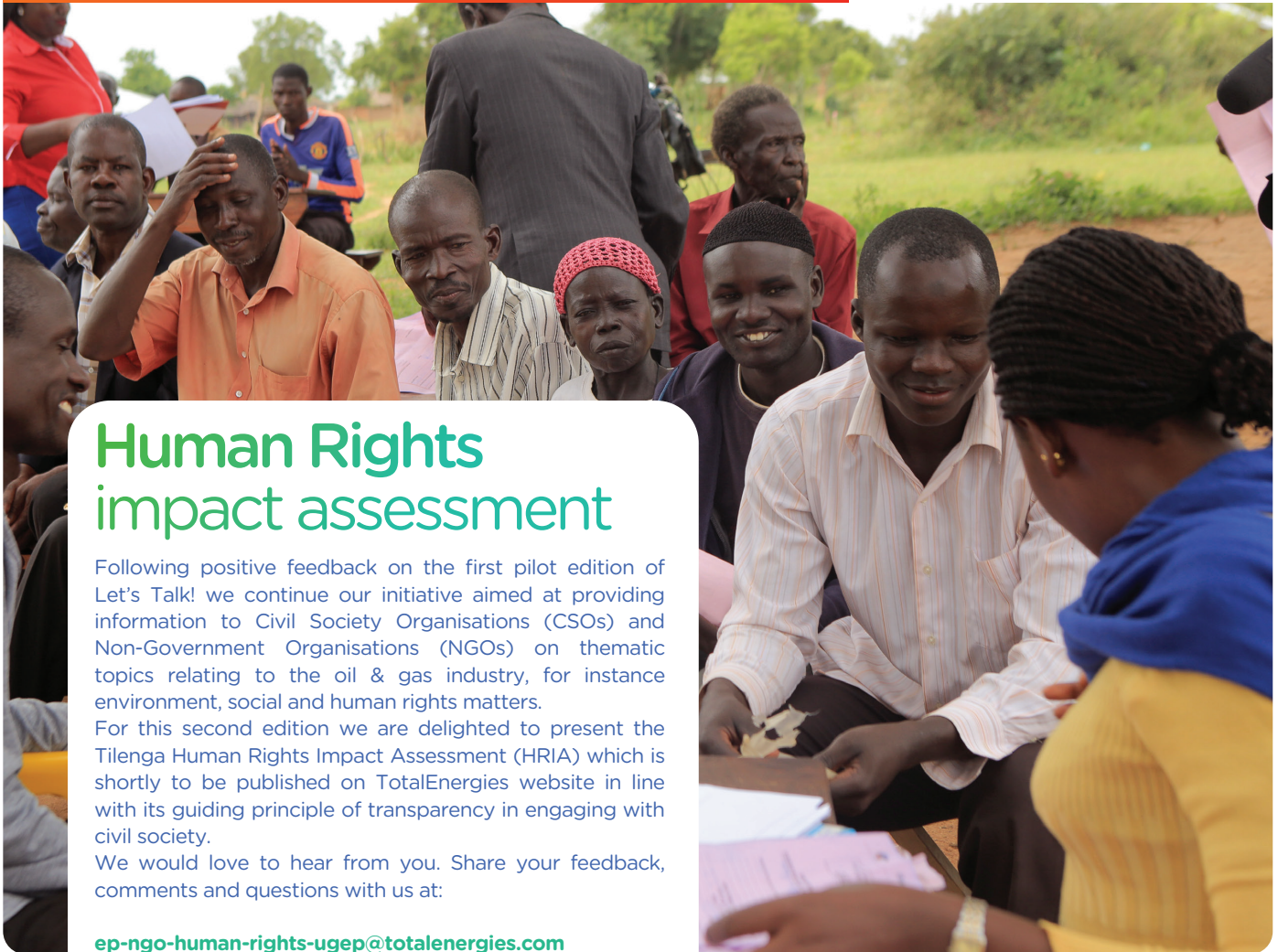
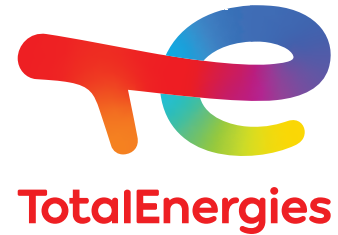


Let's Talk!

ISSUE 02 | FEBRUARY 2022



Human Rights impact assessment

Following positive feedback on the first pilot edition of Let's Talk! we continue our initiative aimed at providing information to Civil Society Organisations (CSOs) and Non-Government Organisations (NGOs) on thematic topics relating to the oil & gas industry, for instance environment, social and human rights matters.

For this second edition we are delighted to present the Tilenga Human Rights Impact Assessment (HRIA) which is shortly to be published on TotalEnergies website in line with its guiding principle of transparency in engaging with civil society.

We would love to hear from you. Share your feedback, comments and questions with us at:

ep-ngo-human-rights-ug@totalenergies.com

TotalEnergies and Transparency

Following a decision by the Board of Directors of TotalEnergies in March 2021, it was decided that the studies, independent third-party reviews and social and environmental action plans related to the Tilenga project in Uganda and the EACOP (East African Crude Oil Pipeline) project in Uganda and Tanzania would be made available online. This includes Environmental and social impact assessment (ESIA) studies and independent reviews conducted by third-party

organizations to ensure that the projects are implemented in compliance with social and environmental best practices. Links to the March 2021 Press Release and published documents can be found here:

<https://corporate.totalenergies.ug/news/tilenga-and-eacop-total-acts-transparency-social-and-environmental-stakes-lake-albert-resources>

Tilenga Project Human Rights

In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out Human Rights Due Diligence” (UN Guiding Principles on Business and Human Rights 2011)



TotalEnergies has a longstanding commitment to respect Human Rights in all of its projects and activities.



The purpose of Human Rights Due Diligence is to identify and address potential and actual adverse impacts with which a company is involved directly or through its business relationships. Conducting Human Rights Due Diligence focuses a company’s attention on its responsibility to respect Human Rights and ensures that a company manages risk to people, and not just risk to business.

Practical examples due diligence process



Tilenga Human Rights Impact Assessment - Some Questions & Answers

Who carried out the Tilenga HRIA?

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

What is the purpose of the Tilenga HRIA?

The purpose of this stand-alone Tilenga HRIA is to understand the risks and impacts of the Tilenga Project on Human Rights and to develop a proactive and comprehensive action plan for ongoing Human Rights Due Diligence. This HRIA builds upon prior Human Rights assessments that the Project has undertaken, notably through the Environmental and Social Impact Assessment (ESIA) and other related studies.

A Tilenga Human Rights Action Plan Framework aligned with the Project's salient issues has been developed for implementation. This Human Rights Action Plan Framework is also intended to be used as a tool for ongoing dialogue and continuous improvement.

What methodology was used?

The HRIA uses recognized methodology notably based on the UN Guiding Principles and the Danish Institute on Human Rights. Following in-depth desktop research which included review of published third party reports about the project, scoping and prioritisation of salient Human Rights was carried out. Extensive fieldwork including with key national and local stakeholders and in the communities around the Project was then conducted. Current mitigation measures were assessed and additional actions to strengthen and prioritise existing Human Rights Due Diligence measures were considered. A Human Rights Action Plan Framework was then prepared.



Overview of Tilenga HRIA Process

Scoping and Initial Prioritisation of Salient Human Rights Issues for HRIA Framework

Field mission to the Project Area and stakeholder engagement

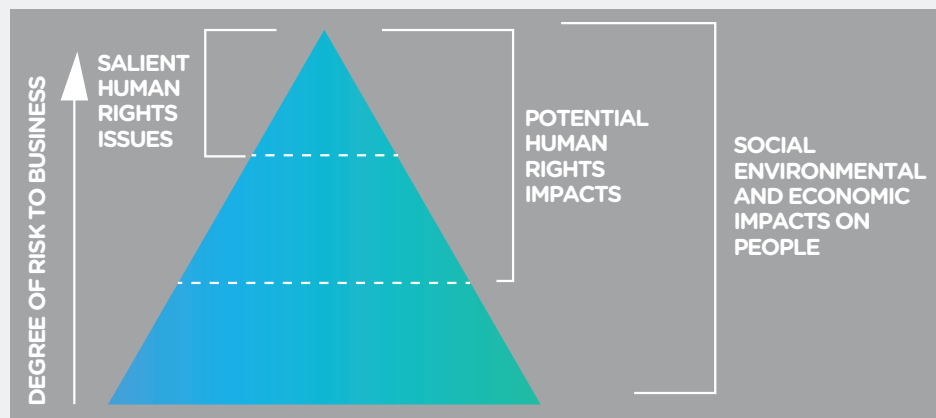
Analysis of existing mitigation measures

Heat mapping and Prioritization of Risks for ongoing Human Rights Due Diligence

Finalisation of Assessment Report and Action Plan Framework

Definition of Salience:

Salient issues as defined in the UN Guiding Principles Reporting Framework are those Human Rights that stand out because they are at risk of the most severe negative impact through a company's activities or business relationships.



What are the Salient Issues identified in the Tilenga HRIA?

Workers' Rights	Communities' Human Rights	Security & Human Rights
<ul style="list-style-type: none"> Contractor and suppliers' workers' rights 	<ul style="list-style-type: none"> Right to information 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.
<h3>Cross-cutting Human Rights</h3> <ul style="list-style-type: none"> Women's rights, gender equality and vulnerable groups Grievance mechanisms and access to remedy Human Rights Defenders 		

Focus on three issues identified in the Tilenga HRIA

While it is not possible in this short bulletin to capture all of the issues identified in the Tilenga HRIA it is worth looking at three representative issues.



1 Workers' Rights of Contractors and Suppliers

This issue was 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.

The Project already has many mitigation measures in place to ensure the respect of Workers Rights. As an example all contractors are required to adhere to TotalEnergies' Fundamental Principles of Purchasing which notably set out minimum standards in relation to 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. Contractors' Human Rights records are considered as part of the pre-selection check at the tendering stage and contracts include provisions to ensure that Human Rights requirements are also incorporated in sub-contracts. Onboarding and induction training, monitoring and auditing procedures all emphasize the need for Contractors to embody the principle of Respect for Others.

Additional actions as a result of the HRIA include:

- Commitment to develop action plans to support contractors in complying with the workers' rights provisions.
- Develop procedures to verify key contractors' human resources, recruitment, procurement and sub-contracting policies and procedures on workers' rights.
- Proactively conducting inspections of the working conditions of selected high-risk contractors.

2 Road Safety

Road safety was prioritized as a high-risk activity because of the increase in road traffic during the construction phase. The Project's may cause impacts related to accidents involving its own employees; and, it may contribute or be directly linked to accidents involving contractors or suppliers or other third parties. To avoid contributing to Human Rights impacts, it will be essential to avoid compromising on road safety requirements due to time pressures related to construction.

Road safety is taken very seriously by TotalEnergies and current Project mitigation measures are set out in a Community Road Safety Management Plan and Transport Management Plan which include a variety of measures related to road safety awareness in communities and schools, enforcement of speed limits, vehicle compliance inspections, driver management including assessment training and monitoring.

Additional actions highlighted in HRIA include:

- Collaboration is planned with school officials, police and parents.
- Raising awareness about implementation of road safety measures and reporting channels for complaints about unsafe driving behaviour.
- Monitoring of driver wellness including fatigue.
- Through investigation of serious road accidents involving injuries or fatalities to ensure that adverse impacts are remediated and appropriate learnings and corrective actions taken.





3 Cultural Rights

Cultural rights have been prioritized in order to bring a focus on the collective elements of culture and to draw attention to the rights of the ethnic groups. In the short-term, the potential adverse impacts on cultural rights are focused on the relocation of sacred sites. In the longer-term, potential adverse impacts relate for example to local cattle culture and the language of ethnic groups in the Project area.

Existing Mitigation Measures are notably set out in the Cultural Heritage & Archaeological Management Framework which includes the need to carry out a preconstruction survey to inventory all archaeological and cultural heritage sites in the Project area, cultural and archaeological heritage training and a capacity building program for relevant workers.

Additional actions highlighted in HRIA include:

- Continuing to engage and consult with the cultural institutions and representatives of the ethnic groups in the area.
- Considering opportunities to work with partners or provide trainings that support a rights-based approach.

Click on the links
below to find out more



TotalEnergies Code of Conduct:

https://corporate.totalenergies.de/de/system/files/atoms/files/total_code_of_conduct.pdf

TotalEnergies Human Rights Guide:

https://totalenergies.com/sites/g/files/nytnzq121/files/atoms/files/human_rights_internal_guide_va.pdf

TotalEnergies Human Rights Briefing Paper:

https://totalenergies.com/sites/g/files/nytnzq121/files/atoms/files/human_rights_-_briefing_paper_update.pdf

TotalEnergies Sustainable Performance Wepages:

<https://sustainable-performance.totalenergies.com/en/our-challenges/ethics/human-rights>

TotalEnergies Fundamental Principles of Purchasing:

https://sustainable-performance.totalenergies.com/en/system/files/atoms/files/totalenergies_pfa-2021_en_0.pdf

EACOP Provisional Human Rights Impact Assessment Report:

<https://eacop.com/publication/view/eacop-human-rights-impact-assessment-report/>

Ugandan National Action Plan on Business and Human Rights:

https://ohchr.org/Documents/Issues/Business/NationalPlans/uganda_approved-national-action-plan-on-business-and-human-rights_august-2021.pdf

IPIECA Human Right Due Diligence Guidance: a practical guidance for the oil and gas, and alternative energy industry, Second edition, 2021

<https://www.iecea.org/resources/good-practice/human-rights-due-diligence-guidance/>

United Nations Guiding Principles on Business and Human Rights:

https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

OECD Guidelines for Multinational Enterprises, 2011: <https://www.oecd.org/daf/inv/mne/48004323.pdf>

Universal Declaration of Human Rights: <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

United Nations Global Compact: [Homepage](#) | [UN Global Compact](#)

Voluntary Principles of Security and Human Rights: <https://www.voluntaryprinciples.org/>

ILO Declaration on Fundamental Principles and Rights at Work:

<https://www.ilo.org/declaration/lang--en/index.htm>

UNGP - Corporate Responsibility to Protect Human Rights - Interpretative Guide:

<https://www.ohchr.org/Documents/Issues/Business/RtRInterpretativeGuide.pdf>



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