



TILENGA HUMAN RIGHTS ANNUAL REPORT 2022



TotalEnergies

Tilenga Human Rights Annual Report 2022

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Glossary

Company	TotalEnergies
CNOOC	Chinese National Offshore Oil Corporation
CODIR	TEPU Directors Committee
CSCO	Civil Society Coalition on Oil & Gas
ESIA	Environmental and Social Impact Assessment
GBV	Gender-Based Violence
HRIA	Human Rights Impact Assessment
HRDs	Human Rights Defenders
HRDD	Human Rights Due Diligence
HSE	Health, Safety and Environment
IMRA	In-Migration Risk Assessment
IVMS	In-Vehicle Monitoring System
MGLSD	Ministry of Gender, Labour and Social Development
MoU	Memorandum of Understanding
NAPBHR	Uganda's National Action Plan on Business and Human Rights
NGOs	Non-Governmental Organizations
OHCHR	UN Office of the High Commissioner for Human Rights
PAPs	Project Affected Persons
PAU	Petroleum Authority of Uganda
PIIM	Project-Induced In-Migration
Project	The Tilenga Project
TEPU	TotalEnergies EP Uganda
TISP	TotalEnergies Iconic Species Programme
UNOC	Uganda National Oil Company
UNRA	Uganda National Roads Authority
UWA	Uganda Wildlife Authority
VPSHR	Voluntary Principles on Security and Human Rights

Textbox A: Tilenga's Human Rights Highlights in 2022

Tilenga's Human Rights Highlights in 2022

- Publication of Tilenga Human Rights Impact Assessment July 2022
- Publication of First Tilenga Human Rights Policy October 2022
- Setting up of Tilenga Human Rights Steering Committee in October 2022
- General Manager of TEPU made a Statement on Human Rights Defenders in November 2022
- TEPU's Directors Committee (CODIR) received a presentation from the United Nations Office of the High Commission of Human Rights on Uganda's National Action Plan on Business and Human Rights (NAPBHR) in April 2022
- Sensitisation of Contractor CEOs and HSE Managers on Human Rights in the Workplace February 2022
- Anti-harassment and Discrimination training in July 2022
- Assessment to verify that key commitments on Human Rights in the Supply Chain completed December 2022
- Bilateral meetings throughout year with 37 NGOs
- NGO Visit to Tilenga site in October 2022
- 5 Let's Talk Webinars with accompanying bulletins for NGOs throughout year
- Partnership Agreements with NGOs for Human Rights and Biodiversity work programmes
- International media visits to Tilenga site with discussion on Human Rights issues with PAPs and NGOs
- Roll out of RAP 2-5 land acquisition processes and livelihood restoration activities
- Commencement of situational analysis update on Project Induced In-Migration
- Extensive community and schools road safety sensitisation programme in April 2022
- Signature of MOU with Cross Cultural Foundation of Uganda for "Culture for Livelihood" in July 2022
- Training of government and private security personnel in VPHSR throughout the year
- Launch of implementation of Gender Management Plan
- Campaign to increase awareness of Grievance Mechanisms throughout year

1. Introduction

The Tilenga Human Rights Impact Assessment (HRIA) was published in July 2022 by TotalEnergies EP Uganda (TEPU) along with a Human Rights Action Plan Framework for ongoing Human Rights Due Diligence (HRDD).¹ The HRIA built upon prior human rights studies and the Environmental and Social Impact Assessment (ESIA) conducted for the Tilenga Project.² The purpose of this report is to set out some of the key developments and actions taken related to Human Rights by the Tilenga Project in 2022.



Whilst good progress has been made on all aspects of implementation of the HRIA the Project has faced some difficulties and criticism. Allegations of threats and intimidation particularly of Human Rights Defenders have been heard. It can be difficult for TEPU to investigate such allegations because they tend to be general in nature with little detail on persons involved, dates, places etc. TEPU continues to encourage persons with knowledge of such events to contact us directly with details so that a thorough investigation can be made and corrective measures taken, including sanction if necessary. Through dialogue with the relevant actors and taking a transparent approach TEPU as operator of the Tilenga project strives towards continuous improvement.

¹HRIA Full Report: [https://corporate.totalenergies.ug/system/files/atoms/files/tilenga_hria - full report 0.pdf](https://corporate.totalenergies.ug/system/files/atoms/files/tilenga_hria_-_full_report_0.pdf); HRIA Summary Report: https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-07/HRIA_Summary_Report.pdf

² ESIA: <https://corporate.totalenergies.ug/tilenga-project-environmental-and-social-impact-assessment-report>

This report commences with a description of the governance measures established for Human Rights within the Tilenga Project (section 1.1); the human rights training and sensitization that has been carried out (section 1.2); and the process for disclosure of the HRIA (section 1.3). Section 2 of this report sets out the steps taken to implement the recommendations made in relation to the following salient human rights issues identified in the Tilenga HRIA:

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 		

1.1. Human Rights Governance

In October 2022, TEPU as the operator of the Tilenga Project published its first **Human Rights Policy**³ which defines TEPU's Human Rights commitments or principles of actions for the benefit of both internal and external stakeholders. Through this Human Rights Policy, TEPU commits to respect human rights and applicable laws in all its activities and to implement the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Principles, the Organisation of Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, the fundamental conventions of the International Labour Organization and the Voluntary Principles on Security and Human Rights.

³ Human Rights Policy https://corporate.totalenergies.ug/system/files/atoms/files/human_rights_policy.pdf

Human Rights Policy

TotalEnergies EP Uganda commits to respect Human Rights and applicable laws in all of our activities and to implement the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Principles, the OECD Guidelines for Multinational Enterprises, the fundamental conventions of the International Labour Organization and the Voluntary Principles on Security and Human Rights.

This Human Rights policy defines TotalEnergies EP Uganda's Human Rights commitments for the benefit of both internal and external stakeholders.

IT COMMITS IN ALL OF OUR ACTIVITIES TO:

- Respect Human Rights in carrying out our business activities.
- Conduct ongoing Human Rights due diligence using a risk-based approach by identifying, assessing, integrating, acting, tracking and communicating on Human Rights risks and impacts related to TotalEnergies EP Uganda's activities.
- In conducting Human Rights risk and impact assessments, we pay attention to the rights of vulnerable people, including groups that are recognized as indigenous peoples according to international standards
- Be sensitive to gender in carrying out business activities and actively promote the representation, participation and development of women.
- Conduct a comprehensive stakeholder engagement process including information sharing, meaningful and inclusive consultation and dialog with stakeholders.
- Engage in specific consultation in a way that is culturally appropriate, timely and respectful of local communities directly affected by our activities, and incorporate stakeholder concerns and feedback when appropriate.
- Provide access to remedy for impacted stakeholders through the implementation of grievance mechanisms aligned with the UNGP effectiveness criteria.
- Ensure that working conditions and remuneration of TotalEnergies EP Uganda employees preserves human dignity and seeks to ensure that our contractors and suppliers apply the same conditions for their workers. Provide a healthy and safe workplace where workers are protected from accidents, injuries and work-caused illness.
- Prohibit:
 - Discrimination based on origin, gender, age, disability, gender identity or affiliation with a political or union organization or minority groups or any other aspect of private life.
 - All forms of harassment
 - Forced or compulsory labour
 - Child labour.
- Respect the rights of freedom of speech, association and collective bargaining, freedom of thought, conscience, and religion.
- Respect the rights to freedom of expression and access to information. In particular, we recognize the important role of Human Rights defenders (as defined in the UN Declaration on Human Rights Defenders of 1998) in the promotion and protection of Human Rights. We do not tolerate any threats, intimidation, harassment, or violence against those exercising their Human Right to freedom of expression to protest peacefully against our business or activities. We take seriously any allegations of reprisals.
- Promote the Voluntary Principles on Security and Human Rights during engagement with any public security forces and implement them while using private security providers.
- Express to host governments and other stakeholders our commitment to respect Human Rights, whilst understanding their respective roles and responsibilities to protect Human Rights and provide access to remedy. In the event of a conflict between legal standards and our Human Rights commitment to respect international Human Rights we will honor the principles of internationally recognized Human Rights to the greatest extent possible in the circumstances.
- The implementation of this policy is subject to periodic review and updating in line with our commitment to continual improvement.

This policy applies to all TotalEnergies EP Uganda personnel. We encourage our business partners and contractors to act in a manner consistent with the principles set out in this policy. We actively promote Human Rights awareness and respect with our business partners, including by adopting and incorporating appropriate legal and contractual frameworks, training, and the promotion of multi-stakeholder actions where appropriate.


Philippe GROUEIX
General Manager
TotalEnergies EP Uganda B.V.



Oct 2022
REV 02 DIR-TUGA-HSEQ

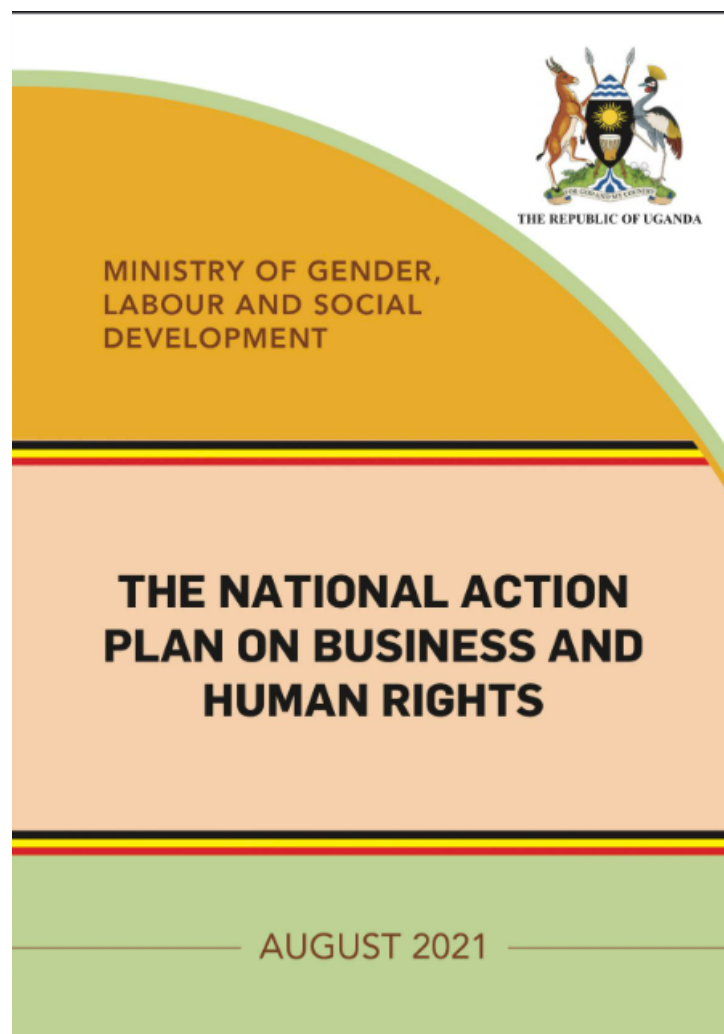
In October 2022, a cross-functional **Human Rights Steering Committee** (the Steering Committee) was established at the Senior Management level to support the implementation of the Tilenga project's Human Rights Action Plan as recommended by the HRIA. The Steering Committee piloted by the TEPU NGO and Human Rights Director and chaired by TEPU's General Manager provides governance, oversight of Tilenga's ongoing Human Rights Due Diligence and monitors the Human Rights Framework action plan. The Steering Committee will meet quarterly or more often if necessary.

The Steering Committee has also incorporated the functions of the **Alerts Screening Committee** set up in 2021 with the objective of investigating allegations of manipulation, intimidation, harassment or dissemination of disinformation. A process for investigation and fact-finding has been drafted and is still in pilot phase.

In November 2022, the General Manager of TEPU made a **Statement on Human Rights Defenders (HRDs)** explaining its policy to respect the rights to freedom of expression, freedom of association and freedom of peaceful assembly as well as access to information in its engagement with stakeholders affected by its activity. TEPU does not tolerate any threats, intimidation, harassment or violence against those who peacefully and lawfully promote Human Rights in relation to our activities. TEPU seeks to promote dialogue and exchanges with HRDs in the framework of its activities. Where appropriate, as recommended by the UN Guiding Principles on Business and Human Rights, TEPU seeks to exert leverage to influence others to respect these principles.

Since July 2021, TEPU has established a **Department for NGO Coordination and Human Rights**. This department is made up of two staff members. In September 2022, the head of department became a member of the subsidiary Director's Committee (CODIR) in order to ensure that Human Rights issues are raised immediately to the highest level of management and to provide oversight and guidance for ongoing Human Rights Due Diligence.

In keeping with management's commitment to respect Human Rights, **TEPU's Directors Committee (CODIR)** has received regular briefings on Human Rights matters. In addition to a presentation and validation of the findings of the HRIA, the CODIR received a presentation from the United Nations Office of the High Commission of Human Rights (OHCHR) on Uganda's National Action Plan on Business and Human Rights (NAPBHR).



1.2. Human Rights Training and Sensitisation

TEPU has placed a great deal of emphasis on training and sensitisation on Human Rights issues over the past year. In particular, every **new employee** is given an introduction to the TEPU's Human Rights commitments (and policy as from October 2022) and the salient human rights issues identified in the Tilenga HRIA.

Other human rights training sessions provided in the last year include:

- Session for Contractor CEOs and HSE Managers on **Human Rights in the Workplace** in February 2022.
- Training of main Contractors on site on **Human Rights in the Workplace** (including Atacama, Mota Engel, McDermott, Sinopec) starting from June 2022.
- Numerous Human Rights **sensitisation sessions for key staff** with a focus on those who work in the Project Area (example CLOs and Environmental Officers).
- Sensitisation on **Gender issues (sexual harassment awareness** in Bugungu camp) in September 2022.
- Human rights and Voluntary Principles on Security and Human Rights (VPSHR) training for all **government and private security forces** deployed to the project area throughout the year.

TEPU employees are also encouraged to carry out e-learning sessions on Human Rights matters. As an example, in July 2022, employees were required to carry out **Anti-harassment and Discrimination training** which was introduced to create awareness on women's rights, gender equality and gender-based violence (GBV).

1.3. Disclosure of the Tilenga Human Rights Impact Assessment (HRIA)

The Tilenga HRIA was finalised in early 2022 and much effort was placed on ensuring that it was widely disclosed both internally and externally. The HRIA was published in July 2022 on the Tilenga and EACOP transparency webpage.⁴

Sensitisation sessions were held in May and June 2022 with Community Liaison Officers (CLOs) and Environment and Biodiversity Officers. Similarly, sessions were held with Tilenga's Joint Venture partners, the Chinese National Offshore Oil Corporation (CNOOC) and the Uganda National Oil Company (UNOC).

Over 10 presentations have been made to disclose the content of the HRIA externally including to the Petroleum Authority of Uganda (PAU), the EU Committee on Democratic Governance and Human Rights, representatives of the Office of the High Commission for Human Rights in Uganda, the Ugandan Human Rights Commission, NGOs, main contractors and the Global Business Initiative on Human

⁴ Human Rights Impact Assessment Full Report:

https://corporate.totalenergies.ug/system/files/atoms/files/tilenga_hria_-_full_report_0.pdf

Human Rights Impact Assessment Summary Report:

https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-07/HRIA_Summary_Report.pdf

Rights. In each case, positive and interesting discussions as well as learning towards continuous improvement took place.

Text Box B: Murchinson Falls Conservation Programme Human Rights Review

Murchinson Falls Conservation Programme Human Rights Review

During 2022, TotalEnergies commissioned a Human Rights Review of a potential TotalEnergies' conservation programme in the Murchinson Conservation Area. The Human Rights Review proactively identifies potential human rights impacts related to the programme so that these can be effectively addressed through the development of mitigation measures to address potential adverse human rights impacts and to adopt a rights-based approach to maximize the potential positive human rights impacts of the programme.

The Human Rights Review concluded that the overall environmental and social objectives of the Programme can have significant positive contributions to the realization of human rights. However, there is increasing recognition that conservation programmes can also have a variety of adverse social and human rights impacts. Therefore, TotalEnergies can leverage its experience of implementing the UN Guiding Principles on Business and Human Rights (UNGPs) in Uganda and elsewhere to strengthen the Programme's human rights performance through the sharing of good practices and building the capacity of implementing partners to conduct Human Rights Due Diligence on an ongoing basis.

Based on a desktop review and targeted interviews with key, as well as research into human rights impacts and issues associated with conservancy projects in Africa, the following are the key human rights risks that were identified and prioritized through the Human Rights Review:

- Interactions with UWA Rangers;
- Human-wildlife conflicts;
- Restrictions on land access;
- Influx (in-migration of people);
- Lack of effective grievance mechanisms;
- Lack of information and consultation;
- Workers' rights for UWA Rangers and park staff;
- Impacts on cultural heritage;
- Impacts from resettlement;
- Environmental impacts; and,
- Unequal benefits.

Recommendations for mitigating and managing these human rights risks were provided in the Human Rights Review, including in terms of the governance structures and selection criteria for the implementing partners for the Programme.

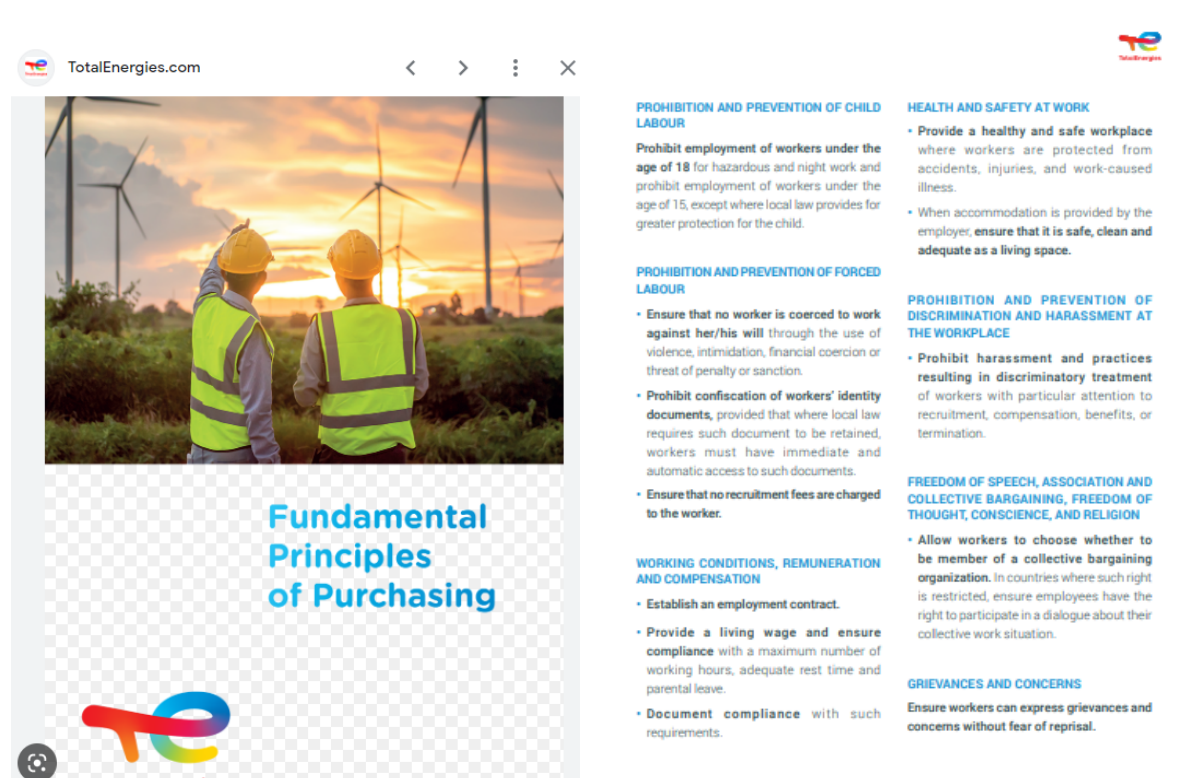
2. Practical Examples of Tilenga’s Human Rights Due Diligence

Below are certain examples of practical measures taken in 2022 to implement the Tilenga HRIA Action Plan Framework.

2.1. Workers’ Rights of Contractors and Suppliers

Tilenga has established a clear process to ensure contractor and suppliers’ worker rights are observed and respected in the supply chain from pre-qualification, through contracting, to verifications, inspections and audits of contractors and suppliers.

In collaboration with TotalEnergies’ Global Procurement Department, a study was carried out in 2022 to verify that the subsidiary is complying with the Company’s key commitments in relation to Human Rights in the supply chain including the requirements under the French Duty of Vigilance law and Company rules on supplier qualification. The resulting report determined that these commitments are being respected and highlighted a number of areas for improvement, including in relation to more systematic inclusion of human rights matters in health, safety and environment (HSE) audits and inspections.



The image shows a screenshot of a presentation slide from TotalEnergies. The slide is titled "Fundamental Principles of Purchasing" and features a photograph of two workers in safety gear standing in a field with wind turbines in the background. The slide is divided into several sections, each with a heading and a list of bullet points:

- PROHIBITION AND PREVENTION OF CHILD LABOUR**
 - Prohibit employment of workers under the age of 18 for hazardous and night work and prohibit employment of workers under the age of 15, except where local law provides for greater protection for the child.
- PROHIBITION AND PREVENTION OF FORCED LABOUR**
 - Ensure that no worker is coerced to work against her/his will through the use of violence, intimidation, financial coercion or threat of penalty or sanction.
 - Prohibit confiscation of workers’ identity documents, provided that where local law requires such document to be retained, workers must have immediate and automatic access to such documents.
 - Ensure that no recruitment fees are charged to the worker.
- WORKING CONDITIONS, REMUNERATION AND COMPENSATION**
 - Establish an employment contract.
 - Provide a living wage and ensure compliance with a maximum number of working hours, adequate rest time and parental leave.
 - Document compliance with such requirements.
- HEALTH AND SAFETY AT WORK**
 - Provide a healthy and safe workplace where workers are protected from accidents, injuries, and work-caused illness.
 - When accommodation is provided by the employer, ensure that it is safe, clean and adequate as a living space.
- PROHIBITION AND PREVENTION OF DISCRIMINATION AND HARASSMENT AT THE WORKPLACE**
 - Prohibit harassment and practices resulting in discriminatory treatment of workers with particular attention to recruitment, compensation, benefits, or termination.
- FREEDOM OF SPEECH, ASSOCIATION AND COLLECTIVE BARGAINING, FREEDOM OF THOUGHT, CONSCIENCE, AND RELIGION**
 - Allow workers to choose whether to be member of a collective bargaining organization. In countries where such right is restricted, ensure employees have the right to participate in a dialogue about their collective work situation.
- GRIEVANCES AND CONCERNS**
 - Ensure workers can express grievances and concerns without fear of reprisal.

Sensitisation

The importance of the “tone from the top” was recognised when a presentation on the Human Rights expectations for contractors and subcontractors was given to Contractor CEOs and HSE Managers at the annual HSE Forum. This was followed up by an initial series of 5 training sessions given in May, June and November to certain key contractors at site.

A new Practical Guide on implementation of the Fundamental Principles of Purchasing has also been developed and will be distributed to all Contractors.⁵

HSE Inspections

Inspections are carried out regularly on site under the responsibility of site teams. A Human Rights checklist has been developed covering the Human Rights requirements of the TotalEnergies Fundamental Principles of Purchasing. This is currently being integrated into the site HSE inspections process. An average of one inspection per week occurs at site.

HSE Audits

A contractor HSE audit plan is prepared on an annual basis. Generally, each contractor is audited a few months from start of activities (to provide a baseline) and regularly thereafter. In addition, TEPU will perform audits at any time in case of repeated non-compliance or a major event. Following each audit, the Contractor prepares an action plan and TEPU follows up as per the agreed audit report and plan. Included in these audits is a social section which covers Human Rights in the Workplace and compliance with the Social Management Systems & Practices.

Worker’s Voice

In 2022 considerable work has been put into the preparation of an additional tool for monitoring Contractors’ workers’ grievances and complaints. This tool is known as “Worker’s Voice”. Given the large number of contractors and sub-contractors on site, it would be difficult to continuously audit and monitor each company and worker. Therefore, the Worker’s Voice tool will be introduced as a pilot initiative to allow the Project to collect feedback on working conditions on site directly from workers through surveys sent to their mobile phones. Such tools have been successfully used in other industries (e.g. textiles and construction) elsewhere in the world to provide an early understanding of emerging workers’ rights issues and allow companies to take fast corrective action before these issues escalate or cause adverse human rights impacts.

The Worker’s Voice tool will use mobile phone technology to carry out periodic digital surveys (e.g. on a quarterly basis). The surveys are sent directly to the mobile phones of those workers who choose to participate and they will be administered on a voluntary and anonymous basis with appropriate protection of privacy. For those who do not have access to mobile phones, a paper version or other medium is available in parallel. Languages used for the surveys will reflect local languages on the site.

The results of the surveys will be assessed and any indicators of at-risk areas will be identified and shared with Contractors with a view to rapidly identifying areas of concern and taking corrective measures before issues escalate. Follow up audits may be necessary and the data from the surveys will help to target audits on key issues of importance for workers.

⁵ https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-09/practical_guide_human_rights_at_work.pdf

Human Rights Audits

In addition to including some Human Rights aspects in HSE audits, targeted Human Rights audits will be carried out for high-risk suppliers. Around six such audits are planned for 2023. Now that the construction phase has commenced, planning work with TotalEnergies Global Procurement has begun for these targeted Human Rights audits in 2023.

2.2. Information and Consultation

Considerable efforts have been made in 2022 to ensure that stakeholders have access to clear, transparent and accessible information in relation to the Project. In addition to revamping and update of the subsidiary's webpages and creating a series of fact sheets to transmit basic knowledge about the project,⁶ many sessions and events have been held with media on the topics of sustainability, biodiversity, and national content. Press releases have also been made regularly to ensure that the public are aware of the major milestones of the Project.⁷

29/08/2022 - PRESS RELEASE

TOTALENERGIES EP UGANDA CONTRIBUTES TO SUSTAINABLE AND INCLUSIVE ECONOMIC EMPOWERMENT; EQUIPS PROJECT AFFECTED PERSONS IN BULIISA WITH INCOME GENERATING TOOLS



⁶ https://corporate.totalenergies.ug/system/files/atoms/files/tilenga-eacop_1_prez-socio-eco_jan2022.pdf

https://corporate.totalenergies.ug/sites/g/files/wompond2271/f/atoms/files/tilenga_eacop_-_inform_and_involve_the_people_and_local_actors.pdf; https://corporate.totalenergies.ug/system/files/atoms/files/tilenga-eacop_3_relocation_jan2022.pdf; https://corporate.totalenergies.ug/system/files/atoms/files/tilenga-eacop_4_environment.pdf

⁷ Examples of Press Releases in 2022: <https://totalenergies.com/media/news/press-releases/uganda-and-tanzania-launch-lake-albert-resources-development-project>; https://totalenergies.com/media/news/press-releases/Uganda_Tanzania-final-agreements-for-lake-albert-resources-development-project; <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-refurbishes-anaka-hospital-staff-housing-facility>; <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-explore-development-120mw-solar-uganda>; <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-launches-action-sustainability-campaign>; <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-contributes-sustainable-and-inclusive-economic-empowerment-equip>; <https://corporate.totalenergies.ug/news/totalenergies-uganda-partners-makerere-university-boost-higher-education-uganda>; <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-commences-relocation-rap-2-5-paps>; <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-launches-tilenga-biodiversity-protection-and-conservation-program-and>; <https://corporate.totalenergies.ug/news/roots-campaign-grow-1-million-trees-may-20th>; <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-launches-free-massive-open-online-course-identify-train-and-recruit>

The Project's Stakeholder Engagement plan has been implemented with quarterly meetings for identified groups of stakeholders. Stakeholder Engagements with women and other vulnerable groups are described in further detail in section 2.8 below. In addition regular community newsletters are published.⁸

Numerous visits to site have been organised for stakeholders with a particular interest in aspects of the project. For instance, TEPU hosted the Bunyoro-Kitara Kingdom (BKK) Cabinet and Oil and Gas Committee of Parliament (Rukurato) at site visiting the industrial area, resettlement houses and livelihood improvement projects such as Kirama water project.⁹ Leaders from religious groups have undertaken familiarization visits.¹⁰

Through the NGO and Human Rights Team, the following actions have also been taken to promote good relations and a mutual understanding with NGOs active in the oil and gas sector:

NGO Mapping and Monitoring

Internal monthly NGO Reports are prepared to explain to key staff the main concerns of Ugandan NGO and civil society as identified through public sources such as the media, internet webpages, social media and conferences. This allows staff to calibrate engagements with civil society to provide more information on subjects of concern to such organisations.

Seminars and Conferences

Attendance at numerous seminars and conferences to listen to concerns and answer questions from external stakeholders. Examples include: a Symposium for Parliamentary MPs on Extractives Governance; Ministry of Gender, Labour and Social Development meeting on National Action Plan on Business and Human Rights; quarterly dialogue meetings between Ministry of Internal Affairs and NGOs; NGO Bureau dialogue meeting between NGO leaders and the Minister of Internal Affairs; Advocates Coalition for Development and Environment (ACOSE) Symposium on implications of climate change and energy transition on Uganda's Extractive Strategy; Avocat Sans Frontiers (ASF) Conference on Business and Human Rights.

Bilateral meetings

Thirty-seven (37) bilateral engagements have been held with national NGOs to openly discuss their concerns. Recurring themes raised by NGOs during bilateral engagements include land acquisition issues, gender equality, Human Rights, allegations of harassment including Human Rights Defenders issues, perceived reduction of civic space, transparency (e.g. Extractive Industry Transparency Initiatives publication of oil & gas agreements), jobs and value creation, climate, and biodiversity.

⁸ https://corporate.totalenergies.ug/system/files/atoms/files/tilenga_community_newsletter_may-august_2022.pdf;
https://corporate.totalenergies.ug/system/files/atoms/files/gr_april_tilenga_newsletter-10-06-2022_0.pdf;
https://corporate.totalenergies.ug/system/files/atoms/files/community_newsletter_24_sept.pdf

⁹ <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-hosts-bunyoro-kitara-kingdom-cabinet-tilenga-project-sites>

¹⁰ <https://corporate.totalenergies.ug/news/catholic-church-leaders-visit-totalenergies-tilenga-project>

Partnership Agreements

Signature of Partnership Agreements with NGOs to support the Project's environmental, social and Human Rights objectives have also occurred, including for example with the Cross Cultural Foundation of Uganda (cultural preservation), Safe Way Rights Way (Road Safety), Chimp Trust (biodiversity) and Wildlife Conservation Society.¹¹

"Let's Talk" webinars

The "Let's Talk" webinars are organized regularly on topics which have been raised by NGOs. In addition to a presentation on the topic and open discussion with webinar participants, bulletins are published online and printed to summarise key issues. These bulletins contain a "Further Reading" section with the aim of building a library of topical materials which could aid NGO research on a given topic. Subjects covered in 2022 include Tilenga Biodiversity Programme, Road Safety, Gender, Voluntary Principles on Security and Human Rights, and Climate.¹²

Field trip

On 11th and 12th October 2022, a field trip was organized for national NGOs who are members of CSCO with the objective of providing an opportunity to observe and learn about the Tilenga Project activities and to assist NGOs to have access to better information to support their work.¹³

Responses to Questions and Allegations

TEPU responds to numerous petitions, letters, requests for information, allegations taking a fact-based approach. Further information on our approach to fact-finding on such allegations can be found in Sections 2.9 and 2.10 below.

TotalEnergies faces a number of lawsuits in relation to the project including litigation in France based on the French Duty of Vigilance Law. Indeed in October 2019, some NGOs brought proceedings against TotalEnergies SE in the Nanterre Civil court based on France's "duty of vigilance" law, claiming that the Company had insufficiently identified and managed the social and environmental impacts of the Tilenga and EACOP projects in Uganda and Tanzania. TotalEnergies repeatedly expressed its regret that the NGOs involved in the proceedings have refused to participate in the mediation process proposed by the court and accepted by TotalEnergies. Such mediation process could have provided an opportunity to initiate a constructive dialogue with the NGOs that brought the proceedings.

¹¹ <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-reinforces-its-commitment-sustainability-initiatives-road-safety>

¹² Examples of Let's Talk! Programme of Webinars with NGOs

Gender: https://corporate.totalenergies.ug/system/files/atoms/files/lets_talk_tilenga_gender_initiatives_bulletin.pdf

VPHSR: https://corporate.totalenergies.ug/system/files/atoms/files/lets_talk_security_vpshr_bulletin_27_04_2022.pdf

Road Safety: https://corporate.totalenergies.ug/system/files/atoms/files/lets_talk_newsletter_01.pdf Biodiversity: https://corporate.totalenergies.ug/system/files/atoms/files/new_uganda_ngo_newsletter.pdf

¹³ <https://corporate.totalenergies.ug/news/non-governmental-organisations-visit-tilenga-project-areas-operation>

Faced with this refusal to mediate, hearings took place before the Paris Civil court in December 2022 at which TotalEnergies argued before the court that its vigilance plan has been implemented effectively and that it has properly checked that its Ugandan and Tanzanian affiliates have applied the appropriate action plans to respect the rights of local communities and ensure respect for biodiversity, within the framework of National Interest Projects decided by the governments of Uganda and Tanzania. TotalEnergies outside counsel insisted in particular on the willingness of the Company to enter into discussions with the NGOs concerned and to seek resolution of the issues outside the Court including by mediation. However this proposal has not been responded to favourably by the plaintiffs. A decision of the Court is expected in February 2023¹⁴

Tilenga and EACOP International Communication Task Force

TEPU also assists TotalEnergies in responding to requests from international media and NGOs about the Tilenga and EACOP projects. Several visits to site have been organized in 2022 (around five) for international journalists in order to ensure that the media have access to fact-based information in relation to the Project. Such visits always include an opportunity for media to visit with local NGOs and Project Affected Persons.¹⁵

2.3. Land and Resettlement

Huge strides were made in 2022 towards completion of the Tilenga land acquisition programme. As of 30 November 2022, 95% of individual entitlement disclosure and signing of compensation agreements had occurred for Resettlement Actions Plans (RAPs) 2 to 5 with compensation payment made for 89% of Project Affected Persons (PAPs).¹⁶

One issue regularly raised in relation to land rights concerns the situation of 7 PAPs from RAP 1 whose case was heard by the Masindi High Court on April 30th, 2021 (the so-called “hold out cases”). The cases concern land situated in Kasinyi village, Ngwedo sub county, Buliisa District. Nine of the 622 PAPs in the area turned down resettlement compensation offers. Despite best efforts to negotiate with these PAPs, a settlement could not be achieved. Therefore, as a last measure, and in accordance with Ugandan law, a compulsory acquisition process was implemented under the authority of the Government of Uganda. Like most countries world-wide, Uganda has legislation which allows land to be acquired by compulsory purchase in the public interest. In parallel to the formal court based compulsory acquisition process, TEPU continued to engage with the PAPs in question to seek a voluntary amicable solution. Two of the nine PAPs accepted their compensation during these engagements and were subsequently paid compensation. On April 30th 2021, the judge of the High Court of Masindi ruled that the land held by the seven remaining affected persons should be made accessible for the Project. It ordered that the compensation amounts should be paid directly to the affected PAPs or, where the PAPs do not accept such payment, the compensation amounts should be deposited in a court account. The compensation amounts due to the remaining 7 PAPs were deposited in the court account in accordance with the Court order. To date, none of the seven PAPs have collected their compensation. They were each visited by CLOs who gave them a copy of the Court

¹⁴<https://totalenergies.com/media/news/press-releases/duty-vigilance-totalenergies-regrets-ngos-refusal-mediation-process>

¹⁵ Examples of materials prepared by Tilenga/EACOP Communications Task Force: <https://totalenergies.com/info/misconceptions-about-tilenga-eacop-projects>; <https://totalenergies.com/special-features/tilenga-eacop-projects>

¹⁶ <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-commences-relocation-rap-2-5-paps>

Order and Notice to Vacate to be signed. However, the seven PAPs refused to acknowledge receipt of the Notice to Vacate. Notwithstanding such refusal the PAPs have vacated the land in question.

2.4. Project-Induced In-Migration

In 2022, the Tilenga Project advanced on an updated situational assessment on Project Induced In-migration (PIIM or influx). The overall objective was to ensure that there is enough planning and support for timely implementation of effective mitigation actions by all Project stakeholders, so that the influx of workers and other economic migrants is minimized and negative impacts on the community and the environment are effectively mitigated. Specifically, the situational analysis aims to:

- Refine and update the influx risk assessment provided in the previously conducted In-Migration Risk Assessment and ESIA then provide updated data on key aspects related to influx such as statistics for key information to be tracked;
- Review and revise potential PIIM hotspots
- Update the identification of key stakeholders who have a role to play in managing PIIM; and
- Consolidate all influx related information into one depository for tracking purpose.

The Report from this situational assessment is expected to be finalised in 2023.

2.5. Road Safety

With the build-up of Project-related traffic, a particular emphasis was placed on Road Safety in 2022. TEPU has put in place rigorous processes aimed at providing guidance and standards for improving and sustaining Road Safety. While the list below is not exhaustive, it gives some idea of the breadth and extent of the procedures in place.

Procedures and Vehicle Requirements

TEPU has implemented a series of rules and plans, cascading from HQ Company level, through country level to specific Tilenga Project rules. In 2022, two key plans were implemented which make up the TEPU Road Safety Management System: the TEPU Community Road Safety Management Plan and the Tilenga Project Transport Management Plan. Moreover a site road safety officer has been appointed as well as road patrol contractors.

Community Road Safety Management Plan		Transport Management Plan	
Vehicles	<ul style="list-style-type: none"> • Setting the minimum standard for company vehicles (cars, light vehicles and HGV's) • Includes mandatory additional safety features required for all company vehicles e.g. Inclusion of IVMS (In-Vehicle Monitoring System) to ensure adherence to journey plans and speed limits 	National driver training	<ul style="list-style-type: none"> • Provision of driver training, through the TotalEnergies Foundation • Advanced training for company drivers • Additional training for Ugandan HGV drivers

Community Road Safety Management Plan		Transport Management Plan	
	<ul style="list-style-type: none"> Vehicle pre-mobilisation inspection to ensure vehicles remain fit-for-service 		
Journey Management	<ul style="list-style-type: none"> Development of journey plans for all travel, including relevant risk assessments Vehicle compliance inspections Maximum speed enforcement Management and control of driving periods and frequency TEPU has provided over 7 patrol vehicles and over 20 flag men/women to guide project vehicles on black spots identified within the project area Specific instructions in regard to cargo trucks road transportation requirements (convoy specificities, inspection, lashing) 	Road Safety Awareness	<ul style="list-style-type: none"> Road safety awareness sessions in schools, through “train-the-teacher” initiatives Roll-out of “direct-to-pupils” road safety awareness in schools in the Buliisa district Community road safety contract awarded to implement detailed road safety initiative to all categories of risks associated with Road Safety
Driver Qualifications & Management	<ul style="list-style-type: none"> Driver licence verification Mandatory additional driver training for both light vehicles and heavy goods vehicles, including the use of Ongoing personnel medical checks Suitable dynamic risk assessment awareness training 	Emergency Response	<ul style="list-style-type: none"> Development of emergency response and management capabilities Development of remote incident reporting capability for company personnel, the “Tilenga Road Safety” mobile app
		Continuous Learning	<ul style="list-style-type: none"> Instigate a full “Return of Experience” programme to ensure lessons learned are incorporated and plans updated to reflect learnings

Road Surveys

Road surveys were regularly carried out to ascertain road conditions including road markings and signage and mitigate the risks to acceptable levels. Engagements with the Ugandan National Road Authorities (UNRA) Ministry of Works and Transport, Uganda Traffic Police and Petroleum Authority of Uganda (PAU) also took place to ensure the road infrastructure mitigates the associated risks identified on the roads serving the project area.

Driver Sensitisation

Drivers engaged on TEPU business, whether directly for the company or through contract companies, are expected to adhere to strict driver behaviour, exemplify safe driving practices and act as role models for other drivers.

In 2022, TEPU drivers were required to comply with the following:

- Pass specific medical examination tailored for drivers
- Consent to routine alcohol and drug testing
- Pass an additional defensive driving course, over and above their normal driving licence

- Drivers of heavier goods vehicles e.g. trucks, shall also be required to attend and pass the “Safe Way Right Way” professional driving course, set-up in conjunction with several NGOs to train and license Heavy Goods Vehicles to the East African Community standard
- Adhere to all company mandated speed limits, monitored by the In-Vehicle Monitoring System (IVMS)
- Provided with the Uganda Driving Highway Code and are at all times mandated to comply with the Uganda Traffic driving requirements..

In order to reduce the potential severity of an accident, or avoid it altogether, all TEPU vehicles are installed with an IVMS to track the driving performance with keen monitoring on the respect for speed limits. Maximum speeds are equal to or lower than the national legal maximum, depending on the road type and location.

Albertine Area Community Sensitization

From April 2022, road safety sensitization in the community was carried out. This included approximately 10 villages in the North and 60 villages in the South Nile regions. The campaign also covered local secondary and primary schools. The sensitization was particularly important since UNRA has conducted a significant amount of work in the area tarmacking roads which were previously marram. As a result, cyclists and motorists now tend to speed. In the Buliisa district, 21 schools were visited in March and April 2022 with 14,000 students engaged with joint training given by TEPU’s Land Transport and Safety Supervisor along with a Community Liaison Officer.

In addition, Road Safety advertisements have been conducted on local radio and recent “Community Drives” (information campaigns) have also focused on Road Safety.

TotalEnergies also works with other stakeholders and the authorities on Road Safety Initiatives. For instance on March 10, 2022, TEPU participated in a Road Safety workshop with PAU, the Traffic Police, Ministry of Works and Transport, UNRA and CNOOC. Actions agreed in the workshop include:

- Constitute a Technical Working Group/Team involving technical representatives
- Establish a coordinating office for Road Safety
- Organize a consultative meeting on the review of traffic and road safety legal framework
- Revise National Roads Action Plan to prioritize Road Safety in districts hosting oil and gas operations



Corporate Social Responsibility Initiatives

In 2022, TotalEnergies continued to work with Global Road Safety Partnership and Safe Way Right Way to implement “VIA”, which is a road safety and mobility program in primary and secondary schools in Uganda. Since March 2022, this programme has been rolled out in the Albertine region (Buliisa, Nwoya, Hoima, Kikuube) and Kampala under the theme: “Road Safety at Heart.” Moreover, “Train the Teacher” sessions have begun involving school teachers being trained to present awareness and road safety sensitisation sessions to their students. This initiative has covered 120 schools, over 259 teachers and 13 469 students/pupils have been trained.¹⁷

A radio jingle dubbed #WEFFUGE (Be responsible) translated into different local languages has been created to communicate to all categories of road users to ensure that they are full responsible for their safety when on the road and take care of other people’s safety.

A further initiative is known as “Safe Way Right Way” and is a driver education and training programme. The programme includes:

- Heavy Goods Vehicle Driver training, aimed at ensuring HGV drivers are trained and licensed according to the East African Community standards
- Significant co-operation with the Ugandan Police on various initiatives, including speed management and enforcement, where TEPU has donated “speed guns” to support speed enforcement along the Southern Corridor



¹⁷ <https://corporate.totalenergies.ug/news/totalenergies-ep-uganda-conducts-road-safety-campaign-buliisa-district>

Speed Limit

Recognizing that children are more vulnerable to road accidents, and following the observations of school children walking in the middle of the roads, speed limits have been restricted to 40 kph on specific roads where children are more prevalent.

Object / Subject: Speed limits instructions South Nile operational area		
1. INTRODUCTION		
On the roads used for our operations South Nile, we can see a significant increase of:		
<ul style="list-style-type: none">• Pedestrians (even walking on the middle of the roads) especially since the re-opening of schools.• Over speeding "boda boda" which are also overloaded (prax & cargo)• Domestic animals (cows & goats).• Community members staying on the roads from evening to morning.		
2. SPEED LIMIT IMPLEMENTATION		
Without waiting the effect of the road safety campaigns, especially in communities & schools, and until further notice .		
The Tilenga project users are instructed to limit the vehicles speed as per below		
Road	UNRA	TILENGA project
R1 (Wanseko - Bullisa - Hoima)	90 km/h	40 km/h between Wanseko & Kisyabi
L1 (Bullisa Bugungu)	TBD	40 km/h
L2 (Wanseko - IA - L1)	70 km/h <small>However, as per last 11th Feb 2022, on the 21.5km L2 road, only 13km are completed & marked 70km/h. The remaining 8.5km are still under construction.</small>	40 km/h

2.6. Cultural Rights

The Tilenga HRIA Identified the Cultural Heritage and Archaeological Management Services Social Management Plan as the principal vehicle for mitigation of any Human Rights risks related to Cultural Heritage. In 2022, TEPU contracted with NewPlan to implement this Plan. In particular, considerable work has been done in order to ensure that **graves and shrines** located in the Project Area are relocated in a manner which respects local traditions and culture, recognizing that such norms are different for each Kingdom.

Initial efforts to build a **Cultural Heritage and Archaeological Training and Capacity Building Program** have also begun with training materials for project staff in place¹⁸, to help them to be able to identify chance finds.

TEPU has also begun work with an NGO called the Cross-Cultural Foundation of Uganda (CCFU) which is well known in the country, notably for its capacity building work in relation to Culture and Development. TEPU entered into a Memorandum of Understanding (MoU) with CCFU in July 2022 to implement a one-year project known as **"Culture for Livelihood"** to safeguard and promote culture in Bunyoro, Bugungu, Alur and Acholi sub-regions. The project aims to promote culture as a key to improving community and individual livelihoods, particularly through capacity building and inter-cultural collaborations in artistic initiatives, crafts, and traditional music, with more focus on women, youth, and children.¹⁹

¹⁸ As an example derogations to Project's rules about not working at night have been obtained in order that cultural practices requiring graves to be moved in darkness can be respected. No photography or videos are permitted and relocations are conducted with the appropriate religious leaders who verify that the necessary rituals are respected

¹⁹ <https://crossculturalfoundation.or.ug/2022/07/14/1742/>



The Cross-Cultural
Foundation of Uganda

Culture in Development

In November 2022, an additional project was launched with CCFU to map and analyze the capacity (human resources, physical structures, viability, etc.) of **community museums and heritage centres/sites** in the Albertine region. The aim of this project is to identify and examine current and future needs of community museums, heritage centres and sites with a view to considering investment in new facilities or assistance to individual community museums. The focus of this initiative will be for purposes of promoting knowledge-sharing and exchange learning and inter-cultural dialogue.



2.7. Interactions with Government and Private Security Forces

The security of the TEPU site is ensured by both the Oil & Gas Police (OGP) and private security companies (unarmed private security guards). The TEPU Security Team also interacts with the other Government Security Forces, including district police and national military forces, and Private Security Forces which are deployed in the area of TEPU activities.

The Project has a programme for continuous implementation of the Voluntary Principles on Security and Human Rights (VPSHR), notably through the setting up of the MoU between TEPU and the Government Security Forces; ongoing VPSHR and human rights training of both Government and Private 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 or Private Security Forces without retaliation. More detail on interaction with Private and Government security forces can be found in the company VPHSR report²⁰

MoU with Oil & Gas Police

In 2021, an MoU with the OGP was negotiated; however, at the end 2022, it had not yet been signed. Ongoing dialogue with the government has continued during this period and in the meantime many of the terms of the MoU are being implemented especially in relation to VPHSR training. The MoU gives the Project a clear framework for continuous engagement on VPHSR. Government commits not to deploy commanders of units who have been held guilty in the past of human rights abuses and appropriate background checks must be carried out before deployment to the Project area.

Liaison with District Police

A district police station is based in Buliisa. This station performs the functions classically assigned to a police station (traffic, crime fighting, etc.) and is not directly related to the Project's activities. In 2022, TEPU had regular liaison with this police station for information-sharing in order to ensure that the police present understand the Project's strong emphasis on protection of persons and respect for human rights. District police officers from this station are included in the VPSHR training session organized by TEPU.

Liaison with UWA Rangers

TEPU coordinates with the Uganda Wildlife Authority (UWA) Rangers in the Murchinson Falls National Park (MFNP). The activities are governed under the terms of an MOU to ensure development in accordance with UWA operational guidelines. UWA rangers provide support to TotalEnergies and its contractors to ensure that Tilenga project activities are managed in a way which does not cause harm to park wildlife. In 2022, the MoU was revised and has been updated to reflect changes in UWA procedure. It will be valid for the duration of construction activities inside the park. Other activities have involved supporting the UWA ranger force in their other duties including the provision of equipment, training and IT support to improve anti-poaching efforts inside the park.

VPHSR Training

Since 2012, TotalEnergies has been an official member of the VPSHR Initiative, a set of principles that guides companies on how to conduct their security operations while respecting human rights.

Within TEPU, ongoing VPSHR training is prioritized as a cornerstone of the Security Department's responsibilities. VPSHR training activities are provided to everyone with a security role on or near the Project site including:

²⁰https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-04/vpsrh_annual_report_2021_totalenergies.pdf

- TEPU's Security Team
- Unarmed Private Security Forces
- Uganda Wildlife Authority Rangers
- Oil & Gas Police Officer
- District Police Officers
- Military Forces

Between January 1st and December 2022, 638 people had been trained over several forces including Ugandan military forces, Private Security Forces to include the deployment of both TotalEnergies and its contractors and Uganda Wildlife Authority Rangers.

The VPSHR training animated by TEPU Security Team contains three modules providing:

- Overview on VPSHR
- Respect for human rights
- VPSHR implementation

The presentation includes three animated videos that provide concrete illustrations of how VPSHR implementation can mitigate any negative human rights impacts the Project's security activities may have. Such videos are based on videos that proved efficient in other countries where TotalEnergies operates, such as Nigeria.



VPSHR
Annual Report
March, 2022

2.8. Women's Rights and Gender Equality

The Tilenga HRIA identified women's rights and gender equality as a cross-cutting salient issue for the Project. Within TEPU a Gender and Diversity specialist was appointed in 2022 who ensures that company recruitment and career development. TotalEnergies fosters an equal gender workplace environment and promotes the visibility of women in its workplace. As part of the Company's drive towards gender equality it has set an objective of having 30% of women in executive and senior management positions by the year 2025. A network known as TWICE (TotalEnergies Women's Initiative for Communication and Exchange) is in place to promote the growth of women in the subsidiary through coaching and mentorship opportunities.

The following are the key activities undertaken to support women's rights and gender equality in the workforce (including Contractors) and communities affected by the Project.

Implementation of Gender Management Plan

The principal mechanism for implementing mitigation measures in this area is through the Gender Management Plan. In 2022, a services contract was entered into with Networth Consult, a Ugandan contractor specialized in the field of gender management. Initial work has been conducted to scope services required on Gender-Based Violence (GBV), Violence against Children and HIV/AIDs.

In 2022, the Project has encouraged the formation of District Gender Committees to strengthen resources in the community that can drive change and help coordinate efforts to mitigate the adverse gender impacts that may emerge in the District. Such committees are made up of individuals, institutions, religious leaders, cultural leaders among others.

With respect to Gender-Based Violence, in November 2022, TEPU took part in an initiative led by the Ministry of Gender Labour and Social Development (MGLSD) known as "16 days of Activism against GBV".

Stakeholder Engagement

TEPU implements a gender-inclusive approach to stakeholder engagements. As well as encouraging women to attend regular meetings, sessions specifically dedicated to women have been organized. For instance, meetings have been specifically dedicated to women's associations such as Pakwach Women's Council, Nwoya Women's Council, Buliis Women Development Association, Kikuube Women's Council and Hoima Women's Council. These women associations are a representation of the different groups within the District that can play an advocacy role in relation to women's rights.

In addition to ensuring that women are part of regular engagement activities, TEPU is careful to ensure that Project representatives include females. As an example, Resettlement Planning Committees include women representatives.

A webinar was conducted by the NGO & Human Rights Department in September 2022 focused on reacting to a valuable study conducted by Dr. Isaiah Owiunji and Santa Vusia Kayonga on behalf of the Civil Society Coalition on Oil and Gas (CSCO) and Advocates Coalition for Development and Environment (ACODE): "Gender Integration in the Petroleum Development Process in Uganda" (Presentation March 2022).²¹

²¹ [CSCO-brief-2021.pdf \(acode-u.org\)](#)

TEPU also attended a meeting organized by MGLSD to discuss the implementation status and key interventions for the private sector within the National Action Plan on Business and Human Rights (NAPBHR) held on 18th August.

A presentation entitled “Inclusion of Gender (Women, Youth and other Marginalised Groups) within the Tilenga Project” was given at a capacity-building workshop for sub-national stakeholders on revenue management and benefit sharing from extractive resources on 15 November 2022.

Land Acquisition Process

Particular emphasis was placed on ensuring active participation of women in stakeholder engagement and land acquisition activities in 2022. Spousal consent is a requirement for the purchase of land for the Tilenga project. Where the couple opts for “in-kind compensation” (i.e., land for land), the replacement titles bear the names of both wife and husband. Signatures of both spouses are required on valuation forms and on compensation agreements. For certain disclosure meetings, it is not permitted to proceed without both spouses being present.

As a prerequisite for payment of compensation, PAPs must open bank accounts. It is a requirement that such accounts are opened jointly by husband and wife. Compensation payments are made directly to such joint bank accounts (with women as co-signatories). Cash compensation cannot be withdrawn without the consent of both spouses. Financial literacy training is offered to both spouses.

Women in households which have been economically displaced due to the Tilenga Project benefit from Livelihood Restoration activities along with other members of the household. Activities proposed include: assistance with improved cassava production, preparation, and storage; assistance with improving cultivation of vegetable gardens; apiary enterprise; and work related to poultry and goat husbandry.

In preparing these Livelihood Restoration programs, great care was taken to collect gender disaggregated data and to understand the different impacts on men and women. For instance, farming is more of a feminine role among the Bagungu, Banyoro and the Alur communities which are the dominant tribes in affected communities. Thus, the percentage of women identified as crop farmers is higher than that of male crop farmers. Women also have multiple roles in the household such as primary home-care givers, fetching water, firewood, building material (especially thatch grass), childcare, cooking and cleaning.

Despite efforts to protect women during the resettlement process, there are still challenges. For example, it can be difficult to ensure equitable management of benefits within households where cultural norms dictate that the male head of household is the primary decision-maker.



Figure: Acan Irene, cassava farmer, Kasinyi Village Buliisa District (RAP 2-5 PAP)

Equal Access to Employment

Women may perceive the oil and gas industry as not being an equal employer. Cultural constraints upon women’s mobility, and lower levels of education, are potential barriers to participation in the industry. “Time poverty” can also be an issue due to domestic responsibilities as mothers and wives. Nevertheless, there are clear social and business benefits to integrating women in oil and gas activities. These include:

- enhanced developmental outcomes for women, families and communities
- realizing the potential of almost half of the available labor force
- equal and inclusive growth
- workforce diversity can increase efficiency, competitiveness, and innovation

TotalEnergies fosters an equal-gender workplace environment and promotes the visibility of women. As part of the Company’s drive towards gender equality, it has set an objective of having 30% of women in executive and senior management position by 2025. A network known as TWICE (Total Women’s Initiative for Communication and Exchange) is in place with the sole purpose of nurturing the growth of women in TEPU through coaching and mentorship opportunities. For the next two years, this initiative will strive to heighten awareness of both men and women to gender diversity and equip women to become future leaders.

At TEPU, care is taken to ensure parity in recruitment. Emphasis is also placed on ensuring that Contractors are inclusive of women candidates when recruiting for Tilenga Project activities. For instance, when mobilizing communities for casual job opportunities, women are encouraged to apply. Affirmative action is taken to favour women applicants during the ballot exercise for local hiring opportunities when they have the necessary qualifications.²²



Figure: Gender consideration in casual recruitment using the ballot box by Mc Dermott at Kibambura village on 26th January 2022

²² A ballot exercise is a random equal selection process. Community members may write their names as applicants for positions, the names are placed in a closed box and candidates are randomly selected from the box. During stakeholder engagements, TEPU raises awareness of equal involvement of women and men in project activities. In practice, job adverts for both the company and contractors encourage women to apply.

Gender-Based Violence

GBV is a particular concern from a women's rights perspective. Awareness sessions about GBV have been held including by Contractors. However, this is an area which will require increased focus in 2023. The company in November 2022 participated in the global UN-led 16 days of activism against Gender Based Violence supporting the Central and Local Government at District level with sensitisation activities which also included posters.

2.9. Grievance Mechanism and Access to Remedy

TEPU and the Tilenga Project have a number of Grievance Mechanisms which are identified in the HRIA through which complaints can be reported and addressed. These include the Tilenga Community Grievance Procedure established by the company, requirements for contractors to establish grievance mechanisms for their workers, and requirement for contractors to establish Community Grievance Procedures established by the contractors. The TEPU Disciplinary Code has been implemented for the TEPU's direct employees and the TEPU Bullying and Harassment Policy has been implemented for the Project's direct workers, which also extends to visitors and contractors.

The Human Rights Policy published in October 2022 commits that TEPU will "Provide access to remedy for impacted stakeholders through the implementation of grievance mechanisms aligned with the UNGP effectiveness criteria."

Tilenga Community Grievance Management Procedure

The Community Grievance Management Procedure applies to all operational stakeholders' Concerns or Grievances raised in connection with the Company or its related Contractor activities. In order to be effective in undertaking well-informed Grievance investigation and providing appropriate response to Grievances, the Company categorized the Grievances into 10 categories that are reflective of its site operations and potential sources of Grievance to the local population. The categories include G1-Land and Resettlement, G2-Other economic loss, G3-Environment and Health, G4-Employment and Supply Chain, G5-Safety (Traffic), G6-Social Conduct and Security towards communities, G7-Cultural Heritage, G8-Social Projects, G9-Engagement and Communication and G10- Others grievances. The Tilenga grievance mechanism does not replace the legal remedies. The complainant has a right to take his or her complainant direct to court. However, the company wish is to ensure that the complaints are managed through the grievance mechanism due to its effectiveness in terms of time, costs and relationships between the project and the stakeholders.

Key Grievance statistics 2022 (as at 14/12/2022)

1,420 Total Grievances Registered: 1,328 (93.5%) Grievances Closed; 92 (6.5%) Grievances Open

70 Grievances Registered in 2022: 44 Grievances Closed (of those registered in 2022)

Categories of Grievances: 84.26% Land and Resettlement; 5.32% Other Economic Loss; 0.99% Employment; 0.78% Environment; 1.70% Safety; 0.28% Social Conduct; 0.71% Cultural Heritage; 0.07% Social Projects; 0.21% Engagement; 5.67% Other categories

The grievance resolution involves 4 escalation levels which are applied based on factor of time and stakeholders involved. The levels include L1,L2,L3 & L4. If the grievance is not resolved at level 1 by the CLO, the mechanism provides an opportunity for the complaint to be further managed at higher levels and this includes seeking remedy in court at level 4. PAPs are given the opportunity to raise a concern before filing a grievance, which allows a more efficient and operational management of their needs. CLOs ensure a liaison function with communities and facilitate cultural appropriateness of the mechanism. To ensure access to the grievance mechanism, complainants can use a toll-free number, visit a local council 1 office, discuss with CLOs during community engagements, or come physically to the Buliisa Liaison Office to file a grievance. CLOs are required to explain to a PAP filing a grievance and the next step of the grievance management process.

In 2022, considerable efforts have been made to improve the Project's communication on the Tilenga Community Grievance Management Procedure. Community drives on the Community Grievance Management Procedure were concluded in 60 villages. In addition to disclosure at community meetings, various other media have been used to promote the Community Grievance Management Procedure, including radio programs, podcasts, and community drives. Updated printed booklets in the relevant local languages have also been prepared and distributed in the communities.

Land and Asset Inventory remains the most frequent type of community grievance received by the Project in 2022.

Alerts Screening

TEPU is sometimes faced with allegations that its employees, its Contractors or other parties related to its activities have been engaged in unethical behavior which may include allegations of manipulation, intimidation, harassment, or dissemination of disinformation. While the Company strongly encourages stakeholders to use of the Community Grievance Management Procedure, it also takes seriously allegations which are brought to its attention outside these processes. In 2022, an Alerts Screening procedure was piloted under the supervision of Senior Management to examine any allegations relating to harassment, intimidation or other alleged abuse. Following an initial screening to verify whether sufficient details are known to permit an investigation, a fact-finding mission may be instigated. Where necessary, an action plan may be put in place which may include disciplinary measures.

Other Complaints to Company

In addition to the Community Grievance Management Procedure, the Project regularly receives complaints by other means (e.g. petitions, letters, demonstration, complaints to the authorities or newspapers). Wherever possible, the company seeks to respond to such complaints either in writing or through dialogue with the complainants and by taking practical corrective actions.

Two examples of TEPU's responses to collective issues raised through other channels in 2022 include:

- Dust near the Industrial Area: In April 2022, TEPU was alerted notably through petitions made to the authorities and media reports of an increase in dust resulting from Project activities in Buliisa District. Indeed, high dust levels were experienced during the dry season partly as a result of very strong winds leading to excessive dust caused by industrial vehicles. Working with the authorities, TEPU immediately increased the frequency of water spraying to suppress the dust, temporarily scaled down certain activities and limited vehicle movements.²³

²³ <https://corporate.totalenergies.ug/news/clarification-reports-about-air-pollution-within-tilenga-project-area>

- **Flooding near the Industrial Area:** Buliisa District experienced heavy downpours in the period between May and September 2022, resulting in the occurrence of flash floods in some areas close to the industrial area. In some instances, these floods impacted neighbouring land. TEPU was made aware of such flooding by local communities and, despite Buliisa being historically prone to flooding, TEPU recognized that such flooding was exacerbated by works at the industrial area and mobilized interventions. As an example, stormwater management ponds were created to help prevent further flow towards the neighbouring community land. In close coordination with the government authorities, TEPU commenced engagements with affected neighbours and undertook an assessment to determine the extent of impact with a view to compensating affected persons. A report was submitted to the Chief Government Valuer from the Ministry of Lands Housing and Urban Development for validation. In addition, as part of a commitment to developing a long-term solution, TEPU contracted an engineering consultant to undertake a hydrological study with the aim of developing a detailed design of a retention pond system for the pond. TEPU actively undertook continuous engagement with all relevant stakeholders and neighbouring communities and enhanced awareness of the Community Grievance Management Procedure to ensure any issues are appropriately reported and managed.

Contractor Grievance Mechanisms

Capacity-building Sessions on Social Safeguards (including Social Management Plans and Labour Management Plans) for Tilenga Contractors and Staff on site has been carried out in 2022 with a particular focus on Grievance Mechanisms and Employee Grievance Management.

Community grievances mechanisms that are available through Contractors are harmonized by the Tilenga Project and all cases must be reported to TEPU to ensure effective and consistent follow-up.

EU Resolution

Following the adoption of a resolution on the Tilenga and EACOP projects by the European Parliament on September 15, 2022, Patrick Pouyanné, CEO and chairman of TotalEnergies, sent a letter to the President of the European Parliament, Ms. Roberta Metsola. He emphasised that all partners are committed to putting environmental and biodiversity issues as well as the rights of the communities concerned at the centre of the project, in accordance with the most stringent international standards. However, he expressed his concern that such a Resolution had been taken without contradictory debate. Had it been invited to do so prior to the adoption of the EU Resolution, the Company could have informed the Parliament of the inaccuracy of many elements which are based on serious and unfounded allegations.²⁴

2.10. Human Rights Defenders (HRDs)

The Tilenga Project has given a particular emphasis to the rights of HRDs working in the Albertine region in 2022. TEPU adopts the definition of the UN Declaration on Human Rights Defenders of 1998 for Human Rights Defenders as “any person or group who, personally or professionally, individually or with others, acts peacefully to protect and promote human rights”.

²⁴ Answer to EU Parliament: <https://totalenergies.com/media/news/press-releases/totalenergies-answer-european-parliament>; https://totalenergies.com/system/files/documents/2022-10/EN_Answer_to_EU_parliament.pdf

In addition to the commitments on HRDs in the newly published Tilenga Human Rights Policy, a specific statement on HRDs was issued in November 2022 by TEPU's General Manager. The draft statement was reviewed by a number of third parties prior to publication and verification was made to ensure that the document is aligned with Oxfam's guidance to companies on HRDs.²⁵

This statement emphasizes that TEPU seeks to promote dialogue and exchanges with HRDs in the framework of its activities and sets out a commitment to act where it is alerted to allegations of threats, intimidation, harassment or violence against HRDs in relation to its activities. The statement also reiterates the various means which HRDs can use for making complaints or raising alerts in relation to the Project which include an office in Buliisa, a toll-free number, Community Liaison Officers, an email service and contact through traditional leaders and district authorities.

The following statement is regularly publicized and repeated including to the Ugandan authorities:

TEPU is strongly committed to the defense of Human Rights in its activities all over the world. In particular Total recognizes the importance of protecting Human Rights Defenders and does not tolerate any attack or threats against those who peacefully promote Human Rights in relations to its activities. Total seeks to promote dialogue and exchanges with Human Rights Defenders in the framework of its activities. Where appropriate as recommended by the UN Guiding Principles on Business and Human Rights, Total seeks to exert its leverage to influence others to respect these principles.

A pilot Alerts Screening Committee has been set up at which Senior Management can consider allegations of harassment and threats against HRDs and NGOs. However, few concrete allegations have been received. Suggestions are rather of a general nature e.g. "threats against HRD are increasing." Such vague allegations are difficult to investigate. TEPU regularly encourages NGOs to inform the company immediately if they have knowledge of any such events providing sufficient detail for investigations to be carried out.

From a practical point of view, the Tilenga Security, NGO & Human Rights and Management teams have intervened on several occasions on hearing of concerns about a "reduction of civil space" in the Albertine region. As an example, in March 2022, following information about the break-in of a HRD's premises, there was immediate follow up with the HRD directly and with the police by TEPU.

Meetings with various Coalitions and NGOs for the protecting of HRDs have occurred in 2022. The NGO & Human Rights team has also held coordination meetings with the EU Committee on Democratic Governance and Human Rights in July 2022 including a presentation on the Tilenga Human Rights Impact Assessment focusing on Human Rights Defenders matters.

On 3 May 2022, which is celebrated as World Press Freedom Day, TEPU Senior Management representatives attended an event with the Uganda Journalism Association (UJA) to raise awareness of the importance of the human right to freedom of expression.²⁶

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²⁵ https://totalenergies.com/media/news/press-releases/totalenergies-answer-european-parliament;https://totalenergies.com/system/files/documents/2022-10/EN_Answer_to_EU_parliament.pdf



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