



# TILENGA HUMAN RIGHTS REPORT 2023



**TotalEnergies**

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## Glossary

Company	TotalEnergies
CCFU	Cross Cultural Foundation Of Uganda
CHAMP	Cultural Heritage And Archaeological Management Plan
CLO	Community Liaison Officer
CNOOC	Chinese National Offshore Oil Corporation
CODIR	TEPU Top Management Committee
CSCO	Civil Society Coalition on Oil & Gas
CSOs	Civil Society Organisations
ESIA	Environmental and Social Impact Assessment
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GM	General Manager (TEPU)
GSF	Government Security Forces
HPI	Health Promotion International
HRDD	Human Rights Due Diligence
HRDs	Human Rights Defenders
HRIA	Human Rights Impact Assessment
HSE	Health, Safety and Environment
IEC	Information, Education and Communication materials
IMRA	In-Migration Risk Assessment
IVMS	In-Vehicle Monitoring System
MEMD	Ministry of Energy and Mineral Development
MGLSD	Ministry of Gender, Labour and Social Development
MoU	Memorandum of Understanding
NAPBHR	National Action Plan on Business and Human Rights (Uganda)
NGOs	Non-Governmental Organizations
OHCHR	UN Office of the High Commissioner for Human Rights
PAC	Project Affected Community
PAPs	Project Affected Persons
PAU	Petroleum Authority of Uganda
PIIM	Project-Induced In-Migration
Project	The Tilenga Project
PSC	Private Security Forces
TEPU	TotalEnergies EP Uganda
TGP	TotalEnergies Global Procurement
TISP	TotalEnergies Iconic Species Programme
UN	United Nations
UNGPs	United Nations Guiding Principles
UNOC	Uganda National Oil Company
UNRA	Uganda National Roads Authority
UWA	Uganda Wildlife Authority
VPSHR	Voluntary Principles on Security and Human Rights

## 1. Introduction

TotalEnergies EP Uganda (TEPU) published the first Tilenga Annual Human Rights Report in 2023 to highlight the Company's Human Rights initiatives conducted in 2022. This year, TEPU's Human Rights report provides an update of the activities undertaken in the Tilenga project for the year 2023. Some of the reported actions are follow-up recommendations from the Human Rights Action Plan Framework for ongoing Human Rights Due Diligence (HRDD)<sup>1</sup>.

Both the Action Plan Framework and Tilenga Human Rights Impact Assessment (HRIA) were published by TEPU in July 2022. As the Project has progressed with the construction phase, the Company and its contractors are prioritising "Respect for Each other" in the Tilenga Project Implementation.

Respect for Each Other is a core value at TEPU and a key cornerstone to our ethical principles that is reflected through being attentive to all our stakeholders, always listening to their concerns, having utmost respect for Human Rights in our business operations and work sites, ensuring there is no discrimination of any type and paying attention to the labour relations within the Project.

TEPU's work on human rights aligns with the Ugandan National Action Plan for Business and Human Rights<sup>2</sup> and is increasingly recognised by local players including civil society organisations, and Non Governmental Organisations (NGOs) which have commended TEPU for its integration of Human Rights in its activities at various engagements.

### Tilenga's Human Rights Highlights in 2023

- Translation of Tilenga Human Rights Impact Assessment brochure into local languages.
- Dissemination of Tilenga Human Rights Policy on a continuous basis.
- Protection of rights of Human Rights Defenders. In November 2023, following the arrest of #StopEACOP protestors, the TEPU GM wrote to the Ministry of Internal Affairs in a bid to exercise leverage and ensure that the Government of Uganda respected the rights of the arrested Human Rights Defenders (HRDs).
- Sensitisation of Contractor CEOs and HSE Managers on Practical Implementation of Human Rights in the Workplace, February 2023.
- Roll out of a Workers Voice Initiative to verify implementation of Human Rights in the supply chain in September 2023.
- 54 bilateral engagement meetings throughout the year with NGOs/CSOs.
- Two NGO visits to Tilenga site in July 2023.
- 3 Let's Talk bulletins for NGOs issued throughout the year.
- International media visits to Tilenga site for discussions on Human Rights issues with PAPs and NGOs.
- Quasi-completion of RAP 2-5 land acquisition processes and continuation of livelihood restoration activities.
- Training of government and private security personnel in Voluntary Principles on Security and Human Rights (VPSHR) throughout the year.
- Revision of Grievance Handling Mechanism in May 2023.

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<sup>1</sup>HRIA 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](https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-07/HRIA_Summary_Report.pdf)

<sup>2</sup>The National Action Plan on Business and Human Rights:

[https://www.ohchr.org/sites/default/files/Documents/Issues/Business/NationalPlans/uganda\\_approved-national-action-plan-on-business-and-human-rights\\_august-2021.pdf](https://www.ohchr.org/sites/default/files/Documents/Issues/Business/NationalPlans/uganda_approved-national-action-plan-on-business-and-human-rights_august-2021.pdf)

### Challenges Registered in 2023

TEPU has registered some concerns regarding respect for Human Rights in its activities including compensation packages, respect for cultural and traditional heritage as well as environmental conservation. Efforts have been made to address these concerns through dialogue and consultations with aggrieved parties.

The Company has continued to create awareness about its grievance mechanism to encourage stakeholders with knowledge of any human rights incidents connected to its activities to contact us directly. Details and information provided will aid in thorough investigation to ensure corrective measures are taken, including sanctions if necessary. As operator of Tilenga Project, TEPU strives towards continuous improvement, through dialogue with the relevant actors and taking a transparent approach.

### Summary Overview

This report provides a brief about governance measures, Human Rights training and sensitisations that were conducted in 2023. Section 2 of this report covers the salient human rights issues identified in the Tilenga Human Rights Impact Assessment (HRIA) which are as follows:

## Salient Issues for the Tilenga Project

 <p><b>1. Workers' Rights</b></p> <ul style="list-style-type: none"><li>• Contractor and their workers' rights</li></ul>	 <p><b>2. Communities' Human Rights</b></p> <ul style="list-style-type: none"><li>• Right to information and consultation</li><li>• Land and resettlement</li><li>• Project-induced in-Migration</li><li>• Road safety</li><li>• Cultural rights</li></ul>	 <p><b>3. Security and Human Rights</b></p> <ul style="list-style-type: none"><li>• Interactions with government security forces</li><li>• Interactions with private security providers</li></ul>	 <p><b>4. Cross-cutting Human Rights</b></p> <ul style="list-style-type: none"><li>• Women's rights, gender equality and vulnerable groups</li><li>• Grievance mechanisms and access to remedy</li><li>• Human rights Defenders</li></ul>
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## 1.1. Human Rights Governance

In 2023, TEPU continued to disseminate its Human Rights Policy<sup>3</sup> which defines its 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 all 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.

Following recommendations from NGOs, TEPU created a more accessible and comprehensible format of the TEPU Human Rights Policy. A poster with pictograms of the TEPU Human Rights commitments was also created and shared with local communities through several platforms like community notice boards, flyers, brochures and digital spaces to ensure that the message reaches all community members. The Company will continue disseminating this information and education material to the general public, especially Project affected communities.



<sup>3</sup> Human Rights Policy [https://corporate.totalenergies.ug/system/files/atoms/files/human\\_rights\\_policy.pdf](https://corporate.totalenergies.ug/system/files/atoms/files/human_rights_policy.pdf):

To promote efforts towards addressing issues of Human Rights in the Tilenga Project, the Company has recruited additional members for the Human Rights team. These will ensure effective dialogue and engagement with our various stakeholders.

TEPU's management team received regular briefings from the Human Rights team on human rights matters throughout 2023. Regular visits to Project sites and communities were organised for the Company's management to interact with local community members and leaders. The visits provide an opportunity for the management team to receive first hand feedback which is a foundation for the Company's good policies.

At the global level, the Senior Management team of TEPU's parent company - TotalEnergies SE has been attracted to social, land and Human Rights aspects of the Project. In 2023, a total number of 16 visits were organised for the TotalEnergies SE's senior management team, including an exemplary visit by the TotalEnergies' Senior Vice President People and Social Engagement who visited the Tilenga Project area in Buliisa and Nwoya Districts.

The purpose of the senior Vice President People and social engagement's visit was to review the operational progress and engage with members of the Project host community including several Tilenga Project Affected Persons (PAPs).

In October 2023, TotalEnergies' Senior Vice President (VP) for Exploration and Production in Africa, Mike Sangster also visited the Tilenga Project and witnessed its progress and positive impact on the local communities.



Senior VP E&P Africa, Mike Sangster during his visit to the Tilenga Project area.

## 1.2. Training and Sensitisation on Human Rights

TEPU continues to place great emphasis on training and sensitisation on human rights and related issues. Every new contracted staff member (including nationals, expatriates and trainees) is given a mandatory introduction to TEPU's Human Rights commitments and policy, and human rights issues identified in the HRIA.

All contracted staff are also required to undertake a mandatory e-learning training called "Human Rights at Work". The training modules emphasise the Company's international human rights commitments already covered in its Code of Conduct, Human Rights Guide, and human rights in the supply chain among others. By the fourth quarter of 2023, a total of 156 contracted staff had completed the mandatory e-learning training.

As of December 2023, a total of 131 staff including experts, nationals, graduate trainees and contracted staff had undergone an in-person and virtual human rights induction conducted by the TEPU NGO & Human Rights Department.

### **Other training sessions in 2023 include:**

- Capacity building for contractor Chief Executive Officers (CEOs) and Health Safety Security and Environment (HSSE) Managers on "Practical Application of Human Rights in the Workplace" in March 2023.
- Human rights and Voluntary Principles on Security and Human Rights (VPSHR) training for all government and private security forces deployed to the Project area. Training sessions were conducted throughout the year.
- Capacity building for 715 participants including Petroleum Authority of Uganda (PAU), Joint Venture Partners (JV), national and international contractors on workers' rights in the supply chain. This was during the Tilenga Quarterly Supplier Development workshop, whose theme was "Enhancing Contractors' Awareness on the Importance of Robust Contract Performance Management and Financial Discipline".
- In September 2023, a VPSHR training for trainers' session was conducted by TotalEnergies VP and attended by personnel from TEPU's security department, representatives from private security companies and a representative from the NGO and Human Rights department. The main focus of the training was to equip the attendees with the right skills and updated information to be used when conducting VPSHR trainings for government and private security forces before they are deployed. Topics covered include how to handle Gender Based Violence (GBV) complaints and application of gender sensitive approach while undertaking security work.
- Capacity building for Ugandan authorities; i.e. 2 sessions which had been specifically tailored to focus on IFC Performance Standard 6 for PAU, National Environment Management Authority (NEMA) and Uganda Wildlife Authority (UWA) (as well as TEPU/EACOP personnel).

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

The HRIA booklet<sup>4</sup> has been translated into local languages including Acholi, Alur, Rugungu and Runyoro for the local communities around the Tilenga Project. This has been done to ensure effective communication for non-English speaking community members.



HRIA Acholi version

HRIA Runyoro version

HRIA Alur version

HRIA Lugungu version

TEPU continued to share the HRIA and progress updates on its implementation with the Tilenga Project stakeholders especially project affected communities. For such updates the company organises regular meetings with PAU, the Ministry of Energy and Mineral Development (MEMD) and the Ugandan Human Rights Commission and this has resulted in the promotion of Human Rights.

Considerable efforts were also made to engage with NGOs and Civil Society Organisations (CSOs) on the implementation of the HRIA. In January 2023, a webinar for CSOs under CSCO was conducted by TEPU to discuss the progress made on implementation of the HRIA.

The NGO & Human Rights team also made a presentation to the representatives of Uganda Human Rights Commission (UHRC) on 28<sup>th</sup> March 2023. The presentation covered TEPU's grievance handling mechanism, the project progress and challenges faced. During this engagement, TEPU had the opportunity to pick up a number of questions raised by the Commission and thereafter, a response was made in writing.

<sup>4</sup>Human Rights Impact Assessment 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)

Human Rights Impact Assessment Summary Report:

[https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-07/HRIA\\_Summary\\_Report.pdf](https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-07/HRIA_Summary_Report.pdf)

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

The following section highlights various measures undertaken in 2023 to implement the Tilenga HRIA Action Plan Framework.

### 2.1. Collaborating With Partners and Contractors

At the heart of the process of ensuring that contractors and suppliers are respecting workers’ rights across the entire supply chain are the TotalEnergies’ Fundamental Principles of Purchasing which every contractor is obliged to implement.

Rather than imposing such obligations, contractors are empowered to adhere to and implement these principles. For this reason, TotalEnergies published a Human Rights Practical Guide for Suppliers<sup>5</sup> which was intended to help suppliers and contractors understand our minimum requirements with respect to human rights, why we adopted such requirements and how they can effectively implement them. In 2023, the guide was disseminated to contractors and suppliers particularly through the HSE Forum.

The infographic displays seven fundamental principles of purchasing, each with a corresponding icon and a representative image:

- PRINCIPLE 1** Respect human rights at work (Icon: interlocking hands)
- PRINCIPLE 2** Protect health, safety, and security (Icon: shield with a person)
- PRINCIPLE 3** Act in favor of climate (Icon: globe with leaves)
- PRINCIPLE 4** Preserve the environment (Icon: hand holding a plant)
- PRINCIPLE 5** Prevent corruption, conflict of interests, and fight against fraud (Icon: camera)
- PRINCIPLE 6** Respect competition law (Icon: two people shaking hands)
- PRINCIPLE 7** Promote economic and social development (Icon: two people)

On the right side of the infographic, there is a section titled "Respect human rights at work" with a sub-header "Respect human rights at work" and a detailed description: "Ensure that working conditions and remuneration of workers preserve human dignity and are consistent with the principles defined by the Universal Declaration of Human Rights and by the fundamental Conventions of the International Labour Organization." Below this text is a large photograph of a worker wearing a yellow hard hat and safety glasses, focused on a task.

The Fundamental Principles of Purchasing<sup>6</sup>

<sup>5</sup>See: [practical\\_guide\\_human\\_rights\\_at\\_work.pdf](#) (totalenergies.com)

<sup>6</sup>[https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-05/Brochure\\_Fundamental\\_Principles\\_of\\_Purchasing.pdf](https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-05/Brochure_Fundamental_Principles_of_Purchasing.pdf)

## **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.

## **HSE Audits**

A contractor HSE audit plan is prepared on an annual basis and in these audits is a social section which covers Human Rights in the Workplace and compliance with the Social Management Systems and Practices.

In 2023, 12 contractors were audited, and the audit reports showed that the contractors were largely complying with their human rights obligations under their contracts and there were no major issues relating to human rights in the workplace. However, it was observed that there were some areas that required improvement for example adopting an independent policy on respect of human rights of the local communities. The Company made recommendations for the contractors to address all the gaps.

## **Worker's Voice**

In 2023, the "Worker's Voice Tool" for monitoring contractors' workers' grievances and complaints was rolled out on a pilot basis at 2 contractor sites. Given the large number of contractors and sub-contractors in the Tilenga Project, it would be difficult to continuously audit and monitor each company and worker. Therefore, this pilot initiative allows the Project to collect feedback on working conditions on site directly from workers through surveys sent to their mobile phones, understand any emerging issues and make fast corrective actions before they escalate. TEPU will be able to exercise its leverage to remind the contractors to develop an action plan to address issues identified.

The surveys are being conducted in Lugungu, Acholi, Alur, Luganda and Runyoro, in addition to English, which reflects the local languages commonly used in Tilenga communities.

## **Human Rights Audits**

Targeted Human Rights audits were carried out for 8 major suppliers of the Tilenga Project by TGP auditors in December 2023. The audits are known as "Sustainability Audits" and focus on implementation of the Fundamental Principles of Purchasing. Their intended purpose is to be used as tools to assist contractors identify areas of improvement, and where necessary corrective action plans are developed with the contractor.

## **Examples of Exercise of Leverage – Workers Rights**

Under both Ugandan law and Human Rights principles, the employer is primarily responsible for ensuring that workers' rights are respected. To promote responsible and sustainable business conduct, TEPU exercises leverage to sensitize its contractors on different issues including human rights in the workplace.

On 25<sup>th</sup> January 2023, Tilenga Project Drilling and Wells team organized a workshop for Drilling and Wells contractors where TEPU's Human Rights and National Content expectations for the Project were presented by the relevant departments. The event was attended by contractors who were represented by their respective Senior Management, including Country managers, Operations Managers, Human Resource Manager etc.

The areas of discussion covered critical topics including;

- TEPU expectations on Business and Human Rights,
- Sensitizing contractors on TEPU’s Human Right standards,
- Reminding contractors to adhere to the Human Rights obligations as relayed in contracts,
- Communicating the developments of Worker’s Voice tool,
- How to implement the Fundamental Principle of Purchasing “Respect for Human Rights at Work”.

In 2023, contractor staff laid down their working tools on two occasions citing issues around enumeration and working conditions. Whereas TEPU cannot directly intervene in employment disputes between service providers and their employees, we were able to leverage our position as the main project implementor to ensure that these issues were resolved.

TEPU made considerable efforts to ensure that stakeholders have access to clear, transparent and accessible information in relation to the Project. Regular press releases are made particularly in relation to issues regarding the sustainability of the Project<sup>7</sup>.

The Project’s Stakeholder Engagement Plan continues to be implemented with quarterly meetings for identified groups of stakeholders. The purpose of these engagements is to give stakeholders updates on the oil and gas industry, and to respond to any concerns, comments, and questions the stakeholders may have in relation to TEPU’s operations. The engagements continued throughout the year.

Key stakeholder groups include: District Local Governments (Nwoya, Pakwach, Hoima, Masindi and Buliisa districts), Civil Society Organizations, CSCO and Regional CSOs/NGOs, Tourism (UWA, Uganda Tourism Board, Association of Tour Operators, Uganda Safari and Guides Association, Uganda Tour Guides Association and Uganda Community Tourism Association), Special Interest Groups (Women, Youths, Older Persons and People With Disabilities), Sub-counties and communities in villages impacted by the Tilenga Project North and South of the Nile.

Regular community newsletters are also published in order to provide written updates to communities in addition to the stakeholder meetings<sup>8</sup>.



<sup>7</sup> <https://totalenergies.ug/news>

<sup>8</sup> <https://totalenergies.ug/projects/tilenga/newsletters>

The following actions have also been taken to promote good relations and a mutual understanding with NGOs active in the oil and gas sector:

**(a) NGO Mapping and Monitoring**

Internal monthly NGO Reports highlight the main concerns of Ugandan NGOs and civil society as identified through public sources such as the media, internet webpages, social media and conferences to guide staff on information on subjects of concern to such organisations.

In 2023, the most recurrent themes included allegations of violations of human rights, compensation, environmental impacts of oil and gas projects, and gender integration in the oil and gas sector along with cultural heritage and flooding in the project area.

**(b) Seminars and Conferences**

TEPU attended and participated in the 5th Annual Symposium on Business and Human Rights in Uganda that took place on 9th and 10th November 2023 under the theme “Assessing Uganda’s Journey in Access to Justice for Business and Human Rights”.

The TEPU Grievance Coordinator made a presentation on TEPU’s grievance mechanism, highlighting the efficacy of the mechanism, the successes and some of the challenges faced. Other sessions of the symposium focused on the compliance with UNGPs and incorporation of Business and Human Rights principles in business structures by Ugandan businesses.

Notable keynote speakers were representatives of the Uganda Human Rights Commission (UHRC), the Ministry of Gender, Labour and Social Development, the Danish Institute for Business and Human Rights, CSOs among others.



*The 5th Annual Symposium on Business and Human Rights.*

TEPU also participated and made a presentation during two-day conference held on 14<sup>th</sup> and 15<sup>th</sup> June 2023, organised by DanChurch Aid on Business and Human Rights. TEPU’s NGO and Human Rights Director made a presentation on the need for all parties (i.e., NGOs, Government and Private companies) to work together to achieve benefits for the community and TEPU’s compensation process which ensures that Project Affected Persons are in a better or equal position compared to where they were before their land was purchased. This is achieved through global livelihood restoration plans, aligned with International Finance Corporation standards to which the Project adheres.

In May, the NGO and Human Rights Director made a presentation at the 10<sup>th</sup> East African Petroleum Conference and Exhibition. Her presentation focused on the HRIA and the TEPU's willingness to engage with CSOs/NGOs. Recognizing their importance in TEPU's activities, she urged NGOs to focus on dialogue and cooperation with TEPU.

**(c) Grassroot Collaborations**

54 Bilateral engagements were held with national and grassroots NGOs to openly discuss their concerns. In 2023, emphasis was placed on engaging more directly with grassroots NGOs based in Hoima and Buliisa Districts and this was included in the NGO Coordination workplan for 2023. The Grassroots NGOs appreciated this initiative and applauded TEPU for its transparency and willingness to share information.

Themes raised by NGOs during bilateral engagements included elephant – human conflict in Buliisa, workers' rights, national content, flooding around the industrial area etc. The NGO Coordination team was able to give prompt responses to NGOs on what TEPU is doing to resolve all the issues that were raised. The NGO Coordination team also worked with other TEPU internal teams to organize meetings with NGOs to discuss and resolve PAP issues raised by NGOs.

**(d) Communications and Publications**

In 2023, greater emphasis was placed on written Let's Talk bulletins. Topics covered included: Livelihood Restoration, Safety, and National Content. 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.

TEPU also supports the Bunyoro Albertine Petroleum Network on Environmental Conservation (BAPENECO) resource centre with hard copies of the Let's Talk bulletins and Annual Human Rights Reports. This resource centre is frequented by students from universities, journalists and government officials in search of information related to the oil and gas sector.



*TEPU staff handing over Let's Talk Bulletins to BAPENECO at their office in Hoima district*

### (e) Field Trips and Site Visits

As part of our commitment to promote transparency in the Tilenga operations, we hosted a total of 2000 visitors at the Tilenga sites including various stakeholders from NGOs, CSOs, religious groups, Government of Uganda Ministries, Local Governments, media houses, and students among others, to monitor the progress of the Project and acquire Project information and updates.

The visits provide us with an opportunity to receive independent reviews from third parties to ensure that the Project is designed and carried out in compliance with the best social and environmental practices.

Some of the delegates include representatives from a consortium of NGOs under the Civil Society Coalition on Oil and Gas (CSCO) and grassroots NGOs who visited the Tilenga Project site to gain insights into the Project progress and witness the implementation of recommendations they provided to TEPU during a similar visit in October 2022, especially in regards to the Tilenga Livelihood Restoration Program.

Following the NGO field visit, CSCO compiled a report titled “Monitoring Report of The Oil and Gas Infrastructure Developments in The Tilenga Development area, Uganda” and invited TEPU to provide feedback at a round table engagement on 20th October 2023. TEPU was pleased to participate in this session and took note of CSCO’s recommendations. This was followed by a detailed written response to the issues raised in the report.



*A demonstration to PAPs on how the cassava chipper works.*

Following the NGO field visit, CSCO compiled a report titled “Monitoring Report of The Oil and Gas Infrastructure Developments in The Tilenga Development area, Uganda” and invited TEPU to provide feedback at a round table engagement on 20th October 2023. TEPU was pleased to participate in this session and took note of CSCO’s recommendations. This was followed by a detailed written response to the issues raised in the report.



National NGO representatives at JBR 5 in the Tilenga Project area on 18<sup>th</sup> July 2023

More delegates visited the Tilenga Project site such as representatives from the European Union Commission to Uganda who visited Ngiri 03 restored site in Kirama, Gunya 01 well-pad which is one of the well pads being prepared for Uganda's first oil in 2025 and the Industrial Area where the Central Processing Facility is being constructed. The delegation also visited the PAPs in the communities and witnessed firsthand the progress of the livelihood restoration programs like cassava growing, and the resettlement houses in Kisomere and Kijumbia village.



EU Commission delegation visit to the Tilenga Project area

#### **(f) Continuous Dialogue For a Sustainable Project**

We believe that transparency, listening and dialogue are essential in building a trust-based relationship and facilitates a path to continuous improvement.

In 2023, TEPU responded to over 22 letters regarding issues of resettlement packages, Human Rights violation, culture, Project impacts, energy transition, gender intergration among others.

TEPU receives numerous requests for information and clarifications in form of emails, letters, etc.

In October 2019, six NGOs brought proceedings against TotalEnergies SE in the Nanterre Civil Court based on France's "duty of vigilance" law, claiming that the 2018 Vigilance Plan of the Company had insufficiently identified and managed the Social and Environmental Impacts of the Tilenga and EACOP projects in Uganda and Tanzania and has not effectively implemented the same.

On 28th February 2023, the Paris Court dismissed the case since the plaintiffs had not complied with the procedural requirements indicating that TotalEnergies Vigilance Plan was sufficiently detailed not to be considered summary.

On June 27, 2023, 5 NGOs and 27 Ugandan citizens filed a fresh summons against TotalEnergies SE and asked the Paris court to examine and judge that the Company would have failed in its duty of vigilance and would not have respected its vigilance obligations in the development of its vigilance plans for the years 2018 to 2023 for the Tilenga and EACOP projects.

The first hearing was held on December 5, 2023 where the court advised the parties to explore a mediation, failing which the court would proceed to hear the case during 2024.

### (g) Tilenga and EACOP International Communication Task Force

TEPU also works with the company's headquarters in preparing responses to requests from international media and NGOs about the Tilenga and EACOP projects. Several visits to the Project site were organized in 2023 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 the media to visit and interact with local NGOs and (PAPs)<sup>9</sup>.

## 2.2. Partnership Agreements



<sup>9</sup>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>

See TotalEnergies response published by HRW:  
[https://www.hrw.org/sites/default/files/media\\_2023/10/20231023-HRW.pdf](https://www.hrw.org/sites/default/files/media_2023/10/20231023-HRW.pdf)

Several Partnership Agreements with NGOs and Ugandan authorities have been signed to support the Project's environmental, social and Human Rights objectives. These include:

- July 2022 - September 2023: MoU with Chimpanzee Sanctuary Wildlife Conservation-Trust (CSWCT), a Ugandan based NGO dedicated to conservation of chimpanzees and their natural habitats.

The partnership promotes conservation awareness and education in schools, including lessons and nature clubs in the community schools surrounding Budongo Central Forest Reserve. A total of 30-episodes of a radio drama were aired on Biiso Radio Station to raise awareness on the importance of conservation of the forest. An educational curriculum was also provided through practical based lessons and after school nature clubs for children between ages of 8-12; a total of 9 schools participated in the program, 160 teachers were trained in the lesson program with participation of over 2,880 pupils in the program.

- May 2023: MoU with National Forestry Authority for collaborative efforts to conserve Budongo Central Forest Reserve (CFR), restoring Bugoma forest corridor through planting over 140,000 mixed native tree species, providing conservation education and community awareness, and maintaining or increasing chimpanzees' population and area of occupancy.
- November 2023: Five-year MoU signed with Ministry of Water and Environment to conserve and restore wetlands and riparian vegetation within the Tilenga Project area, sensitization of communities and establishment of a technical working group.
- November 2023: In partnership with Uganda Wildlife Authority (UWA), TEPU entered into an Agreement with the Wildlife Conservation Society (WCS), to roll out another phase of animal collaring to address the issue of human-wildlife conflicts near Murchison Falls National Park.

The Project will be implemented in various phases over a two-year period, considering that the collars have a lifespan of approximately 18 months. The elephant collaring process involves equipping select elephants with advanced GPS-enabled state-of-the-art collars that transmit real-time data on the elephants' movements, enabling researchers to gain profound insights into their migration patterns and interactions with the environment.

TEPU through, WCS has been monitoring elephants through collaring since 2013 to understand variations in elephant ranging behaviour during the development of oil and gas facilities. Collaring provides vital data for fostering coexistence between wildlife conservation and the ongoing developments in the oil and gas sector, while promoting harmony within the local community.

- Under the MoU signed with Makerere University in 2022, TEPU resumed in 2023 the TotalEnergies Professeurs Associes (TPA) courses that had stopped due to the COVID-19 pandemic. The five courses running for 3-5 days are being conducted at the College of Engineering, Design, Art, and Technology (CEDAT) and Department Geology and Petroleum Studies (College of Natural Sciences).

The objective is to provide opportunities for knowledge transfer and sharing by retired and current TotalEnergies employees plus internationally recognized professors to develop local capacity and talent in the oil and gas sector. These professors share their experiences and knowledge of current and future trends in the sector.

## 2.3. Land and Resettlement



*A PAP at his replacement house in Buliisa District.*

Resettlement Action Plans (RAPs) 2-5 of the Tilenga Project affect a total of 4,954 PAPs. At the end of 2023, the land acquisition process had reached 99% completion as TEPU has acquired land from 4,908 individuals out of 4,954 PAPs. TEPU is yet to receive the 1% related to 32 parcels of land.

In accordance with IFC Performance Standard 5 which obliges TEPU to avoid involuntary resettlement wherever possible, numerous engagements were held with the PAPs in the above categories before the cases were escalated to Government of Uganda to intervene in April 2023.

Between May and August 2023, MEMD and Petroleum Authority of Uganda (PAU) held further engagements with the PAPs who had disputes and those who had refused compensation approved by the Chief Government Valuer (CGV) and disclosed to them by TEPU. MEMD informed the Ministry of Lands, Housing and Urban Development (MLHUD), as the responsible ministry mandated by law for land acquisition, to appoint an Assessment Officer (AO) to review the PAP files and engage them one last time. It is a legal requirement that an AO is appointed for this purpose.

The AO was subsequently appointed on 9<sup>th</sup> August 2023. On 18<sup>th</sup> September 2023, the AO published a Notice to the PAPs requiring all persons having an interest in the land to appear before him to state the nature of their interests, particulars of their claims and objections if any.

In December 2023, unresolved cases from the AO's engagements were handed over to the Attorney General and subjected to an application for deposit of compensation in court under the Land Acquisition Act of Uganda. There were 42 Respondents some of whom are owners / land users, or parties who were claiming ownership interests in the 32 parcels of land located in Buliisa, Hoima and Kikuube Districts. 17 of these presented asset valuation grievances, 18 have land ownership disputes amongst themselves (and the Project could not determine the rightful party to receive payment) and 7 are absent/unreachable.

The compulsory land acquisition program is a Government of Uganda process and the asset compensation values are determined and approved by the CGV. TEPU adopts these rates as required by law. TEPU's commitment remains to ensure that the process respects national laws including the Land Acquisition Resettlement Framework, international laws, principles and standards relating to involuntary resettlement, for example under International Finance Corporation (IFC) Performance Standard 5 and the UN Guiding Principles on Business and Human rights(UNGPs).

In addition to the compensation and livelihood restoration measures, TEPU will support PAPs with transitional assistance including provision of food rations. Livelihood restoration measures include agricultural and vocational training programs and psycho-social support. All the PAPs are eligible for all the support mentioned above and it is accorded to them per Resettlement Action Plan (RAP).



*PAPs are supported through the Agriculture Support Services Project to ensure sustainable livelihoods.*

## 2.4. Project-Induced In-Migration

The Tilenga Project initiated the process of updating the situational assessment of the Project Induced In-Migration (PIIM or influx) in 2022. The overall objective of the study was to gather data that would facilitate monitoring, projection, and planning for effective reduction and management of PIIM, and mitigation of PIIM-related impacts by all relevant Project stakeholders. The results from the analysis are to be used to minimize and manage the influx of workers and economic migrants while effectively minimizing negative impacts on the community and the environment and enhancing potential benefits linked to in-migration.

The study's scope encompassed the Project footprint in Buliisa, Nwoya and Hoima Districts including sub-counties, parishes, and villages that have significant Project components likely to attract in-migration such as Project camps, construction and longer-term work areas, the Industrial Area, and accommodation areas for contractors, among others.

Other key attributes were the Project Affected Communities (PACs) identified as potential sites for a range of direct and indirect impacts, including traffic impacts, impacts on resource-based livelihoods and natural resources, impacts linked to the influx of a predominantly male workforce, hotels and residential areas host project activities and staff, including contractors and sub-contractors, Project-related opportunity seekers reside or engage in trade and higher levels of infrastructure attract longer-term migrants and speculative activities, that can set in place processes of land-use and cultural change that typically require concerted planning and management.

Based on the gaps identified in the current and projected PIIM hotspots, the patterns and significance of PIIM impacts, and the strengths and weaknesses of the influx management strategy and other related management plans, key recommendations from the study were made. These include enhancing community recruitment and capacity development, and utilisation of the Closed Camp Strategy. On the other hand, however, there may be some economic benefits of PIIM, e.g rental income, markets and income from sale of goods and services.

In 2024, TEPU will implement the following key actions;

- Develop a robust monitoring and evaluation framework,
- Engage local stakeholders so that they can participate in the mitigation of effects of PIIM
- Ensure transparent reporting.

## 2.5. Road Safety



Emphasis on Road Safety campaign continued in 2023, due to the increase of project-related traffic, especially during this construction phase of the Tilenga project.

On July 12, 2023, TEPU launched the **VIA Road Safety Programme** in Buliisa District.

### Driver Sensitisation

All drivers engaged in TEPU's business operations, whether directly or through contracts are expected to adhere to strict driver behaviour, exemplary safe driving practices and act as role models for other drivers.

In 2023, TEPU drivers were still 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, were also 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 TEPU 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 potential severity in the event of an accident, or avoid it altogether, all TEPU vehicles are installed with an IVMS to track the driving performance and to monitor speed limits. Maximum speeds are equal to or lower than the national legal maximum, depending on the road type and location.

### Project Contractors

TEPU's commitment to road safety is also emphasized during sensitization sessions with its contractors, for example, the February 2023 meeting to promote road safety awareness. At this meeting, Tilenga Project's major contractors signed a joint road safety charter committing to promoting exemplary leadership in road safety. The objective of the meeting was to raise awareness and promote leadership in road safety management, as well as encourage and showcase the commitment of top management in addressing the issue of the road transport that is one of the highest risks of the Project.

TEPU General Manager emphasized that road safety requires a collaborative approach on all initiatives and measures to mitigate the road-related risks with a special focus on speed limits. TEPU continues to implement rigorous processes aimed at providing guidance and improved standards and sustainable Road Safety.



Representatives of contracted companies sign TEPU's Road Safety Commitments.



TEPU's Road Safety Commitments

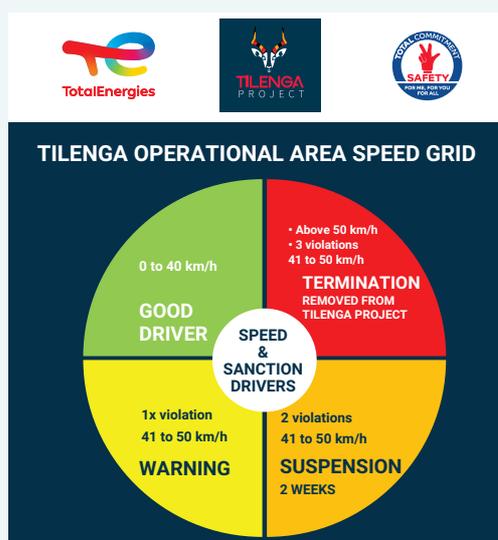
## Albertine Area Community Sensitization

This programme is aimed at raising road safety awareness among young people aged between 10-25 and educating them on safer road behaviour through interactive learning methods deployed in schools. The program is conducted in partnership with the NGO Safe Way Right Way (SWRW). In order to keep road users and children in the Albertine Graben safe, TEPU contracted SWRW to promote and enforce road safety initiatives. Between January- September 2023, over 269 teachers from 138 schools were trained using the “train the teacher model”, and over 37,873 students and Road Safety Clubs in over 130 schools were created in the Project districts (Buliisa, Hoima, Nwoya, Pakwach and Kikuube). Radio talk shows and radio jingles reaching at least 4 million people in these same districts were aired as part of the initiatives.

## Speed Limit

For the benefit of local communities and other road users, TEPU revised and updated its speed limits in September 2023, and a memo was shared internally. Although this update was a result of increased road accidents across the country, emphasis was placed on the fact that the company adopts more stringent standards when it comes to road safety i.e TEPU rules in comparison to Uganda regulations.

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 km/h on specific roads especially in school zones.



TEPU speed grid

## Road Safety Sensitization

Road safety sensitization in the community continued in 2023 in the 5 project districts i.e Buliisa, Hoima (district and city), Kikuube, Pakwach and Nwoya. Community Road Safety Project was successfully rolled out in stakeholder mapping and inception meetings in these districts.

- Four inception meetings were conducted with an attendance of 171 key stakeholders (142 males and 29 females) including subcounty leaders, local leaders, Resident District/City Commissioners (RCCs/RDCs), District Police Officers and other district strategic persons such as boda boda cyclist leaders and taxi association leaders.
- A digital database of boda boda cyclists and key stakeholders was developed by each project district by the “District Road Safety Committee” and utilized for activity planning and implementation.
- Five zebra crossings were painted at five pedestrian crash incidence hotspots in Hoima City including Coronation Primary School, Duhaga Primary School, Mandela Junction, Hoima Regional referral hospital and Hoima Central Police Station.

### Training Road Safety Ambassadors

Among the initiatives undertaken, between January - September 2023, 189 Boda Boda Cyclist Road Safety champions were trained as Trainers of Trainers, and they sensitized over 1,391 cyclists in the districts above. In over 208 sessions, boda boda cyclists in Project districts were trained and certified on road safety activities. Close to 4,229 community members from the Project affected region were sensitized directly on road safety measures in collaboration with Traffic police officers from the respective districts (during stakeholder meetings including both adult males and females).



## Ride Safe, Be Safe



**Wear a helmet & reflective gear while riding**



**Never ride while under the influence of alcohol or illicit drugs**



**Watch out for others on the road**



**Abide by the speed limits**



**Never use a phone while riding**



TEPU produces and disseminates information, education and communication material to raise awareness around road safety.

## Road Surveys

Road surveys are regularly carried out to ascertain road conditions, including the state of road markings and signage and mitigation of risks to acceptable levels. In 2023, signage was placed from Mombasa to site, on the intra-field roads, and road patrol flag men and women were also placed at high-risk locations.

## 2.6. Cultural Rights

The Tilenga HRIA identified cultural heritage as one of the salient human rights issues at risk of being negatively impacted by the Project activities. As a result, the Cultural Heritage and Archaeological Management Plan (CHAMP) was established to be the principal guide for mitigation of any Human Rights risks related to cultural heritage. TEPU's programs in 2023 continued to implement the management plan.

### 2.6.1. Cultural Heritage in the Project Area



*Beneficiaries of handcraft trainings*

In 2023, one of the most prevalent issues from CSOs was the claim that TEPU's activities did not take into account the protection of cultural heritage and archaeological resources in the project area. In responding to these allegations, TEPU highlighted the measures put in place, which had been undertaken in the implementation of the CHAMP.

#### **These included;**

- Working closely with its contractor to ensure that graves and shrines located in the Project Area are relocated in a manner which respects local traditions and culture unique to that region. By the end of the year, a total of 267 out of 474 graves and 107 out of 111 shrines had been relocated in consultation and with the involvement of the affected families and communities.
- Stakeholder engagements with traditional leaders and the communities to register any issues arising from the implementation of the CHAMP. These engagements also included consultations with the affected families to obtain consent and ascertain the requirements for relocating their graves and shrines.

In collaboration with the Cross-Cultural Foundation of Uganda (CCFU), TEPU also initiated a project known as "Culture for Livelihood". This Project was aimed at safeguarding and promoting culture in the Bunyoro, Bugungu, Alur and Acholi sub-regions. It also promotes 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<sup>10</sup>.

<sup>10</sup><https://crossculturalfoundation.or.ug/2022/07/14/1742/>

The project started in 2022 and continued successfully in 2023. Through this project, women groups have been empowered to improve their handicrafts making skills and boost their livelihoods. Training is provided in handcraft making, value addition, business management and marketing skills.

In addition, women groups are being supported to develop business plans for financial support to boost their capital base and promote more diversity and creativity in the industry. CCFU is also monitoring the craft making activity to assess any skills gaps and ensure that quality products are being made for sale.

The beneficiaries of CCFU's project include Boomu Women's Group from Masindi, Tubbehawwe Women's Group in Buliisa, Pakwach Art and Craft Association (PACA) in Pakwach, Can Ber Kimeyo Group and Wamiru Kuc Women Group from Nwoya.

Additionally, some women work with men in wood curving, making products such as mortars, stools, decorative materials and traditional music instruments. A particular highlight is the Pakwach Art and Craft Association (PACA), a group that supplied TEPU with musical instruments that were donated to different traditional groups in the Project area.

### 2.6.2. Promotion of Traditional Music in the Albertine Region



*TEPU promotes traditional music through the Culture for Livelihoods Project.*

TEPU celebrates culture as a foundation for cohesion, an anchor and inspiration for communities, and a basis for connection between different communities. Traditional music is one of the aspects of cultural rights that TEPU seeks to protect and preserve.

Under the Culture for Livelihood Program, TEPU team led by the Social Performance Director made donations of traditional music instruments that include adungu, violins, fiddles, and xylo-phones, and dancing attire to Buliisa Heritage Information Centre Group, Mubaku Adungu Group, Odokolit Adungu Group and Wamiru Kuc Group in Nwoya District.



*Handover of traditional music instruments*

Additionally, TEPU in partnership with the Cross-Cultural Foundation of Uganda (CCFU) organized a two-day music camp for music groups supported under its Culture for Livelihood Program (CUL).

The camp was attended by four groups, including Odoko Lit Music Group and Wamito Kuc Women's group from Nwoya District in Acholi, Mubaku Sound of the Nile, an Alur adungu group that performs in Murchison Falls National Park, and Bugungu Heritage and Information Centre (BHIC) troupe from Buliisa District. Such camps foster intercultural dialogue, promote transmission of skills to young people, and capacity building of the groups by professional music trainers from the Uganda Heritage Roots.

### 2.6.3. Promotion of Education Heritage Exchange Programs in the Albertine Region



*Students during an education visit to a cultural site.*

TEPU in partnership with Cross Cultural Foundation Uganda (CCFU) organized education exchange programs for heritage clubs composed of students from primary and secondary schools in the Albertine region (Buliisa, Nwoya and Pakwach). This was part of TEPU's Culture for Livelihood Program to support regional cross learning through Heritage Education Program (HEP) and Heritage School Clubs.

The students visited heritage centres outside their communities where they discovered and appreciated the history of other cultures. They had an opportunity to discuss, share ideas and appreciate diversity in cultures. These activities are expected to promote intercultural collaboration, peace and unity.

From Buliisa district a total of six schools were represented: Divine SS, Mukitale Development Foundation SSS, Biiso War Memorial SSS, Buliisa Primary School, Kisyabi Primary school and Bugungu SSS. Thirty-three (33) Bagungu students visited Mparo Tombs (Bunyoro Kingdom burial grounds) where Omukama Kabalega was buried, they also visited Kibiro landing site and saw the hot springs and salt mining activities.



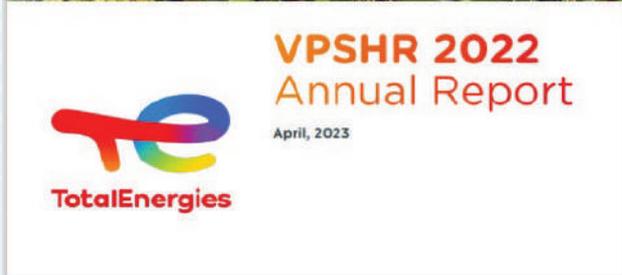
Students at the Wang-Lei Cultural Heritage Site

A total of 18 students from Pakwach District; Pakwach SSS and Panyimur SS, visited the Buliisa Heritage Information Centre Museum to learn about the history of Bagungu. They also visited key landmarks from their classroom lessons e.g., Butiaba Landing site, the Western Escarpment and Biiso War Memorial.

Students from Nwoya District visited Wang-Lei Cultural Heritage Site at North Nile Bridge and Panyimur Cultural Centre. Here, they learnt about the history of Giper and Labongo, their forefathers and the different norms and rituals performed in the Alur Culture. They also met with the Alur high priest responsible for performing the cultural rituals. The following schools participated: Purongo Seed SSS, Kworo High School, Purongo Hill primary School, Paraa Primary school and St. Mary's SSS.

## 2.7. Interactions with Government and Private Security Forces

### Voluntary Principles on Security and Human Rights (VPSHR) Annual Report



Each year in March/April, TotalEnergies issues a VPSHR report covering its activities all over the world. The 2022 Annual Report was published in April 2023 and includes a detailed description of the measures taken by TEPU to ensure that the Voluntary Principles of Security and Human Rights (VPSHR) are respected in Tilenga Project.

*VPSHR Annual Report, 2022<sup>11</sup>.*

The Tilenga Project site and facilities are secured by both the Oil & Gas Police (OGP) and unarmed private security guards from private security companies. 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.

In 2023, the Project continued to implement its programme for continuous implementation of the VPSHR.

#### **VPSHR 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. By end of December 2023, VPSHR trainings had been conducted for 2,098 Government Security Forces and Private Security Company personnel.

Furthermore, in February 2023, the TEPU security department was invited by the management of the Oil and Gas police to give a lecture on VPSHR at their Katakwi training school.

Additionally, before their deployment all over the country, more than 300 trainees attended a two-hour awareness session that covered all themes related to the protection of Human Rights, particularly those of vulnerable people.

<sup>11</sup>[https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-04/vps\\_hr\\_annual\\_report\\_2022\\_totalenergies.pdf](https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-04/vps_hr_annual_report_2022_totalenergies.pdf)

The training topics include;

- i. Understanding Human Rights
- ii. The use of force
- iii. Vulnerable groups including women, children, indigenous people and Human Rights Defenders
- iv. Roles and responsibilities of GSFs and PSCs in promoting VPSHR

### **Liaison with District Police and Government Authorities**

In 2023, TEPU continued regular liaison with this police station for information sharing in order to ensure that the police who are 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 sessions organized by TEPU. *Uganda Police has a district police station 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 February 2023, TEPU was made aware of an incident related to six acacia trees belonging to a land user in Buliisa which had been cleared by MEMD site representatives. In response to this incident, TEPU's General Manager engaged the MEMD and the Government of Uganda on the Company's commitment to implement the Project in alignment with the best social and environmental standards. The matter was resolved accordingly and with mutual agreement from concerned parties.

## **3. Women's Rights and Gender Equality**



*TEPU promotes gender equality and provides equal opportunities to women and men at the workplace.*

The Tilenga HRIA identified women's rights and gender equality as a cross-cutting salient issue for the Project.

### **3.1. Equal Opportunities in the Workplace**

TEPU's Gender and Diversity Specialist ensures company recruitment and career development promotes diversity in the workplace. A TEPU diversity roadmap was also developed and launched internally in the 2023 second quarter by the Human Resource Director at the TEPU General Manager's townhall, highlighting the 4 key diversity areas;

- i. **Promoting gender diversity** – The Company's target is to have at least 30% women in senior management positions by 2025. To encourage female staff retention, TEPU's HR team launched a modern and comfortable Mothers Nursing room (Mama Lounge) in November 2023, to provide an exclusive area for nursing mothers to express milk for their babies while at work.

- ii. **Disability inclusion at TEPU:** TEPU and Light for the World (LftW), a global disability inclusion and development organization signed a two-year Memorandum of Understanding (MoU) aimed at enhancing equal, inclusive, and diverse employment for all qualified persons and affirmative action for Persons with Disabilities. Under this partnership, Light for the World will guide TEPU on creating awareness, establishing disability inclusive recruitment practices, and roll out employment of persons with disabilities as an equal opportunity and equitable company.

Between October and November 2023, several disability inclusion awareness trainings were conducted for the TEPU Human resources, Medical, Corporate Affairs, Social Performance, CSR and Legal teams.

- iii. **Cross cultural diversity promotion:** Finalisation of a cross cultural diversity training program for all staff. This will be launched in 2024 for all TEPU staff and will be used to create awareness and improve the multiple cultural wellbeing in the workplace through a holistic training campaign.
- iv. **Inter-generational relations among staff:** Development of TEPU Coaches Program. This will be launched in 2024 and will focus on creating a cordial and near mentorship relation across the generational diversity of the TEPU staff, while addressing skills and knowledge gaps.

To achieve the 4 key diversity areas, the HR Diversity Coordinator conducted 3 successful diversity workshops with senior management team members in the months of June and July 2023, to create awareness on diversity goals and the existing initiatives to achieve the set objectives.

TEPU also participated in the diversity and inclusion days held by TotalEnergies globally from 18-22 September 2023. Information on topics such unconscious bias in the workplace was shared through various video sessions.

TotalEnergies fosters an equal gender workplace environment and promotes the visibility of women in its workplace. TotalEnergies Women's Initiative for Communication and Exchange (TWICE) in Uganda had several initiatives in 2023 geared towards promoting the growth of women in TEPU through coaching and mentorship opportunities. Activities organized by TWICE in 2023 include:

TWICE Uganda breakfast on 27th June 2023 with Agnieszka Kmiecik – Senior VicePresident People & Social Engagement at TotalEnergies, Anne Juuko – CEO Stanbic Bank Uganda and Mariam Nampeera Mbowe – Deputy General Manager TEPU. The panelists shared their experiences and lessons through their career growth journeys.

- ii. TWICE Uganda International Women's Day Celebrations on 9th March 2023 held online with keynote speaker Caroline Mutuko the CMO of Radio African Group. The theme of the day was "Embrace Equity" and the discussion focused on demystifying the difference between Equity and Equality.
- iii. Partnership with Girls for Girls (G4G) to organize 6 mentorship sessions which are meant to run for 3 months. The first G4G Mentorship session themed Building Trust was held on 27th October 2023 hosted by Florence Nsubuga – COO UMEME Ltd.



TEPU senior management and Stanbic Bank MD (Guest) at the TWICE Uganda breakfast

L-R: Daniel MAYIEKA\_ Managing Director TEMUL, Agnieszka KMIECIAK\_ Senior Vice President people and social Engagement TotalEnergies, Mariam NAMPEERA MBOWA\_ Deputy General Manager, CEO Stanbic Bank \_Anne JUUKO, Mr. Philippe GROUEIX\_ General Manager TEPU

### 3.2. Implementation of Gender Management Plan: Gender Mainstreaming

The principal mechanism for implementing mitigation measures in this area is through the Gender Management Plan. During the year, several activities were undertaken under these services contract entered into with Network Consult, the contractor engaged to provide support on this.

A meeting was also held with the contractor, Health Promotion International to review the Gender Management Services for purposes of recommending mitigation measures to support women empowerment into the current scope of work. Guided by GIIP, the project third party provider has designed activities based on strategic approaches such as SASA Together, Gender Action

Learning and UN Women Empowerment Principles conducted as part of the implementation of the Gender Management Plan. These include:

- Referral mechanism for GBV survivors' guidance document under development to guide contractors and TEPU on managing extreme cases of intimate partner violence, rape and defilement that are normally managed by the authorities
- Gender mainstream training for community activists
- Gender action learning tools and methodologies
- Gender rapid capacity needs assessment
- Support to 5 Districts to form Gender Committees
- Training 62 local activists to champion gender mainstreaming activities in the respective villages.
- Forming strategic relationships with relevant government bodies e.g Ministry of Gender, Labour and Social Development, Departments of Occupational Health, Women, Family & Cultural Affairs, Uganda Police Force Child and Family Protection Unit and community liaison offices within all 5 districts with the purpose of dealing with Violence Against Children (VAC).

### 3.2.1. District Committees

During the year, support was provided towards 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.

Through Network Consult Limited, the contractor for Gender Management Services, Gender Committees were formed in the 5 districts (Buliisa, Nwoya, Pakwach, Kikuube & Hoima) with a total of 100 members (38 females and 62 males).

### 3.2.2. Gender-Based Violence Awareness

In 2023, Network Consult successfully concluded a Trainer of Trainers workshop in Buliisa District and certified 60 village representatives.

The 3-day training organised to support gender mainstreaming activities within the Project area saw community members equipped with knowledge about human rights, children's rights and how to handle Gender Based Violence (GBV) cases. The representatives will in-turn conduct human rights awareness sessions in their communities and support GBV survivors through counselling and referral mechanisms. Network will continuously work with the representatives and support them with required IEC material.



Information, education and communication materials were produced and disseminated to raise awareness around GBV and sexual violence.

### 3.3. Stakeholder Engagement

TEPU implements a gender-inclusive approach to stakeholder engagements. In addition to encouraging women to attend regular meetings, sessions specifically dedicated to women have been organized. Other interest groups include persons with disabilities who are also engaged at district level. The purpose of the engagements is to ensure that TEPU builds trust with the respective constituents at community and district level.

During the meetings, gender specific issues are sought and addressed accordingly together with the authorities and other stakeholders. In 2023, TEPU held gender specific engagements with 4 community-based organizations including farmer groups within the Project area. During the meeting, TEPU through its contractor encouraged participation to strengthen open communication and participate in community development activities.

### 3.4. Livelihood Restoration

The Tilenga Livelihood Restoration Programme is designed and implemented in line with the International Finance Corporation Performance Standard 5 (on Land Acquisition and Involuntary Resettlement), relevant Ugandan laws and TotalEnergies policies.

The programme has three major pillars; financial management and business capacity and the level of support given to households depends on how much they are impacted by the Project. Those that are mildly impacted receive general support, for example one-off seed distribution and small business management training. Whereas those that are severely impacted receive more intensive support. Indicators include size of the affected land, level of vulnerability, alternative revenue sources, household size, and crops affected.

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. Some of the activities being implemented 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.

However, the programme has registered some success, for example a 60-year-old widowed PAP now hosts a cassava demo garden and has set up a large cassava garden from which she expects bumper harvests thanks to the adoption of Good Agricultural Practices (GAPs) advanced by the project including proper spacing and intercropping, horizontal planting style and regular weeding.



A PAP at her cassava demo garden

A 47-year-old PAP with 7 children who has prioritised livestock and crops confirms that his harvest had doubled, and he testified as follows; *“I used to harvest only two bags of maize and beans and I now harvest at least four bags of each of these crops. It is because of the package support and trainings of Living Earth Uganda (LEU) ”*.

### 3.5. Equal Access to Employment – Contractor Obligations

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. TWICE’s primary purpose is to nurture the growth of women in TEPU through coaching and mentorship opportunities.

At TEPU, care is taken to ensure parity in recruitment. Emphasis is also placed on ensuring that Contractors are inclusive when selecting candidates or 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<sup>12</sup>. Section 4.2.2 of the Labor Management Plan (community recruitment) states one of the key aspects in the procedure for community recruitment should include filling vacancies for unskilled labour, semi-skilled labour from the Project areas through a transparent and fair process that takes into consideration gender balance and equal opportunities for all applicants. Some job opportunities should be reserved for women where feasible. TEPU consistently reminds contractors of this whenever there are vacancies requiring community recruitment.

<sup>12</sup> 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.

### 3.6. Training and Sensitisation of Project Workers

Tilenga Project Workers undergo mandatory gender inductions/awareness sessions that include GBV, sexual harassment and the need to ensure culturally appropriate conduct within the communities. By July 2023, 23 gender awareness sessions had been conducted for 15 contractors in the Tilenga Project (104 Females and 635 Males). Work in this area continues.

## 4. LGBTI+

On 26<sup>th</sup> May 2023, the President assented to the Anti-Homosexuality Act, 2023. The Act criminalises same sex sexual relations and imposes life imprisonment for the offence of 'homosexuality', up to 10 years for 'attempted homosexuality', and up to 20 years in prison for 'promoting homosexuality'.

TEPU commits not to discriminate against any of our employees on grounds of ethnicity, gender, religion and also on gender identity – this includes a commitment not to discriminate against LGBT employees. In practice this means that we will treat everyone the same irrespective of their sexuality. Our hiring policy does not take into account gender identity or sexual orientation. Once employees have been hired, we commit to developing their professional skills and careers without any discrimination.

Concerns can be reported to the employee's management, to Human Resources or the local ethics committee. If not comfortable with these channels, an employee can also address their issues directly to the parent Company ethics committee in Paris.

In line with TEPU's non-discrimination policy, a travel advisory was issued for the benefit of expatriates coming to the country for missions and work. The travel advisory highlighted the current legal and social situation in the country resulting from the passing of the Act into law. It also listed dos and don'ts for expatriates for their safety while in the country.

The CEO of TotalEnergies SE Patrick Pouyanné, in the presence of the members of the Diversity and Inclusion Council, renewed on 12th June 2023 the Company's signature of the LGBT+ Commitment Charter coordinated by L'Autre Cercle, a French non-profit that works with diversity and inclusion managers in the public and private sectors. The companies, organizations and public institutions that sign the charter pledge to:

- create an inclusive environment for LGBT+ employees.
- ensure that everyone is treated equally and fairly, regardless of sexual orientation and gender identity.
- support employees who have been the target of discriminatory speech or actions.
- measure progress and share best practices in order to improve the general workplace environment.

TEPU will continue monitoring the progress of the law, including keeping up to date with the various court cases challenging the Act's constitutionality.

## 5. Measures to Reduce Risk of Commercial Sex Work

### i. Camps and Living Areas

The Tilenga Project has developed strict policies on accommodation of employees and contractor personnel living in camp sites while on rotation. Most workers are housed in closed camps either operated by TEPU (Bugungu, Buliisa and Tangi camps as well as accommodation facilities on well pads) or operated by a contractor (such as the McDermott and Sinopec camp within the Industrial Area).

In each case, high security is in place to ensure that only authorized personnel can access the camp. Also, for security reasons, personnel are not authorized to leave the camp outside working hours. This considerably limits access to local communities.

Moreover, workers are transported by bus to the work sites on a daily basis, minimizing contact with the local population. This closed-camp system has been broadly successful in limiting unnecessary fraternization with local communities.

For those sub-contractors who do not reside in these closed camps, TEPU is required to approve the accommodation used.

There is a reporting and grievance handling mechanism in place in case for any incidents in the camp and any other accommodation. These are usually addressed through the respective employer's human resources policy, including any penalties which may be issued.

The camps also have a strict no alcohol and drug policy.

## **ii. Policy on Casual Laborers**

In order to minimise influx of workers from outside the Lake Albert communities and reduce Project induced in-migration (which may lead to increased risk of commercial sex work), TEPU encourages recruitment from villages in the immediate vicinity of its activities. For unskilled labourers, this is obligatory for all contractors. A ballot system has been set up to make sure that the selection process for recruitment is fair and transparent<sup>13</sup>.

## **iii. Sharing Good Practice**

On 22<sup>nd</sup> June 2023, TEPU along with TotalEnergies HQ representatives, took part in a meeting with Rio Tinto's social team in order to discuss and share good practices related to prevention of commercial work sex in a Project context.

## **iv. Continuous Studies**

TEPU's contractor HPI carried out a study to identify commercial sex workers' hotspots in the Project area. This study was part of the Tilenga Community Health and Sanitation Program. The resultant report titled "*Report on the Status of Commercial Sex Work in the Tilenga Region*" made several recommendations on how rights of sex workers can be protected; for example, sensitisation and awareness campaigns, training in vocational skills and providing financial assistance to help them transition into alternative livelihoods.

## **6. Human Rights Defenders (HRDs)**

Emphasis continued to be placed on the protection of rights of HRDs working in the Albertine region and those that focus on the oil and gas sector in 2023. This underscores the commitments on HRDs in the Tilenga Human Rights Policy, and the specific statement on HRDs was issued by TEPU's General Manager in 2022 emphasizing 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. However, TEPU continues to receive imprecise allegations which makes it difficult to conduct investigations and provide the necessary solutions.

In light of the work done, TEPU has continued to encourage dialogue between TEPU and HRDs. For example, the former TEPU Human Rights Director and EACOP team held two meetings with members of the Justice Movement Uganda, a group of climate justice advocates. The purpose of these meetings has been to promote dialogue between TEPU and HRDs, to respond to any human rights concerns that the HRDs have and in some cases to receive petitions and prepare responses to the same.

<sup>13</sup> To apply for these unskilled jobs, applicants have to complete a form which needs to be signed by three local leaders (LC1 chairperson, women representative and youth representative). This is a way to ensure that people who participate in the ballot process are from the area. Job applicants are selected in public and randomly from the ballot box, in the presence of representatives of the community. 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. Job adverts are also posted on the community notice boards at district and sub-counties offices.



*TEPU and EACOP meeting with HRDs.*

Whenever TEPU becomes aware of a protest against the Company, the Tilenga or EACOP projects (in which TotalEnergies is a major shareholder), it mobilizes its security personnel and seeks to ensure that such protestors are safe and that their rights are not violated. We follow up on accusations we have received, investigations and engagement with authorities occur and occasionally with the protestors themselves.

In 2023, 8 #StopEACOP protests were registered and monitored by TEPU. In each of these protests, protestors were arrested by Ugandan authorities. In line with its commitment to respect the rights of HRDs, following the arrest #StopEACOP protestors, the TEPU GM wrote to the Ministry of Internal Affairs in November 2023 in a bid to exercise leverage and remind the Government of Uganda to respect the rights of the arrested HRDs. In some cases, TEPU's Security Department representatives visited the protestors wherever they were being held to ascertain their wellbeing.

TEPU also maintains an active log of all protests that take place in respect of the Company's operations, as well as the steps and measures taken to resolve and manage each incident.

## 7. Grievance Mechanism and Access to Remedy

Please note that this grievance procedure does not apply to;

1. Requests for projects & donations,
2. Requests for jobs,
3. Complaints about your working conditions.

### • Levels of solving your grievance

#### Level One:

Upon receipt of your grievance, the Community Liaison Officer (CLO) will assess it and if the Company or its Contractors find the grievance legitimate, it will be resolved within 48 Hours from the time of registration.



TotalEnergies EP Uganda will proceed with the corrective measure. Once the corrective measure is implemented, you will be required to sign the 'Close Out' section of the **Grievance Form** to close the case.

#### Level Two:

If your grievance was not resolved at level one, it will be escalated to Level Two and resolved within 30 days from the date of escalation.



The Proposed solution will then be presented to you for your consideration. Once you have reviewed and found it acceptable, the corrective measure proposed will be implemented.

You will be asked to sign the 'Close Out' section of the **Grievance Form** to close the grievance.



#### Level Three:

If the solution proposed at level two is still not acceptable to you, the grievance will be escalated by the contractor to TotalEnergies EP Uganda for further management. TotalEnergies EP Uganda will organise a meeting with you and a third party from the district or from any relevant authority to find a solution within 90 days from the date of escalation.

If a solution is found and is acceptable to you, the corrective measure will be implemented. You will be asked to sign the 'Close Out' section of the **Grievance Form** to close the grievance.



If no solution is found, the grievance will be closed by the company as per the grievance mechanism and you may seek any other redress in respect of your grievance.



Throughout the grievance handling process, the CLO will be your contact person. Please note, however, that she/he is not entitled to take any decision on behalf of the company.

**Reporting a grievance and the whole process of resolving it is free and does not require any money from the grievant.**

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 TEPU, requirements for contractors to establish grievance mechanisms for their workers, and requirement for contractors to establish Community Grievance Procedures.

In the application of the grievance mechanism, once a corrective measure is agreed upon between the Company and the grievant, the grievance is resolved but remains open until the corrective measure is implemented, then the grievance is closed. This helps the company to ensure agreed remedies are implemented and grievances are properly closed.

The grievance Management team follows up with the respective department or contractor to fast track the implementation of the agreed remedy through emails, phone calls and where possible physically. Once the agreed remedy is implemented, the grievant signs off the grievance closure form as proof of resolution.

Throughout the above process, the grievance management team keeps in touch with the grievant to share updates on progress.

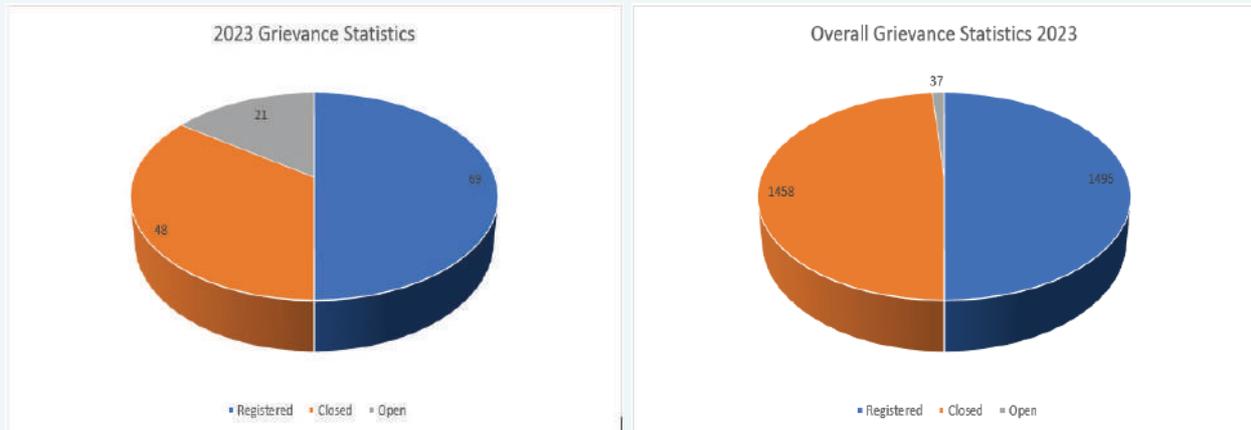
It is important to note that the TEPU Community Concerns and Grievances Mechanism is a living document that is reviewed from time to time to incorporate changes to ensure effectiveness. Through the stakeholder engagements and feedback, lessons are shared with the company to inform the review and updating process of the mechanism.

The last review of the mechanism was done in May 2023 to expand on the resolution timelines, revise the levels of escalation as well as allowing for closure of grievances where best efforts have been exhausted by the company.

## 7.1. Key Grievance Statistics 2023

In 2023, TEPU registered a total of 69 grievances related to land and resettlement (04), other economic loss (relating to damages to sources of income e.g. animals and crops)(32), employment and supply chain (11), environment and health (02), safety and security (09), social conduct (06), cultural heritage (02) and social projects (03). 48 out of 69 registered grievances (70%) were resolved and closed through engagements by both the Contractors and TEPU.

### Grievances Statistics as of December 2023



2023 Grievance statistics

Overall grievance statistics

Cumulatively, the total number of registered grievances since 2012 when the first grievance was registered, and December 2023 is 1,495. Of these, at least 1,458 - (approximately 97.5%) had been successfully resolved and closed. By the reporting period only 37 grievances (representing 2.5% of the total registered grievances) were still open (See statistics as of December, 2023).

## 7.2. Contractor Grievance Mechanisms

Community grievances mechanisms to channel complaints through contractors are harmonized with the TEPU Community Concerns and Grievance Mechanism, and all cases must be reported to TEPU to ensure effective and consistent follow-up. Each Contractor maintains a separate grievance log which is shared with TEPU monthly. However, TEPU provides an oversight role to ensure timely management of the grievances. In 2023, 62 out of the 69 grievances were managed through this mechanism.

## 7.3. Other Complaints to Company

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

Examples of TEPU's responses to collective issues raised through other channels in 2023 include:

- Letter to the Bugungu Community Associations responding to various concerns raised in relations to land acquisition, livelihood restoration - June 2023
- Response to a petition received from #StopEACOP protestors in February and July 2023.
- Responses to Business and Human Rights Resource Center on HRDs and cultural heritage
- Response to Witness Radio on land evictions in Hoima – October 2023
- Response to Global Witness on cultural heritage – November 2023
- Human Rights Watch response in May 2023 on implementation of Human Rights Policy
- Response to AFIEGO's May 2023 Newsletter on compensation related grievances and flooding in the Project area.



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