



The Perenco Group has taken note of the report published by the Environmental Investigation Agency US ("**EIA**") on 22 May 2025 (the "**Report**").

Contrary to what the Report claims, EIA did not offer the Perenco Group an "opportunity to respond to the findings of its investigation" before publication. EIA merely sent the group a list of 35 biased and prejudice questions, 48 hours before the scheduled date of publication of the Report. It is therefore patently disingenuous for EIA to assert in the Report that Perenco's counsel "did not identify any specific findings that were either incorrect or biased." For the sake of transparency, EIA's letter of 12 May 2025 and the response from Perenco's counsel on 14 May 2025 are appended (Appendices 1 & 2).

The desire to smear the Perenco Group and do it harm, and a complete disregard for the facts of the matter, is evident upon reading EIA's letter of 12 May 2025. It is plainly apparent on (almost) every page of the Report. This statement will therefore not respond point-by-point to the collection of approximations, errors and falsehoods that characterize the Report. For example, it simply makes no sense to suggest that "the company systematically misdeclared its production in DRC by at least 5 kbopd", when there is only one local export terminal and each barrel exported is taxed under the supervision of the relevant Congolese authorities. This is only one example.

That said, the group cannot remain silent in the face of the revolting manipulation of the accident that occurred on the Becuna platform operated by Perenco Oil & Gas Gabon ("**POGG**") on 20 March 2024 (the "**Accident**"). Six people have lost their lives, yet over the eleven or more pages focused on the Accident, misinformation and slander achieve new heights. This statement and the corrections below are not intended to be exhaustive – and no doubt this will be used as a pretext for yet more misinformation and slander – but simply to re-establish some accessible truths. These should enable a reasonably attentive reader to consider the Report for what it is: a propaganda tool with no ambition to tell the truth.

Generally speaking, any fact or allegation in the Report that is not explicitly confirmed in this press release is denied.

1. The Report repeatedly states that the Accident was the result of safety failures caused by a desire to "maintain production [from the well] at all costs".

This statement alone shows that the so-called EIA "investigation" is not credible: the well in question (Simba 3) had been shut down since 27 February 2024, in other words for over three weeks, when the Accident took place. Moreover, a "workover operation" necessarily means the relevant well was in shutdown.

2. According to the Report, the intervention on the well was carried out by a "P-115 team [which] was smaller, less well-equipped and less experienced", because "the P-225 team" had allegedly refused to continue the workover operation due to "multiple safety concerns about the company's preparations" for the operation, including "two oil surges" on 6 and 7 March 2024.

These statements are nonsense. Out of either ignorance and/or a deliberate intent to harm, EIA confuses "team" and "unit". Teams are made up of individuals; units are a set of equipment. A unit does not refuse to work, and one unit has no more experience than another. P115 and P225 refer to POGG *units*, not teams.

Moreover, "workovers" are maintenance operations on wells already in production. They are standard operations in the oil industry. Perenco subsidiaries collectively have carried out more

than 7,500 workovers over the last 10 years. POGG specifically has carried out more than 1,500 such operations over the same period.

At the time of the Accident, POGG had four offshore workover units, including the P115 and P225. Before the Accident, the Simba 3 well had already undergone four workover operations. These had not set off any particular safety alert. The workover operations were performed using different units: P115, P225 and LSU.

Unit P115 replaced unit P225 for the workover operation in progress at the time of the Accident because of hydraulic malfunctions observed on unit P225 during preparatory tests conducted several days before the Accident. The P115 unit ultimately used had already been used for a previous workover operation on the same well.

Typically, a workover operation requires two teams, one during the day, the other at night. The day team mobilized was the scheduled team (the change of unit is irrelevant); it did not replace another team that refused to intervene for safety reasons. The team was experienced; some members had already worked on the well and were therefore familiar with it.

To POGG's knowledge, there was no "oil surge" on 6 and 7 March 2024, contrary to what is asserted in the Report. According to information collected after the Accident, only a low-intensity fluid surge was observed at the exit of the tubing on 8 March 2024. The team responded immediately by securing the well before pumping it again to check it. Once this procedure had been implemented, the team was able to resume operations. It was later considered that the surge was the result of a "U-tube" effect between the annular space and the tubing and not an influx, and so did not require any specific additional measures. As a "U-tube" effect is a minor event, it was not recorded.

3. On multiple occasions, the Report states that employees involved in operations were "pressured" to "prioritize production at all costs", to the detriment of safety concerns.

Personal safety is a core concern of POGG and more generally of all the group's subsidiaries.

We therefore strongly reject the allegations – which have not been proved – that "pressure" was exerted on employees. In particular, POGG employees and all service providers involved in its operations are trained and made aware of the "Stop Work Authority" principle, according to which any person, no matter what their rank, who believes they are in an actual or potentially dangerous situation has the right and the duty to interrupt any operation in progress. A sheet reminding people of the importance of "Stop Work Authority" is displayed on all workover units (this was true for unit P115 at the time of the Accident). Awareness campaigns are also conducted regularly. No staff has ever been sanctioned for having used the Stop Work Authority.

4. According to the Report, "crucial safety equipment that could have prevented the explosion was missing from the oil platform" or was "non-functional."

Like the confusion between team and unit discussed above, these allegations illustrate the serious flaws in EIA's so-called "investigation."

Generally speaking, the Becuna platform is equipped with the necessary safety equipment. The hazard study established for the Tchatamba site (to which the Becuna platform is attached) was approved by the Gabonese authorities. We strongly reject allegations about the supposedly dilapidated facilities of the Becuna platform.

Furthermore:

- Blow out preventer (BOP): the P115 unit did have a BOP. The BOP on the P115 unit was identical to that of the originally mobilized P225 unit. The BOP on Unit P115 was successfully tested on the well on 9 March 2024. After the Accident, rescue teams dispatched to the Becuna platform activated the BOP to close the annular space of the well. The BOP functioned normally without showing any signs of malfunctioning.

- Safety valve: there was indeed a safety valve. Employees who were involved in the workover operation were able to set it up on a regular basis whenever necessary (for example during breaks). At the time of the Accident, the workover crew members were in the process of setting it up.
- Winch: Unit P115 was indeed equipped with an operational winch.

5. The Report repeatedly states that "the conditions for a fire triangle were met".

Aside from its multiple references to the "conditions for a fire triangle", and contrary to what it claims, the Report does not examine the cause of the ignition that caused the Accident.

Following the Accident, POGG commissioned an independent expert, a specialist in preventing and controlling fire risk, to identify the ignition source or sources. The expert went to the Becuna platform to make observations on site.

The expert's conclusions are clear: after analysis of all the equipment on the platform (including the power pack mentioned in the Report), only one was identified with "extremely high" probability as the cause of the fire. It is a lighting equipment sold as "Ex" equipment – i.e. equipment with explosion protection – suitable for areas where dangerous quantities and concentrations of flammable gases or vapours may occur. However, in contrast with the characteristics emphasised by its manufacturer, the lighting equipment was affected by several instances of non-apparent non-compliance. The fire on the platform, and therefore the Accident, would never have occurred if the lighting equipment had actually included the "Ex" protections put forward by its manufacturer.

After the independent expert provided his report, POGG (i) removed all of that manufacturer's lighting equipment from all of its operational sites, (ii) forwarded the report to the Gabonese authorities, and (iii) filed a criminal complaint.

6. The Report claims that "stopping the power pack would have averted the accident entirely".

The statement is obviously inaccurate. No one has ever claimed that the ignition was caused by the power pack. The power pack was several metres away from the ignition point and no trace of power pack deformation was noted after the Accident. It can therefore be ruled out as the ignition source.

It has, however, been established that the ignition point was on the work floor, due to a lighting equipment that did not have the characteristics claimed by its manufacturer.

7. The Report claims that the workover operation during which the Accident occurred was entirely supervised by the group's French subsidiary, which decided to continue the operation despite the alleged existence of "several warning signs".

These statements are plainly inaccurate. The role in the Accident that EIA attributes to the group's French subsidiary is based on nothing whatsoever.

As stated above, there were no particular alerts in the days leading up to the Accident.

In concrete terms, the French subsidiary provides services to other subsidiaries in various fields. It is not in charge of workover operations conducted by operational subsidiaries.

8. On several occasions, the Report accuses the group of having tried to obstruct the investigation carried out by Gabonese authorities to determine the cause of the Accident. The Report refers in particular to (i) the concealing of evidence, (ii) pressure supposedly exerted on witnesses, and (iii) a bribe of CFA 40 million allegedly paid to Prosecutor Mvou Loubamono.

We strongly dispute these serious, obviously unproven allegations.

From the moment the Accident occurred, POGG has fully cooperated with the Gabonese authorities to shed light on the circumstances of the Accident. At no point in time did POGG attempt to obstruct the Gabonese authorities' investigation process in any way. No bribe was paid to Prosecutor Mvou Loubamono.

Contrary to the allegations in the Report, as soon as the Accident occurred, POGG mobilized significant resources, in a way that was completely transparent to Gabonese authorities, with a constant concern with cooperating in order to shed light on the circumstances of the Accident. POGG's findings have been forwarded to the authorities.

9. The Report states that the families of those who unfortunately died in the Accident were not compensated, with the exception of Mr. Gares' relatives who allegedly received USD 10 million in exchange for signing a confidentiality agreement.

This accusation is yet another illustration of the poor information on which the Report is based and EIA's distorted use of the term "investigation".

After the Accident, the Gabonese government set up an "Interministerial Commission on the Accident on the Becuna Platform" by Order No. 0434/PM of 22 May 2024. The Report appears to ignore this public information. The Commission, which was placed under the authority of the Prime Minister of the Transition, supervised the process of compensating families, including the determining of compensation procedures and other support. To date, with the exception of one representative of a single family who refused the compensation offered, all the victims' families have entered into settlement agreements under the auspices of the Commission, thereby allowing 22 people to receive compensation.

As regards the family of Mr Gares, the Report's information is false in every respect.



May 12, 2025

Armel Simondin, Chief Executive Officer, Perenco Group

Eric Iwochewitsch, Chairman and Chief Executive Officer, Perenco SA

Subject: Request for Response Regarding Environmental Investigation Agency (EIA US)'s Research

Dear Mr Simondin and Mr Iwochewitsch,

I am writing to inform you that the Environmental Investigation Agency (EIA US), based in Washington, DC, has completed an investigation into Perenco Group's operations. We would like to offer you the opportunity to respond to the following inquiries before the issuance of our report.

We would appreciate your responses to these questions related to the investigation:

1. Is it true that the explosion that occurred on the Becuna platform off the shore of Gabon in March 2024 occurred during a workover operation?
2. Did workers involved in the March, 2024 workover operation on the Becuna platform, or its preparation, raise concerns regarding the risks associated with the preparation and the operation itself? In the affirmative, have these concerns been raised to management based in Gabon, France, and/or the United Kingdom (UK) at any point?
3. Did oil surges occur during the preparation of a workover operation on the Becuna platform between March 6 and 8, 2024?
4. Were these oil surges documented in the daily report prepared by the company man? If not, did any manager within Perenco Group management based in Gabon, France and/or the UK ask the company man to exclude the mention of these surges from the daily report?
5. Did any member of management located in Perenco Group's London and Paris offices intervene at any point to ensure the continuation of the workover operation taking place on the Becuna platform after surges occurred from March 6-8?
6. Did Perenco Group management replace the P-225 workover unit with the P-115 workover unit to execute the workover operation on Simba III in March, 2024? If so, was this personnel decision made after members of P-225 raised concerns about the safety of the workover operation?
7. Has Perenco Group dismissed or relocated workers or contractors who previously raised safety concerns regarding operations on the Becuna platform?
8. Is it true that the shear rams on the blowout preventer used on the Simba III well on the Becuna platform were not operational prior to the blowout on March 20, 2024 that preceded the explosion that led to the deaths of six workers?
9. Was Perenco Group management aware of allegations that the Becuna platform was hazardously dilapidated prior to the March, 2024 explosion, including the absence or failure of key equipment such as the shear rams?

10. Did Perenco France management instruct either the P-115 or P-225 workover unit to proceed with the workover operation after workers or contractors executing the workover raised safety concerns?
11. Did Perenco France management instruct Perenco Oil & Gas Gabon management based in Port-Gentil to proceed with the workover operation despite safety concerns raised by on-site workers?
12. Is it true that more than 90% of personnel working in drilling, workover, and operations on Perenco Group sites in Gabon are provided by personnel and logistics subcontractors, and that these workers are generally on renewable contracts of less than one year in duration?
13. Has Perenco Group management, directly or indirectly, taken measures to prevent independent experts from accessing the Becuna platform for an investigation immediately after the March 2024 explosion?
14. Did the Perenco Oil & Gas Gabon crisis response cell, or any other personnel working for or contracted by Perenco Group, dispose of human remains on the Becuna platform after the accident of March 20, 2024 and before the arrival of governmental authorities and/or investigators at the platform?
15. Is it true that, at the time of the incident, there was not, and that there currently is not, a fire safety system on the Becuna platform?
16. Is Perenco Group aware of allegations that workers are discouraged from reporting safety violations due to fear of contract termination or non-renewal? Has the company taken steps to address this?
17. Did Perenco Group representatives, including senior executives, attempt to influence or limit the scope of any investigation conducted or commissioned by the government of Gabon into the Becuna platform fire?
18. Has Perenco Group been involved in any discussions with Gabonese authorities regarding the results of the investigation commissioned by the government of Gabon into the Becuna platform fire?
19. Can Perenco Group address allegations that a bribe of 40 million Central African CFA (approximately \$65,000 USD) was paid to senior prosecutor Edith Christiane Mvou Loubamono to take over the investigation into the disaster, release detained employees, and cover up the Becuna incident?
20. Did any executive or representative of Perenco Group from the company's France or UK office visit any hospitalized survivor of the explosion and instruct them on what they should or should not say to investigators?
21. Do Perenco Group's Paris and London offices exercise control over the strategic planning of the group's operative subsidiaries?
22. Do Perenco Group's Paris and London offices have final authority over work plans and budgets for the group's operative subsidiaries?
23. Is it correct that Perenco Group's management decisions regarding workovers, drilling, human resources, and Quality, Health, Safety, and Environment (QHSE) are primarily made by personnel in the group's Paris office?
24. Is it correct that Perenco Group requires the group's subsidiaries to maintain a positive cash flow on a monthly basis?
25. Are financial planning decisions for the group managed by the group's London office?
26. Has Perenco Group failed at any point to report environmental incidents, including oil spills and gas leaks, to relevant regulatory and/or governmental authorities in Gabon, the Democratic Republic of Congo, Trinidad and Tobago, and other countries where it operates?

27. Is it correct that Perenco Group management in Paris and London has real-time information and direct control over decisions regarding well production, and that shutting down wells requires authorization from senior executives?
28. Given that there are several registered Perenco Group holding companies in the Bahamas, can you respond to the claims that these entities serve as shell companies for tax and financial secrecy purposes?
29. Does Perenco Group maintain that its production in the Democratic Republic of the Congo has not exceeded 20 kbopd for all assets in the country?
30. In light of the ongoing audit commissioned by the DRC's Ministry of Hydrocarbons, can Perenco Group confirm whether it will fully cooperate with this investigation, and will it publicly disclose the audit findings to ensure transparency and accountability regarding its royalty payments to the DRC government?
31. Has Perenco Group received approximately US \$77 million from the government of Guatemala since the beginning of operations in recouped operating costs?
32. Did a fire occur on the Teak Alpha offshore platform in Trinidad and Tobago in January, 2020? Were three workers injured as a result of this fire?
33. Have Perenco Group offshore installations in Trinidad and Tobago caused spills that have resulted in oil slicks?
34. Are Perenco Group's revenues or profits routed through tax havens such as Luxembourg, Guernsey, and the Bahamas? Are revenues or profits also routed into real estate and other holdings across Europe?
35. Is it correct that the Perenco Group paid approximately \$10 million to the family of the company man who died in the Becuna accident, and had them sign a non disclosure agreement?

We welcome your response in writing to the above queries by May 14, 3:00 PM GMT+2.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexander von Bismarck', with a stylized, cursive script.

Alexander von Bismarck
Executive Director
Environmental Investigation Agency US



HERBERT
SMITH
FREEHILLS

Environmental Investigation Agency US

For the attention of Alexander von Bismarck

Herbert Smith Freehills Paris LLP
66 Avenue Marceau
75008 Paris
T +33 (0)1 53 57 70 70
F +33 (0)1 53 57 70 80
E clement.dupoirier@hsf.com

Toque J025

www.herbertsmithfreehills.com

Avocats au Barreau de Paris

By email (saschavonbismarck@eia-global.org)

Date
14 May 2025

Dear Mr. von Bismarck,

I am writing as counsel for Perenco following your letter dated 12 May 2025 attaching a list of 35 questions and requesting answers to the same within 2 days, i.e. by 14 May, 15h00 GMT+2.

My client understands that eia claims that it "has [already] completed an investigation into Perenco Group's operations," of which my client was unaware until your letter. In light of the timing, the biased and prejudice nature of your questions as well as certain express or implicit underlying assumptions to the same, my client will not comment.

That being said, my client requests that you mention the content of this letter, should you decide to make public any form of report in relation to the subjects linked to the aforementioned questions.

Finally, please note that my client reserves all its rights in relation to this matter and, in compliance with the rules of the Paris Bar, I have to inform you that you may provide this letter to your counsel who, if they believe it appropriate, may liaise with me.

Sincerely yours,

Clément Dupoirier

Avocat au Barreau de Paris

Herbert Smith Freehills Paris LLP and Herbert Smith Freehills, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills.

Herbert Smith Freehills Paris LLP is a limited liability partnership registered in England and Wales with registered number OC360241. Its registered office is at Exchange House, Primrose Street, London EC2A 2EG.



Le groupe Perenco a pris connaissance du rapport publié par l'organisation *Environmental Investigation Agency US* (« **EIA** ») le 22 mai 2025 (le « **Rapport** »).

Contrairement à ce qu'affirme le Rapport, EIA ne lui a pas offert la « *possibilité de répondre aux conclusions de son enquête* » avant publication. EIA s'est contentée de faire parvenir au groupe une liste de 35 questions, rédigées dans des termes particulièrement orientés et partiels, 48 heures avant la date annoncée de publication du Rapport. Il est donc manifestement trompeur pour EIA d'affirmer dans le Rapport que le Conseil du groupe « *n'a identifié aucune conclusion spécifique erronée ou partielle* ». Par souci de transparence, la lettre d'EIA du 12 mai 2025 et la réponse du Conseil du groupe du 14 mai suivant figurent en annexe (Annexes 1 & 2).

La volonté de salir le groupe et de lui nuire au mépris des faits ne faisait aucun doute à la lecture de la lettre d'EIA du 12 mai 2025. Elle ressort sans aucun doute à (presque) chaque page du Rapport. L'objet de ce communiqué n'est donc pas de répondre point par point à l'accumulation d'approximations, erreurs et contrevérités qui caractérisent le Rapport. À titre d'exemple, laisser entendre que « *le groupe sous-déclarerait sa production d'au moins 5.000 bopd* » en RDC lorsque l'on sait qu'il n'existe qu'un seul terminal d'exportation localement et que chaque baril exporté est fiscalisé sous la supervision des autorités congolaises compétentes n'a tout simplement aucun sens. Il ne s'agit que d'un exemple.

Ceci étant, le groupe ne peut rester silencieux face à l'odieuse instrumentalisation de l'accident survenu le 20 mars 2024 sur la plateforme Becuna opérée par Perenco Oil & Gas Gabon (« **POGG** ») (l'« **Accident** »). Sur plus de onze pages qui y sont consacrées, la désinformation et la calomnie atteignent des sommets alors que six personnes ont perdu la vie. Le présent communiqué et les correctifs qui sont apportés ci-dessous ne visent pas à l'exhaustivité – et nul doute que cela donnera prétexte à davantage de désinformation et de nouvelles calomnies –, mais simplement à rétablir quelques vérités accessibles, qui permettront au lecteur raisonnablement attentif de tenir le Rapport pour ce qu'il est : un outil de propagande sans ambition de vérité.

D'une manière générale, tout fait ou allégation contenu dans le Rapport et non explicitement confirmé dans le présent communiqué est expressément rejeté.

1. Le Rapport affirme à plusieurs reprises que l'Accident serait la conséquence de manquements à la sécurité provoqués par une volonté d'« *éviter à tout prix un arrêt temporaire de la production* » sur le puits.

À elle seule, cette affirmation témoigne de l'absence de tout sérieux de la prétendue « enquête » de EIA : le puits en question (Simba 3) était à l'arrêt depuis le 27 février 2024, soit plus de trois semaines lorsque l'Accident a eu lieu. Au demeurant, une opération de *workover* suppose l'arrêt du puits concerné.

2. Le Rapport affirme que l'intervention sur le puits a été réalisée par une « *équipe P-115 [qui] était plus petite, moins bien équipée et moins expérimentée* », car « *l'équipe P-225* » aurait refusé de poursuivre l'opération de *workover* en raison « *de nombreux problèmes de sécurité concernant les préparatifs* » de ladite opération et notamment « *deux remontées de pétrole* » les 6 et 7 mars 2024.

Ces affirmations n'ont aucun sens. Par ignorance et/ou volonté de nuire, EIA confond « équipe » et « unité ». Les équipes sont composées d'individus ; les unités correspondent à un ensemble

de matériels. Une unité ne refuse pas de travailler ; une unité n'a pas plus d'expérience qu'une autre. P115 et P225 désignent des unités de POGG et non des équipes.

Pour aller plus loin, *workover* désigne des opérations de maintenance sur des puits déjà en production. Il s'agit d'opérations ordinaires dans l'industrie pétrolière. Les filiales du groupe Perenco dans leur ensemble ont effectué plus de 7500 *workovers* sur les 10 dernières années. Pour sa part, POGG en a réalisé plus de 1500 sur la même période.

À l'époque de l'Accident, POGG disposait de quatre unités de *workover* offshore, dont les unités P115 et P225. Avant l'Accident, le puits Simba 3 avait déjà fait l'objet de quatre opérations de *workover*. Celles-ci n'avaient suscité aucune alerte de sécurité particulière. Ces opérations de *workover* avaient été réalisées avec différentes unités : P115, P225 et LSU.

Le remplacement de l'unité P225 par l'unité P115 pour l'opération de *workover* en cours lors de l'Accident a été provoqué par des dysfonctionnements hydrauliques constatés sur l'unité P225 lors de tests préparatoires réalisés plusieurs jours avant l'Accident. L'unité P115 finalement utilisée avait déjà été utilisée pour une précédente opération de *workover* sur le puits en question.

Typiquement, une opération de *workover* sollicite deux équipes, l'une de jour, l'autre de nuit. L'équipe de jour mobilisée était bien celle prévue (peu important le changement d'unité) ; elle n'a pas remplacé une autre équipe qui aurait refusé d'intervenir pour des motifs de sécurité. L'équipe était expérimentée ; certains de ses membres étaient déjà intervenus sur le puits en question et le connaissaient donc.

À la connaissance de POGG, aucune « remontée de pétrole » n'a eu lieu les 6 et 7 mars 2024 contrairement à ce qu'affirme le Rapport. D'après les informations recueillies postérieurement à l'Accident, seule une remontée de fluide de faible intensité a été constatée en sortie de *tubing* le 8 mars 2024. L'équipe a immédiatement réagi en sécurisant le puits avant de le contrôler à nouveau par pompage. Une fois cette procédure mise en œuvre, l'équipe a pu reprendre les opérations. Il a été estimé par la suite que la remontée était le résultat d'un effet de « tube en U » entre l'espace annulaire et le *tubing* et non d'une venue, ne nécessitant pas la mise en œuvre de mesures complémentaires particulières. Un effet de « tube en U » correspondant à un événement mineur, il n'a pas été consigné.

3. À de nombreuses reprises, le Rapport fait état de l'existence d'une « *pression exercée* » sur les personnels impliqués dans les opérations « *consistant à donner la priorité à la production à tout prix* », au détriment de la sécurité.

La sécurité des personnes est au cœur des préoccupations de POGG, et plus généralement de toutes les filiales du groupe.

Les allégations – au demeurant non-établies – de « *pressions* » exercées sur les personnels sont donc fermement rejetées. Notamment, les personnels de POGG et tous les prestataires intervenant sur ses opérations sont formés et sensibilisés au principe dit de la « *Stop Work Authority* », en vertu duquel toute personne, quel que soit son niveau hiérarchique, faisant face à ce qu'elle estime être une situation de danger éventuel ou avéré a le droit et le devoir d'interrompre toute opération en cours. Une fiche rappelant l'importance de la « *Stop Work Authority* » est affichée sur toutes les unités de *workover* (c'était le cas pour l'unité P115 au moment de l'Accident). Des campagnes de sensibilisation sont également menées régulièrement. Aucun collaborateur n'a été sanctionné pour avoir fait usage de la « *Stop Work Authority* ».

4. Le Rapport affirme que « *des équipements de sécurité essentiels qui auraient pu empêcher l'explosion faisaient défaut sur la plateforme pétrolière* » ou étaient « *non fonctionnels* ».

Comme la confusion entre équipe et unité abordée ci-dessus, ces allégations illustrent les graves défaillances de la prétendue « enquête » menée par EIA.

D'une manière générale, la plateforme Becuna est équipée du matériel de sécurité nécessaire. L'étude de dangers établie pour le site de Tchatamba (auquel la plateforme de Becuna est rattachée) a été approuvée par les autorités gabonaises. Les allégations portant sur la supposée vétusté des installations de la plateforme Becuna sont fermement rejetées.

Par ailleurs :

- *blow-out-preventer* (BOP) : l'unité P115 disposait bien d'un BOP ; le BOP de l'unité P115 était identique à celui de l'unité P225 initialement mobilisée. Le BOP de l'unité P115 a été testé de manière concluante sur le puits le 9 mars 2024. Après l'Accident, les équipes de secours dépêchées sur la plateforme Becuna ont actionné le BOP afin de fermer l'espace annulaire du puits. Le BOP a alors fonctionné normalement sans montrer aucun signe de dysfonctionnement.
- vanne de sécurité : une vanne de sécurité était bien présente. Les personnels qui sont intervenus lors de l'opération de *workover* ont pu la mettre en place de manière régulière à chaque fois que nécessaire (par exemple lors des pauses). Au moment de l'Accident, les membres de l'équipe de *workover* étaient en train de la mettre en place.
- treuil : l'unité P115 était bien équipée d'un treuil opérationnel.

5. Le Rapport fait état à plusieurs reprises de ce que « *les conditions du triangle de feu étaient réunies* ».

Au-delà de multiples références aux « *conditions du triangle de feu* », et contrairement à ce qu'il affirme, le Rapport ne s'interroge pas sur la cause de l'ignition qui a provoqué l'Accident.

À la suite de l'Accident, POGG a mandaté un expert indépendant, spécialiste de la prévention et de la maîtrise des risques incendiaires, pour identifier la ou les source(s) de l'ignition. L'expert s'est déplacé sur la plateforme Becuna afin de procéder à des constatations sur site.

Les conclusions de l'expert sont nettes : après une analyse de l'ensemble des équipements présents sur la plateforme (y compris le groupe électrogène évoqué par le Rapport), un seul a été identifié comme à l'origine de l'incendie avec une probabilité jugée « *extrêmement forte* ». Il s'agit d'un luminaire vendu comme un matériel « Ex » – c'est-à-dire un matériel équipé d'une protection contre l'explosion – adapté aux zones où des quantités et concentrations dangereuses de gaz ou vapeurs inflammables peuvent apparaître. Cependant, contrairement aux caractéristiques mises en avant par son fabricant, cet équipement s'est avéré affecté de plusieurs non-conformités non-apparentes. L'incendie survenu sur la plateforme, et donc l'Accident, ne se seraient donc jamais produits si cet équipement avait présenté les garanties « Ex » annoncées par son fabricant.

À la suite de la transmission par l'expert indépendant de son rapport, POGG a notamment (i) retiré l'intégralité des luminaires du fabricant impliqué de l'ensemble de ses sites opérationnels, (ii) transmis ledit rapport aux autorités gabonaises et (iii) déposé une plainte pénale.

6. Le Rapport prétend que « *l'arrêt du groupe électrogène aurait permis d'éviter l'accident* ».

L'affirmation est manifestement inexacte. Nul n'a d'ailleurs jamais prétendu que l'ignition avait été causée par le groupe électrogène. Celui-ci se trouvait, en effet, à plusieurs mètres du départ de feu et aucune trace de déformation du groupe électrogène n'a été relevée après l'Accident, ce qui permet de l'exclure comme source d'ignition.

En revanche, il a été établi que l'ignition s'était produite sur le plancher de travail, à cause d'un luminaire ne répondant pas aux caractéristiques annoncées par son fabricant.

7. Le Rapport prétend que l'opération de *workover* au cours de laquelle l'Accident s'est produit aurait été entièrement supervisée par la filiale française du groupe qui aurait décidé la poursuite de l'opération malgré l'existence alléguée de « *plusieurs signaux d'alerte* ».

Ces affirmations sont manifestement inexactes. Le rôle prêté par EIA à la filiale française du groupe dans la survenance de l'Accident ne repose sur rien.

Comme indiqué ci-dessus, aucune alerte particulière n'est survenue dans les jours qui ont précédé l'Accident.

Concrètement, l'activité de la filiale française consiste en la fourniture de services, dans des domaines variés, à d'autres filiales. Elle n'est pas en charge des opérations de *workover* des filiales opérationnelles.

8. À plusieurs reprises, le Rapport accuse le groupe d'avoir tenté d'entraver l'enquête diligentée par les autorités gabonaises pour déterminer la cause de l'Accident. Le Rapport fait ainsi état notamment (i) d'une dissimulation de preuves, (ii) de pression prétendument exercée sur des témoins, ou encore (iii) d'un pot-de-vin de 40 millions de francs CFA qui aurait été versé à Madame le Procureure Mvou Loubamono.

Ces allégations graves et évidemment non démontrées sont fermement contestées.

Dès la survenance de l'Accident, POGG a pleinement collaboré avec les autorités gabonaises pour faire toute la lumière sur les circonstances de l'Accident. À aucun moment, POGG n'a tenté d'entraver, de quelque manière que ce soit, le processus d'enquête mené par les autorités gabonaises. Aucun pot-de-vin n'a été payé à Madame le Procureure Mvou Loubamono.

À rebours des allégations contenues dans le Rapport, dès la survenance de l'Accident, POGG a mobilisé des moyens importants, en toute transparence avec les autorités gabonaises, dans un souci constant de collaboration, afin de faire la lumière sur les circonstances de l'Accident. Les constatations réalisées par POGG ont été transmises aux autorités.

9. Le Rapport indique que les familles des personnes malheureusement décédées lors de l'Accident n'auraient pas été indemnisées, à l'exception des proches de Monsieur Gares qui auraient reçu une indemnisation de 10 millions de dollars américains en contrepartie de la signature d'un accord de confidentialité.

Cette accusation est une énième illustration de ce que le Rapport est mal informé et le terme d'« enquête » utilisé par EIA dévoyé.

À la suite de l'Accident, le gouvernement gabonais a mis en place une « *Commission interministérielle de suivi de l'accident survenu sur la plateforme Becuna* » par arrêté n°0434/PM du 22 mai 2024. Le Rapport semble ignorer cette information publique. Cette Commission, placée sous l'autorité du Premier ministre de la Transition, a supervisé le processus d'indemnisation des familles, en ce compris la détermination des modalités d'indemnisation et mesures d'accompagnement. À ce jour, à l'exception d'un représentant d'une seule famille qui en a refusé le bénéfice, toutes les familles des victimes ont conclu, sous l'égide de la Commission, des protocoles d'accords transactionnels permettant l'indemnisation de 22 personnes.

S'agissant de la famille de Monsieur Gares, les indications contenues dans le Rapport sont en tout point fausses.



May 12, 2025

Armel Simondin, Chief Executive Officer, Perenco Group

Eric Iwochewitsch, Chairman and Chief Executive Officer, Perenco SA

Subject: Request for Response Regarding Environmental Investigation Agency (EIA US)'s Research

Dear Mr Simondin and Mr Iwochewitsch,

I am writing to inform you that the Environmental Investigation Agency (EIA US), based in Washington, DC, has completed an investigation into Perenco Group's operations. We would like to offer you the opportunity to respond to the following inquiries before the issuance of our report.

We would appreciate your responses to these questions related to the investigation:

1. Is it true that the explosion that occurred on the Becuna platform off the shore of Gabon in March 2024 occurred during a workover operation?
2. Did workers involved in the March, 2024 workover operation on the Becuna platform, or its preparation, raise concerns regarding the risks associated with the preparation and the operation itself? In the affirmative, have these concerns been raised to management based in Gabon, France, and/or the United Kingdom (UK) at any point?
3. Did oil surges occur during the preparation of a workover operation on the Becuna platform between March 6 and 8, 2024?
4. Were these oil surges documented in the daily report prepared by the company man? If not, did any manager within Perenco Group management based in Gabon, France and/or the UK ask the company man to exclude the mention of these surges from the daily report?
5. Did any member of management located in Perenco Group's London and Paris offices intervene at any point to ensure the continuation of the workover operation taking place on the Becuna platform after surges occurred from March 6-8?
6. Did Perenco Group management replace the P-225 workover unit with the P-115 workover unit to execute the workover operation on Simba III in March, 2024? If so, was this personnel decision made after members of P-225 raised concerns about the safety of the workover operation?
7. Has Perenco Group dismissed or relocated workers or contractors who previously raised safety concerns regarding operations on the Becuna platform?
8. Is it true that the shear rams on the blowout preventer used on the Simba III well on the Becuna platform were not operational prior to the blowout on March 20, 2024 that preceded the explosion that led to the deaths of six workers?
9. Was Perenco Group management aware of allegations that the Becuna platform was hazardously dilapidated prior to the March, 2024 explosion, including the absence or failure of key equipment such as the shear rams?

10. Did Perenco France management instruct either the P-115 or P-225 workover unit to proceed with the workover operation after workers or contractors executing the workover raised safety concerns?
11. Did Perenco France management instruct Perenco Oil & Gas Gabon management based in Port-Gentil to proceed with the workover operation despite safety concerns raised by on-site workers?
12. Is it true that more than 90% of personnel working in drilling, workover, and operations on Perenco Group sites in Gabon are provided by personnel and logistics subcontractors, and that these workers are generally on renewable contracts of less than one year in duration?
13. Has Perenco Group management, directly or indirectly, taken measures to prevent independent experts from accessing the Becuna platform for an investigation immediately after the March 2024 explosion?
14. Did the Perenco Oil & Gas Gabon crisis response cell, or any other personnel working for or contracted by Perenco Group, dispose of human remains on the Becuna platform after the accident of March 20, 2024 and before the arrival of governmental authorities and/or investigators at the platform?
15. Is it true that, at the time of the incident, there was not, and that there currently is not, a fire safety system on the Becuna platform?
16. Is Perenco Group aware of allegations that workers are discouraged from reporting safety violations due to fear of contract termination or non-renewal? Has the company taken steps to address this?
17. Did Perenco Group representatives, including senior executives, attempt to influence or limit the scope of any investigation conducted or commissioned by the government of Gabon into the Becuna platform fire?
18. Has Perenco Group been involved in any discussions with Gabonese authorities regarding the results of the investigation commissioned by the government of Gabon into the Becuna platform fire?
19. Can Perenco Group address allegations that a bribe of 40 million Central African CFA (approximately \$65,000 USD) was paid to senior prosecutor Edith Christiane Mvou Loubamono to take over the investigation into the disaster, release detained employees, and cover up the Becuna incident?
20. Did any executive or representative of Perenco Group from the company's France or UK office visit any hospitalized survivor of the explosion and instruct them on what they should or should not say to investigators?
21. Do Perenco Group's Paris and London offices exercise control over the strategic planning of the group's operative subsidiaries?
22. Do Perenco Group's Paris and London offices have final authority over work plans and budgets for the group's operative subsidiaries?
23. Is it correct that Perenco Group's management decisions regarding workovers, drilling, human resources, and Quality, Health, Safety, and Environment (QHSE) are primarily made by personnel in the group's Paris office?
24. Is it correct that Perenco Group requires the group's subsidiaries to maintain a positive cash flow on a monthly basis?
25. Are financial planning decisions for the group managed by the group's London office?
26. Has Perenco Group failed at any point to report environmental incidents, including oil spills and gas leaks, to relevant regulatory and/or governmental authorities in Gabon, the Democratic Republic of Congo, Trinidad and Tobago, and other countries where it operates?

27. Is it correct that Perenco Group management in Paris and London has real-time information and direct control over decisions regarding well production, and that shutting down wells requires authorization from senior executives?
28. Given that there are several registered Perenco Group holding companies in the Bahamas, can you respond to the claims that these entities serve as shell companies for tax and financial secrecy purposes?
29. Does Perenco Group maintain that its production in the Democratic Republic of the Congo has not exceeded 20 kbopd for all assets in the country?
30. In light of the ongoing audit commissioned by the DRC's Ministry of Hydrocarbons, can Perenco Group confirm whether it will fully cooperate with this investigation, and will it publicly disclose the audit findings to ensure transparency and accountability regarding its royalty payments to the DRC government?
31. Has Perenco Group received approximately US \$77 million from the government of Guatemala since the beginning of operations in recouped operating costs?
32. Did a fire occur on the Teak Alpha offshore platform in Trinidad and Tobago in January, 2020? Were three workers injured as a result of this fire?
33. Have Perenco Group offshore installations in Trinidad and Tobago caused spills that have resulted in oil slicks?
34. Are Perenco Group's revenues or profits routed through tax havens such as Luxembourg, Guernsey, and the Bahamas? Are revenues or profits also routed into real estate and other holdings across Europe?
35. Is it correct that the Perenco Group paid approximately \$10 million to the family of the company man who died in the Becuna accident, and had them sign a non disclosure agreement?

We welcome your response in writing to the above queries by May 14, 3:00 PM GMT+2.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexander von Bismarck', with a stylized, cursive script.

Alexander von Bismarck
Executive Director
Environmental Investigation Agency US



HERBERT
SMITH
FREEHILLS

Environmental Investigation Agency US

For the attention of Alexander von Bismarck

Herbert Smith Freehills Paris LLP
66 Avenue Marceau
75008 Paris
T +33 (0)1 53 57 70 70
F +33 (0)1 53 57 70 80
E clement.dupoirier@hsf.com

Toque J025

www.herbertsmithfreehills.com

Avocats au Barreau de Paris

By email (saschavonbismarck@eia-global.org)

Date
14 May 2025

Dear Mr. von Bismarck,

I am writing as counsel for Perenco following your letter dated 12 May 2025 attaching a list of 35 questions and requesting answers to the same within 2 days, i.e. by 14 May, 15h00 GMT+2.

My client understands that eia claims that it "has [already] completed an investigation into Perenco Group's operations," of which my client was unaware until your letter. In light of the timing, the biased and prejudice nature of your questions as well as certain express or implicit underlying assumptions to the same, my client will not comment.

That being said, my client requests that you mention the content of this letter, should you decide to make public any form of report in relation to the subjects linked to the aforementioned questions.

Finally, please note that my client reserves all its rights in relation to this matter and, in compliance with the rules of the Paris Bar, I have to inform you that you may provide this letter to your counsel who, if they believe it appropriate, may liaise with me.

Sincerely yours,

Clément Dupoirier

Avocat au Barreau de Paris

Herbert Smith Freehills Paris LLP and Herbert Smith Freehills, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills.

Herbert Smith Freehills Paris LLP is a limited liability partnership registered in England and Wales with registered number OC360241. Its registered office is at Exchange House, Primrose Street, London EC2A 2EG.