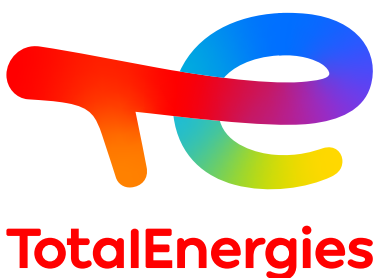




TILENGA PROJECT HUMAN RIGHTS REPORT 2025



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Executive Foreword

Greetings

Since 2022, we have published an annual Human Rights Report outlining key Human Rights actions taken to advance both national and international Human Rights principles throughout the development of the Tilenga Project. This report remains a critical tool for transparency and accountability to keep our stakeholders informed and to demonstrate the standards that guide our work.

Our Human Rights framework focuses on three priority areas.

- 1 Human Rights and our communities
- 2 Human Rights in the Workplace
- 3 Security and Human Rights

The defining theme for this year's report is workers' rights.

In line with the commitment made in last year's report, the 2025 report places particular emphasis on workers' rights, both for our direct workforce and within the wider Tilenga Project supply chain. This focus was intentional as 2025 represented the

peak of Project development phase, with significant activity underway ahead of First Oil expected in 2026.

As Project execution intensified, we recognised the need to reinforce a safe, fair, and respectful working environment for workers contributing to the development of Tilenga. This report therefore highlights various initiatives implemented to strengthen working conditions, enhance worker grievance mechanisms, promote inclusive employment practices and ensure contractor compliance with Human Rights expectations across the workplace. These efforts reflect our broader culture of **Safety** and **Respect for each other**, which continues to be a pillar of how we operate. As the Tilenga Project progresses into the production phase, workers' rights will remain a central priority. Protection and promotion of workers' rights is essential not only for regulatory compliance and operational excellence but also for sustaining trust with the communities and partners we work with.

In addition to the focus on workers' rights, this report provides our progress report on other salient Human Rights topics relevant to the Tilenga Project, such as land acquisition, community grievance mechanisms, road safety, gender equality, cultural rights and the integration of security and Human Rights principles. In everything we are doing on the Project, we have embedded prevention or mitigation measures to address any identified or potential Human Rights risks, and we remain vigilant in responding to evolving impacts.

We hope you will find this report informative and reflective of our continued commitment to responsible development.

We welcome any feedback you may have through our dedicated Speak Up channels highlighted in this report.

Thank you

Philippe GROUEIX
General Manager,
TotalEnergies EP Uganda & Country Chair,
TotalEnergies in Uganda

A Snapshot of Our Human Rights Year



23

Contractor site inspections



2,275

Workers reached through awareness sessions



192

Contractor workers' grievances resolved with TEP-Uganda support



67

Sessions on GBV prevention and harrasment



99.2%

Compensation paid



300+

Community members reached through awareness sessions



20,000+

Learners and community members engaged in road safety sessions



2,517

Security personnel trained on VPSHR



1.1 Our Reference Policies and Standards

TEP-Uganda's Human Rights governance approach is guided by both national and international Human Rights standards including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and Uganda's National Action Plan on Business and Human Rights. These principles have been localised in TEP-Uganda's Human Rights policies¹.

Consistent with the theme of this year's report, TEP-Uganda integrates principles of relevant International Labour Organization (ILO) Conventions into its operational practices. These include key instruments such as:

- ILO Convention No. 111 on Discrimination
- ILO Convention No. 155 on Occupational Safety and Health
- ILO Convention No. 182 on the Worst Forms of Child Labour
- ILO Convention No. 29 on Forced Labour, among others

Additionally, TEP-Uganda has in place policies and contractual frameworks to ensure alignment with the International Finance Corporation Performance Standard 2 (IFC PS2) on Labour & Working Conditions. This standard reinforces fair and non-discriminatory treatment of workers, and outlines an employer's responsibility to provide safe, healthy, and secure working conditions.

TEP-Uganda's approach to these standards is reflected in its Human Rights Policy, TotalEnergies' Code of Conduct and the Fundamental Principles of Purchasing, particularly Principle 1 on Human Rights at Work. This report contains the actions undertaken during the reporting period to operationalise these standards across TEP-Uganda's operations and supply chain.



¹ TEP-Uganda Human Rights Policies

01

HUMAN RIGHTS GOVERNANCE

1.2 Governance Structure

The Tilenga Environmental and Social Impact assessment of 2019 identified potential environment and social risks associated with Project development and established a range of mitigation measures to address these impacts.

The ESIA recommended the development of the Tilenga Project Labour Management Plan to provide a policy statement on labour and working conditions and a comprehensive framework governing labour and working conditions for TotalEnergies EP Uganda, its contractors and suppliers. This framework is reviewed to ensure it remains fit for purpose and aligned with the recommendations of International Standards.

To ensure accountability and oversight for Human Rights at work, TEP-Uganda has embedded Human Rights governance within its organization structure.

Executive Oversight: The Deputy General Manager provides strategic and operational oversight for the Human Rights, Contracts and Procurement, Legal, Human Resources and National Content functions of TEP-Uganda. This ensures that Human Rights considerations are integrated into corporate decision making, operational planning and performance monitoring across the Project.

At Business Ethics Level: The Country Ethics Officer promotes and ensures adherence to TotalEnergies' Code of Conduct and manages the Speak-Up mechanism, which serves as another form of concern management for internal and external stakeholders.

All alerts related to Human Rights in the workplace are assessed and reported to the Business Integrity Committee chaired by the General Manager for validation and implementation of corrective actions, where the alerts are substantiated.

² [TotalEnergies Code of Conduct 2025.pdf](#)

Contract Management: TEP-Uganda's Project teams work closely with our Contracts & Procurement team to ensure our Human Rights principles are contractually embedded within supplier agreements. Contractors are required to uphold TotalEnergies' Code of Conduct², and the Fundamental Principles of Purchasing, promoting alignment across the supply chain.

This structure places Human Rights at the core of executive oversight and reinforces the Company's commitment to responsible Project delivery.

1.3 Roles and Responsibilities

Tilenga Project's Human Rights team leads the implementation of the Human Rights Action Plan in coordination with key functions such as Health, Safety & Environment (HSE), Social Performance, Human Resources, Projects Team, Security, Logistics, and Procurement. While each function retains accountability for its respective responsibilities within the Company, the Human Rights team ensures that each team has the necessary support to ensure that Human Rights risks are effectively identified and monitored. This close coordination safeguards the

integration of Human Rights considerations into Project operations, decision-making processes and contractor engagements.

1.4 Reporting

Progress on HRIA implementation is monitored through regular internal reviews and is systematically documented in the Annual Human Rights Report. This structured reporting process ensures that TEP-Uganda's stakeholders remain informed of TEP-Uganda's performance and reinforces TEP-Uganda's commitment to accountability, transparency and continuous improvement and proactive management of Human Rights risks.












02 RESPECT FOR HUMAN RIGHTS AT WORK

Respect for Human Rights in the workplace is a key aspect of the Company's sustainability approach. TEP-Uganda is taking various initiatives such as those below, to ensure these good practices are incorporated within its own internal policies and procedures, while also requiring its contractors and suppliers to uphold the same standards.

2.1 Due Diligence for Our Suppliers and Contractors

TEP-Uganda recognises that Human Rights are universal and every worker deserves decent working conditions and a safe and respectful working environment. To ensure this is being observed, TEP-Uganda conducts continuous due diligence on our suppliers and contractors to ensure they too have an understanding of Human Rights issues at work and incorporate Human Rights into their governance and operations.

During supplier and contractor due diligence, TEP-Uganda assesses the following aspects based on supplier and contractor declarations.

Focus Areas	Guide
 Child Labour	<ul style="list-style-type: none"> No persons below the statutory minimum age (18) are permitted to work on the Project. Strict age verification steps using the workers' Identification Documents are applied.
 Forced Labour	<ul style="list-style-type: none"> Employment must be free of coercion. Retention of workers' original identification documents is forbidden. No recruitment fees may be charged to prospective or confirmed workers.
 Working Conditions & Pay	<ul style="list-style-type: none"> Are the contractual terms and conditions documented? Are regulated hours in place? What are the provisions of statutory and contractual benefits? Are there accurate payroll records? Are decent accommodation and meals provided within the workers' camps?
 Health & Safety	<ul style="list-style-type: none"> Are occupational health and safety measures in place to ensure a safe workplace? What emergency preparedness systems are in place? Are there routine inspections? Is the provision of Personal Protective Equipment to workers at no cost to the worker? Are policies on drugs and alcohol use implemented within the camps and worksites?
 Non-discrimination & Harassment	<ul style="list-style-type: none"> Has the contractor/supplier effectively implemented a worker's policy of respectful treatment and zero tolerance for all forms of discrimination (nationality, color, sex, religion, disability, political opinion, or marital status)? Does the contractor/supplier ensure the prohibition of bullying and harassment at work? Does the contractor/supplier implement measures to ensure compliance with the TotalEnergies Code of Conduct?
 Freedom of Expression & Association	<ul style="list-style-type: none"> Do the mechanisms in place by the contractor/supplier allow for the effective respect of workers' rights to express views, to organize, and to practice their beliefs in accordance with national laws?
 Grievance Mechanisms	<ul style="list-style-type: none"> Are accessible channels available to allow their workers to report grievances and concerns? Are clear procedures implemented for addressing concerns and grievances and providing their workers with timely remediation and feedback?

2.2 Integration of Human Rights in the Tilenga Project Supply Chain

TEP-Uganda integrates Human Rights considerations throughout the procurement and contract life cycle to ensure that suppliers and contractors uphold labour rights and statutory employment obligations. This due diligence process applies to suppliers and contractors at various stages of engagement and focuses on preventing, identifying and addressing risks related to Human Rights at work e.g.;

At Contracting Stage

- Compliance with statutory employment obligations positions prospective contractors to participate in tenders to supply goods and services. At Contract award, contractors commit to adhere to Fundamental Principles of Purchasing which include obligations on Human Rights at work. **See more details provided in Section 2.3.**

During the Life of the Contract

- Periodic Human Rights audits may be performed either directly or through independent third-party auditors to confirm such adherence especially for high-risk contractors/suppliers. In some cases, on-site audits may be conducted to verify working conditions.
- Critical cases identified through audits or reported grievances from anonymous sources and or third parties or the authorities are assessed by TEP-Uganda and where applicable for contractor workers, such assessment is conducted in coordination with the respective employers.
- TEP-Uganda closely monitors the implementation of corrective action plans and may conduct follow up audits to confirm closure of non-compliances. Persistent non-compliances may lead to termination of contracts as the ultimate sanction.

Workers Voice Tool

- Currently deployed at 4 contractor sites with the largest workers' population. TEP-Uganda escalates to concerned contractors and suppliers the results flagging a violation

of labour conditions or health and safety standards for investigation and where substantiated, corresponding corrective action plans. **See Section 2.4 below.**

Business Ethics Reporting

- Tilenga Project workers including external parties may report directly any Human Rights abuses and ethical misconduct through the designated Speak up channels including the grievances mechanisms in place (for the project and for the workers) and the alert Ethics line (ethics.tepu@totalenergies.com).

2.3 Fundamental Principles of Purchasing

TotalEnergies' Fundamental Principles of Purchasing (FPPs)³ set out basic principles that its contractors and suppliers are required to meet. A practical guide⁴ has been developed by TotalEnergies to support contractors and suppliers in implementing the principles. The FPP is a contractual commitment agreed to in each contract, requiring compliance for both the contractor/supplier and in turn, such contractor's/supplier's own suppliers/subcontractors.

Under the FPPs, TEP-Uganda's suppliers are expected to adopt and implement effective policies and procedures which ensure compliance with applicable labour laws and alignment with the recommendations of international standards on Human Rights in the workplace, such as ILO and UN Guiding principles.

- The FPPs highlight key principles such as prohibition of child labour at supplier and subcontractor work sites, prohibition of forced labour e.g. though withholding workers' original identification documents and the requirement for compliance with employment regulatory obligations.
- Supplier Development Workshops held quarterly, and Community Supplier Development Program held on a monthly basis in the Tilenga Project communities provide additional forums to emphasise such messages on the principles in the FPPs.



³ Brochure Fundamental Principles of Purchasing.pdf

⁴ Practical Guide to the FPPs



2.4 Sustainable Procurement

Committed to contribute to the UN Sustainable Development Goals, TotalEnergies is placing sustainable development at the heart of its Projects and operations. This ambition is advanced through responsible sourcing practices, proactive supplier engagement and rigorous environmental and social standards.

Human Rights Through the Supply Chain

- a. **Qualification of Suppliers:** Before entering into any commitment, TEP-Uganda assesses a supplier's Social Responsibility and Human Rights performance status, with particular emphasis on their adherence to national labour laws and International Human Rights standards. Contractors identified as medium or high risk are required to put in place an action plan to address identified gaps before contract award.
- b. **Scope Optimization & Bid Evaluation:** All scopes of work solicited from bidders are developed with an emphasis on Human Rights, particularly regarding Health and Safety standards, employment contract compliance, employment and training of Ugandans and adherence to the TotalEnergies Code of Conduct and this forms part of the selection criteria.

- c. **Contracting:** Contractors commit to adhere to FPPs and this provides a foundation for any long-term partnerships with a supplier. Principle 1 of the FPPs specifically addresses worker's rights i.e. Respect for Human Rights at work.
- d. **Compliance Monitoring and Risk Assessment:** We continuously monitor and assess main contractors on their Technical, Commercial, and FPP(s) performance to drive ongoing improvement. These assessments are carried out through;
 - i. **Sustainability Audits:** Strategic contractors/suppliers may undergo Sustainability Audits to assess their performance, on key Environmental, Social and Governance parameters, with particular emphasis to Human Rights, Environmental management, and Climate-related impacts. In 2025, 3 contractors/suppliers were assessed by an independent third-party auditor. The objective was to assess compliance with local employment legislation and adherence to the contractors'/suppliers' contractual obligations under the FPPs. Assessments cover matters related to child labour practices, protection of migrant workers, forced labour, wages and benefits, working hours, discrimination, harassment and general workplace conditions. These assessments provide TEP-Uganda with actionable insights to ensure continuous improvement across the supply chain.

- ii. **Contractor Audits and Inspections:** Consistent with the Labour Management Plan, contractor accountability is reinforced through regular site assessments and physical inspections conducted by the Social Compliance team.

In 2025, TEP-Uganda implemented the following monitoring steps to verify contractor alignment with workplace Human Rights standards;

23 contractor site inspections focusing on workforce documentation, conditions of employment, recruitment practices and workers' living conditions. These inspections provide real time visibility into contractor performance and help ensure that all operational partners uphold TEP-Uganda policies and comply with national legislation on Human Rights, labour conditions and worker safety.

7 risk-based social management assessments for high-priority contractors focusing on labour practices, worker welfare, and respect of contractual Human Rights obligations.

6 of the 7 contractors assessed were providing personal protective equipment (PPE) to personnel, installing suggestion boxes at work sites, conducting regular awareness and sensitization on labour matters, providing opportunities for upskilling workers and building capacity and also had in place grievance-management procedures that had been communicated to their workers. TEP-Uganda required contractors with identified gaps to develop or mandate their subcontractors to develop and implement the targeted corrective action plans. These plans are regularly monitored to ensure timely implementation and sustained improvement.



iii. **Workers Voice Tool:** The “Worker’s Voice Tool” was piloted on 2 contractor sites in September 2023 as part of TEP-Uganda’s efforts to strengthen oversight of Contractors’ labour practices through surveys by providing workers with an additional channel to report their working conditions directly to TEP-Uganda by responding to a questionnaire. The tool which remained operational throughout 2025, is implemented through anonymous phone-based surveys, that collect workers’ feedback on their day to day working conditions.

Data generated is intended to enable the Project to measure key indicators of working conditions and to detect signs of potential risks of modern day slavery. It also supports early identification of potential hot spots, and whether further investigation or targeted action plans are required.

Whereas workers’ participation is voluntary and anonymous to ensure confidentiality, the insights obtained through the tool are intended to help improve the work environment.

In 2025, two other major contractors were onboarded onto the tool bringing the total number of contractors covered by the tool to four. These 4 contractors represent over 45% of the workforce on the Tilenga Project. Through these surveys, TEP-Uganda gains timely indicators of onsite working conditions and where necessary, requires contractors involved to investigate concerns raised and development of corrective action plans.

To promote awareness and ensure the workers know how to use the tool and why they need to participate, TEP-Uganda conducted refresher sessions for existing users and provided onboarding sessions for workers under the newly added contractors. The sessions also served as feedback opportunities where workers could report any concerns, in addition to the Contractors’ existing grievance mechanism, without replacing them. More than 204 contractor and subcontractor personnel participated in these sessions, during which TEP-Uganda reinforced key messages on Human Rights at work and highlighted the respective roles of Contractors as employers and the workers.

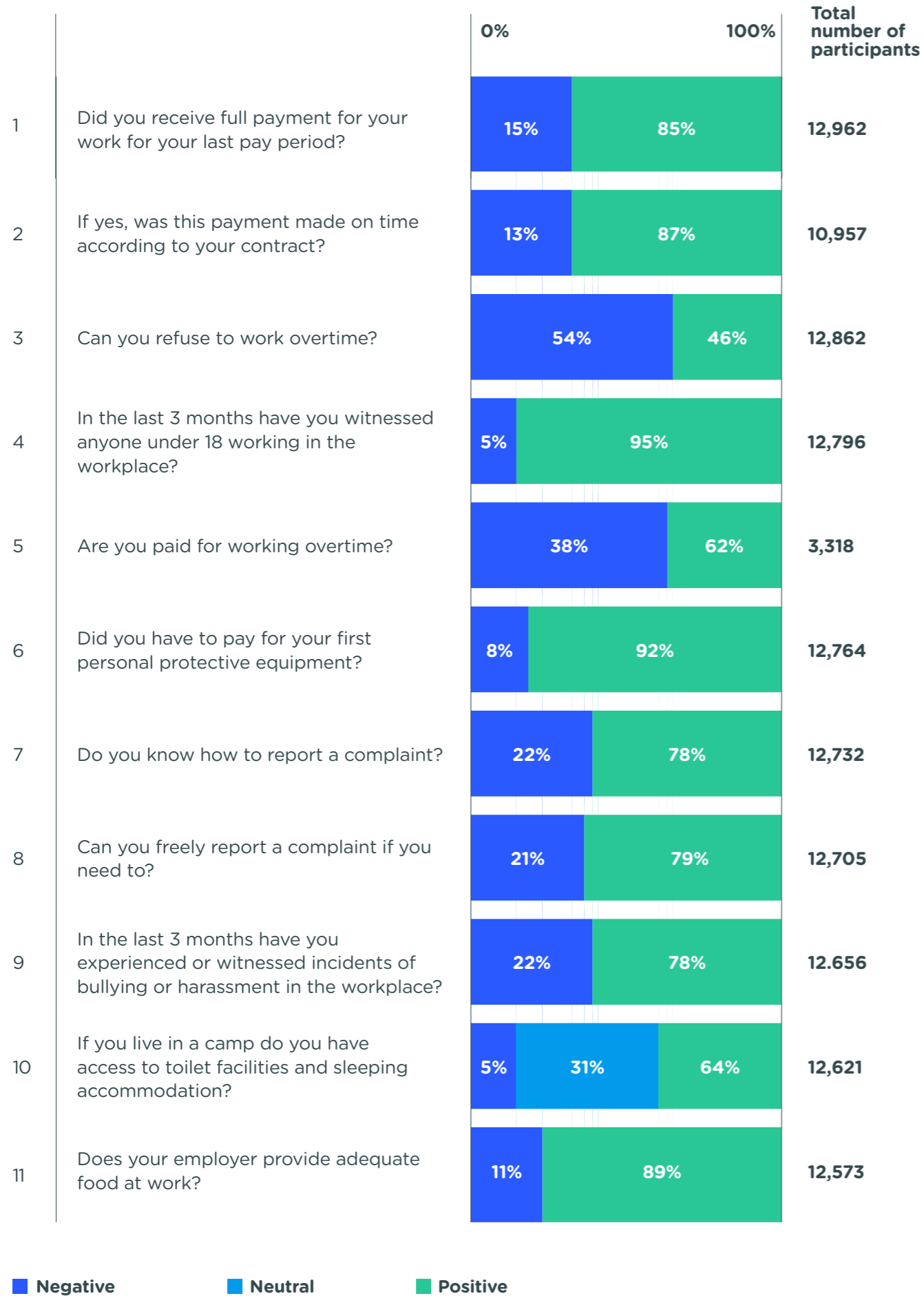
The Workers’ Voice surveys have been an important tool for monitoring working conditions of workers during tool’s pilot

phase. However, the tool is currently deployed at only four contractor sites, and therefore the insights collected remain limited in terms of representing the entire Project’s workforce.

Another challenge relates to the anonymous nature of the Workers’ Voice Tool. While anonymity encourages honest feedback, sometimes it makes it difficult to identify which contractor or subcontractor a concern relates to. To manage this, TEP-Uganda encourages all participating contractors to proactively monitor issues that are applicable to them and to provide feedback on their follow-up actions. This helps in ensuring that concerns are addressed and remedial actions implemented even when the specific source may not be identified immediately.



Sample Chart of Workers Voice Survey Results



2.5 Contractor Training and Capacity Building

During this year, TEP-Uganda conducted the following targeted capacity building and awareness initiatives aimed strengthening Human Rights practices within the supply chain:

- A total of 38 Small and Medium Enterprises (SMEs) participated in the "Human Rights in Business" training. This training covered the UNGPs on Business and Human Rights and key Human Rights at work such as the prohibition of child and forced labour, non-discrimination and diversity, and the right to just and favourable working conditions.
- Further, 107 Micro, Small and Medium Enterprises (MSMEs) received training on Environmental, Social and Governance (ESG) standards with a particular focus on the integration of Human Rights considerations into their business operations. This training was aimed at equipping participants with practical knowledge and tools to identify Human Rights risks, assess potential impacts and develop mitigation measures within their operations and supply chains.

These engagements form part of TEP-Uganda's ongoing commitment to fostering responsible business conduct and enhancing Human Rights due diligence capacity.

Awareness and Sensitizations

Through the Contractors' Toolbox meetings, the Social Compliance team guides workers on Human Rights topics such as grievance reporting procedures in the Tilenga Project, raises awareness on anti-corruption and anti-bribery, prevention of Gender Based-Violence, bullying and harassment, prohibition of discrimination, and Tilenga Project's alcohol/drug policies, applicable to all Project sites.

In total, 33 awareness sessions were conducted during this year, reaching 2,275 contractor and subcontractor personnel across various Project sites. Topics covered included prohibition of forced and child labour, community recruitment integrity, worker grievance handling, leave and rest entitlements, worker contract issuance and personnel demobilization procedures.

However, despite the existence of Uganda's National Action Plan on Business and Human Rights, many businesses still have limited awareness of their responsibilities in integrating Human Rights standards into their operations. At this level, TEP-Uganda continues to help address this gap by conducting awareness raising and capacity building sessions to promote broader understanding and effective integration of business and Human Rights principles within business operation across the country.



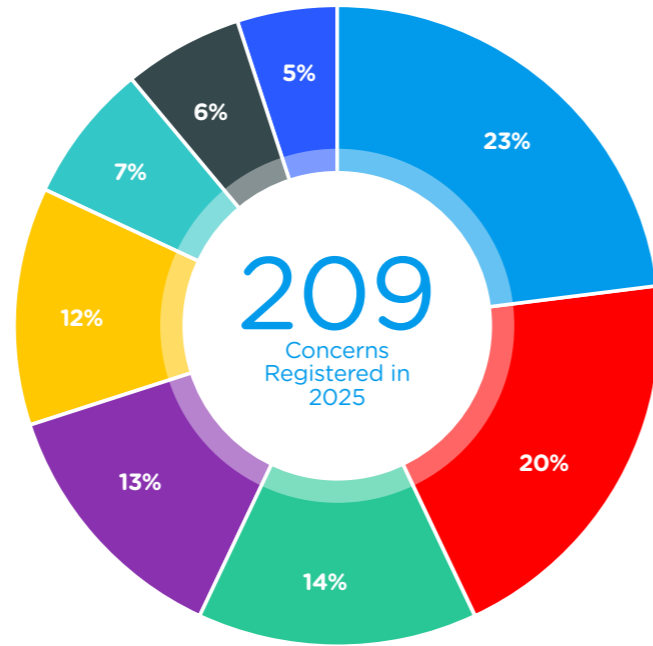
2.6 Workers' Grievance Mechanisms

Several grievance mechanisms are in place and are accessible to TEP-Uganda's employees and contractors' workers to support the reporting of workplace concerns. These **Speak Up** channels ensure that all personnel working on the Tilenga Project, regardless of their employer, have avenues to raise issues safely. Consistent with the FPP requirements, Contractors are required to establish and maintain accessible, impartial, and transparent grievance mechanisms, which allow workers to express concerns freely and without fear of retaliation and aligned with the effectiveness criteria of the UN Guiding Principles on Business and Human Rights.

To ensure alignment with the recommendation of these standards, TEP-Uganda conducts at least 2 field monitoring inspections per month to ensure that contractors and their subcontractors have functional grievance mechanisms in place. The effectiveness of Contractors' grievance processes is tested by reviewing channels used to log grievances, the quality of investigations, as well as the timelines for resolution and outcome of reported cases. TEP-Uganda's oversight is conducted through a combination of social inspections, audits, and meetings at least once every month with contractors - both scheduled and ad-hoc engagements as required.

In addition, TEP-Uganda conducts regular awareness and sensitization sessions to workers and supervisors. These sessions reinforce understanding of various topics such as contractor grievance mechanisms, recruitment and employment requirements, gender management, prohibition of sexual harassment, workplace harassment & bullying among others all aimed at reinforcing understanding among employees and employers alike regarding their rights, responsibilities and the importance of maintaining a respectful, safe and compliant working environment.

In 2025, a total of 209 contractor worker grievances were escalated to TEP-Uganda. TEP-Uganda facilitated the resolution of 173 worker grievances through its oversight and engagement processes. 36 concerns remain open and are being addressed by the contractors with support from TEP-Uganda.



Note: 173 Concerns were closed

- Irregularities in recruitment
- Delayed payment of salaries and wages
- Delayed payment of service providers
- Non-remittance of NSSF
- Poor labour and working conditions
- Unfair termination and dismissal
- Working without contracts
- Others

Where necessary, a grievance may be escalated by the complainant to the District Labour Officer who works collaboratively with TEP-Uganda, the affected worker, and their employer (contractor) to facilitate a fair and timely resolution of the grievance. This provides workers with access to an independent channel of intervention when contractor-level grievance mechanisms do not, in the complainant's view, fully address their concerns. The most commonly reported grievances during this year related to non-payment of salaries & wages, irregularities in recruitment procedures, alleged unfair terminations & dismissals, poor working conditions and non-remittance of NSSF contributions.

These insights continue to guide TEP-Uganda's engagement with contractors and inform targeted action to address any systemic issues across the Project.

Ethics Compliance Program

TEP-Uganda maintains a whistleblower mechanism that allows employees and concerned stakeholders, including workers to report incidents or concerns to the Country Ethics Officer at (ethics.tepu@totalenergies.com) without fear of retaliation. This channel is designed to ensure internal and external stakeholders can raise concerns in accordance with TotalEnergies' Code of Conduct. To reinforce the culture of ethical behaviour, TEP-Uganda observes annually, the Business Ethics Day. This event serves as an important reminder of the Company's values and expectations and encourages personnel and workers to "Speak up" when they become aware of actual or potential violations of our Code of Conduct including issues related to Human Rights or ethical concerns in their work.





2.7 Other Initiatives on Workers' Rights

Contractor Recognition

To further reinforce good workforce management practices within the sector, TEP-Uganda introduced at the inaugural Annual Social Performance Forum, a new award category, that is "Worker Capacity Building and

Local Community Inclusion". The award promotes and recognises contractors demonstrating exemplary commitment to workers' rights compliance, workforce development and inclusive local hiring practices. During the inaugural ceremony held at Sheraton Hotel Kampala in 2025, two Project contractors out of fifteen, were recognised for their notable investments in strengthening their workforce management practices and prioritising local community employment.

2.8 Championing Equality in the Workplace

Cross-cultural Awareness

Consistent with TotalEnergies core value, "Respect for Each other," TEP-Uganda continued to promote an inclusive and culturally sensitive work environment. In 2025, TEP-Uganda continued to deliver a series of Cross-Cultural awareness workshops aimed at enhancing appreciation of diversity within its workforce and foster a culture of respectful coexistence with each other considering that its personnel base is currently comprised of more than 45 nationalities.

The workshops equipped personnel with skills to navigate and work within a multicultural environment. They are also aimed at fostering a workspace where personnel feel welcomed and

recognised as an integral part of TEP-Uganda which aligns with TEP-Uganda's commitment to diversity, as a shared priority across TEP-Uganda.

Disability Inclusion

Laws on Occupational Safety and Health, and laws on Persons with disabilities, mandate employers to ensure workplace safety, accessibility and inclusion for employees living with disabilities. TEP-Uganda's premises have been designed to ensure adherence with the requirements with the Ministry of Gender, Labour and Social Development's accessibility guidelines with additional technical guidance and advisory support from TEP-Uganda's disability inclusion partner, Light for the World Uganda. Additionally, TEP-Uganda's Diversity Officer ensures that inclusion and diversity actions are implemented across the Project.

TotalEnergies' Women's Initiative for Communication and Exchange (TWICE)

At TotalEnergies we recognize that gender equality is fundamental to our success in the oil and gas sector. Through the TWICE initiative, TotalEnergies upholds and promotes the principle of gender equality in the workplace. In 2025, TWICE hosted two breakfast engagements aimed at fostering mentorship, inspiration, and open dialogue between TEP-Uganda female employees and senior female leaders from TotalEnergies in France. These engagements provided firsthand insights from leaders within TotalEnergies serving as role models for emerging female professionals.





3.1 Promoting Transparency and Accountability

3.1.1 Let's Talk Roundtables and Publications

During 2025, four Let's Talk Roundtable engagements were held at both the national level and with grassroots NGO communities to discuss livelihood restoration, environmental impacts of the Project, human wildlife conflict and agricultural development initiatives for impacted communities. Prior to the roundtable engagement on livelihood restoration program in February 2025, a Let's Talk Bulletin on this topic was published. The bulletin provided background information on the Company's livelihood restoration initiatives and served as the basis for informed dialogue during the roundtable discussions at national and grassroots levels.

These round table engagements were held in Kampala and Buliisa and were organised in collaboration with the NGOs' umbrella organizations, specifically, the Civil Society Coalition on Oil and Gas (CSCO) at the national level and the Bunyoro Albertine Petroleum Network on Environmental Conservation (BAPENECO) at the grassroots level. Key stakeholders including our Joint Venture Partners, Regulators, and Local Government representatives, participated in the engagements and exchanged ideas, provided feedback and broadly speaking contributed to constructive dialogue on the highlighted topics, reinforcing TEP-Uganda's commitment to transparency, accountability and meaningful stakeholder engagement.

3.1.2 Field Monitoring Visits

TEP-Uganda organised a three-day field visit for CSOs and other partners to monitor the progress of the Tilenga Project. More than 50 participants including representatives from the CSCO, Joint Venture Partners (JVPs) and Petroleum Authority of Uganda (PAU) took part in the visit within the Lake Albert Project area covering, Tilenga, Kingfisher and EACOP Project sites. The visit allowed participating NGOs to see firsthand the Company's continued efforts to promote accountability and dialogue with its stakeholders.



03

PROGRESS REPORT ON MANAGING TILENGA'S SALIENT HUMAN RIGHTS RISKS





3.1.3 3rd Joint Annual CSO Conference

TEP-Uganda participated in the 3rd Joint Annual CSO Conference organized by PAU and the JVPs. The theme for the 2025 conference was “Discerning Business, Social, and Human Rights Issues in Uganda’s Oil and Gas Sector.” The conference enabled open dialogue with civil society partners and provided an opportunity for TEP-Uganda along with its Joint Venture Partners, to share updates on Project implementation and responsible conduct.



3.1.4 Community Engagements

TEP-Uganda introduced Community Barazas in 2025, as an added initiative to disseminate information to impacted communities and encourage stakeholder engagements through traditional public gatherings. These Community Barazas focused on social matters affecting communities, for example flood management, human wildlife conflict, workers’ rights among others.

TEP-Uganda also provided updates on the Company’s ongoing initiatives and mitigation measures designed to address the said concerns. More than 300 community members were reached through the 12 engagements held during 2025, further strengthening the Company’s grassroots engagement efforts.





3.2 Project Land Acquisition

As at end December 2025, 99.2% of compensation agreements had been paid for, the implementation of livelihood restoration programs was at 98.8% and all relocation houses had been built and handed over to households whose primary residences were impacted.

Throughout 2025, TEP-Uganda continued monitoring the effectiveness of the resettlement activities to ensure that affected households received support and that the intended outcomes of the program are achieved. An independent assessment was conducted by the Canadian firm Land & People Planning Ltd on the land acquisition, resettlement and livelihood restoration program implemented by TEP-Uganda. The report concludes that the program was implemented in line with the Project's land acquisition and resettlement commitments,

aligned with IFC Performance Standard 5, with no material systemic deficiencies. Based on the recommendations from the report, TEP-Uganda will implement an action plan for the identified gaps. [The report can be accessed here.](#)

Additionally, TEP-Uganda continues to follow up on requests made to the Attorney General by Project Affected Persons (PAPs) intending to access their compensation awards that were deposited into the court account upon resolution of their land disputes. 42 PAPs owning/claiming ownership rights in 32 land parcels, i.e. 0.8% of all PAPs were subject to a Court Application by the Attorney General in 2023. Among the 32 land parcels in litigation, 17 presented asset valuation grievances, 18 had land ownership disputes amongst themselves (and the Project could not determine the rightful party to receive payment) and 7 were absent/unreachable. As of the reporting year, only 10 PAPs came forward to request access to their funds.



3.3 Community Grievance Mechanisms

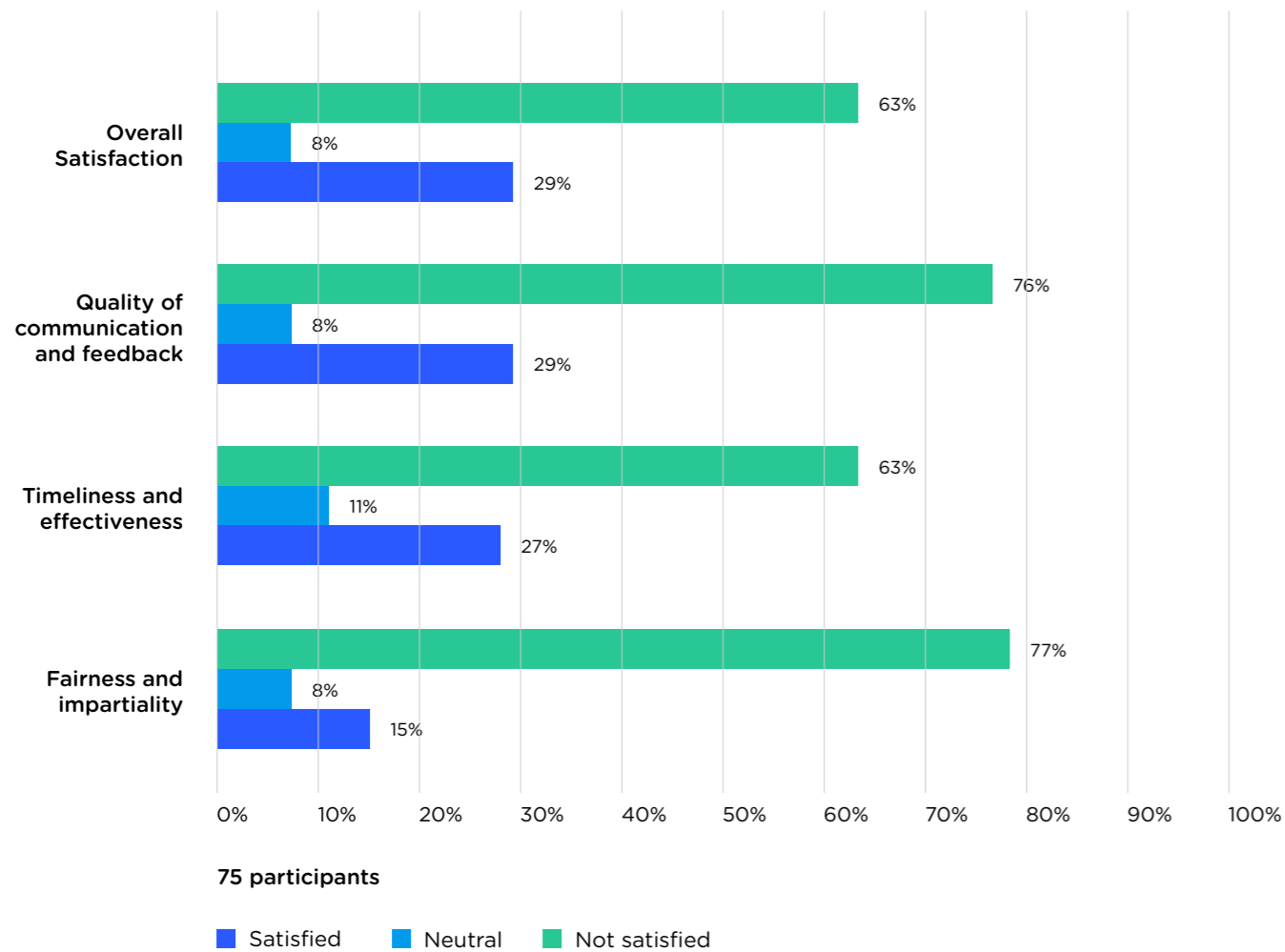
TEP-Uganda recognizes that effective Grievance mechanisms are important components of Human Rights due diligence and play a central role in identification, mitigation and remediating actual and potential Human Rights risks and impacts. TEP-Uganda's community grievance management procedure undergoes periodic reviews to ensure that it remains fit for purpose, specifically that it remains responsive, transparent and aligned with evolving stakeholder expectations to address the evolving nature of grievances while remaining aligned with the effectiveness criteria of the UN Guiding Principles on Business and Human Rights. During 2025, in addition to the review exercise undertaken for the mechanism, there were other efforts focused on monitoring, evaluation,

awareness and sensitization and strengthening alternative grievance reporting channels.

a) Monitoring and Evaluation: To further enhance the effectiveness of the grievance mechanism, TEP-Uganda launched in 2025, a post-grievance monitoring tool to assess stakeholder satisfaction levels, capture feedback and measure the perceived effectiveness of the grievance resolution, levels of satisfaction and to receive any feedback about the mechanism. Quarterly surveys are launched to stakeholders whose grievances have been closed. Feedback and recommendations from the monitoring process have informed the ongoing review of the grievance mechanism and a ramp up in awareness sessions aimed at improving understanding of the process within communities.




Feedback from the Satisfaction Survey in 2025





b) Awareness and Sensitization: Following feedback from the monitoring assessments and recognising the need to strengthen understanding of the grievance process, reduce misinformation and build confidence in the grievance mechanism as a reliable platform for raising concerns, TEP-Uganda conducted 82 awareness and sensitization sessions for community members and Project staff. These sessions help ensure that Project stakeholders clearly understand how to raise grievances, what to expect from the process, and how their concerns are addressed.


c) Other Forms of Reporting Grievances: Throughout the year, TEP-Uganda continued to receive concerns through other speak up channels including petitions, letters, media platforms, stakeholder engagement, National and Local Government authorities. A total of 11 written responses were prepared and submitted by TEP-Uganda to address concerns raised by various stakeholders. Concerns raised included shrinking civic space, labour rights, environmental impacts, human wildlife conflict and flooding. The diversity of concerns raised underscores the importance of maintaining multiple avenues for community engagement and grievance reporting, ensuring that all stakeholders, regardless of literacy levels, access to technology, or social standing have an accessible and meaningful way to voice matters affecting them.


Available Grievance Channels

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Contact Number
0800 216 500
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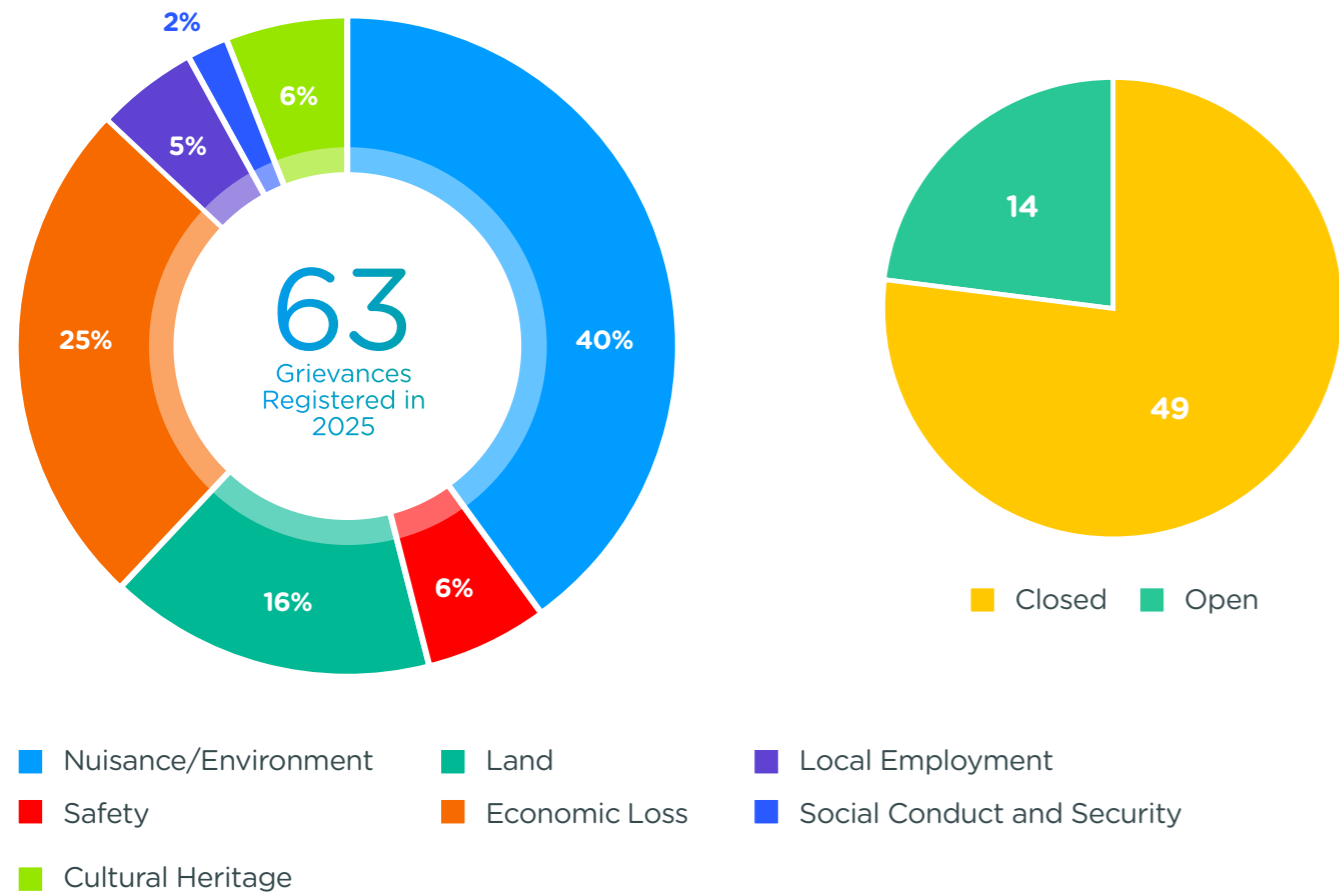
TotalEnergies EP
Uganda Liaison
Office in Buliisa
- 

In the Project Area:
Local Council Leaders
- 

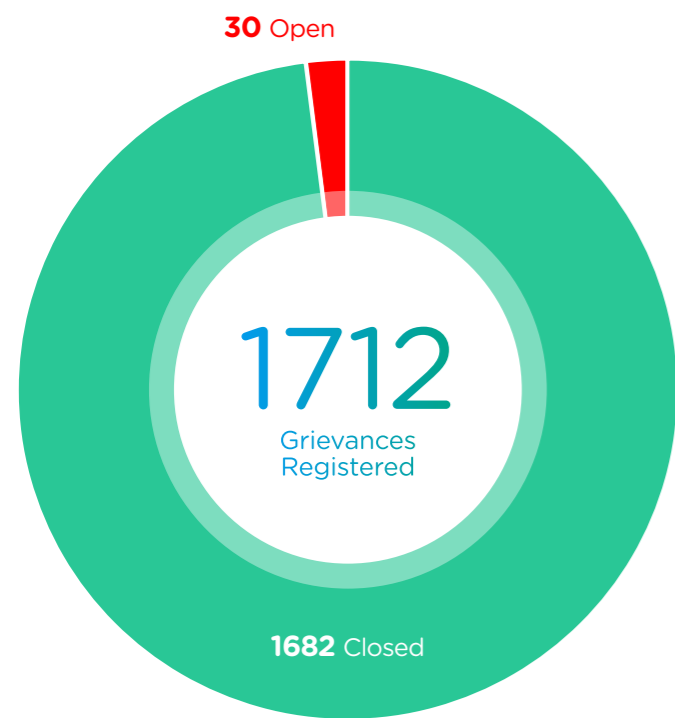
Community
Tourism Liaison
Officers (CTLOs)
- 

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Community Grievance Figures 2025



Cumulative Grievances Since 2012



TEP-Uganda recognizes that effective Grievance mechanisms are important components of Human Rights due diligence and play a central role in identification, mitigation and remediating actual and potential Human Rights risks and impacts.

3.4 Safer Roads in the Communities

During 2025, TEP-Uganda in coordination with Safe Way Right Way Road Safety Officers, together with the OC Traffic in Buliisa and Pakwach Districts, conducted mass road safety awareness sessions and mentorship programs in schools across the two districts. The sessions covered essential topics such as identification of safe walking routes, proper road-crossing techniques, and understanding the risks associated with unsafe road behaviour. Over 20,000 learners benefited from these engagements.



To further empower the young people in road safety, members of selected School Road Safety Clubs received mentorship aimed at enabling them to develop and lead their own age-appropriate sensitization initiatives and materials. Students created posters, poetry, music, and drama pieces to promote safe road practices, effectively bringing road safety messaging to life through peer-to-peer learning. In addition, club members were equipped with high-visibility PPE, in the form of reflective vests to stay visible and safe while on the road.

Other road safety awareness actions in 2025 included

- **Community Sensitizations:** A total of 708 sessions were conducted, reaching over 67,000 community members, including engagement with religious leaders, and clan leaders.
- **Motorcyclist and Taxi driver Training:** 540 sessions were delivered to boda-boda riders, reaching 5,000 riders. Additionally, 35 taxi drivers were trained in defensive driving, vehicle safety, and basic first aid.
- **Mass Awareness Campaigns:** Road safety messages were amplified through 224 radio adverts, and 17 talk shows broadcast in multiple languages including host communities' dialects of Alur, Lunyoro, Lugungu and Acholi.
- **Monitoring and Evaluation:** Four field visits and stakeholder review meetings were undertaken to ensure evidence-based implementation, enhanced accountability and timely adjustments to program delivery.



3.5 Women's Rights, Gender Equality and Gender-Based Violence

TEP-Uganda remained committed to fostering respect for women's rights and promoting gender equality across its own workforce, contractors and host communities. These commitments are embedded in our policies and social management frameworks including the Human Rights Policy, Sexual Harassment Prevention Policy, Gender Management Plan, Community Health, Sanitation and Safety Management Plan, among others.

In line with the above commitments to promote a safe, inclusive, and respectful work environment, TEP-Uganda conducted 67 training sessions reaching 5354 contractor and TEP-Uganda workers focusing on GBV and harassment prevention in 2025. These trainings were conducted at different contractor sites and accommodation camps. The sessions aimed at equipping workers with practical knowledge and tools to identify, prevent, respond to and report inappropriate behaviour in the workplace. Across all training platforms, TEP-Uganda reiterated its zero-tolerance policy towards Sexual harassment, abuse and any other inappropriate workplace conduct.



3.6 Security and Human Rights

3.6.1 Human Rights Defenders

In line with TEP-Uganda's Statement on Human Rights Defenders⁵, TEP-Uganda recognizes the importance of freedom of expression and the essential role that Human Rights Defenders play in upholding Human Rights. Consistent with TEP-Uganda's commitment, we seek to engage HRDs in open and constructive dialogue. In 2025, TEP-Uganda engaged the National Coalition of Human Rights Defenders - Uganda to explore opportunities for collaboration aimed at strengthening dialogue with HRDs. This engagement is part of TEP-Uganda's broader effort to promote respect for the Human Rights of the HRDs across its operations and to maintain transparent and accountable relationships with civil society stakeholders.

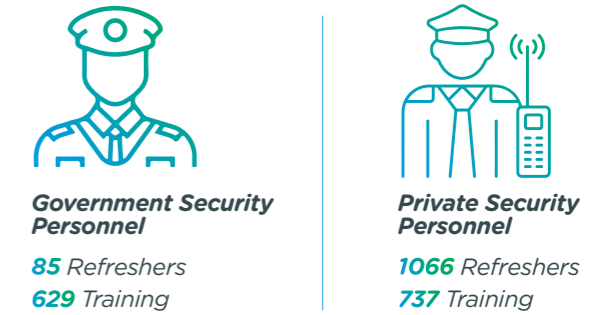
Following the above engagement, TEP-Uganda participated in a "Shuttle Diplomacy" engagement organized by NCHRD. The platform brought together grassroots HRDs from Hoima, Kiryandongo, Kikuube, and Masindi. The session provided a platform for HRDs to raise concerns with the State and other stakeholders regarding Human Rights in the Albertine region, and for TEP-Uganda to listen, share its commitments, and reaffirm its respect for the rights and role of HRDs in line with international Human Rights standards. TEP-Uganda values this type of multi-stakeholder dialogue as part of its ongoing engagement with civil society on matters related to the Tilenga Project.



⁵ Statement on Human Rights Defenders

3.6.2 Implementing the VPSHR

In 2025, TEP-Uganda continued to maintain vigilance by proactively implementing the Voluntary Principles on Security and Human Rights (VPSHR) on the Tilenga Project. More than 2,517 personnel belonging to both Government and Private Security Companies received training and refresher sessions on VPSHR and internationally recognised Human Rights.



TEP-Uganda continued to hold regular engagements with Government authorities including police commanders to reinforce understanding of the relationship between Human Rights and security and the Company's commitments to respect Human Rights in its operations, including the rights of HRDs. A specialized VPSHR training session was conducted at the Counter-Terrorism Police Academy for all newly recruited officers, including those assigned to the Oil and Gas operations.

Contractors providing private security services also commit to observe the VPSHR. TEP-Uganda continued to provide targeted trainings for the private security personnel that are assigned to the Project sites and assets, to reinforce their understanding of Human Rights standards, responsible security practices and appropriate conduct when engaging with community members. TEP-Uganda continues to exert its influence by using dedicated workshops convened among the Joint Venture Partners in addition to existing JOA governance framework.

In 2025, TEP-Uganda advocated for ensuring the actions or conduct of security forces do not negatively impact the rights of host communities, and for promoting that the rights of HRDs are respected.

3.7 Partnerships

In 2025, TEP-Uganda formalised the following partnerships with NGOs and Ugandan authorities to advance the Project's social, environmental and Human Rights objectives. These collaborations supported community development, biodiversity conservation, and strengthened stakeholder engagement in the Project area.

a) 1-year Agreement with Nature Uganda to support the conservation and restoration of the Murchison Falls-Albert Delta Ramsar Site. This Partnership aims to develop essential conservation tools, including a Community-Based Management Plan for the Ramsar site. Efforts will also be directed towards restoration and demarcation along a 15 km stretch of the delta and restoration of 20 hectares of the Ramsar site. The Project will also enhance awareness and training on sustainable wetland management practices.

b) Comfort Community Network (COCENET): To map and analyze the apriary value chain in Buliisa and Nwoya districts, identifying opportunities, constraints, and interventions to enhance beekeeping as a sustainable livelihood and promote apriary development as a strategy for human-wildlife conflict mitigation.

c) Umoja Wildlife Conservancies Uganda Limited: To conduct a community needs assessment for sustainable livelihoods development to support communities and conservation of Murchison Falls National Park.

d) BIRUDO: TEP-Uganda continued to collaborate with BIRUDO to implement the "Let's Talk" Dialogue with grassroots communities focusing on human-wildlife conflict. These engagements provided platforms for open discussion on Human Wildlife Conflict challenges, mitigation strategies, and community led solutions.

3.8 Cultural Rights

As part of TEP-Uganda's Cultural heritage preservation program, the Project seeks to protect and promote the identity of its host communities while helping to sustainably develop Uganda's energy resources. Through

partnerships with organizations like the Cross-Cultural Foundation Uganda (CCFU), TEP-Uganda has initiated efforts to document, safeguard, and revitalize local traditions, to contribute to the preservation of the region's rich cultural fabric amidst ongoing developments and Project Induced In-Migration (PIIM).



In 2025, a heritage awareness program was implemented across 40 schools, 10 of these schools were in Nwoya and 30 in Buliisa District. The program provided young people with opportunities to reconnect with their cultural heritage and identity. In addition teachers too received training on how to manage and sustain their schools' cultural heritage clubs. All these programs were implemented in collaboration with local cultural institutions within the Project areas, reinforcing community ownership and authenticity.

Additionally, TEP-Uganda in partnership with CCFU, launched a Heritage Education Toolkit and a bilingual publication of Bagungu Folk Stories in Lugungu and English. These Cultural Heritage resources are intended to promote cultural learning among pupils whilst ensuring preservation of oral traditions, bridge generational gaps, and inspire pride in preserving and promoting the Bagungu culture, values, and norms. Collectively, these initiatives contribute to ensuring that the Cultural identity of host communities remains vibrant and resilient for future generations.





Tilenga Project Human Rights Impact Assessment and 2026 Outlook

Our focus in 2026 is to ensure that the visibility of the core Human Rights impact is maintained during the transition from the current development phase of the project to the production phase. This process will involve a review exercise by an external advisor, as part of our continuous Human Rights due diligence exercise. This review will help identify any new

emerging risks and ensure that they receive the appropriate level of attention and mitigation in line with the UNGPs on Business and Human Rights.

In line with our commitment to continuous engagement and information sharing, we will also continue to hold consultative sessions with our primary stakeholders including Government authorities, our host communities, and contractors to receive feedback on Human Rights topics that concern them.



04 OUTLOOK FOR 2026



05

POSTSCRIPT - SPEAK UP AND FEEDBACK

The Legal and Human Rights Team

If you wish to contact us about any aspect of this report or have any Human Rights concerns, please do not hesitate to contact any one of the following members of the Human Rights Team or to use any of our other speak-up channels below:



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Community Grievance Mechanism



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In the Project Area:
Local Council Leaders



Community
Tourism Liaison
Officers (CTLOs)



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Glossary

Company or TEP-Uganda	TotalEnergies EP Uganda
CSCO	Civil Society Coalition on Oil & Gas
CSOs	Civil Society Organizations
GBV	Gender-Based Violence
HRDs	Human Rights Defenders
HRIA	Human Rights Impact Assessment
HSE	Health, Safety and Environment
IFC	International Finance Corporation
LARF	Land Acquisition and Resettlement Framework
NGOs	Non-Governmental Organizations
PAPs	Project Affected Persons
PAU	Petroleum Authority of Uganda
PIIM	Project-Induced In-Migration
Project	The Tilenga Project
RAP	Resettlement Action Plan
UNGPs	United Nations Guiding Principles on Business & Human Rights
VPSHR	Voluntary Principles on Security and Human Rights

Cross Referenced Docs

Fundamental Principles of Purchasing



Practical Guide for Suppliers Implementing the Fundamental Principles of Purchasing

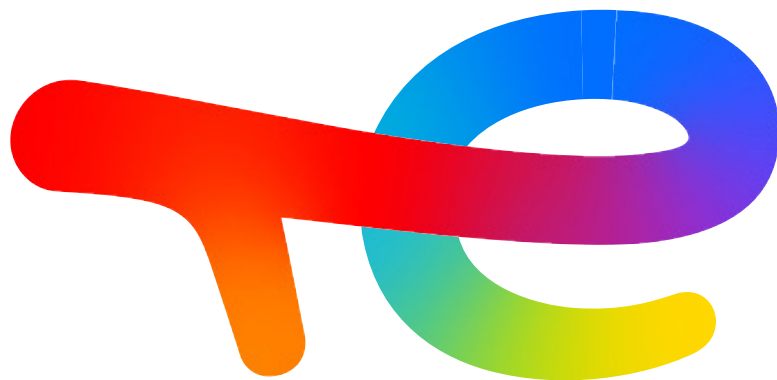


Social Report 2025



Security Report - VPSHR





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