Kulevi Oil Refinery

Factual Summary

Black Sea Petroleum LLC (BSP) is a privately owned energy company based in Georgia. It owns and operates Kulevi Oil Refinery on the Black Sea coast. **The refinery operates exclusively on non-Russian crude oil.**

Purpose and basis of this summary

This summary concerns the European Commission's review of Kulevi Oil Refinery's inclusion on the EU sanctions list. It draws on BSP's detailed submissions to the Commission through its legal counsel, Steptoe, and subsequent operational updates. BSP management takes full responsibility for its factual accuracy.

1. Permanent non-Russian crude oil supply

BSP completed the operational transition on 23 August 2026. Since then, the refinery has received and processed exclusively non-Russian crude oil. This sourcing policy is permanent. The third Libyan crude shipment arrived at Kulevi on 28 October 2026 aboard the tanker FRANKOPAN. A fourth shipment has been agreed for November 2026. BSP's non-exclusive framework agreement with energy trader BGN runs through 31 December 2027.

2. Commercial sustainability

Kulevi Oil Refinery operates profitably using exclusively non-Russian crude oil.

3. Ownership and control

BSP is privately owned by Georgian nationals. It is not a state-owned company. **There is no Russian ownership or control.** Page 2 presents the ownership structure and ultimate beneficial owners.

4. Independent verification and ongoing monitoring

The initial 60-day monitoring exercise was completed in October 2026. Operational records, independent inspection reports from Intertek and confirmations from SOCAR's Black Sea Terminal support the transition within each document's scope and reporting period.

The Monitoring Plan provides for independent inspection of each delivery, documented origin checks and reconciliation with inventory and production records. It covers sanctions risks involving counterparties, vessels and payments, with transactions held while material concerns remain unresolved. Oversight is assigned to a Compliance Officer reporting directly to the Board.

BSP commits to monthly reporting to the European Commission on deliveries, identified risks and corrective actions. These controls and reporting commitments continue after any delisting.

5. Early preparations for non-Russian supply

BSP began preparing Kulevi Oil Refinery for a permanent switch to exclusively non-Russian crude oil in late 2025, well before its EU listing in July 2026. This allowed BSP to complete the switch on 23 August 2026, within one month of listing and well before the end of the six-month period provided for diversification.

Preparations included a request for Turkmen crude in January 2026, BGN's agreement with Dragon Oil in April 2026 and a long-term Libyan supply agreement in July 2026.

6. Investment and European cooperation

BSP plans to expand refining capacity to up to five million tonnes annually, including Euro 5 fuel production. Listing uncertainty is holding back financing. The investment would create opportunities for EU suppliers and partners and could provide additional non-Russian fuel supply to regional and European markets.

The EU Affairs office in Brussels and the European Advisory Council's strategic guidance support sustained cooperation with European institutions. Alongside verifiable reporting, this provides a permanent channel for follow-up and keeps BSP accessible beyond the current sanctions review.

BLACK SEA PETROLEUM

6 November 2026

Ownership Structure and Ultimate Beneficial Owners

Black Sea Petroleum LLC (BSP) is a privately owned company that owns and operates Kulevi Oil Refinery in Georgia. The refinery processes exclusively non-Russian crude oil.



David Potskhveria

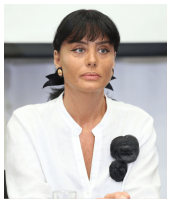
Ultimate Beneficial Owner

29.34%

Georgian national

Co-Founder and Chief Executive Officer

Over a decade of experience in international commodities trading and energy logistics.



Maka Asatiani

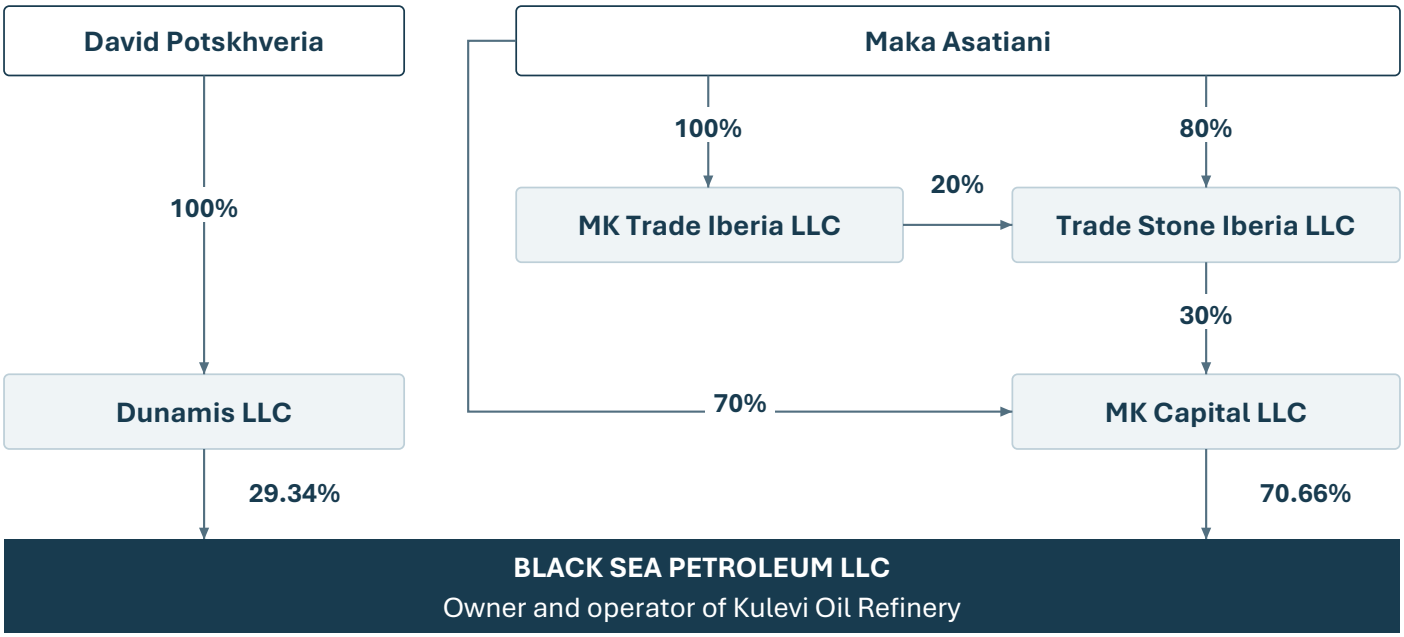
Ultimate Beneficial Owner

70.66%

Georgian national

Energy investments, petroleum imports and fuel distribution in Georgia. Long-standing shareholder in Georgia's official Mercedes-Benz distributor.

Ownership structure



Funding structure

Equity USD 54.63 million — **Loans USD 87.18 million**

38.5% | 61.5%

Management statement

BSP management confirms the accuracy of this ownership overview and takes responsibility for its content. The ownership details are based on publicly available corporate registry records. Supporting registry extracts and related corporate documents are available upon request.

Further information: BSP at a Glance | bsp.com.ge/en/at-a-glance/