprises measures taken to avoid creating adverse impacts on biodiversity before actions or decisions are taken that could lead to such impacts, such as careful spatial placement of infrastructure, or timing construction sensitively to avoid disturbance. Examples include the placement of roads outside of rare habitats or key species' breeding grounds, or timing of seismic operations when aggregations of whales are not present. Avoidance is the most effective and most certain mitigation measure. Achieving effective avoidance requires biodiversity to be considered in the early stages of a project.
Biodiversity	Defined by the Convention on Biological Diversity (CBD) as "the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species, and ecosystems".
Congregatory Species	Species whose individuals gather in large groups on a cyclical or otherwise regular and/or predictable basis (International Finance Corporation [IFC] Performance Standard 6 [PS6], 2012; update 2019).
Critical Habitat	Areas with high biodiversity value, including: 1) Habitat of significant importance to Critically Endangered and/or Endangered species; 2) Habitat of significant importance to endemic and/or restricted-range species; 3) Habitat supporting globally significant concentrations of migratory species and/or congregatory species; 4) Highly threatened and/or unique ecosystems; and/or 5) Areas associated with key evolutionary processes (IFC PS6, 2012; update 2019 and Ministerial Diploma no. 55/2022 of 19 May, section VII)
DUAT	"Direito do Uso e Aproveitamento da Terra", or the Right to Use and Benefit from land. The DUAT refers to the land use rights granted by the Government of Mozambique ("**GoM**") for the purpose of developing the Projects.

Term	Definition
Endemic and Restricted Range Species	The term endemic is defined as restricted range. Restricted range refers to a limited Extent of Occurrence (EOO) (IFC PS6, 2012; update 2019).
Habitat	A terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the non-living environment. For the purposes of implementation of IFC PS6, habitats are divided into modified, natural, and critical. Critical habitats are a subset of modified or natural habitats (IFC PS6, 2012; update 2019).
Highly Threatened or Unique Ecosystem	Highly threatened or unique ecosystems within PS6 are those: 1) That are at risk of a significant decrease in area or quality; 2) With a small spatial extent; and/or 3) Containing unique assemblages of species, including assemblages or concentrations of biome-restricted species
Key Biodiversity Areas (KBAs)	Sites with significant contribution to the global persistence of biodiversity, in terrestrial, freshwater, and marine ecosystems (United Nations Environment Programme – World Conservation Monitoring Centre [UNEP-WCMC]).
Migratory Species	Any species of which a significant proportion of its members cyclically and predictably move from one geographical area to another (including within the same ecosystem) (IFC PS6, 2012; update 2019).
Minimization	Measures taken to minimize the duration, intensity and/or extent of impacts that cannot be completely avoided. Effective minimization can eliminate some negative impacts, such as measures to reduce noise and pollution, designing powerlines to reduce the likelihood of bird electrocutions, or building wildlife crossings on roads.
Mitigation Hierarchy	A widely used good practice framework that guides users towards limiting as far as possible the negative impacts on biodiversity from development projects. It can be applied to projects in any sector and is based on a sequence of four iterative actions: avoiding and minimizing any negative impacts (prevention), before restoring and finally offsetting residual impacts (remediation).
Modified Habitat	An area that may contain a large proportion of plant and/or animal species of non-native origin, and/or where human activity has substantially modified the area's primary ecological functions and species composition. Modified habitats may include areas managed for agriculture, forest plantations, reclaimed coastal zones, and reclaimed wetlands (IFC PS6, 2012; update 2019).
Natural Habitat	An area composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified the area's primary ecological functions and species composition (IFC PS6, 2012; update 2019).
Net Gain (NG)	Additional conservation outcomes that can be achieved for the biodiversity values for which the critical habitat was designated. NGs may be achieved through the development of a biodiversity offset and/or, in instances where the client could meet the requirements of paragraph 17 of PS6 without a biodiversity offset, the client should achieve NGs through the implementation of programs that could be implemented in situ (on-the-ground) to enhance habitat, and protect and conserve biodiversity (IFC PS6, 2012; update 2019).

Term	Definition
No Net Loss (NNL)	The point at which project-related impacts on biodiversity are balanced by measures taken to avoid and minimize the project's impacts, to undertake on-site restoration, and finally to offset significant residual impacts, if any, on an appropriate geographic scale (e.g., local, landscape-level, national, regional). NNL includes natural habitat and its associated significant biodiversity values. Significant biodiversity values may include species of conservation concern (e.g., species that are threatened, legally protected, or otherwise identified as important by stakeholders) and ecological features in the landscape that are important to stakeholders (IFC PS6, 2012; update 2019).
Offset	Biodiversity offsets are measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development and persisting after appropriate avoidance, minimization, and restoration measures have been taken (IFC PS6, 2012; update 2019).
Protected Area	A clearly defined geographical space, that is recognized, dedicated, and managed through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values (IUCN, 2008).
Rehabilitation	The stabilization of the terrain, insurance of public safety, aesthetic improvement, and return of the land to what, within the regional context, is considered to be a useful purpose. Revegetation may entail the establishment of only one or a few species (IFC PS6, 2012; update 2019).
Residual Impact	Impacts that might remain after measures are taken to avoid and minimize impacts on biodiversity and ecosystem services and/or to restore viability (IFC PS6, 2012; update 2019).
Restoration	The process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. An ecosystem has recovered when it contains sufficient biotic and abiotic resources to continue its development without further assistance or subsidies. It would sustain itself structurally and functionally, demonstrate resilience to normal ranges of environmental stress and disturbance, and interact with contiguous ecosystems in terms of biotic and abiotic flows and cultural interactions (IFC PS6, 2012; update 2019).
XRG	Abu Dhabi National Oil Company's (ADNOC's) energy investment platform

2. PURPOSE AND SCOPE

The overall development of the Area 4 Offshore Rovuma Basin Straddling and Non-Straddling Reservoirs will be pursued in multiple phases, of which Rovuma Liquefied Natural Gas (LNG) Phase 1 Project is the first phase. The Rovuma LNG Project will develop and commercialize natural gas from the Mamba fields located in Area 4.

ExxonMobil Moçambique, Limitada S.A. ("**EMML**") is the Midstream and Upstream Operator with responsibility for the development of the liquefaction and related operations pertaining to the Rovuma LNG Phase 1 Project (herein after the Project).

This Biodiversity Strategy forms part of Rovuma LNG's Environmental and Social Management Plan (ESMP)[1] for the Project. The principal objective of the ESMP is to facilitate the avoidance, reduction, and mitigation of environmental, social, and community health risks and impacts associated with the construction phase of the Project. This Biodiversity Strategy has been developed to cover both construction and operational phases of the Project.

The Project is located in an area of globally important biodiversity, as identified in the Project's Environmental Impact Assessment (EIA) and supported by the presence of internationally recognized biodiversity areas (e.g., Key Biodiversity Areas [KBAs], Ecologically or Biologically Significant Areas [EBSAs] and protected areas; see Section 2.3).This Biodiversity Strategy describes the comprehensive approach designed to achieve the overarching goal to conserve key biodiversity values locally and regionally with a focus on vulnerable ecosystems, habitats, and species for which significant residual impacts from Project activities are predicted. Specifically, the Biodiversity Strategy serves as a framework to guide the implementation of the Project's biodiversity objectives to meet with Mozambique regulations and align with the national biodiversity objectives and International Finance Corporation Performance Standard 6 (IFC PS6).

The purpose of this strategy is to define the Project's biodiversity objectives and outline the approaches that will be implemented to achieve them. The Project's Biodiversity Strategy will inform a Biodiversity Action Plan (BAP)[2] that will identify detailed actions required to execute the strategy. This document supersedes the High-Level Biodiversity Strategy Document (MZLN-EL-RPPLN-00-0022) from 2019.

[1] Document reference no. MZFF-00-EM-HX-PPP-0013
[2] Document reference no. MZLN-EL-RPPLN-00-0011

2.1. Background Context

Moçambique Rovuma Venture S.p.A. ("**MRV**"), Empresa Nacional de Hidrocarbonetos, E.P. ("**ENH**"), Abu Dhabi National Oil Company's (ADNOC's) energy investment platform ("**XRG**"), and Kogas (together the "Area 4 Concessionaire") and the Government of the Republic of Mozambique ("**GoM**") are parties to the Area 4 Exploration and Production Concession Contract ("**Area 4 Engineering, Procurement, Construction, and Commissioning [EPCC]**"), as supplemented by the Coral South Supplemental Agreement (1 June 2017), and the Designated Operator Supplemental Agreement (7 November 2017). Each of MRV, ENH, XRG, and Kogas are parties to the Area 4 Joint Operating Agreement (as supplemented and novated, the "**Area 4 JOA**"). MRV is the designated operator under both the Area 4 EPCC and the Area 4 JOA. Under the Area 4 EPCC, MRV holds a 70% participating interest, while ENH, XRG, and Kogas each hold 10%.

MRV is a joint company incorporated in Italy and is a Società per Azioni (stock company). MRV shareholders are: Eni S.p.A., a company existing under the laws of Italy, with a shareholding of ~35.7% ("**Eni**"); ExxonMobil Development Africa B.V., a company existing under the laws of The Netherlands, having a shareholding of ~35.7% ("**EMDA**"); and China National Oil and Gas Exploration and Development Corporation Dutch Cooperatief U.A. ("**CNODC**") , a company existing under the laws of The Netherlands, holding the remaining ~28.6% . Each of Eni and EMDA holds a 25% indirect participating interest in the Area 4 EPCC and CNODC holds a 20% indirect participating interest in the Area 4 EPCC. Pursuant to their direct and indirect participating interests, Eni, EMDA, CNODC, XRG, Kogas and ENH are, together, the "**Area 4 Parties**". The development of the Project is being conducted by EMML as MRV's designated operator.

2.2. Project Overview

The Rovuma LNG Project will develop and commercialize hydrocarbon resources from the Mamba Reservoirs to supply two onshore LNG trains with a combined nominal capacity of 18 MTA as well as a domestic gas export.

An area of approximately 6,475 hectare (ha) in the Afungi Peninsula, located in the Palma District of the Cabo Delgado province, has been allocated by the Government through a specific act for the Right of Use and Benefit of Land (Direito do Uso e Aproveitamento da Terra ["**DUAT**"]) for the development of the onshore components of the multiple LNG projects of Area 1 and Area 4 (the Afungi LNG Park). This area allows for the development of both the Straddling Reservoir Initial Developments and Non-Straddling Reservoirs of Area 1 and Area 4 in segregated zones.

The components that make up the Project are described in Table 2-1.

Table 2-1: Components of the Project

Components		Notes
A4 Midstream Facilities (i.e., Area 4 Exclusive Facilities—Onshore): MRV's facilities and activities		MRV is the constructing and operating entity.
A4 Upstream Facilities (i.e., Area 4 Pipeline and associated facilities): MRV's facilities and activities		MRV is the constructing and operating entity.
• Shared Facilities • DUAT Common Facilities • Resettlement	Construction & Operation of Materials Offloading Facilities (MOFs) & LNG Marine Terminal (LMT)	• Area 1 is the constructing entity for MOF & LMT. • Operating Entity for MOF & LMT respectively, is to be determined during construction phase.
	Construction & operation of waste management facility	Area 1 is the constructing entity.
	Common infrastructure (e.g., roads, airstrip, fencing within Afungi LNG Park)	Area 1 is the constructing entity.
	Onshore, Offshore, Livelihood	Area 1 is the constructing entity.

A safety maritime exclusion zone will be established around the near-shore facilities during construction. Once operational, the exclusion zone will be established around the Support Harbour and Products Export Jetty. No transport vessels or fishing will be allowed within the safety zones.

Figure 2-1 shows the Project location. Figure 2-2 and Figure 2-3 illustrate the reservoir location and conceptual plant design.

Figure 2-1: Project Location

Figure 2-2: Reservoir Location

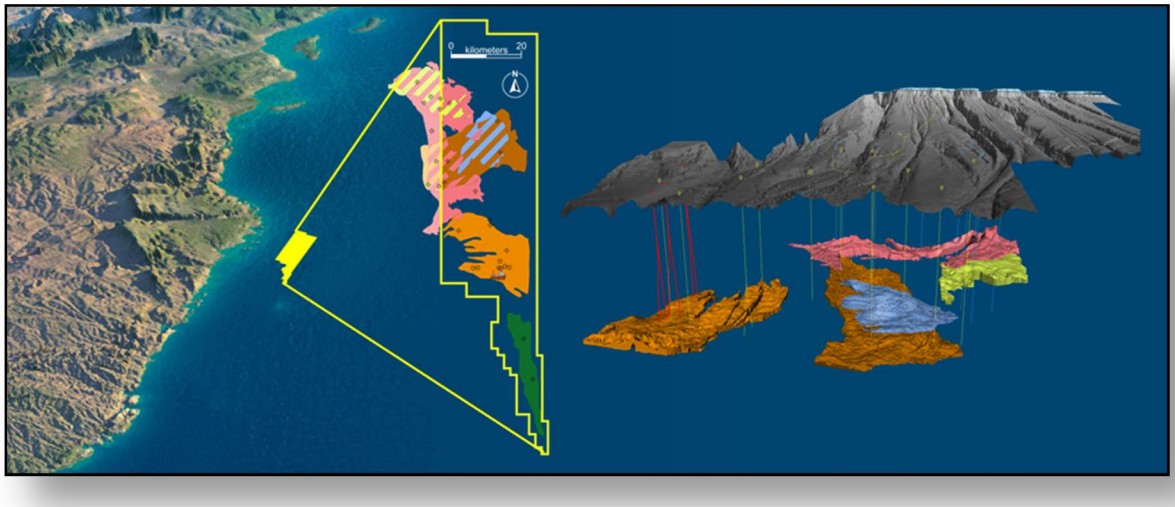


Figure 2-3: Conceptual Plant Design

2.3. Ecological Context

The Project takes place in a biodiversity-rich area, both onshore and offshore. Several protected areas and other internationally recognized areas for biodiversity are present in the Project landscape/seascape which highlights this biodiversity richness. Three protected areas[3] are as follows:

- Quirimbas National Park (IUCN category V), United Nations Educational, Scientific and Cultural Organization (UNESCO) biosphere reserve, encompassing coastal forest and secluded islands, and supporting endangered species above and below the waterline (located approximately 130 km from the Project DUAT)
- Primeiras y Segundas Environmental Protection Area (EPA) ("**Área de Protecção Ambiental**" ["**APA**"]) (IUCN category V), the largest marine reserve in Africa, with a great richness in biological diversity, forming an integral part of the Eastern Africa Marine Eco-Region, which stretches from southern Somalia to the coast of Kwazulu-Natal in the Republic of South Africa (RSA), characterized by extensive coral reefs, mangroves, and breeding sites for its rich avifauna (Sistema de Informação de Biodiversidade de Moçambique ["**SIBMOZ**"], n.d.) (located approximately 550 km from the Project DUAT)

[3] Source: World Database on Protected Areas (WDPA); https://www.protectedplanet.net

- Palma-Quirimbas EPA (not yet evaluated by IUCN but likely falls under Category V), created in August 2024 with the aim of preserving and protecting marine, terrestrial, and coastal species and their habitats. The Palma-Quirimbas EPA covers a total area of 15,882.99 km² and includes the four following zones:
    - A terrestrial area in the Palma District of 1,923.00 km² (located approximately 15 km from the Project DUAT)
    - A marine-coastal area in the northern section of the Quirimbas National Park (located approximately 80 km from the Project DUAT)
    - An oceanic area associated with the São Lázaro Bank, covering 13,872.69 km² (located approximately 80 km from the Project DUAT)
    - Vamizi KBA, spanning 86.5 km² (located approximately 15 km from the Project DUAT)

One proposed protected area[4] is the Memba e Mossuril Proposed Protected Area (Wildlife Conservation Society [WCS] Blue Future Project), established in Nampula province, which will include a network of well operated community-managed fishing areas, aiming to enhance priority biodiversity and ecosystem services that contribute to reducing vulnerability and increasing resilience of local communities to climate change impacts, promoting effective prevention and adaptation, aiding coastal protection, and fostering alternative livelihoods to fisheries (located approximately 300 km from the Project DUAT)

Ten other internationally recognized areas for biodiversity[5] are as follows:

- "Mnazi Bay" KBA, located in Tanzania and created in 2009, which encompasses marine, coastal, and terrestrial habitats with a variety of ecosystems which supports a great diversity of life
- "Lower Rovuma Escarpment" Tropical Important Plant Area (TIPA), a critical conservation zone located in both northern Mozambique and southern Tanzania, and part of the Rovuma Centre of Endemism. This area, rich in endemic and globally threatened plant species, gained recognition for its biodiversity following botanical surveys conducted between 2003 and 2012.
- "Palma" KBA / Alliance for Zero Extinction (AZE) site, created in 2020, supports a variety of rare and range-restricted fauna and flora, including a distinctive assemblage of species characteristic of coastal dry forests

[4] Source: WCS Blue Future Project (https://wcsbluefuture.com/)
[5] Sources:

- KBAs: https://www.keybiodiversityareas.org/
- TIPAs: https://www.kew.org/science/our-science/projects/tropical-important-plant-areas
- AZE sites: https://zeroextinction.org/
- ISRAs: https://sharkrayareas.org/
- IMMAs: https://www.marinemammalhabitat.org/
- EBSAs: https://www.cbd.int/ebsa/

- "Quiterajo" KBA / AZE site, created in 2020, supports a number of rare, range-restricted and endemic or near-endemic species, particularly plant species, and is recognized as one of the four key areas for conservation of coastal forests and associated vegetation types in Northern Mozambique
- "Vamizi" KBA, created in 2020, supports rich offshore fauna, including marine turtles, as well as diverse nearshore ecosystems such as coral reefs, seagrass beds, and mangroves, which provide important nursery habitats for associated aquatic species
- "Vamizi" Important Sharks and Rays Area (ISRA), located in the Quirimbas Archipelago in northern Mozambique, and crucial for the conservation of certain shark species, including the grey reef shark and the blacktip reef shark. There currently isn't a specific creation date for the Vamizi ISRA. The area has been recognized for its ecological importance due to the presence of these threatened species, as well as its significant role in their reproductive cycles.
- "Mozambique Coastal Breeding Grounds" Important Marine Mammal Area (IMMA): between the months of July and November each year, the coastal waters of Mozambique are used as mating, calving, and nursery grounds for Southern Hemisphere humpback whales. This area covers the whole Mozambican coast.
- "Pemba Bay to Mtwara" EBSA[6] is located in the Mozambique Channel and known for its rich biodiversity and unique marine habitats. It supports important species, including migratory birds and threatened marine life, and provides critical breeding and feeding grounds.
- "Northern Mozambique Channel" EBSA, spanning parts of Tanzania, Mozambique, Madagascar, Seychelles, Comoros, Mayotte, and Glorieuse, is a biodiversity hotspot in the Western Indian Ocean. Dynamic gyres and eddies create strong island connectivity, earning it the title of the region's Coral Triangle.
- "Mozambique Channel" EBSA, characterized by dynamic eddies and currents that drive a highly productive ecosystem, attracting diverse and often endangered species. Its geology and oceanography, including upwellings on the Madagascar Plateau, foster strong ecological connectivity and productivity, influencing coral reefs, pelagic communities, and marine fauna. This region also plays a critical role in global ocean circulation and climate regulation.

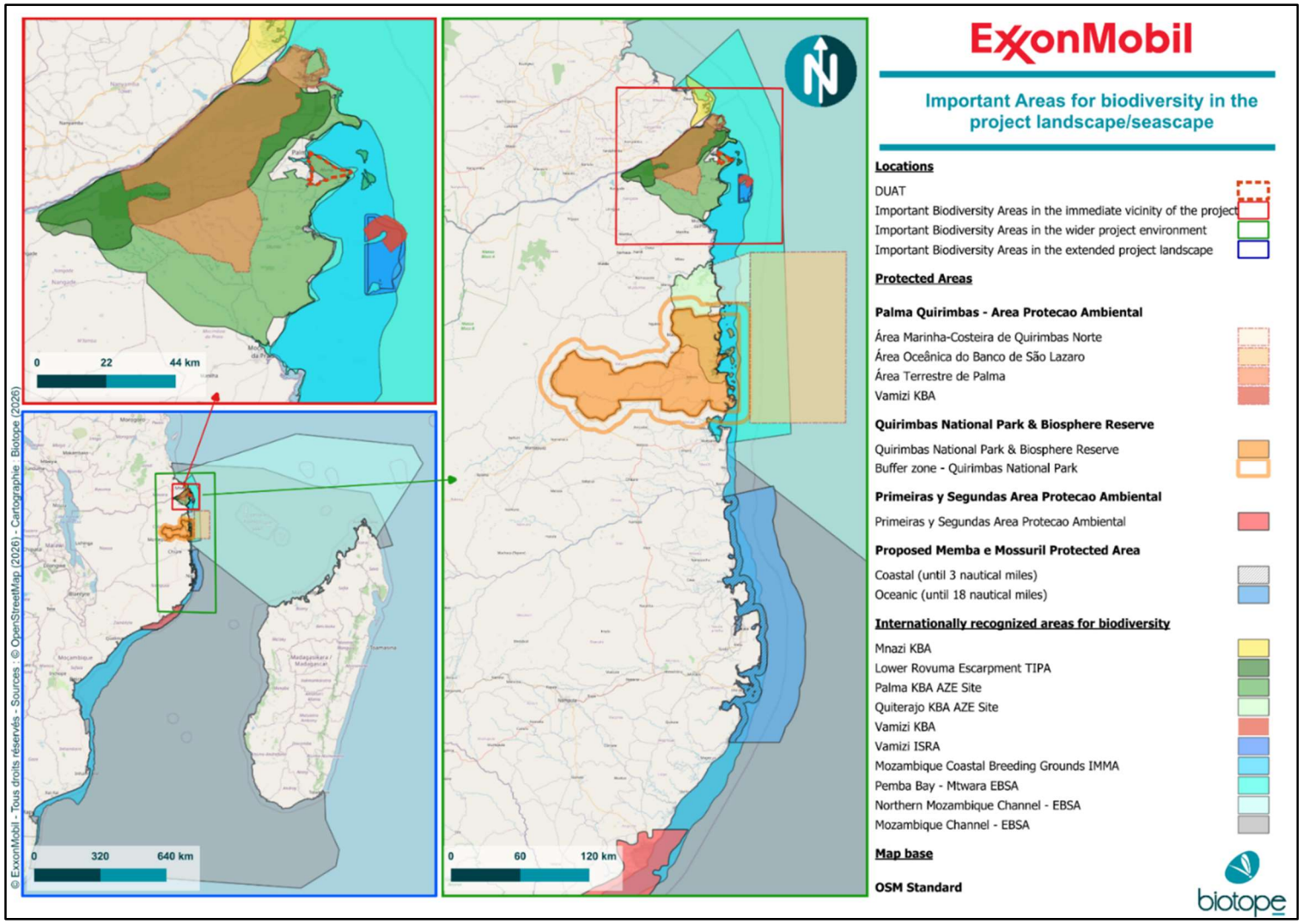
Further details on these internationally recognized biodiversity areas and their relevance to the Project will be provided in the BAP.

The DUAT is located within the Palma KBA / AZE site, designated in 2020, and Tungue Bay overlaps with the Mozambique Coastal Breeding Grounds IMMA and three EBSAs: the Pemba Bay to Mtwara EBSA, the Northern Mozambique Channel EBSA, and the Mozambique Channel EBSA.

The map in Figure 2-4 shows these areas.

[6] A designation identified under the CBD for areas that are important for marine biodiversity

Figure 2-4: Important Biodiversity Areas in the Project Landscape/Seascape (Biotope, 2026)



A summary of the biodiversity and ecosystems present within and in the vicinity of the Project, is presented below. Detailed baseline biodiversity information can be obtained from the Project documentation listed in the Annex.

The Project's onshore facilities within the DUAT are located predominantly on a coastal plain consisting of scrubland and secondary woodland which has seen high historical modification and clearance for agriculture. Several sensitive coastal wetland habitats are fed by seasonal streams and channels that drain into Tungue Bay. These wetlands support a diverse range of species, particularly amphibians and a number of resident and migratory birds. Areas of dry forest are mainly found further west of the proposed Project facilities. Coral rag forest is found on the Cabo Delgado peninsula to the north of Tungue Bay, with mature stands providing important habitat for Berlinia orientalis, a key species of conservation concern in the region.

The bay is characterized by intertidal habitats including mangroves and mudflats, as well as shallow-water seagrass beds and coral reefs, supporting a high diversity of marine life (ERM and Impacto 2014). Several islands provide important nesting habitats for sea turtles and separate the bay from the continental shelf, through which several incised canyons extend from the coast out to deeper waters.

In the Project area, three main ecological zones were identified:

- Eastern Oceanic Area, characterized by coral communities
- Channel and Bommies Area, which contains a field of coral bommies
- Western Bay Area, which supports seagrass meadows (these seagrass habitats provide shelter and feeding grounds for a wide variety of species, including echinoderms, mollusks, sponges, reef fish, and even scattered branching corals [Creocean, 2025])

Beyond these nearshore habitats, the Rovuma Basin (covering Area 1 and Area 4) is characterized by a low-energy marine environment dominated by low-relief sand and mud substrates interspersed with localized high-relief structures. Recent baseline surveys (Creocean, 2025) confirmed that some of these deeper outcrops support benthic assemblages, including soft corals, gorgonians, sponges, echinoderms, and reef-associated fish.

3. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

3.1. Overview

The ESMP for this Project sits within a broader Environmental and Social Management Framework, as illustrated in Figure 3-1. This Framework comprises two overarching, system-level documents: (i) Company Environmental and Social Management Plan, and (ii) Environmental and Social Requirements for Contractors, and a set of theme and activity-specific documents that collectively describe how the Project will manage its environmental and social risks.

The theme and activity-specific documents fall into four categories, based on the allocation of responsibility for implementing defined actions between Company and Contractor and recognizing that many theme and activity-specific actions require a mixture of both. The four categories are as follows:

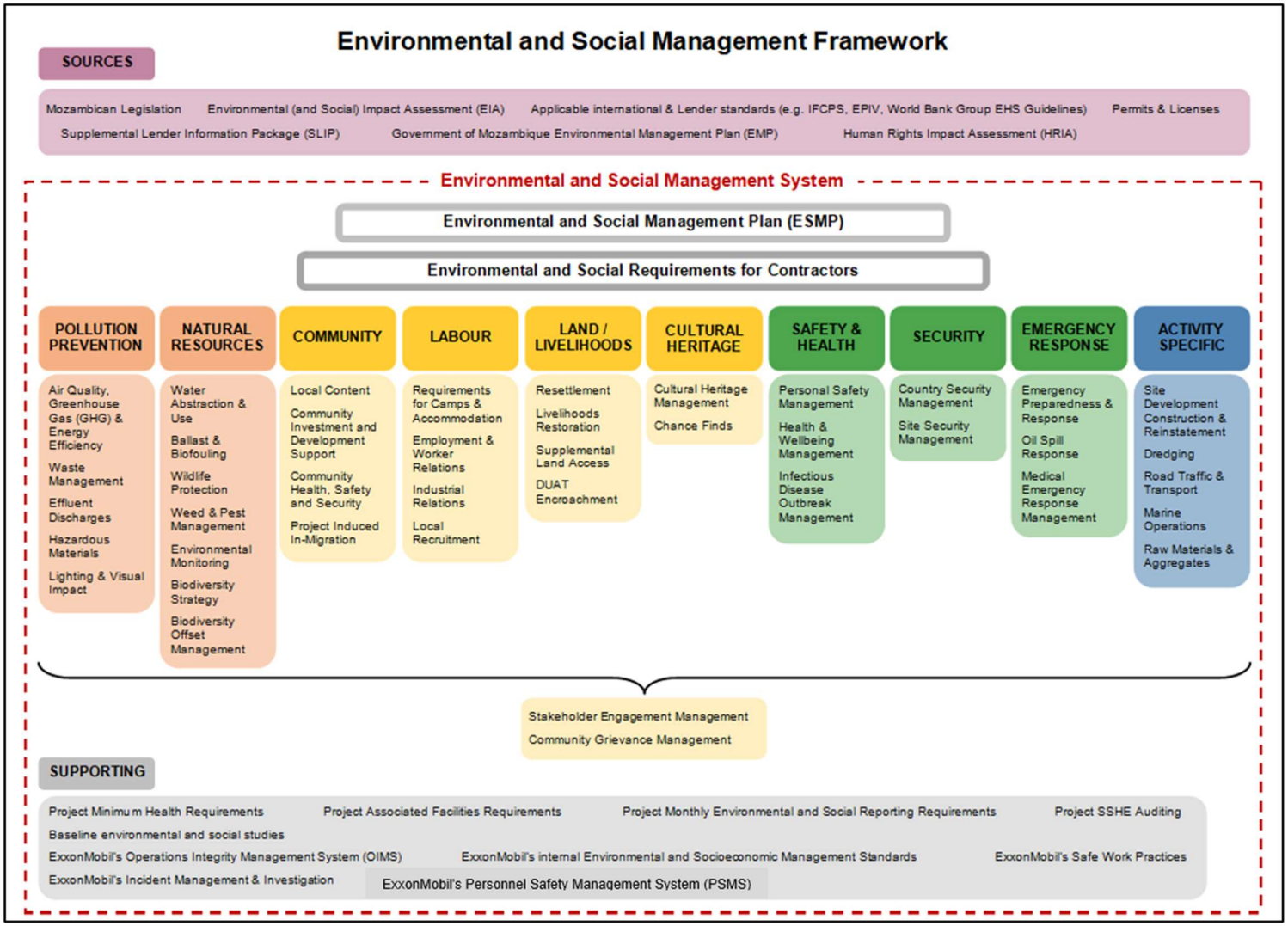
- Type 1: Company Management Plans developed and implemented by The Project
- Type 2: Documents developed by The Project and containing both Company and Contractor requirements
- Type 3: Documents developed by The Project and containing requirements to be implemented solely by the Contractor
- Type 4: Contractor Implementation Plans (CIPs) developed and implemented by the Contractor

This Biodiversity Strategy is a Type 1: Company Management Plan developed and implemented for the Rovuma LNG Project. Several other Biodiversity documents will be prepared to implement the Biodiversity Strategy; a brief summary of these documents is included in Table 3-1.

Table 3-1: Description of Company Plans Relevant to Managing Impacts to Biodiversity

Document Title	Scope
Company Management Plan	
Biodiversity Strategy	Key guidance on implementing the Project's biodiversity commitments, and describes the holistic, landscape/seascape-level approach designed to achieve the overarching goal to conserve biodiversity locally and regionally with a focus on vulnerable ecosystems, habitats, and species for which significant residual impacts from Project activities are predicted
BAP	Covers a set of detailed actions to mitigate and monitor the Project's biodiversity impacts
Project Induced In-Migration (PIIM) Management Plan	Covers PIIM baseline; monitoring, assessment, and management of PIIM impacts during the construction and operation phase
Site Biodiversity Management Plan (BMP)	Covers site-specific measures and actions to avoid, minimize, and restore biodiversity impacts during Project construction activities at designated sites (to be developed)
Biodiversity Offset Management Plan (BOMP)	Details the strategy and actions to compensate for residual biodiversity impacts that cannot be fully avoided or mitigated, and achieve NNL or a NG of biodiversity depending on the impacts being on natural habitats or critical habitats
Biodiversity Monitoring and Evaluation Plan (BMEP)	Defines the framework, indicators, and methods for monitoring biodiversity outcomes and evaluating the effectiveness of mitigation and offset measures over time (to be developed)

Figure 3-1: Environmental and Social Management System



3.2. Roles and Responsibilities

3.2.1. Project Organization

Further details on the Project's Safety, Security, Health, and Environment (SSHE) Organization are provided in the ESMP: Internal Roles and Responsibilities. The relevant roles include:

- **Project SSHE Manager:** Reports to the Project Director have overall governance and oversight of the ESMP
- **Environmental and Regulatory (E&R) Manager:** Primary responsibility for managing the implementation of the environmental components of ESMP
- **A Biodiversity Lead supported by two Biodiversity Advisors:** Day-to-day responsibility for executing the strategies and actions outlined in the BAP
- **Socioeconomic Manager:** Primary responsibility for the implementation and ongoing oversight of the social components of the ESMP, including implementation of the PIIM Management Plan and programs

3.2.2. Operations Organization

The proposed E&R organization for operations is structured to effectively manage environmental monitoring, biodiversity plans, and regulatory compliance. It aligns with IFC Performance Standards and Mozambican regulations, providing robust governance and lender confidence.

3.2.2.1. Governance and Oversight

The E&R Manager reporting to the SSHE Manager provides integration of E&R functions. There is clear reporting lines and accountability for compliance and stewardship.

3.2.2.2. Regulatory Team Capability

The Supervisor is supported by Advisors, the Advocacy Advisor, Analyst, Technician, and Geographic Information System (GIS) Technician. There is a strong capacity for compliance tracking, advocacy, permitting, and spatial analysis.

3.2.2.3. Environmental Team Capability

The Environmental Team consists of the following:

- Environmental Advisor(s) for Waste, Water, and Air
- Terrestrial Biodiversity Subject Matter Expert (SME)
- Marine Biodiversity SME
- Biodiversity Advisor(s) for additional support

3.2.2.4. Field Oversight

Field Oversight consists of two rotational field positions to provide continuous oversight of contractors and consultants Field Oversight enables adaptive management and rapid response to site conditions.

3.2.2.5. Spatial and Data Support

One GIS specialist supports environmental aspects with a focus on Biodiversity Data Management.

Note: The Project will work to provide adequate training procedures and establish mentoring to meet the resourcing requirements for the biodiversity roles through Engineering, Procurement, and Construction (EPC) into Operations.

3.2.3. Contractors

Contractors will be required to have resources on an ongoing basis to achieve effective implementation of the requirements established in the ESMP. Similarly, Contractors will be required to verify that their subcontractors allocate sufficient resources to achieve effective implementation of the requirements established in the ESMP.

The Environmental and Social Requirements for Contractors require the preparation of topic-specific CIPs that describe the resources allocated to and responsible for the execution of each task and requirements contained therein.

Contractors will work closely with the Project to define the appropriate level of Environmental and Socioeconomic (E&S) staffing and associated organizational structure. The Project recognizes that staffing levels and organizational structures will vary as a function of each Contract scope of work, execution activity levels, and E&S risk. Key positions within Contractors' and subcontractors' E&S organizations are subject to Project review and approval.

Prior to the commencement of work, Contractors will provide evidence, in accordance with the expectation of the Project, that it has the capacity to fulfill the E&S requirements established in the ESMP and Contractors' CIPs and provide dedicated, competent, and appropriately qualified E&S resources.

3.2.4. External Partners

Potential external partners have been identified in the Biodiversity Stakeholder Engagement Strategy (BSES) (MZFF-00-EM-HE-STR-0002) and during the stakeholder engagement process. The BSES identifies and maps the Project's relevant biodiversity-related stakeholders and introduces a high-level engagement plan with these stakeholders. The Project will seek to identify suitable offset sites for the anticipated actions that will be required to compensate for the direct Project impacts that remain following the application of the mitigation hierarchy. Relationships will evolve into partnerships with the goal of meeting the Project's biodiversity objectives, which will be further expanded upon in the BAP and associated documents as the Project progresses.

3.3. Related Project Documentation

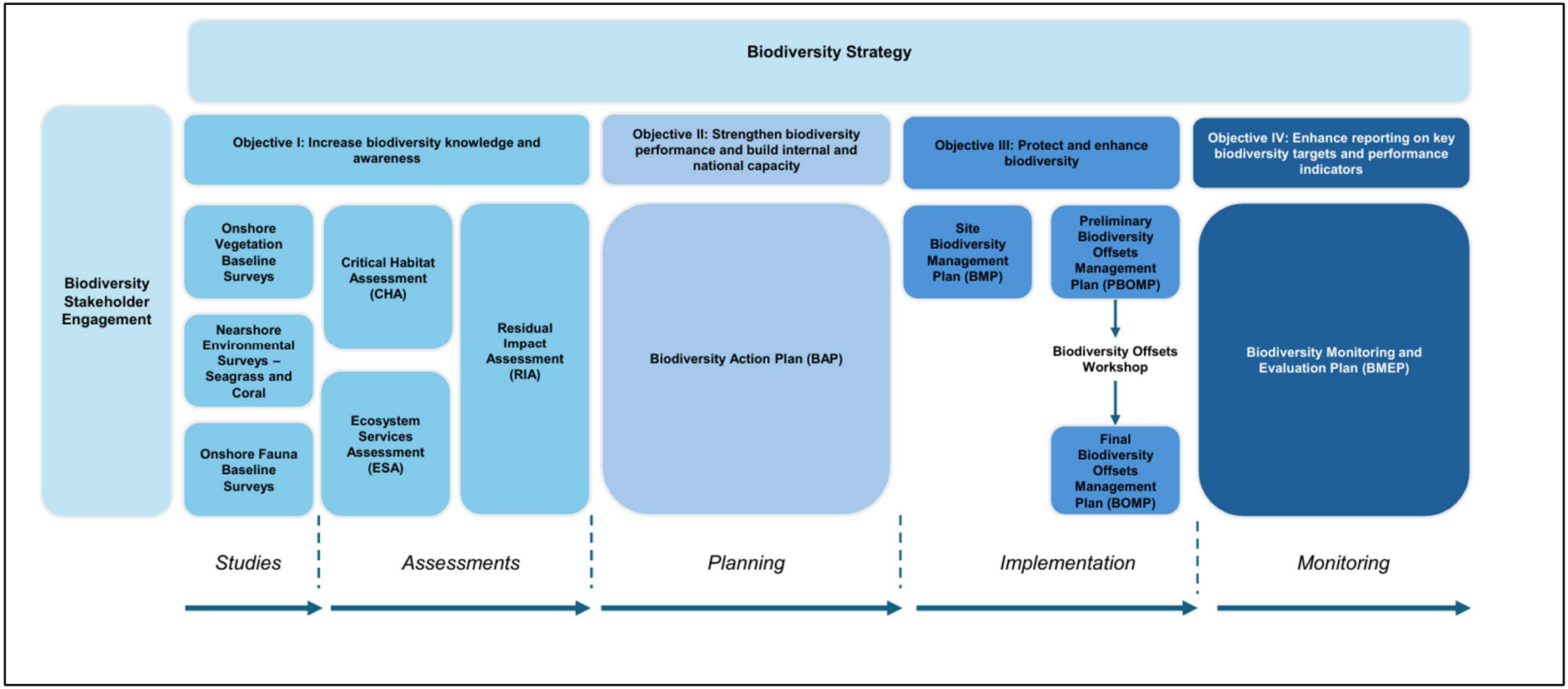
Biodiversity surveys have been completed in the vicinity of Area 4 to provide a description of the biodiversity baseline. The Biodiversity Strategy is the key guiding document on implementing the Project's biodiversity commitments. It will serve to inform the following Project documents:

- **BAP** – a set of detailed actions to mitigate and monitor the Project's biodiversity impact
- **Biodiversity Stakeholder Engagement Plan (BSEP)** – identification of local / national / international biodiversity stakeholders and their interests, concerns, and risks in relation to the Project, and the engagement process to be undertaken by the Project

- **Preliminary and Final Biodiversity Offset Management Plan (BOMP)** – a set of detailed actions to be implemented to confirm that the Biodiversity Offset Strategy is realized
- **Ecosystem Services Assessment (ESA)** – an assessment of the significance of the Project's impacts on ecosystem services and the appropriateness of mitigation measures, considering the findings of the post-EIA ecosystem services baseline evaluation and community engagement
- **Site Biodiversity Management Plan (BMP)** – a set of site-specific measures designed to avoid, minimize, and mitigate impacts to biodiversity during the construction phase of the Project
- **Biodiversity Monitoring and Evaluation Plan (BMEP)** – a set of detailed actions to determine whether mitigation measures are functioning as intended through the construction and operations phase, with the anticipated benefits to biodiversity. Monitoring will need to be undertaken to verify that:
  - Mitigation and offset actions are effective.
  - Implementation actions are carried out in a timely and appropriate manner as detailed in the BAP.

Figure 3-2 illustrates the relationship between the Biodiversity Strategy and other relevant Project documentation.

Figure 3-2: Relationship Between Biodiversity Strategy and Other Project Documentation



4. POLICIES, REQUIREMENTS, & GOOD INTERNATIONAL INDUSTRY PRACTICE

4.1. Corporate Environment Policy

It is the Company's policy[7] to conduct its business in a manner that is compatible with the balanced environmental and economic needs of the communities in which it operates. The Company is committed to continuous efforts to improve environmental performance throughout its operations.

Accordingly, the Company's policy is to:

- comply with all applicable environmental laws and regulations and apply responsible standards where laws and regulations do not exist
- encourage concern and respect for the environment, emphasize every employee's responsibility in environmental performance, and foster appropriate operating practices and training
- work with government and industry groups to foster timely development of effective environmental laws and regulations based on sound science and considering risks, costs, and benefits, including effects on energy and product supply
- manage its business with the goal of preventing incidents and of controlling emissions and waste to below harmful levels; design, operate, and maintain facilities to this end
- respond in a timely and effective manner to incidents resulting from its operations, in cooperation with industry organizations and authorized government agencies
- conduct and support research to improve understanding of the impact of its business on the environment, to improve methods of environmental protection, and to enhance its capability to make operations and products compatible with the environment
- communicate with the public on environmental matters and share its' experience with others to facilitate improvements in industry performance
- undertake appropriate reviews and evaluations of its operations to measure progress and to foster compliance with this policy

4.2. National and International Requirements

National and international requirements applicable to the Project are described within the ESMP. Ecology, conservation and natural resource use is governed in Mozambique by the Ministério da Agricultura, Ambiente e Pescas (MAAP) (Ministry of Agriculture, Environment and Fisheries). The primary relevant legislation for the management of biodiversity includes the following:

- Land (Law 19/97) (approved by Law 19/97, of 1 October)
- Environmental Law (approved by Law 20/1997, of 1 October)

[7] ExxonMobil corporate website, page 16 of the Standards of Business Conduct; issue date is December 2025 as adopted by EMML

- Law on the Protection, Conservation and Sustainable Use of Biological Diversity (approved by Law 16/2014, of 20 June and revised by Law 5/2017, of 11 May)
- Mozambique's National Biodiversity Strategy and Action Plan (NBSAP) (2015–2035)
- Diploma Ministerial 55/2022 on Biodiversity Offsets (approved by Diploma Ministerial 55/2022, of 19 May)
- Sea Law (approved by Law 20/2019 of 8 November)
- Fisheries Law (approved by Law 22/2013, of 1 November)
- Forest and Wildlife Law (approved by Law 10/99, of 6 July)

The 2014 Government approval of the EIA for the Rovuma Basin development was subject to certain conditions which, along with the commitments from the EIA, are addressed in Environmental Management Plans for the Area 4 exclusive facilities.

4.3. Project Standards – IFC PS6

The Project is seeking financing from various Export Credit Agencies (ECAs), commercial banks and potentially other International Financial Institutions (IFIs), and consequently will align with relevant IFC Performance Standards including PS6 on Biodiversity Conservation and Sustainable Management of Living Natural Resources (PS6) (IFC 2012). IFC PS6 comprises a set of requirements for projects based on the recognition that protecting and conserving biodiversity, maintaining ecosystem services, and sustainably managing living natural resources are fundamental to sustainable development. It includes the following key steps for managing biodiversity:

1) Assess the risks and impacts to biodiversity and ecosystem services, considering relevant threats across the potentially affected landscape and seascape.
2) Identify Modified, Natural, and Critical Habitat.
3) Apply the mitigation hierarchy to prioritize the avoidance of impacts, design mitigation to reduce impacts, and retore the damages caused through the practice of adaptive management.
4) Consider biodiversity offsets to achieve measurable conservation outcomes.
5) Retain competent biodiversity specialists and create partnerships with external stakeholder institutions for effective biodiversity management.
6) Monitor and evaluate biodiversity gains and losses.

The Project recognizes it is operating in an area of Critical and Natural Habitat, holding biodiversity of both national and global importance. The objective for MRV is to achieve a NG of at least 15% of biodiversity for significant and measurable impacts to Critical Habitat in alignment with Mozambique regulation and No Net Loss (NNL) of biodiversity in Natural Habitat to meet PS6.

4.4. Good International Industry Practice

The principles and techniques applied during the Project lifecycle will be tailored to the hazards and risks associated with the nature of the Project and will draw upon Good International Industry Practice (GIIP), as appropriate, for example:

- Ipieca/International Association of Oil and Gas Producers (IOGP) – Marine net positive impact concepts and approaches, Literature review (September 2025)
- Ipieca/API/IOGP – Sustainability Reporting Guidance for the Oil and Gas Industry (5th edition, June 2025), providing updated frameworks and indicators for comprehensive sustainability reporting, including the nature dimension
- Ipieca/IOGP – A guide to developing biodiversity action plans: For the oil, gas, and alternative energy sector (2023)
- Ipieca – Managing biodiversity and ecosystem services in oil and gas: Mainstreaming the mitigation hierarchy (Ipieca & IOGP 2018)
- Ipieca – Biodiversity and ecosystem services fundamentals: Guidance document for the oil and gas industry (2018)
- Ipieca/IOGP – Managing Biodiversity & Ecosystem Services (BES) issues along the asset lifecycle in any environment: 10 Tips for Success in the Oil and Gas Industry (2016)
- Cross-Sector Biodiversity Initiative (CSBI)[8] – A cross-sector guide for implementing the Mitigation Hierarchy (CSBI & TBC 2015)
- International Union for Conservation of Nature (IUCN) – IUCN Policy on Biodiversity Offsets (IUCN 2016)
- Ledec and Johnson (2016) – Biodiversity offsets: a user guide
- Business and Biodiversity Offsets Programme (BBOP) – Guidelines and principles which establishes a framework for designing and implementing biodiversity offsets programs and for measuring their conservation outcomes (2012)[9]
- Fauna & Flora International (FFI) – Biodiversity and Ecosystem Services: Good Practice Guidance for Oil and Gas Operations in Marine Environments (2017), the first sector-specific guidance focusing on minimizing impacts from offshore oil and gas activities on marine biodiversity and ecosystem services

[8] The Cross-Sector Biodiversity Initiative is a partnership between Ipieca, the International Council on Mining and Metals (ICMM), and a number of commercial and development banks.
[9] IFC (2019) refers to BBOP, http://bbop.forest-trends.org/guidelines/principles.pdf GN92.

5. BIODIVERSITY STRATEGY OBJECTIVES

5.1. Biodiversity Objectives

The overarching biodiversity goal of the Project is to conserve biodiversity locally and regionally, focusing on sensitive ecosystems, habitats, and species potentially affected by Project activities. To achieve this, the Project has defined a set of biodiversity objectives that translate its conservation commitments into measurable and actionable outcomes.

These objectives are designed to provide a strong alignment between international, national, and Project-level frameworks. They reflect the principles of IFC PS6 while supporting the Strategic Goals and Guiding Principles of Mozambique's NBSAP (2015–2035), which emphasizes ecosystem resilience, sustainable use, equitable benefit sharing, and participatory management.

To assist in effective implementation, the Project's biodiversity objectives will be operationalized through the Biodiversity Management and Monitoring Framework, which provides a structured pathway for integrating biodiversity conservation into Project planning, execution, and monitoring.

The Project's four biodiversity objectives are as follows:

- **Objective I:** Increase biodiversity knowledge and awareness related to the Project.
- **Objective II:** Strengthen biodiversity performance and build internal and national capacity where Rovuma LNG operates, supporting the guiding principles and strategic goals of the NBSAP (2015–2035).
- **Objective III:** Protect and enhance biodiversity for Rovuma LNG operations employing the Mitigation Hierarchy, following a NNL approach of biodiversity in Natural Habitat and a Net Gain (NG) approach of at least 15% of biodiversity in Critical Habitat.
- **Objective IV:** Enhance reporting on key biodiversity targets and performance indicators related to Rovuma LNG activities.

Table 5-1 presents how these objectives are linked with national biodiversity priorities, IFC PS6 requirements, and the Project's biodiversity management framework that will support their implementation.

Table 5-1: Alignment of Project Biodiversity Objectives with National and International Frameworks

Project Objective	Alignment with NBSAP 2015–2035	Alignment with IFC PS6 Requirements	Implementation Framework (Project Documents)
Objective I – Increase biodiversity knowledge related to the Project.	• **Strategic Objective D:** Enhance implementation through participatory planning, knowledge management, and training. • **Principle 8:** Traditional knowledge and practices of use and conservation of biodiversity should be respected, preserved, and protected, and their access be promoted in line with the national legal framework and customary norms. • **Principle 9:** The dissemination and sharing of information on biodiversity must be provided for all sectors of Mozambican society, including local communities and vulnerable groups, without prejudice to the right of certain information protection under the national law.	**PS6 GN23:** Clients are encouraged to develop partnerships with recognized and credible conservation organizations and/or academic institutes. This is especially relevant with respect to potential developments in Natural or Critical Habitat. Partnering organizations may bring regional experience in biodiversity conservation that clients lack. Partnering organizations may be helpful in identifying species specialists, undertaking field surveys, advising on management plans, conducting biodiversity monitoring programs, advising on BAPs, and managing relations with civil society groups and other local stakeholders.	• **Baseline Surveys** (Marine, Vegetation, Fauna) – Characterizes ecological context and identifies biodiversity values to be considered in Project design and mitigation strategy • **Ecosystem Services Report** – Identifies priority Ecosystem Services to be considered in Project design and mitigation strategy • **Critical Habitat Assessment (CHA)** – As part of PS6 requirements and definitions, identifies biodiversity values that trigger Critical Habitat in the Project landscape/seascape, and thus a NG requirement as per PS6
Objective II – Strengthen biodiversity performance and build internal and national capacity where Rovuma LNG operates.	• **Strategic Objective C:** Improve the benefits sharing from biodiversity and ecosystem services for all sectors of the Mozambican society. • **Strategic Objective D:** Enhance implementation through participatory planning, knowledge management, and training. • **Principle 2:** All stakeholders have a responsibility to contribute to the conservation of biodiversity and verify sustainable use and equitable sharing of its components, including genetic resources. • **Principle 3:** Decision-making processes should be participatory and should involve various stakeholders at all levels, including local communities and vulnerable groups, so that access to information on biodiversity should be guaranteed.	**PS6 GN20:** Adaptive management is not a trial-and-error process but rather a structured "learning by doing" approach. Monitoring plans should define performance thresholds or triggers for adapting mitigation and management so that they achieve the requirements of PS6. It is recommended that adaptive responses to such triggers be predefined in the Environmental and Social Management System (ESMS), while acknowledging that those mitigation and management options may change over time due to knowledge gained through experience or changing conditions. New findings may arise from the client's monitoring program or from independent sources. In either case, the client has the responsibility to update its approach to integrate these findings and to continually improve on the existing management of biodiversity, ecosystem services, and living natural resources.	• **BAP** – Structures the Project mitigation strategy; includes governance as well as training, awareness and institutional capacity-building initiatives • **Site BMP** – Builds local and site-level capacity for implementation of mitigation and management measures • **Biodiversity Stakeholder Engagement Strategy (BSES)** – Provides biodiversity stakeholder mapping, their roles and contributions, and the way they will be engaged

Project Objective	Alignment with NBSAP 2015–2035	Alignment with IFC PS6 Requirements	Implementation Framework (Project Documents)
Objective III – Protect and enhance biodiversity for Rovuma LNG operations employing the Mitigation Hierarchy, following a NNL approach of biodiversity in Natural Habitat and a NG approach of at least 15% of biodiversity in Critical Habitat	• **Strategic Objective A:** Reduce the direct and indirect causes of degradation and loss of biodiversity (excluding impacts related to PIIM and resettlement, which are addressed through dedicated social management plans). • **Strategic Objective B:** Improve the status of biodiversity by preserving the diversity of ecosystems, habitats, species, and genes.	**PS6 10:** For the protection and conservation of biodiversity, the mitigation hierarchy includes biodiversity offsets, which may be considered only after appropriate avoidance, minimization, and restoration measures have been applied. A biodiversity offset should be designed and implemented to achieve measurable conservation outcomes that can reasonably be expected to result in NNL and preferably a NG of biodiversity; however, a NG is required in critical habitats.	• **RIA** – Identifies and, as much as possible, quantifies the biodiversity losses because of the Project after appropriate avoidance, minimization, and restoration of the impacts (as per the Mitigation Hierarchy) • **BOMP** – Guides offset design and implementation to achieve NNL for Natural Habitats and a NG of at least 15% for Critical Habitats
Objective IV – Enhance reporting on key biodiversity targets and performance indicators related to Rovuma LNG activities	• **Strategic Objective D:** Enhance implementation through monitoring, knowledge management, and training. • **Principle 4:** An ecosystem approach based on adaptive management principles are critical for biodiversity conservation in the context of global climate change.	**PS6 7:** Given the complexity in predicting Project impacts on biodiversity and ecosystem services over the long term, the client should adopt a practice of adaptive management in which the implementation of mitigation and management measures are responsive to changing conditions and the results of monitoring throughout the Project's lifecycle.	**BMEP** – Tracks the effectiveness of mitigation and offset actions to confirm achievement of these outcomes; consolidates monitoring results and evaluates performance to strengthen management systems

5.1.1. Objective I – Increase Biodiversity Knowledge Related to the Project

The goal is to generate, consolidate, and use scientific and local knowledge to inform biodiversity management decisions throughout the Project lifecycle. This objective will:

- Establish robust baseline data on habitats, species, and ecological sensitivities to support informed decision-making.
- Provide insight into the effectiveness of mitigation, restoration, and offset measures, identifying opportunities to refine strategies and interventions.
- Integrate traditional ecological knowledge and stakeholder input to enhance understanding of local biodiversity and ecosystem dynamics.
- Share biodiversity knowledge and monitoring results with relevant stakeholders, including local communities, in accessible formats to support collaborative biodiversity conservation.
- Support long-term conservation research, contributing to broader scientific understanding of biodiversity trends, threats, and recovery processes.

5.1.2. Objective II – Strengthen Biodiversity Performance and Build Internal and National Capacity for Rovuma LNG Activities

This objective focuses on developing the skills, knowledge, and institutional capabilities required to implement effective biodiversity management. It aligns with the guiding principles and strategic goals of the NBSAP (2015–2035), meaning the objective will:

- Build internal capacity by providing operational teams and contractors with clear guidance on biodiversity management measures, monitoring protocols, and adaptive management practices.
- Strengthen national capacity through collaboration with local authorities, universities, and Non-Governmental Organizations (NGOs), supporting knowledge transfer and long-term conservation outcomes.
- Enhance performance by confirming teams at all levels are trained for and capable of identifying biodiversity risks, implementing mitigation measures, and monitoring outcomes effectively.
- Contribute to sustainable institutional development, creating lasting expertise that persists beyond the Project life.

5.1.3. Objective III – Protect and Enhance Biodiversity for Rovuma LNG Operations Employing the Mitigation Hierarchy

The primary goal is that the Project's operations avoid, minimize, restore, and offset biodiversity impacts in line with the Mitigation Hierarchy. This includes achieving NNL in Natural Habitats and a targeted NG of at least 15% for significant and measurable residual effects to Critical Habitats, meaning:

- All biodiversity planning and management actions, from strategic (i.e., BAP) to operational (i.e., BMP, BOMP, BMEP), are guided by this principle.

- Residual impacts are addressed through carefully designed offset measures to such that ecosystem integrity and species viability are maintained or enhanced.
- Adaptive management processes provide allowances that if mitigation or offset measures do not perform as expected, then corrective measures are implemented to meet NNL/NG targets.
- These objectives anchor all other biodiversity actions and monitoring programs, providing the framework for compliance with national and international biodiversity commitments.

Implementing the Mitigation Hierarchy[10]

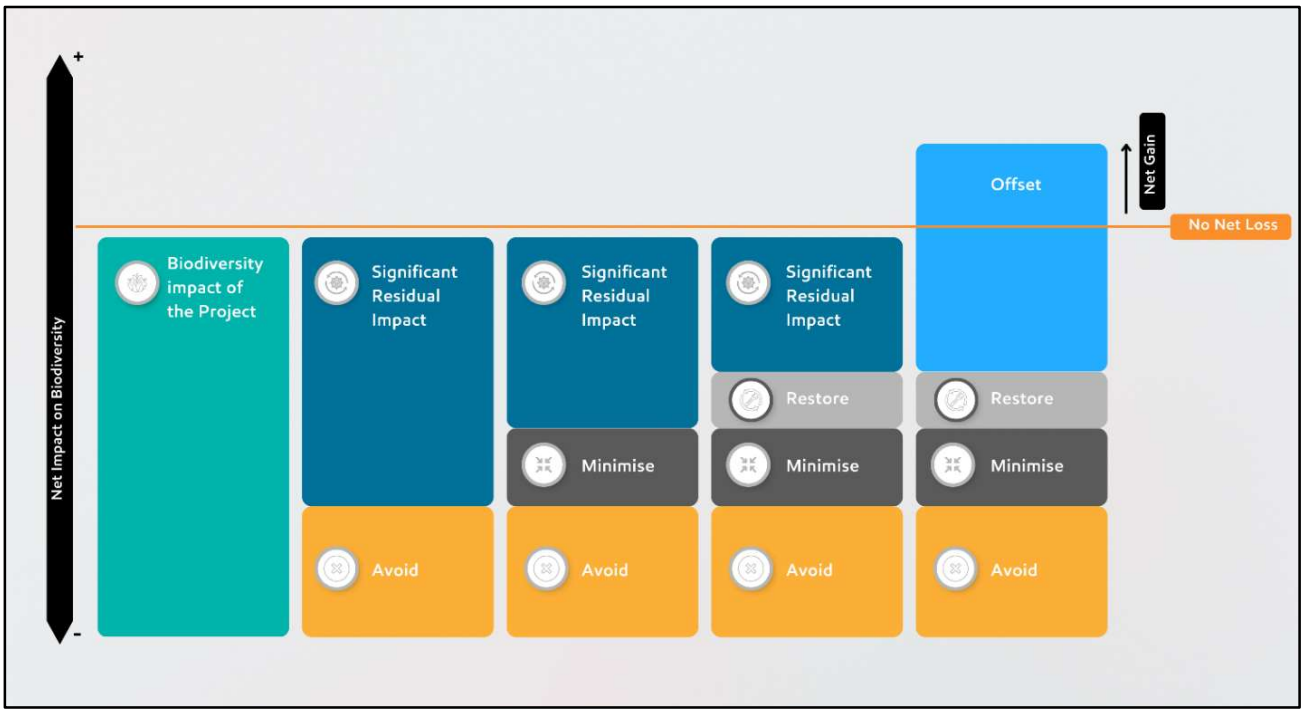
Through Objective I, the Project will be implementing the Mitigation Hierarchy to achieve NNL/NG on biodiversity (Figure 5-1). This approach is applied throughout Project planning, design, and impact assessment and continues through the implementation and operation of Project management plans.

Opportunities to mitigate impacts on biodiversity and ecosystem services are sought by avoiding and minimizing impacts wherever possible and restoring biodiversity after temporary Project impacts. Where significant residual impacts remain for CH-qualifying biodiversity even after avoidance, minimization, and restoration measures have been implemented, the Project will develop offset measures in hope of achieving an overall NG of biodiversity.

In line with IFC PS6, care is taken to consider not just direct Project impacts, but also indirect and cumulative impacts (excluding impacts related to Project-induced immigration and resettlement). This means that mitigation is often necessary at a landscape and seascape scale, to address potential impacts beyond the direct Project footprint. Biodiversity and social mitigation must be considered together such that key biodiversity values and ecosystem services such as fisheries are addressed without being a detriment to either biodiversity or the local communities.

[10] Source: ERM, 2014

Figure 5-1: EMML Depiction of The Mitigation Hierarchy[11]



Avoidance Measures

The Project will employ avoidance measures (i.e., measures to "design out" an impact or risk to prevent their expected impact on biodiversity). It has also employed design criteria to evaluate all infrastructure development options and looked at alternatives when significant impacts to biodiversity were likely. Economic and social criteria were also taken into consideration. Details demonstrating how avoidance of biodiversity was considered in the Project planning are included in Volume 1, Chapter 5 – "Consideration of Alternatives", of the EIA (ERM, 2014) and have been included in Environmental and Social Requirements for Contractors (refer to Section 3.1).

Minimization Measures

The Project is committed to employing minimization measures (i.e., measures that minimize the severity of impacts on biodiversity by controlling or limiting the source of impact to as low as reasonably practicable). Measures to minimize identified impacts on biodiversity are incorporated into the Project's ESMP and its' component documents such as the Company Plans and Environmental and Social Requirements for Contractors.

[11] Adapted from Cross Sector Biodiversity Initiative (CSBI), 2015, A cross-sector guide for implementing the Mitigation Hierarchy. https://www.ipieca.org/resources/a-cross-sector-guide-for-implementing-the-mitigation-hierarchy

Rehabilitation and Restoration Measures

The Project will rehabilitate and restore habitat loss, habitat degradation, and habitat fragmentation caused by temporary land used during the construction phase. The general aim will be to reclaim to a similar habitat type that existed prior to clearance. The implementation of restoration and rehabilitation measures will be guided by the Site Development, Construction and Reinstatement Requirement for Contractors[12] and the Site BMP.

Addressing Residual Impacts

The Project will have some residual impacts on biodiversity. The Residual Impact Assessment (RIA) will address those critical habitats where significant and measurable impacts occur and will guide the offset strategy outlined below.

Developing Biodiversity Offset

The Project will offset to achieve NNL of biodiversity in natural habitats, where feasible and a NG of at least 15% for its significant residual impacts in CH-qualifying habitats. The Preliminary and Final BOMPs will outline the approach to achieving this outcome.

5.1.4. Objective IV – Enhance Reporting on Key Biodiversity Targets and Performance Indicators Related to Rovuma LNG Activities

This objective verifies transparent, accurate, and timely communication of biodiversity performance, both internally and to external stakeholders, including regulators, communities, lenders, and NGOs. The objective will:

- Define clear indicators and metrics aligned with NNL/NG targets that will be outlined in the BMEP.
- Allow for monitoring data collected through the BMEP, and other operational programs to be analyzed, reported, and acted upon.
- Provide accountability through structured reporting of mitigation, offset, and adaptive management outcomes.
- Facilitate continuous improvement by identifying gaps, lessons learned, and corrective actions, feeding back into the BAP, BOMP, and BMEP.
- Strengthen the stakeholder confidence in the Project's commitment to biodiversity protection and sustainable development.

[12] Document reference no. MZFF-00-EC-HE-PLN-0001 – Annex 5 no. MZFF-00-EC-HE-PLN-0001-005

Monitoring and Evaluation

Through Objective IV, the Project has committed to developing robust monitoring and evaluation program(s) to verify achievement of biodiversity mitigation measures and that the implementation actions are carried out in a timely and appropriate manner as detailed in the BAP. The development of the program(s) will draw on international best practice and consultation with experts to develop a range of species- and ecosystem-specific monitoring methods that can be consistently applied for the life of the Project. Each monitoring method will be appropriate to quantify both losses (from direct and indirect Project impacts) and gains (from Project rehabilitation and offset programs) for priority biodiversity.

Monitoring results will be used to evaluate the appropriateness of Project mitigation measures, both in terms of specificity and level of commitment. Where possible, thresholds will be established for each monitoring indicator to alert the Project when mitigation measures may need to be adopted. Monitoring will thus inform the adaptive management of Project mitigation (e.g. to modify or increase mitigation if any impacts are higher than anticipated or to respond to emerging situations). Monitoring will also allow for robust evaluation of the Project by third parties (e.g., Mozambique government agencies, international lenders, independent auditors).

5.2. BIODIVERSITY STRATEGY IMPLEMENTATION

The Biodiversity Strategy is implemented through a suite of Project-specific management plans and studies that operationalize biodiversity commitments across the Project lifecycle.

The BAP serves as the central framework, translating strategic objectives into a coordinated set of mitigation, restoration, monitoring, and offset actions. It integrates findings from key supporting assessments and defines how NNL and NG objectives will be achieved.

The implementation of the Strategy is supported by several key documents, including:

- CHA and ESA, which inform the identification of biodiversity risks, impacts, and priority features
- RIA, which defines significant residual impacts and associated offset requirements
- BOMP (preliminary and final), which outlines the design and implementation of biodiversity offsets
- Site BMP, which defines site-specific mitigation and management measures
- BMEP, which establishes the framework for tracking performance and verifying outcomes over time

Together, these documents will confirm that biodiversity mitigation follows the mitigation hierarchy and is implemented consistently from design through construction and operations.

Further details on the scope, content, and implementation of each document are provided in the BAP and associated Project documentation.

REFERENCES

- AZE sites: https://zeroextinction.org/.
- Biotope. (2024). CHA update report V2 – Critical Habitat Assessment (CHA) Update – December 12, 2024 – TotalEnergies EP Mozambique Area 1, Limitada (TEPMA1). 71 pp.
- Biotope. (2026) – Critical Habitat Assessment (CHA) – TotalEnergies EP Mozambique Area 1, Limitada (TEPMA1).
- Business and Biodiversity Offsets Programme (BBOP). (2012). Guidelines and principles for designing and implementing biodiversity offsets programmes and measuring their conservation outcomes.
- Convention on Biological Diversity (CBD). (1992). Rio Earth Summit.
- Cross-Sector Biodiversity Initiative (CSBI) & International Association of Oil & Gas Producers (IOGP). (2015). A cross-sector guide to implementing the mitigation hierarchy.
- Diploma Ministerial 55/2022 on Biodiversity Offsets.
- EBSAs: https://www.cbd.int/ebsa/.
- ERM. (2014). Environmental Impact Assessment Report for the Liquefied Natural Gas Project in Cabo Delgado (No. EA-MZ-SR0100-ERM-U17-00001-00). Anadarko & ENI.
- ExxonMobil corporate website, Standards of Business Conduct. (December 2025). As adopted by EMML. pp. 16.
- Fauna & Flora International (FFI). (2017). Biodiversity and Ecosystem Services: Good Practice Guidance for Oil and Gas Operations in Marine Environments.
- International Finance Corporation (IFC). (2012). Guidance Note 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources. Washington, DC, USA.
- International Finance Corporation (IFC). (2019). Guidance Note 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources. Washington, DC, USA.
- Ipieca. (2016). Biodiversity and ecosystem services fundamentals: Guidance document for the oil and gas industry.
- Ipieca & International Association of Oil & Gas Producers (IOGP). (2018). Managing biodiversity and ecosystem services in oil and gas: Mainstreaming the mitigation hierarchy.
- Ipieca/IOGP. (2023). A guide to developing BAPs for oil, gas and alternative energy sector.
- Ipieca/IOGP. (2025). Sustainability Reporting Guidance for the Oil and Gas Industry (5th edition).
- Ipieca/IOGP. (2025). Marine net positive impact concepts and approaches. Literature review (September 2025).
- International Union for Conservation of Nature (IUCN). (2008). Barcelona, Spain.
- International Union for Conservation of Nature (IUCN). (2016). IUCN Policy on Biodiversity Offsets. Gland, Switzerland.

- IMMAs: https://www.marinemammalhabitat.org/.
- ISRAs: https://sharkrayareas.org/.
- KBAs: https://www.keybiodiversityareas.org/.
- Law 16/2014: Conservation and Biodiversity. (Revised in 2017).
- Law 20/1997: Environment.
- Law 22/2013: Fisheries.
- Law 10/99: Forest and Wildlife.
- Law 19/97: Land.
- Law 4/1996: Sea.
- Lede, G. C., & Johnson, S. D. R. (2016). Biodiversity offsets: A user guide. Working Paper No. 110820. World Bank Group, Washington, DC, USA.
- Mozambique's National Biodiversity Strategy and Action Plan (NBSAP). (2015–2035).
- República de Moçambique / Ministério da Terra, Ambiente e Desenvolvimento Rural (MITADER). (2015). National Strategy and Action Plan of Biological Diversity of Mozambique (2015-2035). 116 pp.
- The Biodiversity Consultancy. (2018). Ecosystem Services Assessment Report (Unpublished report prepared for The Biodiversity Consultancy on behalf of ExxonMobil).
- TBC. (2019). Critical Habitat Assessment for Area 1 and Area 4 LNG, Northern Mozambique (Unpublished report prepared for Anadarko, ENI and Exxon by The Biodiversity Consultancy Ltd.).
- TIPAs: https://www.kew.org/science/our-science/projects/tropical-important-plant-areas.
- United Nations Environment Programme – World Conservation Monitoring Centre (UNEP-WCMC). Key Biodiversity Areas (KBAs).
- WCS Blue Future Project (https://wcsbluefuture.com/).
- World Database on Protected Areas (WDPA); https://www.protectedplanet.net.

ANNEX: KEY BIODIVERSITY BASELINE DOCUMENTATION

Title of Study	Document Number	Year	Study Period	Main Contractor
Rovuma LNG Project – Onshore Vegetation Survey – Habitat Status Report		2025	2025	Consultec
Critical Habitat Assessment Update – GIS Report	CREO_EM_GISProjectReport_Criticalhabitat_Rev_0	2025	2025	Creocean
Critical Habitat Assessment Update – Project Report	CREO_EM_ProjectReport_CriticalHabitat_Rev_0	2025	2025	Creocean
Nearshore Marine Baseline Update – Mozambique Rovuma LNG Phase 1	MZFF-00-OT-HE-RPT-0001	2025	2025	Creocean
Palma District Vegetation Report – Rovuma LNG	MZ-000-SLR-HS-RPT-00003	2019	2018–19	ECOREX
Integrated Environmental Baseline Report	MZLN-EL-RRRPT-00-0012	2018	N/A	ERM
Critical Habitat Assessment for Area 1 and Area 4 LNG, Northern Mozambique	440200BGRV40009	2017	N/A	The Biodiversity Consultancy (TBC)
Field Report – BES Benthic Habitats and Associated Species (Dry Season)	440202BFRV00419	2017	2017	Geoteam
Field Report – BES Benthic Habitats and Associated Species (Wet Season)	440202BFRV00412			
Field Report – BES Ecosystem Services	440202BFRV00420			
Field Report – BES Marine Mammals (Wet and Dry Season)	440202BFRV00411			
Field Report – BES Marine Turtles (Wet and Dry Season)	440202BFRV00409			
Field Report – BES Shore and Seabirds (Wet and Dry Season)	440202BFRV00410			
Nearshore Environmental Baseline Report	440202BFRV00413			
Environmental Baseline Survey	440200BRRV01065	2016	2016	Fugro
Habitat Bottom Type Description Report Additional Environmental Video Survey – Tongue Bay	440200BGRV30035	2016	2016	D'Appolonia
Habitat Assessment Report: Overview of Coral Reef and Associated Habitats	440200BGRV30036			

Title of Study	Document Number	Year	Study Period	Main Contractor
Final Report Environmental Survey Tungue Bay: • Volume 1: Habitat Assessment Results–Tungue Bay • Volume 2: Environmental Baseline Survey Results • Volume 3: Environmental Baseline Survey Results (Appendices)	440200BGRV30013	2014	2014	
BES Field Survey Report and Raw Data (Dry Season)	440205BGRV00758	2014–15	2014–15	CH2MHILL
BES Field Survey Report and Raw Data (Wet Season)	440205BGRV00759			
Environmental Baseline Report + Annexes	440205BGRV00752			