

HEREMA's clarifications regarding the International Public Invitation for granting prospection licenses for the acquisition and processing of non-exclusive seismic data within the offshore areas of Western and Southern Greece.

Clarifications provided hereinafter are an integral part of the International Public Invitation with HEREMA prot. no. 35059/6.5.2026 (Greek Government Gazette Issue B' 3948/30.6.2026) and procurement process. All Applicants are kindly requested to carefully review them and engage accordingly in the submission process.

1. Whether a third country (non-EU) Applicant can participate in the tender.

It is clarified that for Applicants from third countries (non-EU members), the condition of reciprocity should be met. Such a condition is satisfied in case the Applicant submits to HEREMA a certificate from the competent public oil & gas authority of its country of origin or incorporation, by which it is attested that Greek natural or legal persons (or alternatively, European Union natural or legal persons) enjoy, in that third country, the same legal status for the award and execution of multiclient seismic surveys, with the one that is recognized for these foreign Applicants under the Greek Hydrocarbons legislation (or alternatively, under Directive 94/22 of the European Union).

2. Whether a UK Companies House Certificate of Good Standing on its own is sufficient for insolvency/liquidation purposes, or if HEREMA also require a notarial declaration.

Regarding the Good Standing Certificate, if the Applicant is a limited liability company under Companies Act 2006, according to our previous experience, the declarations by the Registrar (e.g., the company has been in continuous unbroken existence, no action has been taken to strike the company off the register, is not subject to one or more of the following: liquidation, company voluntary arrangement, etc.) are sufficient and there is no need to require a further notarial declaration.

Please check the provisions of the Public Invitation about the apostille requirements and the deadline for their submittal (must be issued not more than three months prior to the Application Submission Deadline).

3. Whether Basic Disclosure & Barring Service (DBS) certificates for a UK registered company are acceptable for directors/management in relation to criminal record requirements: [Disclosure and Barring Service - GOV.UK](#)

Regarding the suitable criminal records, we understand that in the UK, the most common options for criminal records (depending on the reason for the request) are the following:

(i) ACRO Police Certificate, (ii) DBS Certificate, (iii) Disclosure Scotland Certificate (for criminal record checks in Scotland) and (iv) AccessNI Certificate (for criminal record checks in Northern Island).

According to HEREMA's Public Invitation, the reason for requiring these certificates, is mentioned in 4A (Legal Capacity Documents) and, especially, under (viii) (c), i.e., for convictions by a final court decision of an offence related to Applicant's professional activity and are applied for all the Directors of the Applicant or for all natural persons who legally exercise Management functions. Thus, we advise considering the above provisions of the Public Invitation and then deciding upon one of the above available options in the UK. The Applicant, certainly, must consider that the use of these Certificates will be "overseas" since the UK is no longer an EU Member State (except if there is a special status established by the various Brexit statutes or bilateral agreements between UK-EU).

Finally, we underline that the Public Invitation provides the alternative (in case no such certificate is issued in UK), to submit to HEREMA a Solemn Declaration in front of e.g., a judicial or administrative authority or a notary public, etc.

4. Whether the required declarations (5-6 in total) can be combined into a single notarised declaration, or if they must be provided separately.

This is acceptable (single notarised declaration). But we advise following the terms of the Public Invitation to incorporate in this single notarised declaration the appropriate wording for each declaration (in agreement with the Public Invitation).

5. Whether a UK apostille is required for Companies House electronic certificates (procured online), or only for notarised and/or original paper documents.

On-line certificates (procured online) can be affixed with an e-apostille. E-apostille has the same legal force as the paper apostille under the relevant Hague Convention 1961.

6. Which qualified e-signature providers (e.g., DocuSign) are acceptable for non-EU/UK applicants.

This matter is related to the special Brexit statutes and EU-UK bilateral agreements. The following apply: (a) in order for a UK natural or legal entity to create an e-signature when dealing with EU citizens, they may seek trust services from trust service providers established in the EU, (b) AdES (advanced electronic signatures) or even better QES (qualified electronic signatures) may be used (the latter due to their legal standing as a handwritten signature) for transactions between UK and EU citizens, but coupled with data integrity (e.g., Adobe Sign, "data integrity" as defined in the UK-EU Trade and Co-operation Agreement 2020). For further reassurance, we advise the Applicants to make use of the services of either a UK solicitor or a UK public notary.

7. Our Data Protection officer has raised a question regarding the international transfer of in-depth personal information of our directors, in relation to the UK GDPR data protection requirements. Based upon the GDPR advice we have received, we propose providing director signed non-disqualification declarations confirming that none of the disqualifying grounds apply. Would this be acceptable?

It is clarified that the supporting documents submitted by the applicants to HEREMA are confidential. They are only going to be disclosed to the Hellenic Court of Audit (the competent Greek Court which will execute the pre-contract audit) and, also, to the Ministry of Environment and Energy which shall approve the Prospection License, after its issuance by HEREMA.

In lieu of Criminal Records of the Directors [4. SELECTION CRITERIA, A. Folder A - Legal Capacity Documents, viii, c)1. and c)2.], such signed non-disqualification declarations can be accepted, only in case the said Criminal Records (or part thereof) are not issued in the country in which the Applicant is established or has its origin and this fact must be stated within the relevant declarations. It is clarified that these must be solemn declarations before a judicial or administrative authority or a notary public, etc., certifying that such documents/certificates (Criminal Records), or part thereof, are not issued in that country and, that none of the above cases apply to it.

8. Are all foreign documents required to be apostilled? Would we need to apostille the Certificate of Incorporation and current Articles of Association?

Please refer to Section 4, "SELECTION CRITERIA, A. Folder A - Legal Capacity Documents" of the Tender Documents (Government Gazette, Series B, Issue 3948/30.06.2026, p. 41298-41300), which specifies the required supporting documents and the applicable apostille requirements.

9. Under the Technical Capacity requirements, the tender requests a project list for the last five (5) years that includes project value and the client/recipient of the data. This information is commercially typically confidential and not disclosed. Can you please confirm whether omitting project value and/or client/recipient details would affect the Applicant's evaluation, and if so, whether anonymized or aggregated information (or submission under confidentiality) would be acceptable instead?

According to CHAPTER 4 of the Public Invitation [(Selection Criteria-Folder B (Technical Capacity Documents)], it is expressly foreseen that the Applicant, in order to demonstrate its technical capacity in hydrocarbon prospection, shall include to the above mentioned (Folder B), certain information, e.g., '...projects executed in the last 5 years, indicating size and value of each project, the contracting entity and the client/recipient of this project, start and completion dates, etc. The Contracting Authority may contact the recipients of each project or request the submission of certificates of good performance...' Besides, in par. 5.2 of the Public Invitation (EVALUATION TABLES), it is foreseen in Technical Criteria a Weighting Factor of 30% for experience in seismic surveys in Greece and the Eastern Mediterranean, which is directly related to the abovementioned requirements for past projects, etc. Finally, all the information submitted by the Applicants to HEREMA in order to participate in the tender, remains confidential, with the exception of its submission to the Hellenic Court of Audit (which will execute a legal audit upon the process of the tender and the proposed agreement to be signed) and, further, to the Ministry of Environment and Energy. Taking into consideration all the above, it is suggested that as many project details as possible are included in the Applicant's tender, especially, survey size, year and country/area.

10. Please confirm that the contracting authority will accept a tender submission as an asset light multiclient company without naming a confirmed acquisition partner at the time of submission. We are currently assessing multiple potential contractors and can confirm the selected acquisition provider at a later stage.

An asset light multiclient company can submit a bid without naming a confirmed acquisition contractor at the time of the submission. However, since the technology used for the acquisition forms an integral part of the technical evaluation, and the vessel used constitutes the acquisition platform, it is imperative that the minimum vessel and acquisition technology specs are specified in the submitted technical proposal. Ideally, specific vessel types and associated acquisition technologies should be proposed. The proposed specs will be evaluated against the tender technical criteria.

11. Are there any specific data residency requirements we should be aware of (i.e., are we able to process the data outside of Greece)?

No, there are no such requirements. Special clauses that refer to the back-up systems of the Licensee, in which the data may be retained, may be negotiated and added to the relevant contract.

12. Does the winning multiclient company retain full ownership of acquired data?

No, the ownership of the acquired seismic data resides with the Hellenic Republic. Selected Applicant(s) that will be awarded a Prospection License, shall be given the exclusive commercial rights to market, promote, and license the acquired data for a specific period of time.

13. How long will the winning multiclient company be awarded exclusivity for licensing the data to third parties?

There is no provision in the Hydrocarbons Law for any specific period of exclusivity for licensing the data to third parties. This is a matter of negotiation between HEREMA and the winning multiclient company. We expect the exclusivity period to form part of the Applicant's commercial offer.

14. What existing state-owned seismic and well datasets will be provided to the winning party?

According to the Invitation, it is not a prerequisite for the Applicants to purchase certain state-owned seismic and well datasets or anything similar in order to participate in the tender. The Hydrocarbons Law does not foresee anything similar either. If the winning party wishes to be provided with such seismic and well datasets, this is something for which existing procedures shall be followed for their procurement.

15. Are existing datasets available for reprocessing with ability for Multiclient licensing?

According to CHAPTER 2 of the Invitation (SCOPE OF WORK), it is foreseen that the scope of the tender consists of the acquisition and processing of non-exclusive data. There is no reprocessing foreseen which is, therefore, out of the scope of the tender. Potential reprocessing for the purposes of multiclient licensing can be submitted as an alternative proposal.

16. Will more than one multiclient company be awarded acquisition licenses in the area?

In accordance with article 2 par. 9 of the Hydrocarbons law, it is possible to grant Prospection Licenses to more than one Applicants. The award of the license does not create any other right to the recipient.

17. Is this intended as a precursor to future licensing rounds? Will it be a requirement for interested parties to license the data in their areas of interest?

The launch of future licensing rounds is in the discretion of the Greek State. New concession blocks can also be awarded through an "expression of interest" procedure. In either case, there would be normally a requirement for interested parties to license the multiclient data in their areas of interest.

18. Who leads the permit acquisition process after the acquisition is awarded?

The holder of the Prospection License will lead and will be responsible for the permitting of the acquisition process. HEREMA and the holder of the license may appoint, e.g., a common representative for the receipt of information, etc. This is subject to the negotiation of the relevant contract between HEREMA and the holder of the Prospection License.

19. How long will the winning multiclient company have to acquire their proposed seismic program once the acquisition license is granted?

According to article 2 par. 6 of the Hydrocarbons Law, the initial term of the Prospection License is eighteen (18) months, but it may be extended (the law does not foresee a specific extension period) when this duration is not sufficient for the completion of works.

20. Are there any acquisition restrictions or requirements we should be aware resulting from protected marine mammals or habitats?

These should normally be covered by the approved Environmental Action Plan. Please also see Environmental Management and Mitigation Measures of the Public Invitation, that the contractor has to implement during the execution of the works.

21. Is there an expected minimum program size?

Please see Chapter D of the Public Invitation (Folder D-Technical and Financial Offer (Competitive Elements) -Technical Offer-Third and Fourth bullets as well as Specific technical Specifications (pages 41304-41306 of the Greek Government Gazette, Issue B' 3948/30.6.2026).

22. Would seismic acquisition outside the 1 October–31 March window (e.g., due to vessel scheduling or weather contingency) be acceptable?

No specific time window is foreseen in Greek Hydrocarbon Law (L. 2289/1995, as in force) for the execution of the seismic acquisition. Nonetheless, such time window may be included in the terms of the approved Environmental Action Plan (EAP). In practice, these EAPs require an October-to-March acquisition window. Therefore, acquisition outside the abovementioned window is generally not acceptable and should not be planned in such a manner. It might be possible to continue acquisition past 31st of March in order to complete an acquisition program that has been delayed due to unforeseen circumstances, such as weather downtime.

23. What duration of exclusivity would be granted to the winning bidder?

No prescribed duration of exclusivity is foreseen in the Greek Hydrocarbon Law. This is rather a matter of negotiation between HEREMA and the selected Applicant. We expect the duration of exclusivity to form part of the Applicant's commercial offer.

24. Section 5.3 refers to “the selected Applicant(s)”. Please could HEREMA clarify whether the programme may be awarded to multiple qualified applicants, with parallel non-exclusive licences covering the same or overlapping areas?

Article 2 par. 9 of the Greek Hydrocarbon Law allows the granting of prospection licenses within the same area to more than one Applicants. These licenses may be in parallel, and non-exclusive. HEREMA reserves the right to offer geographical exclusivity depending on the quality and merit of the offers received.

25. Could HEREMA confirm whether the €10,000/€12,400 Application Submission Fee is refundable if the application is unsuccessful or the procedure is declared void?

No, the application fee is not refundable in any case.

26. Annex B commits applicants to 'enter into the contract for the acquisition of non-exclusive seismic data' without specifying contract terms or confirming these remain subject to negotiation. Please clarify.

There is no model contract for the tender. This is subject to negotiation between HEREMA and the selected Applicant(s).

- 27. Could HEREMA clarify exactly what documentation is required in relation to the requested Power of Attorney? Our authority and details will be evidenced by a Certificate of Good Standing and the relevant Companies House records. Please confirm whether this documentation will suffice.**

For the proper signature and execution of the Application Letter Form (ANNEX B of the Public Invitation), the signatory must be an authorized representative of the Applicant. As an example, in UK companies, such authorized representatives may be one (or two) of the Directors of the company, as indicated each time by the relevant Articles of Association, or may be a third person authorized by a Power of Attorney. Such Power of Attorney may be issued following a relevant decision of the Directors of the company, authorizing such a person for the signature of the Application Letter Form, and then, followed by a Power of Attorney (private document) for the validation of the mandate to such third person. The latter must first be notarised and then apostilled.

- 28. We cannot identify any prescribed wording for the solemn declarations referred to in the tender documentation. Please could HEREMA clarify the specific declarations and/or wording required, including any notarisation or apostille requirements?**

Solemn Declarations are foreseen in 4 A (iv). Please follow the wording for each (a) to (f). Please, take also into consideration that these declarations are mainly private documents and, as such, they normally first are notarized by a public notary and, afterwards, the signature of the notary is apostilled.

- 29. Could HEREMA confirm whether a signed declaration from each Director confirming that they have not been convicted of any relevant offences would be accepted in lieu of criminal record extracts? If so, please could HEREMA specify which offences should be covered by the declaration?**

Solemn Declarations in lieu of Criminal Records are accepted only in case the country of origin of each of the Directors does not issue such Certificates. If this is the case, the relevant Solemn Declaration should contain the phrase of 4 (A) (iv)(c). Please take also into consideration the Apostille obligation (if applicable).