



Tilenga Project

HRIA Summary Report

Prepared by
**Eco & Partner
Consult Limited**
Environment, Health, Safety and Quality Management Consultants

LKL INTERNATIONAL
CONSULTING INC.

Submitted to
TotalEnergies



January 2022

Introduction

This report presents a summary of key findings and recommendations of the Human Rights Impact Assessment (the Assessment) for the Tilenga Project (the Project), which was commissioned by TotalEnergies EP Uganda (TEPU).¹

The purpose of the Assessment is to understand the risks and impacts of the Project on human rights and to develop a proactive and comprehensive Human Rights Action Plan framework for ongoing Human Rights Due Diligence (HRDD) to manage the Project's salient human rights issues as it moves through the construction and operational phases. This Assessment builds upon prior human rights studies that the Project has undertaken, notably through the Environmental and Social Impact Assessment (ESIA) and other related studies.



The Tilenga Project²

Located in the Buliisa and Nwoya districts in the Lake Albert area of Uganda, the Tilenga Project is operated by TEPU (56.6%), in partnership with a subsidiary of the Chinese National Offshore Oil Corporation (CNOOC) (28.4%) and the Ugandan National Oil Company (UNOC) (15%). It comprises oil production, a crude oil processing plant, underground pipelines and infrastructure.

Production will be delivered through buried pipelines to a treatment plant built in Kasenyi, for the separation and treatment of the fluids (oil, water, gas). All of the water produced will be reinjected into the fields and the gas will be used to produce the energy needed for the treatment process. One of the fields to be developed, Jobi Rii, is located inside Murchison Falls Park. The others are located outside the Park, south of the Victoria Nile in sparsely populated rural areas and activities that are essentially agricultural.

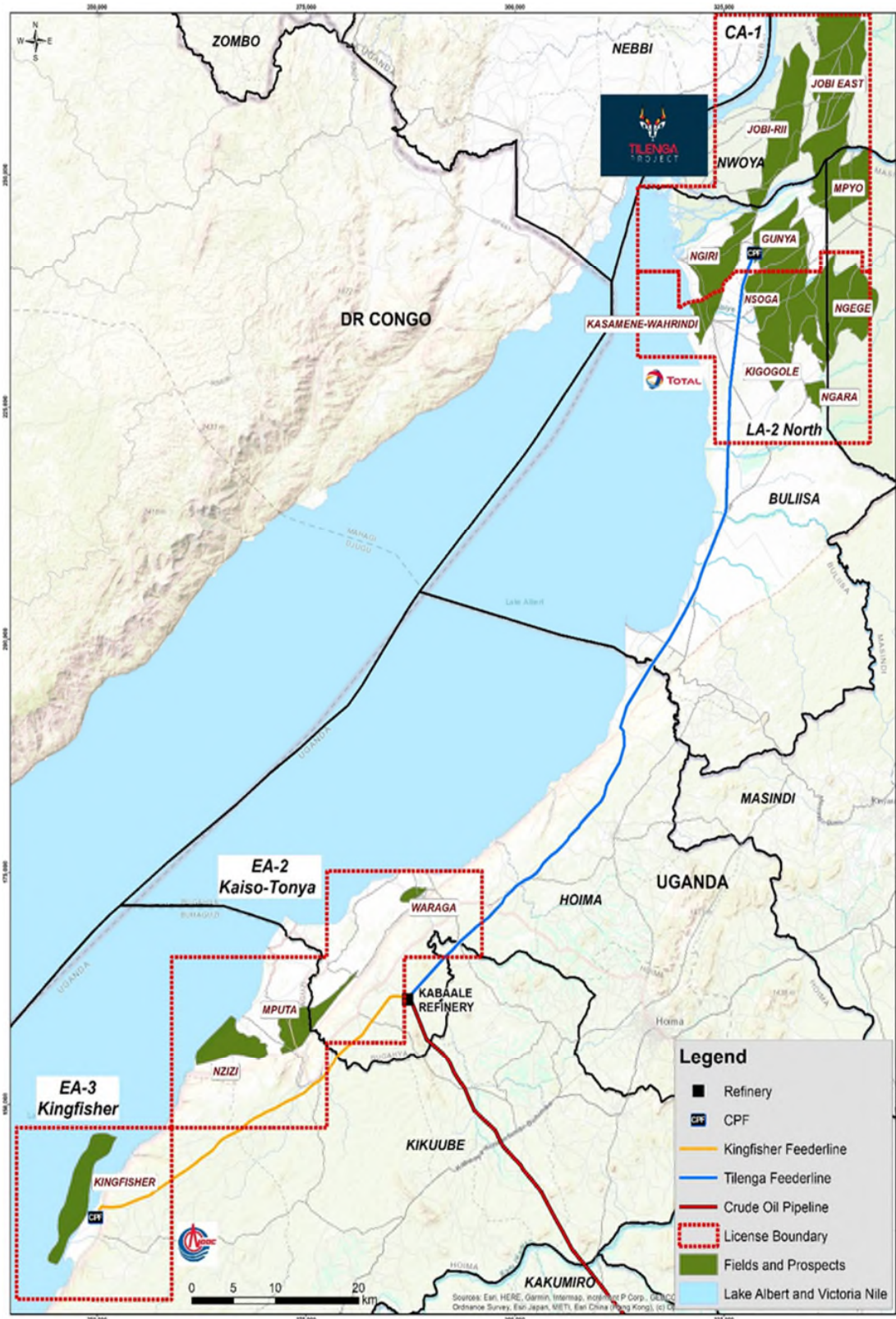
Tilenga connects to the East Africa Crude Oil Pipeline, which consists of the construction of a buried 1,443 km oil pipeline between the town of Kabaale in Hoima District in Uganda and the port of Tanga in Tanzania, and a storage terminal and loading jetty in Tanga.

The Assessment was conducted during the timeframe that the final agreements were signed to launch the Tilenga and EACOP projects and they began the construction phase. First oil production and operations of the pipelines is currently planned for 2025.

The map on the following page provides an overview of the Project's location and its associated components in Uganda.

¹ The full report of this Assessment is also available.

² For more information about the Tilenga and EACOP Projects, see: <https://totalenergies.com/projects/oil-gas/tilenga-and-eacop-acting-transparently>



The Assessment Process

The Assessment was implemented in a collaborative and participatory manner by Eco & Partners Consult (Uganda) and LKL International Consulting Inc. (Canada) between December 2020 and January 2022.

The following table presents the key steps or phases in the Assessment process.

Assessment Phases	Key activities and outputs	Timeline
HRIA Scoping	<ul style="list-style-type: none"> ▪ Desktop research and review of internal and external reports about the Project ▪ Scoping and prioritization of salient human rights issues for the Assessment ▪ Development of protocols for fieldwork phase ▪ Workshops with Project leaders and key departments 	December 2020 to March 2021
HRIA Fieldwork and Follow-up	<ul style="list-style-type: none"> ▪ Stakeholder mapping and development of interview guidance and protocols for fieldwork phase ▪ Extensive fieldwork with affected and other stakeholders in Uganda and in the communities around the Project ▪ Follow-up engagement and workshops with TEPU and key contractors 	April to November 2021
Human Rights Assessment and Reporting	<ul style="list-style-type: none"> ▪ Assessment of human rights risks and impacts ▪ Assessment of current mitigation measures ▪ Development of recommendations for priorities or additional actions to strengthen ongoing HRDD ▪ Preparation and internal review of draft HRIA report ▪ Development of Human Rights Action Plan 	November 2021 to January 2022
Disclosure and Governance	<ul style="list-style-type: none"> ▪ Disclosure of HRIA report and Human Rights Action plan with local and national stakeholders ▪ Finalization of Human Rights Action Plan ▪ Establishment of governance structures to support implementation of Human Rights Action Plan ▪ Engagement with internal stakeholders and contractors to raise awareness of expectations under the Human Rights Action Plan 	February to March 2022

The Assessment had a strong focus on engagement with affected stakeholders in Uganda and in the Project area during an extensive fieldwork mission in April and May 2021. Stakeholders were engaged through focus groups, key informant interviews and other types of stakeholder engagement such community meetings. Gender balance was a priority for the assessment team. Focus groups with women were held in each community and key stakeholders focused on women’s rights were targeted throughout the assessment.

Representatives of TEPU were engaged throughout the Assessment for ongoing dialogue about management approaches and mitigation measures to address the salient human rights issues identified and prioritized through the Assessment.

The following table presents an overview of the different stakeholders engaged through the Assessment.

Stakeholder Groups	Stakeholder Sub-Groups	Numbers
Affected stakeholders (rights-holders)	Potentially impacted community members living near the Project in: <ul style="list-style-type: none"> ▪ Kasinyi ▪ Kisomere ▪ Kakindo ▪ Rwamutonga ▪ Ndaragi ▪ Kigwera NW ▪ Nyapea ▪ Kisansya ▪ Beroya 	360
Stakeholders with responsibilities for protection and respect of human rights (i.e. duty-bearers)	TEPU representatives from relevant departments <ul style="list-style-type: none"> ▪ NGO and Human rights ▪ Social Affairs ▪ Human Resources ▪ Procurement ▪ Security ▪ Community Liaison Officers 	20
	TEPU Business partners	6
	TEPU Contractors and sub-contractors	18
	Government of Uganda Ministries, Departments and Agencies	25
	Local Governments in Bulisa, Nwoya, Masindi and Pakwach	20
	Government security forces	8
Other relevant stakeholders	Uganda Human Rights Commission (UHCR)	8
	International Labour Organization (ILO)	1
	Trade unions	2
	International NGOs	12
	Local NGOs	28
	Community-based organisations	3
	Faith-based organisations	1
Academic expert	1	
TOTAL STAKEHOLDERS ENGAGED IN THE HRIA FIELDWORK		513

The salient human rights issues for the Assessment were identified, prioritized and refined through an iterative process that included a desktop scoping phase, an extensive fieldwork and stakeholder engagement phase, and follow-up engagement and dialogue with TEPU about the severity and likelihood of human rights risks and impacts, as well as about current mitigation measures and opportunities to enhance ongoing HRDD.

Based on this iterative process and the criteria for salience used in the United Nations Guiding Principles on Business and Human Rights (UNGPs) (i.e. the most severe and likely human rights risks or impacts), the following table presents the salient human rights issues that are the focus of the Assessment. The framing of the salient human rights issues has been organized around the 3 main topics (Workers, Communities and Security) also identified in TotalEnergies' Code of Conduct and Human Rights Guide to facilitate alignment of corporate policies and procedures for effective management and mitigation.

Workers' Rights	Communities' Human Rights	Security and Human Rights
<ul style="list-style-type: none"> ▪ Contractor and suppliers' workers' rights 	<ul style="list-style-type: none"> ▪ Right to information and consultation ▪ Land and resettlement ▪ Project-induced in-migration ▪ Road safety ▪ Cultural rights 	<ul style="list-style-type: none"> ▪ Interactions with Government Security Forces ▪ Interactions with Private Security Providers
Cross-cutting Human Rights		
<ul style="list-style-type: none"> ▪ Women's rights, gender equality and vulnerable groups <ul style="list-style-type: none"> ▪ Grievance mechanisms and access to remedy <ul style="list-style-type: none"> ▪ Human Rights Defenders 		

The focus on salient human rights issues in the Assessment is meant to highlight and prioritize the areas where there are the greatest risks to people from a human rights perspective, and consequently where the Project should focus its attention and resources in the development of its Human Rights Action Plan.

The following sections of this summary report provide a high-level overview of the salient human rights issues and the key recommendations for ongoing human rights due diligence.

Workers' Rights of Contractors and Suppliers

Potential impacts on the workers' rights were prioritized given the large number of contractors, sub-contractors and suppliers that will work on the Project, particularly during the construction phase. This is an area where international standards and expectations are evolving rapidly in terms of due diligence in supply chains.

TotalEnergies has strong policies and requirements for workers' rights of its contractors, sub-contractors and suppliers and these should serve to enhance Ugandan national labour law protections, awareness and implementations of workers' rights for the Project. In this regard, there are risks to the full range of workers' rights issues including: non-discrimination, freedom from child labour, freedom from forced labour, freedom of association, just and favourable working conditions and safe and healthy working conditions.

During the Assessment, there were still a relatively small number of contractors; and the engagement with the Project and contractor managers demonstrated strong awareness and appropriate due diligence on workers' rights. However, given the complexity of managing all the contractors, sub-contractors and suppliers during the Project's construction phase, this should remain a high priority for the Project's due diligence on human rights, and should involve ongoing engagement with and development of strong channels of communications and grievance mechanisms for contractor and suppliers' workers. Ongoing engagement throughout the Project's workforce and supply chain should provide opportunities for human resources issues to be raised and addressed before they amount to human rights impacts.

Current mitigation measures include the implementation of TotalEnergies' Fundamental Principles of Purchasing, and the Project's Labour Management Plan which include references to human rights and ILO labour standards, including: prohibition and prevention of child labour; prohibition and prevention of forced labour; working conditions, remuneration and compensation; health and safety at work; prohibition and prevention of discrimination and harassment at the workplace; freedom of speech, association and collective bargaining, freedom of thought, conscience and religion; and, mechanisms for grievances and concerns.

The process for implementing these requirements includes the following:

- A pre-selection check and engagement with proposed contractors at the tendering stage.
- Contract provisions on workers' rights aligned with the Fundamental Principles of Purchasing, including requirements to incorporate workers' rights provisions in sub-contracts and to monitor sub-contractors regarding workers' rights in the workplace.
- Onboarding and induction training on workers' rights.
- Monitoring and auditing procedures.
- Developing action plans to support contractors in complying with the workers' rights provisions if issues are identified during the pre-selection engagement or the course of the contract.

The recommended priorities for ongoing human rights due diligence include:

- Ensuring that the pre-selection engagement, onboarding and induction training process for contractors duly emphasizes the Project's commitments to respect workers' rights.
- Develop procedures to verify key contractors' human resources, recruitment, procurement and sub-contracting policies and procedures align with the Project's commitments to respect workers' rights.
- Require contractors to put in place effective grievance mechanisms for workers.
- Proactively conduct inspections of the working conditions of selected high-risk contractors', sub-contractors' and suppliers to identify and address issues before they escalate to infringements on workers' rights. These processes should be conducted collaboratively with the contractors to build their awareness and capacity to inspect and monitor their sub-contractors.
- In implementing these measures, special attention should be paid to addressing issues regarding gender equality and non-discrimination in recruitment and labour management practices and raising awareness about the prohibition against sexual harassment.
- Engage proactively with the ILO, Ministry of Gender Labour and Social Development and the National Organization of Trade Unions (NOTU) to see how the Project can support dialogue and action related to freedom of association for the Project's workforce and the oil & gas industry more generally.

Given the evolving global expectations about responsible supply chains, the Project can seek to build the capacity of Ugandan contractors, sub-contractors and suppliers about respecting workers' rights standards and good practices. This could eventually

be extended to the oil & gas industry more generally through multi-stakeholder initiatives such as collaboration with universities and participating in supplier forums.

While the Project's monitoring of workers' rights is designed to be done directly by TEPU in collaboration with contractors and sub-contractors, opportunities to work with the district Labour Officers should also be considered as a longer-term goal to contribute to the government's capacity to protect workers' rights.

Information and Consultation

The right to information and consultation provides the foundation for building strong, constructive, and responsive relationships between the Project and its affected stakeholders. Furthermore, timely dissemination of information about the Project and meaningful consultation with affected stakeholders is an important component of ongoing HRDD and the mitigation and management of the Project's other salient human rights issues.

The need for improvement of information and consultation was highlighted as a priority for many of the Project's stakeholders and particularly for local community members during the fieldwork. This is partly because delays in the development and government approvals for the Project between 2019 and 2021 have led to uncertainty about Project timelines and feasibility, rumours and misinformation about the Project. Furthermore, the COVID-19 pandemic has created significant challenges for the ongoing implementation of the Project's stakeholder engagement plans.

While the Project has the main responsibility for informing and consulting with affected stakeholders, there are other actors who also provide information about the Project and who many not be adequately informed. This highlights the need for the Project to increase its efforts and develop effective strategies for working with local government officials, community leaders and civil society organizations to support the right to information and consultation. The Project also has a responsibility to garner feedback from stakeholders to understand whether potential impacts have been correctly identified and effectively addressed.

The Project has considerably increased its stakeholder engagement efforts since the Project has moved into the development phase, and is currently undertaking a number of actions to address stakeholder concerns about information and consultation. These actions are focused on the continued implementation of the Project's Stakeholder Engagement Plan and strengthening the Stakeholder Engagement Team, which includes Community Liaison Officers for local communities. Furthermore, the Project has created an NGO Coordination and Human Rights department to proactively engage with local and national stakeholders and especially non-government organizations (NGOs) and community-based organizations about human rights issues and concerns.

The recommended priorities for ongoing human rights due diligence include:

- Strengthen the teams based in TEPU's head office and in the communities who have roles and responsibilities for stakeholder engagement, notably by filling any vacancies and providing workshops on rights-based approaches and best practices for stakeholder engagement.
- Continue to ensure that the number of CLOs is adequate and provide adequate resources and logistical support in order for them to have regular and visible presence in the local communities.

- Continue to adapt stakeholder engagement activities to accommodate the needs and feedback from women and other vulnerable groups.
- Continue to develop and produce information, communications and educational materials in local languages about key environmental, social and human rights issues of recurring concern or interest to local stakeholders.
- Proactively disclose the HRIA Report and the Human Rights Action Plan in a manner that encourages ongoing dialogue about the Project's salient human rights issues with local and national stakeholders, and then conduct periodic disclosure and consultation sessions about progress on the implementation of the Human Rights Action Plan.
- Conduct periodic evaluations of the Project's stakeholder engagement efforts using a participatory methodology.
- Develop an agreed framework or protocol with key civil society organizations to reinforce a structured and constructive ongoing dialogue on issues of mutual interest, including human rights.
- Within the framework of the Project's regular stakeholder engagement meetings, consider opportunities for developing a capacity-building program on business and human rights to create the conditions for more constructive dialogue between different stakeholders.

Land and Resettlement

Land acquisition and resettlement have been prioritized as these are inherently high-risk activities given the range of potential impacts on a variety of human rights and the challenge of fully remediating those impacts over the longer term. Access to land and an adequate standard of living have been identified as salient human rights issues globally in the TotalEnergies Human Rights Guide and briefing papers. Moreover, resettlement impacts are generally amongst the first significant impacts experienced by Project Affected Persons (PAPs) and Project Affected Households (PAHs) and thus become an important test for company-community relationships.³

Many of the impacts related to land acquisition and resettlement can be remediated through improved consultations, compensation and well-executed livelihood restoration programs. Nonetheless, in any resettlement, there are risks that some PAPs or PAHs will not fully restore their livelihoods over time. It is often observed that this can lead these PAPs and PAHs to end up worse off after resettlement in terms of landlessness, homelessness or impoverishment. In addition, forced eviction of potential hold-outs can lead to severe human rights impacts and therefore must be avoided or carefully mitigated or remediated in cooperation with government.

In relation to the Tilenga project, activities related to land acquisition and resettlement have been the subject of intense scrutiny and allegations of human rights impacts—notably related to RAP1. Delays in Project agreements and approvals have led to the land acquisition process being delayed. Measures to address these concerns are

³ PAPs and PAHs is the terminology used to refer to individuals (Project Affected People) and households (Project Affected Households) who are displaced by land acquisition and resettlement in the relevant standards and technical literature. This is also the terminology that has been used with the individuals and households who will be impacted by resettlement activities for the Tilenga Project. Therefore, in this section of the Assessment we will use the terms of PAPs and PAHs. This corresponds with the vocabulary of “affected stakeholders” that is used in the UNGPs.

being implemented and lessons learned are being applied in the implementation of RAPs 2-5.

In line with the UNGPs, the Project should continue to proactively address any potential displacement impacts and address grievances related to the land and resettlement process. The Project should also conduct rigorous monitoring and evaluation (as per the monitoring and evaluation plan and third-party evaluations outlined below) until it can be demonstrated that displacement impacts have been appropriately addressed and PAPs and PAHs have been provided with adequate opportunity to restore their quality of life to at least pre-Project levels.

Current mitigation measures are focused on the implementation of a variety of plans designed to mitigate and remediate impacts related to land acquisition and resettlement. These include:

- Land Acquisition and Resettlement Framework
- Stakeholder Engagement Plan for the land process
- Resettlement Action Plans (RAPs 1 to 5), including compensation program approved by the government and supplementary valuations for land as prices rose, as well as financial literacy training
- Transitional supports, including food rations
- Global Livelihood Restoration Plan, including plan for vulnerable people and households
- Monitoring and evaluation, including an ongoing monitoring and evaluation plan until Project has successfully restored livelihoods, and periodic third party evaluations by independent resettlement experts
- Grievance mechanism for resettlement process
- Cooperation with independent third parties to support the resolution of outstanding cases

The Project also aims to go beyond the threshold of direct livelihood restoration to pre-Project levels. In particular, the Project's GLRP targets benefit creation above the mitigation threshold through the improvement and diversification of livelihoods.

For ongoing HRDD, the following priorities have been identified:

- Continue to work with PAPs to ensure that land grievances are resolved fairly, including working with independent third parties to support the resolution of cases.
- Systematically apply process learnings from RAP1 for RAPs 2-5.
- Consider a program to encourage good practices with respect to use of compensation money and household engagement in livelihood restoration programmes.
- Continue to liaise and work with government to develop and implement a clear and written process that ensures protection of the rights of people who must be evicted in accordance with the compulsory acquisition process under Ugandan law.
- Following completion of the land acquisition process continue to monitor resettlement outcomes for PAPs and PAHs.

Project-induced in-migration (PIIM)

Influx or Project-induced in-migration (PIIM) is increasingly understood as a predictable phenomenon related to large-scale developments that include potential impacts on community members, notably in terms of human rights related to health and safety, as well as on a variety of other economic, social and cultural rights. The individuals who are seeking opportunities from the Project also may experience adverse impacts related to freedom of movement, the right to work and health, safety and security. Potential impacts on women and girls can have high severity, especially related to reproductive and sexual health, harassment or gender-based violence and human trafficking.

The highest risks related to PIIM are often related to the presence and behaviour of third parties who are seeking opportunities related to the Project—which can include speculators and criminal elements. Normally, companies are not linked to potential impacts of third parties with whom they do not have business relationships; however, the Project should exercise due diligence as proactively as possible in order to help communities and local governments avoid as many of the impacts as possible by reducing the incentives for PIIM and by contributing to community resilience, services and infrastructure to address impacts that do occur.

The Project has developed an Influx Management Strategy that cuts across a variety of other management plans and seeks to minimize the incentives for PIIM and to manage the residual impacts of PIIM that does occur. In particular, the Community Health, Sanitation and Safety Management Plan aims to address a number of the specific concerns noted by stakeholders and will focus attention on potential influx “hotspots” for proactive influx management. Furthermore, the Labour Management Plan prioritizes local hiring for non-skilled and semi-skilled jobs—which should minimize the opportunities and incentives for employment-seekers to migrate to the Project region if it is well-communicated—and includes other measures to reduce the risks of health risks for communities from workers.

For ongoing HRDD, the following priorities have been identified:

- Proactively monitor and validate PIIM hotspots originally identified in the Influx Management Strategy and prioritize implementation of the mitigation measures where influx is already occurring or is now predicted to occur.
- Appoint a coordinator for PIIM matters to oversee the implementation of the Influx Management Strategy (and related management plans) internally with contractors and other actors.
- Seek to use leverage with local government, community leaders and other actors to proactively build capacity and multi-stakeholder initiatives related to PIIM preparedness and management (e.g. related to community health, safety, gender, local content, agriculture.).
- Establish the monitoring framework for PIIM to allow the Project and other actors to respond to early indications of negative impacts caused by PIIM.
- Ensure that the monitoring framework for identifying PIIM hotspots includes proactive assessment of potential activities and impacts on women, and that organizations that support women are engaged in the multistakeholder planning and coordination activities for the implementation of the Influx Management Strategy.

Road Safety

Road safety has been prioritized as a high-risk activity because of the increase in road traffic that is related to the Project's direct activities, as well as those of contractors and suppliers, particularly during the construction phase. The increase in road traffic will create risks to drivers and community members, including children; and, road accidents can lead to serious injuries or even fatalities. Even with strong mitigation measures, the potential severity and likelihood of impacts merits ongoing due diligence.

The Project's relationship to the impacts related to road safety will depend on the facts of a given accident: it may cause impacts related to accidents involving its own employees; and, it may contribute or be linked to accidents involving contractors or suppliers or other third parties who are travelling to the Project for business reasons. To avoid contributing to human rights impacts, it will be important to avoid compromising on road safety requirements due to time pressures related to construction timelines.

Road safety is taken very seriously by TotalEnergies. For TEPU, the current mitigation measures related to road safety are focused on the Community Road Safety Management Plan and the Transport Management Plan. These management plans include a variety of measures related to road safety awareness in communities and schools, enforcement of speed limits, vehicle compliance inspections, driver management that includes assessment training and monitoring, road risk assessments and mitigation measures.

In addition to the technical aspects of road safety such as vehicle and road maintenance, the following mitigation measures should be prioritized from a human rights perspective:

- Collaborate with school officials, police and parents to implement the sensitization and mitigation measures related to the road safety of children, given their greater vulnerability to accidents.
- Raise awareness about the implementation of road safety measures and the channels for reporting complaints about unsafe driving behaviour.
- Monitor the driver wellness aspects of road safety, including fatigue management. Monitoring related to fatigue management can also provide information for other workers' rights issues such as hours of work and excessive overtime.
- Ensure that the Project and/or contractor's safety representatives participate in the investigation of any serious accidents involving injuries or fatalities to ensure that any adverse impacts are remediated and that there are appropriate learnings and corrective actions taken from each accident to avoid recurrence.

Road safety awareness campaigns for drivers, community members and children may have positive outcomes beyond the Project as they can encourage safer behaviour in relation to driving and road safety in general.

Cultural Rights

Cultural rights have been prioritized in order to bring a focus on the collective elements of cultural rights⁴ and to draw attention to the rights of the ethnic groups in the Project areas.

In the short-term, the potential adverse impacts on cultural rights are focused on the relocation of sacred sites during the land acquisition and resettlement process. Potential impacts will also continue throughout the construction phase. The cultural and spiritual dimension of potential impacts are complex to remediate as they require specific rituals. These impacts are caused directly by the Project and therefore it has a responsibility to prevent or remediate any such impacts. For the most part, it appears that communities accept that these impacts can be remediated through compensation and the performance of appropriate rituals. The Project acknowledges that it has had some impacts in its early grave relocations during RAP1, and has subsequently adjusted its procedures to respect the cultural practices of the communities. Furthermore, the RAP completion audits will review the implementation of grave and shrine relocations.

In the longer-term, other potential adverse impacts on cultural rights relate to the cattle culture of the Bugungu and the culture and language of the other ethnic groups in the Project area. These cultural aspects risk being eroded over time through in-migration and fragmentation of communal lands, and could ultimately be irreparable. This is a complex issue that is historical in nature and that involves many different factors; nonetheless, the Project will contribute to the potential impacts and therefore has a responsibility to work with a variety of other actors—including the representatives and cultural institutions of the affected ethnic minorities—to respect their rights and support the preservation of their culture and language over time.

The Project's current mitigation measures are included in the Cultural Heritage & Archaeological Management Framework, and includes the following:

- Preconstruction survey to inventory all archaeological and cultural heritage sites in the entire Project area.
- Cultural and Archaeological Heritage Training and Capacity Building Program for all relevant workers.
- Excavation, Relocation/Restoration and Monitoring of Graves, Sacred and other Sites of Importance Program/Procedure.
- Paleontological and Archaeological Protection, Management and Monitoring Procedure.
- Preservation of Cultural Heritage Program.
- Ecosystem Cultural Resources Monitoring Program.

For ongoing HRDD, the following priorities have been identified:

⁴ The right to participate in cultural life has both individual and collective elements, which may be exercised as an individual and within a community or group. The cultural rights of ethnic minorities are important to preserve their culture and support cultural and social development, including in connection to language and land and natural resources.

- Roll out the Cultural and Archaeological Heritage Training and Capacity Building Program and emphasize that there are potential human rights impact associated with it.
- In the implementation of the Cultural Heritage Program, continue to engage and consult with the cultural institutions and representatives of the ethnic groups in the area to develop long-term strategies for cultural and linguistic preservation. Consider opportunities to work with partners or provide trainings that support a rights-based approach to any initiatives or programmes.

Interactions with Government Security Forces

The Project's interaction with Government Security Forces was prioritized as a salient human rights issue during the scoping phase of the Assessment based on the inherent risk to people if and when Government Security Forces interact with community members, workers or other individuals. This is widely recognized as a key human rights risk for extractives and energy projects, and has been identified as one of the salient human rights issues globally for the TotalEnergies group.

To be assessed on a case-by-case basis, but the Project could be linked to adverse human rights impacts by Government Security Forces, including in cases of off-duty misconduct of personnel—which can include incidents of gender-based violence. The Project could be in a position of contribution through logistic support (vehicles, accommodation, communication systems); through actions that encourage intervention or inappropriate use of force; or failure to monitor and follow-up on incidents or abuses involving the Government Security Forces. On the other hand, strong implementation of the VPSHR should help demonstrate that the Project does not contribute to adverse human rights impacts by Government Security Forces.

The Project's approach for interaction with the Government Security Forces is through the continuous implementation of the Voluntary Principles on Security and Human Rights, (VPSHR) notably through the application and monitoring of the Memorandum of Understanding (MoU) between TEPU and the Government Security Forces;⁵ ongoing VPSHR and human rights training of Government Security Forces deployed in the Project area; and, ongoing efforts to ensure that the Project's grievance mechanisms for community members and workers are effective and able to receive complaints about the conduct of Government Security Forces without retaliation.

For ongoing HRDD, the following priorities have been identified:

- Ensure that the MoU with the Government Security Forces is signed as soon as possible in order to give the Project a clear framework for continuous engagement on the VPSHR.
- Update VPSHR risk assessment and review of mitigation measures for the Government Security Forces. As part of this update, clarify the role and mandate of different units of the Government Security Forces that will interact with the Project, including potential interactions with respect to the Ugandan Wildlife Authority's Rangers and Environmental Police Force.
- Continue to implement a VPSHR training program for all Government Security Forces that may interact with the Project and its stakeholders. As part of the ongoing VPSHR training program, strengthen the training materials and messaging

⁵ At the time of writing, the MoU is currently in final form and is ready to be signed subject to Government Approval.

about tackling gender-based violence, freedom of expression and the rights of Human Rights Defenders; and the importance of registering and responding to complaints.

- Through the MOU ensure that the Government commits not to deploy commanders of units who have in the past been responsible for human rights abuses.
- Ensure that there is a transfer procedure for material or financial resources provided to Government Security Forces under the MoU.
- Work with the Project's Social Affairs Department and Community Liaison Officers to ensure that information about the Project's security arrangements are shared with communities and workers, and that the Project's grievance mechanisms for community members and workers are effective and have the necessary safeguards to receive complaints about the conduct of Government Security Forces without retaliation.
- Consider how the Project can work with other organizations to seek to establish a national working group or structure for the VPSHR in Uganda.

Private Security Providers

There is a concern from a human rights perspective regarding the potential use of force in the interaction between Private Security Providers and workers or community members. As the Private Security Providers for the Project do not have lethal weapons and do not have a mandate to apprehend suspects, the human rights risks are significantly less severe than those for the Project's interaction with Government Security Forces.

From the stakeholder feedback received during the fieldwork, there are also concerns about the potential for interactions between off-duty private security guards and women and girls. This includes concerns about the potential for gender-based violence in the context of relationships between Private Security Providers and sex workers, as well as in terms of relationships between private security guards and women or girls in the local communities that can lead to unwanted pregnancies and a range of related adverse impacts.

Although it is not the focus of this assessment, it must be remembered that Private Security Providers also have a mandate to protect Project workers and contribute to their rights to a safe and healthy working environment. Furthermore, private security guards also have human rights, including in terms of their own health, safety and working conditions, and there are also indications that they are at risk of false accusations of harassment by members of the communities.

When it comes to on-the-job impacts of Private Security Providers, the Project is in a relationship of contribution or direct linkage; however, depending on the degree of operational control that the Project may have over its security contractors, it may be considered to cause the impacts.

The association of the Project with the off-duty conduct and impacts of contractors and sub-contractors will depend on the circumstances, but there were particular concerns about the risk of interactions between Private Security Providers with local women and girls. As discussed in the chapter on Women's Rights, Gender Equality and Gender Based Violence, the Project should proactively reinforce the safeguards and supports for local women and girls to use the Project's grievance mechanisms

without retaliation, and develop partnerships with NGOs to strengthen community awareness and support mechanisms related to harassment or GBV.

The Project's approach for human rights due diligence is through the continuous implementation of the VPSHR, notably through the inclusion of contractual provisions on the VPSHR in its contracts with Private Security Providers; screening for past human rights abuses by Private Security Providers; ongoing VPSHR and human rights training; constant dialogue with the Private Security Providers through regular meetings; appointment of TEPU supervisors in Kampala and onsite to oversee daily security activities and, ongoing efforts to ensure that the Project's grievance mechanisms for community members and workers are effective and able to receive complaints about the conduct of Private Security Providers without retaliation.

For ongoing HRDD, the following priorities have been identified:

- Update the VPSHR risk assessment and review mitigation measures with Private Security Providers, including in relation to any new Private Security Providers that will be hired by contractors and sub-contractors.
- Continue to implement a VPSHR training program for all Private Security Providers. As part of the ongoing VPSHR training program, strengthen the training materials and messaging about tackling gender-based violence, freedom of expression and the rights of Human Rights Defenders; and the importance of registering and responding to complaints.
- Continue to ensure that background checks are conducted on Private Security Providers hired by the Project. In particular, ensure that any new Private Security Providers that will be used by contractors and sub-contractors are appropriately vetted—both in terms of the companies being hired and the security guards being hired or deployed to the Project. Ensure that these vetting processes are properly documented.
- Work with the Private Security Providers to ensure that incidents or complaints that relate to potential human rights impacts are rapidly escalated to the Project and are included in and followed-up through the Project's incident management and reporting mechanism.
- Work with the Project's Social Affairs Department and Community Liaison Officers to ensure that information about the Project's security arrangements—including its Private Security Providers—are shared with communities and workers, and that the Project's grievance mechanisms for community members and workers are effective and able to receive complaints about the conduct of private security guards without retaliation.
- Consider whether the Project can enlist the support of the Private Security Providers with which it works to support the establishment of a national working group or structure for the VPSHR.

Women's Rights and Gender Equality

This section compiles a range of risks and impacts related to women's rights and gender equality that are relevant to the other salient issues identified in the assessment in terms of workers, communities and security forces. In terms of severity, the human rights risk and impacts are the highest in relation to Gender-Based Violence (GBV), which for the purpose of this report is defined to include Sexual Violence against Children (SVAC) and Intimate Partner Violence (IPV). The scale of potential impacts on physical and mental health are severe and very difficult to remediate—potentially

including the right to life in extreme cases of violence or through sexually transmitted diseases. The scope of potential impacts for GBV may be higher in the region than in other parts of the world. Indeed, the likelihood of impacts is high as cultural norms and practices are patriarchal and tolerant to GBV. The assessment teams received feedback and allegations about cases of GBV that have occurred in the Albertine area.

The Project's association with the impacts related to GBV will depend on the circumstances. The Project could be linked to these impacts through the off-duty behaviour of contractors and security forces that are associated with the Project. The Project could also be in a position of contribution to these impacts if they occur when contractors or security forces are on-duty and there is insufficient due diligence to implement policies related to harassment and violence in the workplace. While they are complex and sensitive situations, the Project should support programs that address Intimate Partner Violence (IPV) that can be triggered by Project activities (e.g. disputes over resettlement compensation). This is an area where international expectations and standards are rapidly evolving and there are heightened expectations on companies to have strong policies and robust mechanisms for handling complaints or incidents related to GBV.

Current mitigation measures are focused on a Gender Management Plan (GMP), including a plan for a capacity assessment of local communities and capacity building program to improve outcomes for women. A service provider currently in the process of being contracted to implement the GMP. Additional mitigation and protection measures are included in the following management plans:

- The RAPs contain measures for women displaced through the resettlement processes
- The Stakeholder Engagement Plan (SEP) contains measures to support the equitable participation of women in engagement processes.
- Contracts and workforce management plan, including the LMP and CSMCF contain measures for women in the workplace.

In addition to the effective implementation of the GMP and related management plans, the assessment recommends the following additional measures:

- Assess risks and impacts that are associated to the Project and/or PIIM, including: Intimate Partner Violence that could be triggered by Project activities; harassment or GBV in the workplace or community; increases in prostitution and trafficking; and increases in sexually transmitted diseases, substance abuse and other negative health outcomes. Develop a monitoring and evaluation framework for tracking the effectiveness of recommended measures over the longer term. Ensure that this assessment includes consideration of issues and impacts for LGBTQ+ persons.
- Appoint a gender focal point for the Project.
- Review the Project's and contractor grievance mechanisms to ensure that there are adequate safeguards for handling complaints or incidents related to GBV. Key safeguards include strong protections of confidentiality and guarantees of non-retaliation, as well as sensitivity and discretion in the investigation and resolution of such cases. At the same time, the grievance procedures should also ensure procedural fairness with respect to the alleged perpetrators while allegations or incidents are under investigation. Furthermore, the Project should consider working with civil society organizations as well as psycho-social, legal,

and health-care professionals to increase the range of options for victims of GBV to report or seek protection.⁶

- Identify opportunities to work in partnership with local authorities, security forces, health centers and relevant organizations (e.g. donors, civil society and NGOs) to strengthen positive gender relationships and create safe spaces for women within communities. Involve international and regional experts who can raise awareness of creative initiatives and best practices.

Raising awareness about women's rights and gender equality within the oil & gas industry provides an opportunity to demonstrate leadership and to contribute to improvements in the sector and society over time.

Grievance Mechanisms

The corporate responsibility to develop effective operational grievance mechanisms (and to enable access to remedy through other non-judicial or judicial mechanisms) are an important focus of the UNGPs and other international standards. Grievance mechanisms and access to remedy are a cross-cutting salient issue for the Project since all human rights require access to remedy in order to be meaningful.

Key feedback about improving the effectiveness of the Project's grievance mechanisms are currently focused on the community grievance mechanism, notably in terms of improving the speed of resolution of grievances; more consistent recording and documentation of grievances; providing more feedback and explanation before closing out grievances; strengthening the mechanisms for escalation of grievances; using third parties to support resolution and to strengthen trust in the mechanism; and, increased transparency and reporting on the implementation and effectiveness of the grievance mechanism.

The Project's responsibility to provide remedy depends on its role in relation to cause, contribution and linkage of the underlying impact or concern. The Government of Uganda and contractors and sub-contractors also have their own responsibilities to provide or facilitate access to remedy. In relation to contractor grievance mechanisms, it is particularly important that the Project ensures that appropriate measures are in place in line with the UNGPs effectiveness criteria.

In terms of due diligence, the Project has established multiple grievance mechanisms for community members; contractors, sub-contractors and suppliers; and its own direct workers. These include:

- A Community Grievance Procedure to receive and respond to community grievances.
- Requirements for contractors to establish grievance mechanisms for their workers are incorporated into contracts and are being implemented by the contractors who have been active during the pre-construction and current activities.
- Requirement for contractors to establish Community Grievance Procedures identical to the TEPU Community Grievance Procedure

⁶ In some instances, with the consent of the victim, the Project should report the incidents or allegations of GBV to the police. However, this must be done with care and sensitivity to not create unintended additional impacts. Working through third-party experts or organizations can reinforce the safeguards for victims in such circumstances.

- My Safety for All mechanism using mobile app technology has been implemented to allow workers and contractors to raise issues about safety performance.
- Tilenga Road Safety mechanism using mobile app technology is being piloted to allow workers and contractors to raise issues about road safety.
- TEPU Employee Grievance Procedure has been implemented for the TEPU's direct employees.
- TEPU Bullying and Harassment Policy has been implemented for the Project's direct workers, which also extends to visitors and contractors.

In addition to the Project's grievance mechanisms, the Project has been supportive of other organizations working on access to remedy issues in the area for instance through community legal clinics to mediate outstanding grievances related to the land and resettlement process.

The priority areas for ongoing HRDD about grievance mechanisms include:

- Develop an updated communications strategy to promote the Project's comprehensive approach to grievance management to all relevant stakeholders and involve contractors and other responsible parties in the communications efforts to promote their understanding and ownership.
- Emphasize the importance of grievance mechanisms in the early engagement with contractors and work with them to have harmonized tools and templates for tracking grievances.
- Review the community and workers' grievance mechanisms to ensure that there are appropriate safeguards against retaliation and for handling sensitive grievances including sexual harassment or Gender Based Violence and Human Rights Defenders issues.
- Reinforce work with independent third parties for assistance in resolving complex or sensitive grievances.
- Review the monitoring and evaluation framework to ensure that it is aligned with the UNGPs effectiveness criteria and, after an appropriate lapse of time, conduct a participatory review that focuses on engaging past users of the grievance mechanisms.

Working with contractors to implement and continuously improve their grievance procedures can have a lasting positive outcome for workers if they are implemented beyond the Project. Therefore, the Project should reinforce its messaging to contractors that effective grievance management has mutual benefits for workers and for companies, and that understanding and implementing good practices will help position them for further opportunities with international companies. Similarly, working with third parties (e.g. community legal clinics and other initiatives) can have a positive impact both in terms of strengthening awareness of human rights at the community level and in providing a model for alternative dispute resolution for company-community grievances.

Human Rights Defenders

The issue of Human Rights Defenders was prioritized during the Scoping Phase of the Assessment in recognition that this is an increasingly important issue globally and in Uganda, including in the context of business and human rights.

Human Rights Defenders are defined, in part, by what they do. The following text box provides an overview of the actions that Human Rights Defenders undertake to support the promotion and protection of human rights.

Actions of Human Rights Defenders⁷

- Promotion and protection of all human rights for all in every part of the world
- Collecting and disseminating information on violations
- Supporting victims of human rights violations
- Undertaking action to secure accountability and to end impunity
- Supporting better governance and government policy
- Contributing to the implementation of human rights law and policy
- Conducting human rights education and training

TEPU has stated publicly that it is committed to the importance of freedom of expression and recognizes the essential role that Human Rights Defenders play in upholding rights and ensuring constructive dialogue and an open civil space. TEPU also states that it does not tolerate or contribute to attacks, or physical or legal threats, against those who safely and lawfully exercise their human right to freedom of expression, peaceful protest or assembly, including where they are acting as Human Rights Defenders.

TEPU regularly takes opportunities to discuss and promote human rights issues during its dialogue with Government, petroleum authorities and private and public security forces. For instance, where TEPU is alerted of allegations that a Human Rights Defender carrying out work in relation to Project activities has been subject to threats or Human Rights breaches, TEPU has contacted the authorities in order to insist that the rights of such defenders are protected.

During the course of the assessment, a former UN Special Rapporteur on Human Rights Defenders undertook a field mission to Uganda and provided recommendations for TEPU. Both his report⁸ and TEPU's response and action plan⁹ have been published on the TotalEnergies' website that supports transparency about the EACOP and Tilenga Projects.

As a result of this concurrent process and public report, the assessment team has decided to defer to the expertise of the former UN Special Rapporteur on Human Rights Defenders (and dialogue with TEPU and a variety of stakeholders) and recommends that all of the key elements of the action plan on HRDs be incorporated into the Human Rights Action Plan that will be prepared in follow-up to the HRIA so

⁷ Summarized from the website of the UN Special Rapporteur on Human Rights Defenders: <https://www.ohchr.org/EN/Issues/SRHRDefenders/Pages/Defender.aspx>

⁸ Former UN Special Rapporteur on Human Rights Defenders' report: <https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2021-09/Human-Rights-Defenders-Report-2021.pdf>

⁹ TEPU response and action plan on HRDs: <https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2021-09/TEPU-Action-Plan-Human-Rights-Defenders-2021.pdf>

that they are implemented and followed up in a coherent and comprehensive manner. These recommendations include:

- Publish a Human Rights Policy, including a statement on Human Rights Defenders.
- Consider setting up a dedicated mechanism for Human Rights Defender complaints and alerts.
- Prepare guidance on follow-up of allegations of harassment or intimidation.
- Maintain good relations and regular contact with Government Security Forces.
- Provide training to local police on VPSHR, including requirement to register complaints.
- Provide training to Atacama and other contractors.
- Investigations of allegations of inappropriate behaviour by contractors.
- Meet with Human Rights Defenders, including potential meetings with the French Embassy, EU Delegation and other foreign companies.

Human Rights Action Plan Framework

The following table presents a Human Rights Action Plan framework that is organized around the UNGPs key requirements for Human Rights Due Diligence and are aligned with the Project’s salient issues as identified and prioritized in the Assessment.

In addition to helping organize and track the Project’s follow-up on the recommendations in the Assessment, the Human Rights Action Plan framework is intended to be used as a tool for ongoing dialogue and continuous improvement. Over time, the Human Rights Action Plan framework should incorporate new or emerging human rights issues, feedback from stakeholders, and learnings from different approaches and partnerships. Further details should also be integrated into the Human Rights Action Plan framework in terms of responsibilities, timelines and KPIs.

In the proposed Human Rights Action Plan framework, the next steps and recommendations are organized in terms of key components of HRDD according to the UNGPs, as well as into recommendations that should be prioritized in the shorter-term and those that require longer-term planning and partnerships. This prioritization also considers the Project’s transition to the construction phase and the need for shorter-term actions on a number of salient issues in order to have a proactive approach.

HRDD Action Plan Framework Categories	UNGP Categories
Foundations	<ul style="list-style-type: none"> ▪ Policy & Embedding ▪ Stakeholder Engagement ▪ Grievance Mechanisms
Assessment	<ul style="list-style-type: none"> ▪ Assessing Risks & Impacts ▪ Integrating & Acting
Monitoring	<ul style="list-style-type: none"> ▪ Tracking
Communicating	<ul style="list-style-type: none"> ▪ Communicating

In order to support a comprehensive approach to ongoing HRDD, the assessment team also recommends the following as foundational aspects of the Human Rights Action Plan framework:

- Develop a stand-alone TEPU Human Rights Policy.
- Appoint a cross-functional committee to support the implementation of the Human Rights Action Plan.
- Continuously seek further stakeholder engagement on salient issues identified in the Assessment and gather further information about actual impacts and stakeholder perceptions and priorities.
- Develop KPIs for tracking progress on the implementation and outcomes of the Human Rights Action Plan.
- Ensure periodic internal monitoring and reporting of the Human Rights Action Plan.
- Develop a communications plan for reporting and proactive information-sharing with affected stakeholders and other key stakeholders and that is aligned with good reporting practices in the UNGP Reporting Framework.
- Proactively disclose the HRIA Report and the Human Rights Action Plan in a manner that encourages ongoing dialogue about the Project's salient human rights issues with local and national stakeholders.
- Conduct periodic disclosure and consultation sessions about progress on the implementation of the Human Rights Action Plan.

While implementing, refining and consulting on the Human Rights Action Plan framework, the Project is strongly encouraged to think about leverage opportunities by working with the EACOP Project—particularly on systemic issues such as women's rights, gender equality and GBV; interactions with the security sector; contractors' workers' rights; and, trade union involvement in the oil & gas sector. Furthermore, the EACOP Project is often undertaking implementing similar mitigation measures and developing initiatives related to environmental, social and human rights risks and impacts. Coordination can enhance policy and operational coherence between these interrelated components of the wider project, and can foster more regional approaches through the involvement of stakeholders from government, companies, trade unions and civil society from Tanzania and Uganda.

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
Human Rights Policy and Action Plan	<ul style="list-style-type: none"> Develop a stand-alone TEPU Human Rights Policy. Appoint a cross-functional committee to support the implementation of the Human Rights Action Plan. Proactively disclose the HRIA Report and the Human Rights Action Plan in a manner that encourages ongoing dialogue about the Project's salient human rights issues with local and national stakeholders. 	<ul style="list-style-type: none"> Continuously seek further stakeholder engagement on salient issues identified in the Assessment and gather further information about actual impacts and stakeholder perceptions and priorities. 	<ul style="list-style-type: none"> Develop KPIs for tracking progress on the implementation and outcomes of the Human Rights Action Plan. Ensure periodic internal monitoring and reporting of the Human Rights Action Plan. 	<ul style="list-style-type: none"> Develop a communications plan for reporting and proactive information-sharing with affected stakeholders and other key stakeholders and that is aligned with good reporting practices in the UNGP Reporting Framework. Conduct periodic disclosure and consultation sessions about progress on the implementation of the Human Rights Action Plan. 	
Workers					
Contractor and Suppliers' Workers Rights	<ul style="list-style-type: none"> Ensure that the pre-selection engagement, onboarding and induction training process for contractors duly emphasizes the Project's commitments to respect workers' rights. Develop procedures to verify key contractors' human resources, 	<ul style="list-style-type: none"> Engage proactively with contractors about workers' rights and how these will be implemented and tracked. As part of hiring procedures, ensure that contractors proactively communicate that women are eligible for 	<ul style="list-style-type: none"> Proactively conduct inspections of the working conditions of contractors', sub-contractors' and suppliers' workers to identify and remediate potential issues before they escalate to infringements on workers' rights. These processes should be conducted 		<ul style="list-style-type: none"> Engage proactively with the ILO and the National Organization of Trade Unions (NOTU) to see how the Project can support dialogue and action related to freedom of association for the Project's workforce and the oil & gas industry more generally.

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
	<p>recruitment, procurement and sub-contracting policies and procedures align with the Project's commitments to respect workers' rights.</p> <ul style="list-style-type: none"> Require contractors to put in place effective grievance mechanisms for workers, including raising awareness about safeguards against retaliation and for handling sensitive grievances related to discrimination, harassment and Gender Based Violence. 	<p>and encouraged to apply for jobs and encourage contractors to provide targeted training for women and organise work so that women work with other women to increase their personal safety and comfort.</p>	<p>collaboratively with the contractors to build their awareness and capacity to inspect and monitor their sub-contractors.</p>		<ul style="list-style-type: none"> Given the evolving global expectations about responsible supply chains, the Project can seek to build the capacity of Ugandan contractors, sub-contractors and suppliers about respecting workers' rights standards and good practices. This could eventually be extended to the oil & gas industry more generally through multi-stakeholder initiatives such as collaboration with universities and participating in supplier forums. While the Project's monitoring of workers' rights is designed to be done directly by TEPU in collaboration with contractors and sub-contractors, opportunities to work with the district Labour Officers should also be considered as a longer-term goal to contribute to

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
					government's capacity to protect workers' rights.
Community Members					
Information and Consultation	<ul style="list-style-type: none"> Strengthen the teams based in TEPU's head office and in the communities who have roles and responsibilities for stakeholder engagement, notably by filling any vacancies and providing workshops on rights-based approaches and best practices for stakeholder engagement. Include a session on good practices in engaging with women and other vulnerable groups, including about creating safe spaces for voicing opinions and concerns. 	<ul style="list-style-type: none"> Continue to ensure that the number of CLOs is adequate and provide adequate resources and logistical support in order for them to have regular and visible presence in the local communities. Reinforce efforts to ensure that all members of the community are systematically engaged in information and consultation activities at times and places that are convenient and appropriate for them. Continue to adapt stakeholder engagement activities to accommodate the needs and feedback from women and other vulnerable groups. 	<ul style="list-style-type: none"> Conduct periodic evaluations of the Project's stakeholder engagement using a participatory methodology. 	<ul style="list-style-type: none"> Continue to develop and produce additional information, communications and educational materials in local languages about key environmental, social and human rights issues of recurring concern or interest to local stakeholders. Proactively disclose the HRIA Report and the Human Rights Action Plan in a manner that encourages ongoing dialogue about the Project's salient human rights issues with local and national stakeholders, and then conduct periodic disclosure and consultation sessions about progress on the implementation of the Human Rights Action Plan. 	<ul style="list-style-type: none"> Develop an agreed framework or protocol with key civil society organizations to reinforce a structured and constructive ongoing dialogue on issues of mutual interest, including human rights. Within the framework of the Project's regular stakeholder engagement meetings, consider opportunities for developing a capacity-building program on business and human rights to create the conditions for more constructive dialogue between different stakeholders.

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
Land and Resettlement	<ul style="list-style-type: none"> ▪ Continue to work with PAPs to ensure that land grievances are resolved fairly, including working with independent third parties to support the resolution of cases ▪ Systematically apply process learnings from RAP1 for RAPs 2-5 ▪ Continue to liaise and work with government to develop and implement a clear and written process that ensures protection of the rights of people who must be evicted in accordance with the compulsory acquisition process under Ugandan law. 	<ul style="list-style-type: none"> ▪ Consider developing a program where people who have successfully restored their livelihoods and quality of life engage with other displaced households to help them do the same and to encourage good practices with respect to use of compensation money and household engagement in livelihood restoration programmes. ▪ Following completion of the land acquisition process continue to monitor affected families for instance to identify whether there are cases where women or orphaned children have been dispossessed of their resettlement entitlements by other family members and if there have been cases of IPV that have been triggered by household 	<ul style="list-style-type: none"> ▪ Following completion of the land acquisition process continue to monitor affected families. ▪ The livelihood monitoring and evaluation officers who will support the ongoing engagement with PAPs and PAHs, should be trained and mandated to identify red flags for IPV. The households that are identified as being at risk should be regularly monitored and provided with the appropriate support. 		<ul style="list-style-type: none"> ▪ Aim to go beyond the threshold of direct livelihood restoration to pre-Project levels through the improvement and diversification of livelihoods. ▪ Consider opportunities for community programmes designed to reduce the prevalence of GBV (including IPV).

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
		disputes about compensation.			
Project-Induced In-Migration (PIIM)	<ul style="list-style-type: none"> Appoint a coordinator for PIIM matters to oversee the implementation of the Influx Management Strategy (and related management plans) internally with contractors and other actors. 	<ul style="list-style-type: none"> Proactively monitor and validate PIIM hotspots originally identified in the Influx Management Strategy and prioritize implementation of the mitigation measures where influx is already occurring or is now predicted to occur. Seek to use leverage with local government, community leaders and other actors to proactively build capacity and multi-stakeholder initiatives related to PIIM preparedness and management (e.g. related to community health, safety, gender, local content, agriculture.). 	<ul style="list-style-type: none"> Establish the monitoring framework for PIIM to allow the Project and other actors to respond to early indications of negative impacts caused by PIIM. Ensure that the monitoring framework for identifying PIIM hotspots includes proactive assessment of potential activities and impacts on women, and that organizations that support women are engaged in the multistakeholder planning and coordination activities for the implementation of the Influx Management Strategy. 		
Cultural Heritage	<ul style="list-style-type: none"> Roll out a Cultural and Archaeological Heritage Training and Capacity Building Program and emphasize that there are potential human 	<ul style="list-style-type: none"> In the implementation of the Cultural Heritage Program, continue to engage and consult with the cultural institutions and representatives of the 			

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
	rights impact associated with it.	<p>ethnic groups in the area to develop long-term strategies for cultural and linguistic preservation.</p> <ul style="list-style-type: none"> Consider opportunities to work with partners or provide trainings that support a rights-based approach to any initiatives or programmes. 			
Road Safety	<ul style="list-style-type: none"> Raise awareness about the implementation of road safety measures and the channels for reporting complaints about unsafe driving behaviour. 	<ul style="list-style-type: none"> Collaborate with school officials, police and parents to implement the sensitization and mitigation measures related to the road safety of children, given their greater vulnerability to accidents. Ensure that the Project and/or contractor's safety representatives participate in the investigation of any serious accidents involving injuries or fatalities to ensure that any adverse impacts are remediated and 	<ul style="list-style-type: none"> Monitor the driver wellness aspects of road safety, including fatigue management. Monitoring related to fatigue management can also provide information for other workers' rights issues such as hours of work and excessive overtime. 		<ul style="list-style-type: none"> Implementation of road safety awareness campaigns for drivers, community members and children may have positive outcomes beyond the Project as they can encourage safer behaviour in relation to driving and road safety in general.

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
		that there are appropriate learnings and corrective actions taken from each accident to avoid recurrence.			
Security					
Government Security Forces	<ul style="list-style-type: none"> ▪ Promote the signature of the MOU with the Government Security Forces as soon as possible in order to give the Project a clear framework for continuous engagement on the VPSHR. ▪ Continue to implement a VPSHR training program for all Government Security Forces that may interact with the Project and its stakeholders. ▪ As part of the ongoing VPSHR training program, strengthen the materials about the Project's commitments to take action against gender-based violence; to freedom of expression and the 	<ul style="list-style-type: none"> ▪ Update the VPSHR risk assessment and review the mitigation measures for the Government Security Forces. As part of this update, clarify the role and mandate of the Government Security Forces that will interact with the Project, including potential interactions with respect to the Ugandan Wildlife Authority's Rangers and Environmental Police Force. 	<ul style="list-style-type: none"> ▪ Ensure that the Project follows up with the Government if there is evidence that commanders of units in the Project region have in the past been responsible for human rights abuses. ▪ Ensure that there is an equipment transfer procedure for material or financial resources provided to Government Security Forces under the MoU. 	<ul style="list-style-type: none"> ▪ Work with the Project's Social Affairs Department and Community Liaison Officers to ensure that information about the Project's security arrangements are shared with communities and workers, and that the Project's grievance mechanisms for community members and workers are effective and have the necessary safeguards to receive complaints about the conduct of Government Security Forces without retaliation. 	<ul style="list-style-type: none"> ▪ Consider how the Project can work with other organizations to seek to establish a national working group or structure for the VPSHR in Uganda.

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
	rights of Human Rights Defenders; and the importance of registering and responding to complaints.				
Private Security Providers	<ul style="list-style-type: none"> Continue to implement a VPSHR training program for all Private Security Providers. As part of the ongoing VPSHR training program, strengthen the materials about the Project's commitments to take action against gender-based violence, as well as the responsibility of Private Security Providers to report and respond to incidents and complaints. 	<ul style="list-style-type: none"> Update the VPSHR risk assessment and review the mitigation measures with Private Security Providers, including in relation to any new Private Security Providers that will be hired by contractors and sub-contractors. 	<ul style="list-style-type: none"> Continue to ensure that background checks are conducted on Private Security Providers and require that this process be documented. Ensure that any new Private Security Providers that will be used by contractors and sub-contractors are appropriately vetted—both in terms of the companies being hired and the security guards being hired or deployed to the Project. Ensure that these vetting processes are properly documented. Work with the Private Security Providers to ensure that incidents or complaints that relate to potential human rights impacts are 	<ul style="list-style-type: none"> Work with the Project's Social Affairs Department and Community Liaison Officers to ensure that information about the Project's security arrangements—including its Private Security Providers—are shared with communities and workers, and that the Project's grievance mechanisms for community members and workers are effective and able to receive complaints about the conduct of private security guards without retaliation. 	<ul style="list-style-type: none"> Consider whether the Project can enlist the support of the Private Security Providers with which it works to support the establishment of a national working group or structure for the VPSHR.

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
			rapidly escalated to the Project and are included in and followed-up through the Project's incident management and reporting mechanism.		
Cross-Cutting Issues					
Women's Rights and Gender Equality	<ul style="list-style-type: none"> Appoint a gender focal point for the Project Review the Project's and contractor grievance mechanisms to ensure that there are adequate safeguards for handling complaints or incidents related to GBV. Key safeguards include strong protections of confidentiality and guarantees of non-retaliation, as well as sensitivity and discretion in the investigation and resolution of such cases. At the same time, the grievance procedures should also ensure procedural fairness with respect to 	<ul style="list-style-type: none"> Assess risks and impacts that are associated to the Project and/or PIIM, including: Intimate Partner Violence that could be triggered by Project activities; harassment or GBV in the workplace or community; increases in prostitution and trafficking; and increases in sexually transmitted diseases, substance abuse and other negative health outcomes. Ensure that this assessment includes consideration of issues and impacts for LGBTQ+ persons. 	<ul style="list-style-type: none"> Develop a monitoring and evaluation framework for tracking the effectiveness of recommended measures. 		<ul style="list-style-type: none"> Identify opportunities to work in partnership with local authorities, security forces, health centers and relevant organizations (e.g. donors, civil society and NGOs) to strengthen positive gender relationships and create safe spaces for women within communities. Involve international and regional experts who can raise awareness of creative initiatives and best practices Raise awareness about women's rights and gender equality within the oil & gas industry, which provides an opportunity to demonstrate

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
	<p>the alleged perpetrators while allegations or incidents are under investigation.</p> <ul style="list-style-type: none"> Consider working with civil society organizations as well as psycho-social, legal, and health-care professionals to increase the range of options for survivors of GBV to report or seek protection. 				<p>leadership and contribute to improvements in the sector and society over time.</p>
Grievance Mechanism and Access to Remedy	<ul style="list-style-type: none"> Emphasize the importance of grievance mechanisms in the early engagement with contractors and work with them to have harmonized tools and templates for tracking grievances. Reinforce work with independent third parties for assistance in resolving complex or sensitive grievances. 	<ul style="list-style-type: none"> Review the community and workers' grievance mechanisms to ensure that there are appropriate safeguards against retaliation and for handling sensitive grievances including sexual harassment or Gender Based Violence and Human Rights Defenders issues. 	<ul style="list-style-type: none"> Review the monitoring and evaluation framework to ensure that it is aligned with the UNGPs effectiveness criteria and, after an appropriate lapse of time, conduct a participatory review that focuses on engaging past users of the grievance mechanisms. 	<ul style="list-style-type: none"> Develop an updated communications strategy to promote the Project's comprehensive approach to grievance management to all relevant stakeholders and involve contractors and other responsible parties in the communications efforts to promote their understanding and ownership. 	<ul style="list-style-type: none"> The Project should reinforce its messaging to contractors that effective grievance management has mutual benefits for workers and for companies, and that understanding and implementing good practices will help position them for further opportunities with international companies. Similarly, working with third parties (e.g. community legal clinics and other initiatives) can have a positive

Human Rights Action Plan Framework

Salient Issues	Foundations	Assessment & Action	Monitoring	Communication	Partnerships and Positive Contributions
	Shorter-term	Longer-term			
					impact both in terms of strengthening awareness of human rights at the community level and in providing a model for alternative dispute resolution for company-community grievances.
Human Rights Defenders	<ul style="list-style-type: none"> ▪ Publish a Human Rights Policy, including a statement on Human Rights Defenders. ▪ Consider setting up a dedicated mechanism for Human Rights Defender complaints and alerts ▪ Prepare Guidance on follow-up of allegations of harassment or intimidation 	<ul style="list-style-type: none"> ▪ Maintain good relations and regular contact with Government Security Forces ▪ Provide training to local police on VPSHR, including requirement to register complaints ▪ Provide training to Atacama and other contractors 	<ul style="list-style-type: none"> ▪ Investigations of allegations of inappropriate behaviour by contractors 	<ul style="list-style-type: none"> ▪ Meet with Human Rights Defenders, including potential meetings with the French Embassy, EU Delegation and other foreign companies 	