



TotalEnergies

EXTERNAL GRIEVANCE MANAGEMENT PROCEDURE

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1 OBJECTIVE

TotalEnergies EP Danmark A/S (TEPDK) recognizes that grievances may arise from external stakeholders in relation to its operations and activities. The purpose of this procedure is to define TEPDK's commitment toward societal dialogue and to describe the process and the roles and responsibilities for registering, investigating, resolving and remedying local stakeholder complaints in a timely manner.

TEPDK adheres to the United Nation Guiding Principles (UNGP) on Business and Human Rights and is committed to ensure that all stakeholders have access to an effective Grievance Mechanism. The UNGP gives a framework for companies to respect Human Rights through two main principles: 1) avoid causing or contributing to adverse Human Rights impacts through their own activities (directly or through their contractors); and in case of adverse impacts, 2) provide remediation through a Grievance Mechanism at operational level.

The procedure ensures alignment with the One MAESTRO Expectations (01.07; 04.12; 09.01; 10.02) and Company Rule CR-GR-HSE-412.

2 SCOPE

This procedure relates to external grievances only from local stakeholder raised in connection with TEPDK, employee behavior, or related contractor activities.

2.1 TEPDK Locations

This procedure covers all complaints received in relation to TEPDK operations and activities at or around any TEPDK offshore and onshore sites located in Esbjerg.

Offshore sites include: DUC Offshore Facilities consisting of both manned installations (7) and unmanned installations of different types including the associate inter field pipelines. The Offshore facilities are located in the Danish part of the North Sea approximately 240 km west of Esbjerg.

Onshore sites include:

- Esbjerg head office – Britanniavej 10 (including the K2 offices), 6700 Esbjerg,
- Warehouse facilities at Esbjerg Harbour
- NORM storage facility in Måde, Esbjerg
- Any other locations (also temporary offices) are included (but only for the time they are in use by TEPDK)

2.2 Grievance categories

A grievance is defined as a statement from an individual or a group of persons that something, regarding a specific impact, real or perceived, associated with TEPDK's activities is unsatisfactory or unacceptable and request a corrective action. For the purpose of this procedure, only external grievances are included and not complaints from TotalEnergies or TEPDK workforce which are subject to other management systems.

Grievances can be classified into distinct categories:

- **Access to land (related to land access and/or acquisition):** Temporary or permanent problems related to the use of land or property. Examples: disagreement about property value and appraisal, issues in identifying landowners, trespassing on property.
- **Local economic losses:** Temporary or permanent problems related to the damage and/or failure to restore the livelihoods of impacted stakeholders. Examples: damage to crops, impact on fisheries activities.
- **Employment:** Complaints about the recruitment process. Example: perceived discrimination in selecting workers among local community.
- **Environment and health hazards:** All issues tied to the impact of the TEPDK's activities on the environment and the health of stakeholders. Examples: noise nuisance, pollution event, damage to the biodiversity, impacts on the water system.

- **Road safety/logistics & transport:** All issues tied to the impact of the TEPDK’s activities on the safety of stakeholders. Examples: speeding/reckless driving of contractor trucks.
- **Security & social conduct:** Grievances related to the behavior of the TEPDK’s staff and Contractors with stakeholders. Examples: disrespectful behavior towards members of a community, harassment, threats, physical abuse, conduct issue of security forces and other security services.
- **Attacks on culture & heritage:** Temporary or permanent problems related to an impact on a site of cultural value. Examples: destruction of graves, trespassing on a sacred site, damage to assets of historical value.
- **Social investment projects:** Issues related to the management of development projects initiated by TEPDK. Example: timeline not respected in the implementation of the project; damage caused by the construction of a water well related to a water project.
- **Stakeholder engagement and communication:** Grievances as a result of a lack of stakeholder consultation or a general lack of information disclosure. Example: grievances about activities being carried out in a locality without having notified local authorities.

2.3 Limits and redirection of grievances

There are no restrictions on the type of grievance a stakeholder can raise under this procedure. However, when a grievance might be more appropriately handled under a separate process, it will be re-directed as described in the table below:

Grievances outside the scope	Redirection
Already introduced in a court of law	Legal Service
From an affiliate's employees regarding their contract or work conditions	Human resources
From employees of suppliers of goods and service	Their employer
Commercial nature made by partners or suppliers of goods and services	Entity in charge of relations with these third parties
From local authorities or a national company	Managing Director or Public Affairs/ HSE entity except when they deal with grievances from local communities
Requests regarding social funds or local development projects	Social and Environmental entity or Managing Director

TEPDK will not investigate anonymous complaints (but will provide privacy if requested) and reserves the right to decline any complaints which are considered abusive.

3 REFERENCES

3.1 Internal References

Document Name		Document ID
1	Code of Conduct	CH-GR-ETH-001
2	One-MAESTRO HSE Expectations	CR-GR-HSE-001
3	Stakeholder and Local Impact Management	CR-GR-HSE-412
4	Community grievance management	GM-GR-HSE-490
5	Guide for Human Rights	GM-GR-ETH-002

3.2 External References

External requirement	Description
United Nations Guiding Principles (UNGP)2011	Guiding principles on business and human rights. Implementing the United Nations “Protect, Respect and Remedy” Framework, United Nations
International Finance Corporation (IFC) Standards 2012	Performance standards on environmental and social sustainability, International Finance Corporation
International Petroleum Industry Environmental Conservation Association (IPIECA) 2015	Community Grievance mechanisms on the Oil and Gas industry

3.3 Local Legislation

Title	Reference
1 Bekendtgørelse af Lov om anvendelse af Danmarks Undergrund	Klima- Energi- og Forsyningsministeriet LBK 1533, 16/12/2019

4 PROCESS/PROCEDURE

There are three levels of grievance resolution:

Description	
Level 1	Resolution through dialogue without financial commitment, with two possible outcomes:
	Level 1a: Immediate resolution without formal investigation.
	Level 1b: No immediate resolution can be found, investigation is needed, by the Stakeholder Engagement Coordinator / Grievance Administrator in coordination with interested parties. Solution 1 is proposed. If the complainant does not accept Solution 1, the grievance is escalated to Level 2.

Description	
Level 2	When Solution 1 is refused by the complainant and resolution requires involvement of the Grievance Management Committee.
	The Grievance Management Committee (GMC) reviews the grievance and identifies an alternative solution (including an acceptable financial commitment). If the complainant does not accept Solution 2, the grievance is escalated to Level 3.

Description	
Level 3	Solution requiring the intervention of an external mediator.
	The Stakeholder Engagement Coordinator/ Grievance Administrator, in consultation with the complainant, shall find a third party who will serve as mediator and will propose a third solution (Solution 3) to the GMC and the complainant. If the complainant does not accept Solution 3, the grievance is referred by the Grievance Administrator to the Legal Service.

4.1 Receiving a complaint

Concerns or complaints can be deposited in any form to the Stakeholder Engagement Coordinator/Grievance Administrator (SEC/GA, same person at TEPDK) either by email, letter, phone or via the TEPDK website.

The complaints form is available to collect from the Esbjerg office and can also be filled out from the TEPDK website under contacts. (<https://corporate.totalenergies.dk/din-bekymring-your-concerns>)

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6700 Esbjerg
Denmark
Tel: +45 7545 1366

[Email: EP.TEPDK-reception@totalenergies.com](mailto:EP.TEPDK-reception@totalenergies.com)

The grievance resolution process is detailed in Appendix 1 – Grievance Process Flowchart.

4.2 Recording & acknowledging a complaint

If the SEC/GA receives a grievance submitted orally, he/she fills out the grievance form in front of the person making the complaint and reads it back to them. Grievances communicated by phone have to be confirmed in writing by the complainant.

The SEC/GA shall then establish if the complaint falls within the scope of the procedure. If at this stage, the grievance is considered unfounded, the SEC/GA shall send a letter to the complainant indicating the reasons why the grievance is rejected; The SEC/GA shall enter all complaints received into the TEPDK grievance register.

4.3 Investigation

The SEC/GA shall lead an investigation with the help of other appropriate roles within the organization. During the investigation, the SEC/GA provides appropriate updates to the complainant by letter, telephone, face-to-face meeting or email, and updates the GMC as needed.

4.3.1 Level 1 – Resolution without financial commitments

If there is no expenditure commitment involved, the SEC/GA can propose solutions such as providing further information or explanation, apologizing for the disturbance caused or offering corrective actions planned to remove the nuisance.

Investigation and Solution 1 shall be offered within 7 days after the grievance deposit.

Acceptance or refusal of Solution 1 shall be made known by the complainant to the SEC/GA within 2 weeks after the grievance deposit.

If Solution 1 is refused by the complainant, the grievance is escalated to Level 2.

4.3.2 Level 2 – Resolution requiring validation from the Grievance Management Committee (GMC)

The SEC/GA requests a meeting with the Grievance Management Committee (GMC) to explain the case. The GMC analyses the complaint, proposes a solution and mobilizes the necessary resources.

If a financial commitment is required, the case is presented to the Managing Director for approval.

The SEC/GA communicates Solution 2 to the complainant in writing, personally.

If Solution 2 is accepted, the implementation of the solution, the close-out of the grievance shall be done within 30 days after the grievance deposit.

If the implementation of the solution requires more time, it needs to be documented.

If Solution 2 is refused by the complainant, the grievance is escalated to Level 3.

4.3.3 Level 3 – Resolution requiring an outside mediator

If the complainant does not accept Solution 2, the SEC/GA will find, in consultation with the complainant a third party who will help to find a solution suitable for the complainant and the GMC (Solution 3).

Solution 3 shall be closed-out within 90 days after the grievance deposit.

If the implementation of the solution requires more time, it needs to be documented.

If the complainant does not accept Solution 3, the SEC/GA informs TEPDK's Legal team that there is a potential risk of legal proceedings. From then on, the complaint is referred to the Legal team and is not anymore handled by HSE Department.

4.4 Closure of the grievance

A grievance is considered closed if the solution is properly implemented in accordance with the agreement between the parties and the complainant by signs a Grievance Acceptance and Closure Form.

5 COMPLAINTS DOCUMENTATION

The SEC/GA is in charge of maintaining a proper grievance database (register and all documents related to grievance management) and producing reports as defined in the current procedure as well as reporting relevant KPIs to the GMC (Section 7.1) and to TotalEnergies headquarter entities in the societal and stakeholder reporting systems.

6 PROTECTION OF COMPLAINANTS

In compliance with international standards and best practices, this procedure must protect the rights of all complainants. These rights include the right to information, access to the grievance procedure and respect of confidentiality, if requested.

6.1 Right to confidentiality

TEPDK will do everything it reasonably can to respect confidentiality when requested by any complainant wishing to register a complaint in a confidential manner.

6.2 Retaliation

Potential conflicts of interest will be managed by identifying the various roles and responsibilities of TEPDK's staff involved in the grievance procedure and by avoiding placing individuals in positions where conflicts of interest could be perceived to arise.

Complainants may choose not to use complaints mechanisms because they have concerns about the consequences. For example, they may perceive that submitting a grievance may negatively impact their

employment opportunities with TEPDK or its contractors. When concerns about retaliation or victimization are raised, they will be investigated under Total's Code of Conduct procedure (CH-GR-ETH-001.)

6.3 Legal Framework

The Complainants have the right to pursue other legal avenues of remedy if a solution cannot be agreed upon by TEPDK and the complainant.

7 PROMOTION AND ACCESSIBILITY

The SEC/GA will explain the procedure to neighboring communities through small group meetings (e.g. community council) and/or directing people to the TEPDK web page.

The SEC/GA ensures that all relevant staff dealing with project and operational activities receive training on the grievance management procedure.

The response letters will be either in Danish or English depending on the language the grievance is raised in.

7.1 Indicators

The SEC/GA reports internally on the performance of the grievance mechanism to TEPDK management on an annual basis. Data analysis on the types of grievances/complaints received and the lessons learned will help to avoid recurrences and sustain positive relationships with stakeholders.

Table 1 – Grievance Key Performance Indicators

No.	Theme	Description	Target
1.	Receipt of Grievance	% of grievances acknowledged in time	80% of grievances are acknowledged by letter or email within 7 working days of receipt.
2.	Complaints resolution time	% of grievances timely response	At least 80% of grievances closed within 60 calendar days.
3.	Performance of mechanism	% of grievances resolved in the first and second levels	At least 80% of grievances are closed at first and second levels.
4.	Learning ability & key themes to focus on	% of repeat grievance/ complaints	To have an 80% decrease of repeat complaints after one year. The intention is to learn from grievance and complaints and respond to them in a manner that over time reduces their rate of occurrence
5.	Effectiveness of the mechanism	% of satisfaction in the process	To have 80% of complainant satisfied after Signing a Grievance Acceptance and Closure Form

8 ROLES AND RESPONSIBILITIES

Role	Responsibility
TEPDK Managing Director	<ul style="list-style-type: none"> • Approves and signs the Grievance procedure and is accountable for Grievance management. • Ensures TEPDK gets the resources (human and financial) to manage grievances efficiently.
TEPDK HSE Manager	<ul style="list-style-type: none"> • Ensures high level coordination between the company and the contractor in the management of grievances, as part of the Social Management Plan. • Supports the Stakeholder Engagement Coordinator and the Grievance Administrator or any person overseen the process in the resolution process, especially the investigation when the grievance is directly related to operational activities. • Ensures the implementation of the solution is carried out fairly and timely.
TEPDK Environment Manager	<ul style="list-style-type: none"> • Responsible for the development and the overall implementation of the procedure in compliance with TotalEnergies requirements. • Is in charge of the design of the grievance mechanism. • Ensures the Stakeholder Engagement Coordinator and the Grievance Administrator are trained to manage grievances properly. • Ensures awareness on Grievance Management is provided to Company and Contractor 'staff who can be grievance recipients. • Ensures the grievance database is updated and reporting is provided as per the requirements of the current procedure.
Stakeholder Engagement Coordinator (SEC)	<ul style="list-style-type: none"> • Is the main point of contact between stakeholders and the business. • Ensure stakeholders are aware of the Grievance Mechanism. • Receives and reports complaints to the GA and participates to the resolution process. • Serves as the main point of contact with the complainants. • Maintains dialogue with the complainants during resolution. • Promotes awareness and understanding of the purpose of Grievance Management within the workforce, for them to know what to do in case they become recipients of a complaint. • Provides regular feedback about attitudes and opinions of stakeholders to the HSE Team regarding their perceptions / understanding of TEPDK. <p>Note: the positions of SEC and GA at TEPDK shall be handled by the Environment Advisor – Societal in the Environment Team of the TEPDK HSE Entity.</p>

Role	Responsibility
Grievance Administrator (GA)	<ul style="list-style-type: none"> • Helps the Environment Manager to adapt the grievance procedure to the local context and culture. • Is assigned to investigate and design a solution to a grievance and follows up document status and progress. • Ensures that a response is provided to the complainant in a timely and fair manner. • Coordinates internally grievance reception and resolution with the Stakeholder Engagement Coordinator and internal parties involved in the process. • Coordinates with the contractors in charge of exploration activities. • Maintains a grievance register and archives all supporting documentation (forms, letters, photos, etc.). • Reports on a regular basis on the status of grievances, prepares monthly (if any grievances received) and yearly reports with an analysis of Key Performance Indicators (KPIs). • Regularly reviews the complaints and their causes to identify changes to existing procedures and practices. <p>Note: the positions of SEC and GA at TEPDK will be handled by the Environment Advisor – Societal & Stakeholder Management in the TEPDK HSE Entity.</p>
Recipient (any employee, incl. Contractors)	<ul style="list-style-type: none"> • Must be aware and understand the procedure. • Refers complaints to the Company or Contractor Stakeholder Engagement Coordinator / Grievance Administrator (SEC/GA).
COMPANY Grievance Management Committee (GMC)	<ul style="list-style-type: none"> • Internal committee with members nominated by the Managing Director. • Composed of the Managing Director, the HSE Manager, Environment Manager, Environment Advisor (Societal & Stakeholder Management) and representatives from the operations and HSE, possibly the Legal team. • Chaired by the SEC/GA. • Other relevant Project or Contractor staff may be invited if relevant. • GMC is involved in the resolution process and approves solutions when grievances are not resolved at Level 1.

9 TERMS, ABBREVIATIONS & ACRONYMS

Terms, abbreviations and acronyms included in this document are specific to the contents of the same. A list of other relevant terms is available in CMS Definitions for general reference.

Acronym / Term	Definition
Complainant	A person, group of persons or organization that considers it has been adversely affected by activities carried out under TEPDK's supervision and presents/files a grievance.
Grievance/Complaint	A statement that something is unsatisfactory or unacceptable. A grievance is an expression (in any form) of dissatisfaction (whatever its degree) regarding a specific impact, real or perceived, associated with TEPDK's activities.
Grievance mechanism	A process to receive, record, investigate, respond to and close grievances from affected stakeholders in a timely, fair and efficient manner.
Grievance Administrator (GA)	A person supervising the grievance resolution process. (role detailed in chapter 5).
Concern	A question, request for information or general perception regarding the activities of TEPDK or its contractors, which is not a grievance, but might become one.
HSE	Health, Safety, and Environment
Recipient	Any person who receives a complaint related to TEPDK activities – Company staff; contractor staff; local authority.
Stakeholders	Refers to all individuals, civil organizations and communities that may impact on TEPDK or be affected by its activities
Stakeholder Engagement Coordinator (SEC)	Person in charge of the dialogue with TEPDK stakeholders apart from the medias and the other stakeholders handled by the Public Affairs department. (role detailed in chapter 5).

APPENDIX 1 GRIEVANCE PROCESS FLOWCHART

