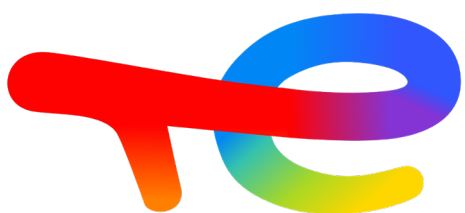




VPSHR 2022 Annual Report

April, 2023



TotalEnergies

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LIST OF ABBREVIATIONS

ADRA:	Auto-Diagnostic and Risk-Assessment
CC:	Country Chair
CLO:	Community Liaison Officer
CSO:	Country Security Officer
EP:	Exploration and Production
ESHIA:	Environmental, Social, and Health Impact Assessment
FEED:	Front-End Engineering and Design
FID:	Final Investment Decision
FSV:	Family and Sexual Violence
GSF:	Government Security Forces
HRIA:	Human Rights Impact Assessment
HSE:	Health, Safety, Environment
ICWG:	In-Country Working Group
IFC:	International Finance Corporation
IGT:	Implementation Guidance Tool
IOC:	International Oil Company
JTF:	Joint Task Force
JV:	Joint Venture
LNG:	Liquefied Natural Gas
MoU:	Memorandum of Understanding
MS:	Marketing and Services
Mtpa:	Million tonnes per annum
NGO:	Non-Governmental Organisation
PAOI:	Project Area of Influence
PER:	Pipeline Export Route
PSC:	Private Security Company
UN:	United Nations
VLO:	Village Liaison Officer
VPI:	Voluntary Principles on Security and Human Rights Initiative
VPSHR:	Voluntary Principles on Security and Human Rights

Introduction

This report describes TotalEnergies' (the "Company") overall commitment and 2022 implementation of the Voluntary Principles on Security and Human Rights ("VPSHR" or "VPs"). The Company joined the VPSHR

Initiative ("VPI") in March 2012 as a member of the Corporate Pillar and is continuing its efforts to further embed and promote the VPSHR into its day-to-day business activities.

TotalEnergies key achievements in 2022 were the following:



Continuous VPSHR Trainings organized at operational levels;



Launch our annual VPSHR campaign with a new approach on a secured platform;



Updating the Company's VPSHR reference documents and further embed the VPSHR at operational level;



Develop several VPSHR communication materials and translation in 5 languages;



Revision of the VPSHR Auto-Diagnostic and Risk Assessment tools;



Creation of new incident management practical tools and a mnemonic.

During the year, special attention has been given to four countries: Myanmar, Mozambique, Uganda and Papua New Guinea.

In Myanmar, facing the worsening of the situation from a human rights standpoint since the February 2021 coup, TotalEnergies announced its withdrawal from the Yadana field in January 2022 and exited Myanmar effectively in July 2022. The Company has undertaken a responsible withdrawal strategy throughout 2022. Operational withdrawal went along with the withdrawal from the Myanmar VPSHR In-Country Working Group (ICWG) – for which the Myanmar Centre for Responsible Business (MCRB) provided secretariat since 2018, as the situation led to the winding up of the ICWG as its last meeting in February 2022.

In Mozambique, the evolving security situation in the north of Cabo Delgado province led TotalEnergies to withdraw all Mozambique LNG project personnel from the Afungi site and to declare force majeure under the Exploration and Production Concession Contracts in April 2021. However, TotalEnergies remained active

from a VPSHR perspective by delivering several training courses and participating in the launch of the National and Regional VPSHR In-Country Working Groups.

In Uganda, the Final Investment Decision (FID) and launch of Lake Albert resources development project were announced in February 2022. TotalEnergies maintained its proactive approach to ensure that each stage of the project is implemented in accordance with internationally recognized human rights standards and the VPSHR. [The Tilenga Project Human Rights Impact Assessment Report](#) has been published in 2022.

In Papua New Guinea, the Company and its partners have signed a Memorandum of Understanding with the State of Papua New Guinea in 2018 for the Papua LNG Project. This project will increase Papua New Guinea's LNG export capacity and thus contribute to its further development. In 2022, the decision to launch the first phase of front-end engineering and design (FEED) studies has been announced for the Papua LNG project's upstream production facilities.

TotalEnergies' VPSHR implementation is led by the Company Security Division ("Company Security") in coordination with the Human Rights Department of the Strategy & Sustainability Division, which provides support and expertise on human rights matters. The Company's VPSHR activities are carried out through a simultaneous bottom-up and top-down approach that encompasses an extensive network of employees at various levels of the Company.

The Company Security oversees the VPSHR's international deployment and ensures that the Company's strategies, policies, and procedures are in line with the VPSHR expectations. Furthermore, Company Security relies on and works in close collaboration with a global network of more than 100 Country Chairs (CC) and Country Security Officers (CSO) to establish concrete and effective VPSHR activities at ground-level.

A. TotalEnergies' commitment to the VPSHR

I. Public statement of commitment or endorsement of the VPSHR

TotalEnergies' commitment to the VPSHR is explicitly enshrined in various Company documents (e.g. *the Code of Conduct, the Human Rights Guide and the Human Rights Briefing Paper*¹) and the 2018 top management's commitment reiteration remains valid.

1. Reference documents are available on [Human Rights | Sustainable performance \(totalenergies.com\)](https://www.totalenergies.com/en/human-rights/sustainable-performance)

II. Examples of commitments and measures to promote the implementation of the VPSHR

2022 VPSHR TRAINING AND AWARENESS ACTIVITIES

The Company managed to implement several training and awareness-raising programmes in 2022, mainly at operational levels.

In 2022, continuation of VPSHR awareness sessions at local level was encouraged and organized for employees as well as Private Security Companies (PSC) and Government Security Forces (GSF) working with TotalEnergies.

Several of our affiliates have organized training sessions with topics such as "Human Rights and Security Operations", "Use of Force", "VPSHR and Conflict Resolution" "Protecting Vulnerable People" "VPSHR Incidents" to gradually deepen understanding of the subject.

Some examples for 2022:



* The term "Security guards" refers to individuals of the Private Security Companies working with TotalEnergies;

* The term "Officers" refers to individuals of the Government Security Forces working with TotalEnergies.



Ongoing VPSHR trainings provided in Mozambique despite the Force Majeure

In the framework of the Mozambique LNG Project, to increase momentum of VPSHR training provided internally since 2019, and following the recommendation of the Company Security, the partnership with Watchman – signed in December 2020, helped scaling up VPSHR training sessions.

Please refer to the Project website for more information on [Mozambique LNG Project \(mzlng.totalenergies.co.mz\)](https://mzlng.totalenergies.co.mz)

The need to upgrade the skills of the subsidiary's security teams as well as trainers within the command of the Mozambican armed forces led to the implementation of a continuous training cycle combining Train-the-Trainers sessions for the security department and officers with senior ranking positions of the Cabo Delgado Joint Task Force (JTF), as well as refresher trainings for the JTF and private security personnel. Notwithstanding the fact that Force Majeure continued in place, in 2022, 65 VPSHR trainings were delivered to 2515 GSF and 42 PSC individuals. A real training dynamic has been reached thanks to the Train-the-Trainers sessions, and the continuous participation and joint work of TotalEnergies security team on ground.



Throughout the year, the Company Security emphasized the importance of raising awareness among all TotalEnergies collaborators, whether they are involved in VPSHR implementation. Company Security participated in several internal webinars organized for Country Security Officers in Africa

and Europe as well as Human Rights coordinators of the Exploration and Production (EP) branch – which was the opportunity to reiterate what are the main requirements in VPSHR implementation, the importance of inter-department cooperation and discuss the challenges.

TotalEnergies in Uganda

As part of the Tilenga project, TotalEnergies Exploration and Production in Uganda (TEPU) is concerned to ensure that civil society organisations understand its actions with respect to GSF and PSC. For this reason, a webinar was organised in April 2022 as part of a regular series of such events for Ugandan Non-Governmental Organisations (NGO) and civil society organisations. The webinar focused on Security for the Tilenga Project and the application of the VPSHR. In addition to highlighting TEPU's commitments in this area, the webinar delved into a description of what such implementation means in practice including for both public and private security providers. Key features of VPHSR training were highlighted. Following the webinar, a summary bulletin was published.²

Please refer to the [TotalEnergies 2021 VPSHR Annual Report](#) and [TotalEnergies website](#) for more information.

2. Reference document is available [here](#).



VPSHR Trainings and awareness sessions provided in Santo Domingo, Dominican Republic

In October 2022, an incident was reported to the Company Security. Thus, a VPSHR mission in cooperation with the Human Rights Department has been set up to train the Management Direction of two affiliates in Santo Domingo, the entities' personnel as well as to sensitize service stations employees. The mission occurred in parallel to a Marketing and Services Retail Management seminar for which Human Rights and VPSHR segments took place. A total of 11 training and awareness sessions were delivered to 84 attendees on various topics such as "Induction to the VPSHR", "Working with Private Security Companies in a VPSHR compliant way", "VPSHR awareness campaign within service-stations", etc. Company Security also directly sensitized the management of a Private Security Company.

INVOLVEMENT IN VPSHR EVENTS

TotalEnergies participated to the Voluntary Principles Initiative's ("VPI" or "VP Initiative") 2022 Annual Plenary Meeting which took place in Toronto, Canada, in May 2022. The Company also attended other events with VPI members, including regular Corporate Pillar calls, United-Kingdom VPs Working Group and In-Country Working Groups meetings.

TotalEnergies Mexico

In May 2022, TotalEnergies Mexico's CSO participated to a Workshop on the VPSHR, organised by the Asociación Mexicana de Empresas de Hidrocarburos (AMEXHI) alongside with Security Managers of International Oil Companies (IOCs) members of the AMEXHI, representatives of the National Commission of Human Rights (CNDH), the Mexican Navy (SEMAR) and the Public Security Secretary (SSPC).

This was the opportunity to overseeing the challenges that our peers operating in Mexico can face as well as sharing best practices then conclude on a shared definition of what are the major challenges in Mexico from a VPSHR point of view.

TotalEnergies Ghana

In October 2022, TotalEnergies Ghana's CSO attended the 2022 African Business and Human Rights Forum held in Accra, Ghana.

This annual event is aimed at providing a platform for discussing how to promote and ensure responsible business conduct in Africa.

In 2022, it brought various stakeholders from across Africa and proposed a VPSHR dedicated thematic session entitled "Multistakeholder approaches to addressing security and human rights challenges: The role of the Voluntary Principles on Security and Human Rights".



TotalEnergies also attended IPIECA's³ Social Responsibility Group and more precisely its Human Rights Working Group and Responsible Security Task Force's virtual meetings where VPSHR related matters are broadly discussed. The purpose of these groups is to share experiences, approaches and best practices on VPSHR implementation between Energies sector companies and to provide support to the VPSHR Initiative relevant to the sector.

Since April 2019, TotalEnergies' security internal network is using an online communication platform that includes a dedicated VPSHR channel, encouraging the sharing of experiences, examining case studies, and disseminating key information.

3. Established in 1974 as the International Petroleum Industry Environmental Conservation Association, the association changed its name in 2002 as IPIECA.

Mozambique National and Regional Working Groups on Security and Human Rights (VPSHR)

Established in November 2021 by the Mozambican Ministry of Justice, Constitutional and Religious Affairs, TotalEnergies EP Mozambique Area 1 (TEPMA1) attended the National Working Group on the VPSHR on February 23, 2022.

A Regional VPSHR Working Group, the Cabo Delgado Working Group on Security and Human Rights has been launched in March 2022. At this occasion, TEPMA1 attended the event together with other lead international LNG actors in Mozambique. Whereas the National Working Group focuses on the normative and police framework at national level, the Regional Working Group addresses strategic security and human rights issues with particular focus from an operational perspective.

For more information regarding the Working Groups, please refer to the [DCAF/ICRC Security Human Rights Hub](#) website.



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GENDER AND VULNERABLE GROUPS-SENSITIVE APPROACH

Learning from the obstacles and challenges the Company faced during the pandemic, Company Security worked on the development of an e-learning designed for operational security managers. This one includes a complete VPSHR module which was the opportunity to make a first-step gender and vulnerable groups-sensitive approach within our trainings. After the sharing of the Implementation Guidance Tool Companion by the VPI, Company Security managed to update our training materials and presentations to go further into the inclusion of this approach. Recognizing the challenges that Human Rights Defenders may face, the Company is committed to respecting the safe and enabling environment of civic freedoms necessary for defenders when it comes to our activities. This approach is incorporated into our training materials and is also considered in the formalisation of our relations with external security actors.

Please refer to the [TotalEnergies 2021 VPSHR Annual Report](#) for more information.

TotalEnergies Uganda's vulnerable groups-sensitive approach

TotalEnergies EP Uganda (TEPU) worked on a Memorandum of Understanding (MoU) with the Ugandan government to give the Tilenga Project a clear framework for continuous engagement on VPSHR and human rights matters. For example, a clause requires behaviour relating to gender-based violence, sexual abuses, respect of minorities, marginalized and vulnerable communities to be addressed. In addition, a clause on expected behaviour with local communities, non-governmental organisations and the media is included.

TEPU published a Tilenga Human Rights Policy in 2022 which refers specifically to freedom of expression and access to information as well as the need to promote the Voluntary Principles on Security and Human Rights.⁴

4. Reference document is available [here](#).

Moreover, TEPU's General Manager (and Country Chair for Uganda) made a statement on Human Rights Defenders in December 2022 explaining that it is TEPU's policy to respect the rights to freedom of expression, freedom of association and freedom of peaceful assembly, as well as access to information in its engagement with stakeholders affected by its activities. He recognised the legitimacy and important role of Human Rights Defenders (as defined in the UN Declaration on Human Rights Defenders of 1998) in the promotion and protection of human rights and further recognizes Article 38 of the Constitution of the Republic of Uganda that provides for civic rights and activities. TEPU recognizes the International Finance Corporation (IFC) Position adopted in 2018 on Retaliation Against Civil Society and Project Stakeholders.⁵ He further stated that :

5. Reference document is available [here](#).

“Accordingly, TEPU does not tolerate any threats, intimidation, harassment, or violence against those who peacefully and lawfully promote Human Rights in relation to our activities”.



B. Policies, Procedures and Related Activities

I. Implementation of the VPSHR

In May 2019, TotalEnergies published its new internal VPSHR Company Rule (“VPSHR Rule” or “Rule”) that stipulates TotalEnergies’ VPSHR requirements. In 2020, VPSHR Implementation Guidelines were issued in the form of a Guide and Manual to assist operational entities in the implementation of VPSHR standards, providing practical guidance and best practices to its users. This Guide and Manual – published internally in early 2021, applies to all Company affiliates as controlled by the Company in accordance with their respective decision making process and subject to their applicable laws. In 2022, Company Security revised this Guide and Manual, to deepen the embedding of our vulnerable group-approach and to include a proper

requirement regarding the human rights respect and protection while apprehending individuals. The revision of this Guide and Manual was the opportunity to include in a guiding document the mnemonic developed to ensure a proper VPSHR incident management called “APRECoM”. The APRECoM mnemonic has been designed to help increasing the ability to recall the key steps to manage and report any VPSHR Incident: Assistance, Protection, Report, Enquiry, Communication of final incident report and Measures. Company Security also took the opportunity to develop a VPSHR Incident Investigation Report template with categorization of incidents in order to broaden the understanding of what is a VPSHR incident at operational level.

II. Company procedure to conduct Security and Human Rights risk-assessments and VPSHR auto-diagnostic evaluations

RISK-ASSESSMENT AND AUTO-DIAGNOSTIC TOOLS

Since 2016, the Company has been using Auto-Diagnostic and Risk-Assessment (ADRA) tools – both inspired by the Implementation Guidance Tool (IGT), which help TotalEnergies’ affiliates to evaluate their own conformity to the VPSHR, assess the VPSHR-related risks present in their operating environment, and formulate an action plan with recommendations to mitigate the identified risks. Auto-Diagnostic tool takes the form of a questionnaire which, once completed, gives the entity’s VPSHR

compliance rate on a scale from 0% to 100%, identification of an action plan to increase the level of compliance. The Auto Diagnostic must be updated once a year and following any incident or significant change at the entity level.

The Risk-Assessment tool must be completed at least every two years and once completed, generates a risk matrix and an action plan for implementation.

These tools must be completed after a workshop with a team made up of representatives from different departments (Legal, Social, Compliance, Purchase, HSE, etc). A VPSHR risk pre-identification form has been developed to guide this working group. In 2022, Company Security worked with a third-party consultant on the improvement of these tools in the sense of a simplification and questions that will be adaptable to each local context. The revision of the tools went through reorganizing the questions, improving incoherencies in the responses by integrating conditional rules, reformulating the questions, adding clarifications as well as examples and enhancing the traceability of results by removing unhelpful open-ended questions. The actual tool contains 25 risk indices covering Governance, Conflict Situation, Security Actors as

VPSHR RISK PRE-IDENTIFICATION FORM

This document contains 24 questions that would generate a simple yes or no answer covering the topics addressed in the Risk-Assessment. It has been designed to help the Security Manager to embark representatives who may hold quite different perspectives on those topics.

well as Environment, and socio-economy topics. To heighten the Company's actions – particularly in conflict or post conflict-affected areas, security reviews conducted by each Regional Security Representatives within the Security Division, allow Company Security to monitor ADRA action plans and audit the VPSHR implementation on the field.

ORGANISATION OF ANNUAL VPSHR CAMPAIGNS (ADRA CAMPAIGNS)

These tools are deployed during the annual ADRA campaigns rolled out across Company entities worldwide. Each Regional Security Representative contacts the Country Security Officer or Security Manager in the target countries to share the campaign strategy. An explanatory infographic is shared with them in parallel on an internal VPSHR channel. Since 2020, both tools were updated and made available on a secure digital platform and the 2022 campaign was held 100% online.

In 2022, the ADRA Campaign also includes a Security and Human Rights Activities Questionnaire – which is now mandatory and must be filled-out by all entities regardless of the list of countries targeted by the Auto-Diagnostic and Risk-Assessment tools. This allowed for strengthening monitoring and better traceability of results as well as issuing proper recommendations to adapt the VPSHR action plan for the coming year.

KEY STEPS



METHODOLOGY OF THE 2022 VPSHR ADRA CAMPAIGN

Company Security launched its annual ADRA Campaign in December 2022 and a total of 103 countries were surveyed. To meet the requirements of the Company VPSHR Rule, the following countries were surveyed:

- + Countries that didn't provide information on the ADRA tools in 2021 or whose information was more than 2 years old;
- + Countries whose VPSHR compliance rate in the Auto-Diagnostic was below 50% during the 2021 campaign;
- + Countries whose VPSHR Risk-Assessment's results indicated high or extreme risks during the 2020 campaign and didn't provide information in 2021.

FINDINGS OF THE 2022 VPSHR ADRA CAMPAIGN



A total of 96 countries filled-out at least one of the three tools deployed during the 2022 VPSHR ADRA Campaign and the overall campaign's countries participation rate reached 93%.

On both Auto-Diagnostic and Risk-Assessment tools, the return rate reached 92%.

92%

RETURN RATE ON ADRA TOOLS



ACTIVITIES QUESTIONNAIRE

Out of 103 countries surveyed, 94 countries sent back the activities questionnaire.



AUTO-DIAGNOSTIC

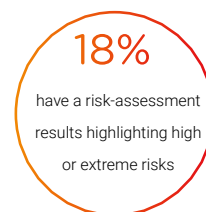
Out of 20 countries, 19 countries filled-out the tool. **+ 24 countries not surveyed filled-out the tool.**



RISK-ASSESSMENT

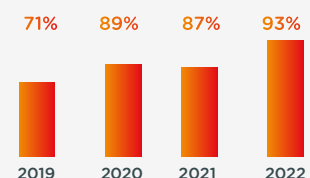
Out of 19 countries, 16 countries filled-out the tool. **+ 15 countries not surveyed filled-out the tool.**

KEY FIGURES



The 2021 VPSHR ADRA campaign approach intended to provide an overview of the Company's VPSHR risks. Recommendations were issued to help affiliates building up a strong action plan. The 2022 VPSHR ADRA Campaign findings show a greater participation, a real evolution in terms of implementation and the successful outcome in terms of enhanced feedback from affiliates.

PAST CAMPAIGNS OVERVIEW



III. Company mechanisms for reporting and addressing security-related incidents with Human Rights implications

The 2019 VPSHR Company Rule addresses security and VPSHR incidents and near-miss incidents procedures by outlining the various measures to take when facing security-related incidents with human rights consequences. A VPSHR incident report template is annexed to this Rule and made available on the internal VPSHR channel as well as in the VPSHR kit transmitted to entities. In addition, an incident investigation report template has been developed and included in the revised Guide and

Manual in 2022. As one of the 12 categories of security incidents classified as “serious” incidents, VPSHR incidents must be reported to Company Security within 24 hours. To ensure that all steps are well followed for incident management and reporting, the Security Division developed a mnemonic APRECoM for Assistance, Protection, Reporting within 24 hours, Enquiry, Communication of the final incident report and Measures.



- 1 Assistance** provided to affected persons.
- 2 Protection** of the victim.
- 3 Reporting** within 24h.
- 4 Enquiry** investigation to assess the situation.
- 5 Communication** of the final VPSHR incident report.
- 6 Measures** appropriate corrective measures.

IV. Company procedure for taking into consideration the VPSHR when establishing relationship with PSC

The VPSHR Rule stipulates that all contracts with Private Security Companies (PSC) shall include a VPSHR clause requiring PSC to comply with the VPSHR commitments and the Company standards. In 2020, TotalEnergies’ Marketing & Services (MS) branch deployed a VPSHR clause to be included in the operation contracts of the Company’s service station network. This VPSHR clause must be included in all new contracts, renewals, extensions, and amendments. In 2022, the VPSHR

clause was included in more than 4400 contracts. A subcontracting clause template was also developed to encompass every kind of contractual situation. At the request of many subsidiaries, a VPSHR-compliant performance check questionnaire has been produced – covering the following topics: core values, training performances and use of force performances. This questionnaire can now be used as a basis for regular meetings with Private Security Companies.

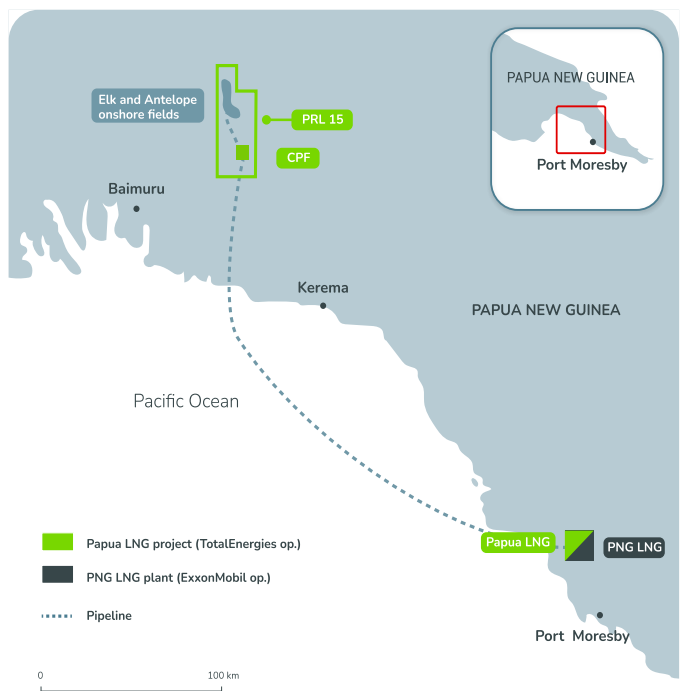
C. Implementation of the VPSHR in a country: Papua New Guinea

I. Context

TotalEnergies IN PAPUA NEW GUINEA: THE PAPUA LNG PROJECT

The Independent State of Papua New Guinea (“Papua New Guinea” or “PNG”) is resource-rich, and its economy is mainly based on agriculture, fishing, mining, and petroleum. The Papua LNG Project (the “Project”) is a liquified natural gas (LNG) production project led by TotalEnergies in response to Papua New Guinea’s desire to develop its gas resource while placing the protection of biodiversity and livelihood at the heart of the Project. The Project is considered by the Government of Papua New Guinea as essential for the country’s economic development.

Located onshore in the Gulf Province of Papua New Guinea – located circa 100km North from the Australian coast, the Papua LNG Project involves the development of 2 gas fields via 9 wells with a gas processing plant, a 320 km pipeline (260km of which will be offshore and 60 km onshore), liquefaction units in Port Moresby and the extension of an existing central processing facility operated by another Energies Sector Company also member of the VPI. The Project will have an LNG export volume of 5.6 million tonnes per annum (Mtpa). The field referred as the Petroleum Retention Licence 15 area (“PRL15”) is approximately 120 km inland from the township of Kerema and 360 km northwest from Port Moresby. The particularity of the Project is the choice to opt for electric liquefaction trains which will reduce the Project’s carbon footprint when combined with



renewable energy. Papua LNG Project partners are committed to implementing the project in an exemplary manner, ensuring that the negative impact of the Project is minimized and taking into consideration the rights of concerned communities, in accordance with the stringent performance standards of the International Finance Corporation (IFC). As communities are located out of the block, there will be no population displacement at any stage of the Project, and TotalEnergies Exploration and Production PNG (TEP PNG) keeps communities involved to determine how we can limit the inconveniences caused by the transport of equipment along the river where the villages are situated.

Please refer to [Papua LNG Project](#) for more information.

THE SECURITY AND HUMAN RIGHTS SITUATION IN PAPUA NEW GUINEA

According to the Verisk Maplecroft's Security Forces and Human Rights index, although Papua New Guinea has a reasonable legal framework, the outcome of the index makes it the 47th riskiest country in the world and the riskiest in Oceania. The country has ratified or signed two out of ten relevant treaties in security and human rights field (e.g., Geneva Conventions and Protocols, Montreux Document, Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Convention for the Protection of all Persons from Enforced Disappearance, etc.) However, at national level, country's domestic legislation is fully comprehensive, right to life is protected, torture and other cruel, inhuman, or degrading punishment is strictly prohibited as well as arbitrary arrest or detention. Papua New Guinea is committed by its laws to address violence against women (e.g sexual harassment, domestic violence and rape are prohibited according to the Verisk Maplecroft's Women's and Girls' Rights Index) and the violation of these particularly vulnerable populations' human rights is an issue that the Company monitors.

The potential for tribal and inter-communal conflict is reported as being particularly high in both urban and rural areas, especially in the Highlands region. Tribal disagreements, following a phenomenon of revenge between different clans, cause violent disorders and can result in the displacement of people and the destruction of property.

Social tensions are present within the country despite improvement of economic growth and Human Rights Defenders are mainly engaged in addressing land and environmental rights, women and children's rights and gender-based violence.

RELATIONS WITH PRIVATE SECURITY COMPANIES (PSC)

TotalEnergies EP PNG entered into service contracts with PSC in the Project area and at Port Moresby. These contracts are carefully drafted and include stringent human rights measures. Under the Security (Protection) Industry Act of 2004, to operate in PNG, PSC must obtain a license and every employee must be granted a permit delivered by the Security Industries Authority. The legislation is strict, and the licensing conditions are carefully supervised as the permit will not be delivered unless the person is sufficiently trained as a security officer or security

guard. At Project level, all security actors receive VPSHR training before being deployed – which is conducted by TEP PNG security team to ensure quality control, and screening for past human rights abuses is carried out.

Regular security meetings are held with the management of the PSC – allowing the Project security team to evaluate the PSC performances compliance with the VPSHR.

SECURITY FORCES AND HUMAN RIGHTS

The index measures the effectiveness of state security forces as well as the involvement of both state and private security forces in human rights violations. Violations of the human rights by security forces include arbitrary arrests and detentions, extrajudicial killings, enforced disappearances, and torture or other ill-treatment of individuals.

Please refer to [Tribal Violence in Papua New Guinea | ICRC](#) for more information.

RELATIONS WITH GOVERNMENT SECURITY FORCES (GSF)

The affiliate maintains good working relations with Papua New Guinea's GSF deployed at TEP PNG sites. Only GSF from the Gulf Province and/or the Waterway Police are deployed at Project site. To mitigate the risks linked to the use of force while managing security activities and to reinforce the skills of GSF deployed in the vicinity of operations,

the affiliate provides them with awareness presentations on VPSHR and Conflicts Resolution elements. Moreover, TEP PNG only provides logistical support strictly necessary for daily security operations. Meetings are regularly held with Police to ensure positive and trusting working relationship.

II. Policies and procedures

INTERNAL POLICIES

TEP PNG's internal policy is consistent with the VPSHR Company Rule and VPSHR training is a cornerstone of the affiliate security department's efforts to meet VPSHR standards. TEP PNG has pledged to respect human rights during the development and operation of the Project.

It is also committed to respecting the IFC Performance Standards which include PS 4 on Community Health, Safety and Security. Further commitments in this area are set out in TEP PNG's Security Policy and TotalEnergies' Code of Conduct.

HUMAN RIGHTS IMPACT ASSESSMENT

A Human Rights Impact Assessment (HRIA) for the Papua LNG Project – conducted in March 2017 by the Danish Institute for Human Rights and specifically focused on gender, security, and conflict has been published in English and Tok Pisin – one of the official languages of Papua New Guinea.⁶

The HRIA highlighted the importance of ensuring that the Project does not exacerbate gender-based violence against women and girls by addressing sexual and gender-based violence within the VPSHR management. At the time of the HRIA, the Project was in the preparatory pre-front end engineering and design (pre-FEED) so that findings and recommendations can feed into the Environmental, Social, and Health Impact Assessment (ESHIA).

6. Reference document is available [here](#).

ESTABLISHMENT OF FORMALISED RELATIONSHIPS WITH SECURITY ACTORS

In application of the VPSHR Company Rule, TEP PNG has contractually formalized relationship with PSC for security services. The affiliate has engaged a dialogue with national authorities and made every effort to establish an official agreement for GSF deployment in the Project area. In 2016, a Memorandum of Understanding (MoU) has been signed with the Royal Papua New Guinea Constabulary.

The document notably stipulates that all practical procedures and measures will be implemented in compliance with – and therefore all personnel will adhere to, the Universal Declaration of Human Rights, the Voluntary Principles on Security and

Human Rights, the United Nations (UN) Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, and Code of Conduct for Law Enforcement Officials. Through the MoU, TEP PNG ensured that the Government commits not to deploy individuals who have in the past been responsible for human rights abuses.

The document also addresses the utmost importance of respecting the local communities while exercising fundamental rights such as the right to freedom of association and collective bargaining. This helped building a clear framework for continuous engagement on the VPSHR.

COMMUNITY-BASED SECURITY APPROACH

TEP PNG ambition is to co-construct the Project with local communities and contribute to a positive development in the area of operations in a way that will meet their expectations and wishes. For this purpose, TEP PNG engaged with the community in several ways such as setting-up societal and economic projects as part of the local content policy but mainly placed the community at the core of its security approach. For instance, building-up a strong collaboration with the Project's 15 Community Liaison Officers (CLOs) – deployed 24/7, has been highlighted as a decisive strategy for mitigating the risks related to interaction of security actors with local communities.

To liaise with the local communities, CLOs are in contact with Village Liaison Officers (VLOs) who are nominated by the communities themselves and paid by the Project. There are currently 10 VLOs for the 5 villages of the PRL15 Project Area of Influence (PAOI) and 22 VLOs are going to be deployed on the Pipeline Export Route (PER) and waterways. In each village communities must appoint one man and one woman. TEP PNG ensures that the information about the

Project's security arrangement with security actors and compliance with the utmost recognized standards is shared with communities and workers. To that end, the affiliate managed to translate internationally recognized human rights and security standards into a speech that would make sense in the local context.

As per the VPSHR Company Rule, TEP PNG ensures that the grievance mechanisms are effective and can receive complaints about the conduct of GSF and PSC without retaliation. Mechanisms are in place for complaints involving GSF and PSC with potential human rights impact to be rapidly escalated to the Project and brought to the Country Security Officer's attention. Through this procedure, complaints are followed-up through the Project's incident management and reporting mechanism.

TEP PNG fully committed to ensuring that adverse impacts of the Project are reduced to the minimum. To foster this constructive dialogue with stakeholders, TEP PNG has established an Independent Advisory Panel.

which comprises different individuals who are recognised for their positive impact and contribution in various sectors such as environment, biodiversity, human development, and community work.

The Independent Advisory Panel was launched early in November 2022 and will help TEP PNG to move forward in a better and more sustainable way.

Please refer to [Independent Advisory Panel | TotalEnergies Papua-New-Guinea](#) for more information.

The Project Security team will therefore welcome and apply the recommendations issued by the Panel to further deepen its community-based security approach.

The HRIA highlighted the fact that social relations in the Project area are strongly gendered. The affiliate strives – in an ongoing effort, to minimize the Project potential to exacerbate the risks of sexual and gender-based violence against women and girls. Thus, the VPSHR have been highlighted as an important standard to conduct our security operations while placing great emphasis on protecting the rights of the identified vulnerable population and not exacerbating the inherent risks. For this purpose, TEP PNG has explored ways to collaborate with civil society actors to enhance its commitments on this topic. For instance, [Bel Isi PNG](#) is an invaluable Initiative which mission intends to galvanize private and public actors

to play an important role in changing attitudes towards sexual violence. The Initiative endeavours to contribute to Papua New Guinea’s goals to achieve an environment in which gender equality is realised.

As part of the Bel Isi Initiative, seven staff members from both TEP PNG and TotalEnergies Marketing&Services PNG (TEMS PNG) participated in a two-day training package to become workplace focal points for Family and Sexual Violence (FSV) issues. The FSV workplace focal points will encourage and accept notification from employees about perpetrators of FSV in the workplace and will coordinate with Human Resources and Security in the investigation of these allegations. TEP PNG also participated to the [Bel Isi Elimination of Violence Against Women Walk](#) in November 2022 with the intention to promote awareness for staff and the public about gender-based violence. All of these actions contribute to the education of the personnel and allow them to heighten awareness of the collaborators within the framework of our security operations..

TEP PNG is pleased and proud to support this program recognized in the [Papua New Guinea National Strategy to Prevent and Respond to Gender Based Violence](#).

III. VPSHR Trainings

The sensitivity of the Project as well as the proximity with local communities underscore the importance of providing in-depth VPSHR trainings to the whole staff, including personnel not directly involved in the VPSHR implementation. TEP PNG provides VPSHR trainings to PSC and GSF covering several modules such as Core Human Rights Principles, International Humanitarian Law, the Use of Force and Conflict Resolution. Trainings integrate role play sessions and main objectives are

UNDERSTAND

how behaviour/attitude may affect a given situation;

BEING ABLE TO

state the various physical signs displayed by a person prior to a physical assault;

DESCRIBE

how roles of persons may change during a conflict, master the TRUCE model to provide a structured and effective response. while respecting human rights.

THE TRUCE MODEL

Topic: Identify yourself and tell the person why you are here;

Resolution: Discuss what you want to achieve and how can the issue be resolved;

Under Control: Stay calm and focused during any escalation of hostility;

Communicate: Use clear, informed and measured speech;

Evaluate: Monitor and assess all replies and actions, be prepared to adapt to the changing situation.

KEY FIGURES

In 2022, TEP PNG conducted 22 such trainings sessions at Project level and a total of 31 GSF members and 33 PSC guards were trained. In Port Moresby, 32 trainings were also conducted with a total number of 34 GSF, 19 PSC guards as well as 55 PSC drivers trained during the year. In addition, 122 members of the affiliate staff attended a VPSHR and Conflict Resolution presentation with tabletop exercise.

122

members of the affiliate staff sensitized on the VPSHR and Conflict Resolution.



Review of the VPSHR training material was part of the HRIA conducted in 2017. The HRIA recommendations highlighted the importance to improving VPSHR trainings by including a component on sexual and gender-based violence, extending the training into a full day session as well as more practical scenarios and exercises.

In a continuous effort to improve the VPSHR training program, the affiliate created a reality-based exercise training. The scenario took the form of four disgruntled locals unlawfully entering the site with the intent to deny access of any waterway activity. Employees from an Oil&Gas Service Company operating in Papua New Guinea took the role as disgruntled locals under the command of TEP PNG Security Coordinator.

Exercise scenario objectives were to :

ENSURE that security actors adopt and implement previous training in the VPSHR and Conflict Resolution.

IDENTIFY hazard and use of proportionate mean to deescalate situation.

IMPLEMENT clear communication and reporting lines.

ACT as cohesive team throughout the exercise and use all assets available to give a positive outcome.

More importantly, the security actors understood very well the stakes and what are their limitations in a heated situation.

The affiliate is in the process of strengthening materials as once the security actors' number will increase in the upcoming months, the exercises will intensify and incorporate a series of incidents which will culminate in a Conflict Resolution scenario.

In 2022, VPSHR trainings and Conflict Resolution trainings represented **33 %** of the total number of trainings delivered.

KEY FIGURES



33%

of the total number of trainings delivered in 2022.

IV. VPSHR Incidents Reporting and Management

In 2022, there was no incident reported related to the intervention of Government Security Forces or Private Security Companies individuals in relation to the Project with human rights implication. Strong procedures at Project level, active participation into VPSHR ADRA Campaigns the previous years as well as the number of trainings delivered to security actors helped preventing the occurrence of such situation.

If a situation involving the use of force with a potential human rights violation were to occur, the Conflict

Resolution elements incorporated into the trainings delivered as well as the reality-based scenarios should enable the security actors to effectively manage the event. Nevertheless, should such an incident arise, TEP PNG has integrated the key steps of VPSHR incident management into its procedure.

Additionally, the Project grievance mechanism in place meets the UN Guiding Principles on Business and Human Rights effectiveness criteria and integrates VPSHR incidents.

COLLABORATIVE APPROACH IN IMPLEMENTING THE VPSHR

The HRIA highlighted the opportunities to adopt a collaborative approach in implementing the VPSHR as establishing technical cooperation between the security functions of the Joint Venture (JV) Partners, engaging the Chamber of Mines and Petroleum in order to establish a technical working group on VPSHR implementation. If such an opportunity arises and given the salient security and human rights issues, TEP PNG would welcome the benefit of a collaborative approach in implementing the VPSHR and the creation of a safe and trustworthy environment to share best practices.

D. Lessons Learned and Issues

I. Notable security issues with Human Rights implications

In countries where TotalEnergies only operates through the Marketing&Services (MS) branch and where the issues at stake are essentially the security of service stations by Private Security Companies (PSC), greater vigilance, and reinforcement in terms of monitoring performance in line with the VPSHR is required. Company Security decided to conduct, in November 2022, a performance audit of a PSC considered a strategic service provider with which TotalEnergies has a framework contract for security service.

Few weeks after this performance audit, in one of our service-station located in the Kongo Central Province, Democratic Republic of the Congo (DRC) – where security is provided by this specific PSC, a private guard noticed that a driver was maneuvering on the runway to park and reproached him for this faulty practice as it is not allowed to park on this site.

There was an exchange of words, which resulted in the guard hitting the driver with a baton, causing him to lose a tooth and two other moving teeth. Police officers were on the other side of the street and immediately intervened. The victim was taken to the hospital immediately to receive appropriate treatment.

TotalEnergies Marketing and Services DRC (or “TEM DRC”) management sent a letter to the PSC country level management giving notice to comply with contractual commitments, including compliance with the VPSHR and requesting the guard to be forbidden to work at any TotalEnergies site again.

Company Security requested a meeting with the PSC management to quickly provide a VPSHR action plan for all units deployed at a TotalEnergies site in all countries in which it contracts for that PSC services.

How has been implemented the APRECoM mnemonic in this case ?

- 
A ssistance
 Assistance has been directly provided to the victim by taking him to the hospital.
- 
P rotection
 The affiliate protected the identity of the victim in all communications.
- 
R eporting
 A first report written by the PSC has been brought to the attention of the Country Security Officer, then he informed the Company Security.
- 
E nquiry
 The affiliate conducted an enquiry and sent a local team of the PSC to the hospital to hear the victim side of the story.
- 
Co mmunication of the final incident report
 The CSO filled out the VPSHR Final Incident Report and sent it to the Company Security.
- 
M easures
 Corrective measures were adequately taken as the affiliate management sent the letter to PSC asking them to remove the guard and medical expenses were assumed by the guard. Moreover, TEM DRC also held a meeting with the PSC management and required that not only the PSC involved in this incident but also the other contracted PSC organize a VPSHR (re)awareness campaign for all guards operating at TotalEnergies sites in the country.

Please refer to **Part B** of this report for more information regarding the mnemonic.

II. TotalEnergies' blueprint – Our way forward in 2023

IMPROVE VPSHR IMPLEMENTATION AT OPERATIONAL LEVEL FOLLOW-UP

In 2023, TotalEnergies goal is to reinforce VPSHR activities, work on the identified weaknesses and improve the Company's overall VPSHR implementation, in accordance with our 2023 action plan. We will strive to implement the following objectives:

- + Strengthen the follow-up of VPSHR action plans as well as the integration of recommendations issued after the annual VPSHR ADRA campaign throughout the year.
- + Enhance our security and human rights risk mapping methodology for low level security countries to anticipate new forms of incidents that may occur during events, demonstrations, or protests.
- + Continue to develop partnerships with recognized training organizations that can deliver quality and adapted VPSHR trainings to the 2023 priority countries.
- + Increase our intervention and awareness-raising actions at the various management levels within the different branches of the Company.

PRIORITY COUNTRIES

Countries whose VPSHR compliance rate was below 50% and/or whose Risk-Assessment's results has indicated high or extreme risks during the 2022 ADRA Campaign.

ACHIEVE A TOTAL OF 100% OF TRAINED SECURITY MANAGERS ON THE E-LEARNING COURSE WITH A DEDICATED VPSHR MODULE

In 2021, the Company's Security Division has started the development of an e-learning training course for Security Managers. This digital training tailored to Country Chairs and operational security manager's needs has been finalized in 2022 and made available

in early 2023. The objective of the Company Security is that at least one security manager in each of the countries in which TotalEnergies operates follows this online training and the dedicated VPSHR module.

IMPROVE VPSHR AFFILIATES TOOLKITS

The Company Security provides for each entity a VPSHR kit consisting of internal and external reference framework, documents templates as well as training and communication materials. In 2023, Company Security will further develop the toolkit by translating the training and communication materials into different complementary languages

and roll out all our communication materials to the different facilities of the Company to increase general awareness. Development of several VPSHR videos will also allow the entities to easily sensitize on the VPSHR through dissemination campaigns or workshops.

DEVELOP SPECIFIC SECURITY AND VPSHR GUIDANCES FOR NEW ENTITIES

The number, diversity and specificity of the Company's new projects lead us to consider new approaches that are more adapted to the operations of each entity in terms of VPSHR implementation. The Company's Security Division will work on a guidance handbook for new entities – in addition to the Company's VPSHR

referential, giving them specific indications to adopt an action plan to align their security standards with those of the Company and to integrate the Company's security reference framework (rules and implementation guides).

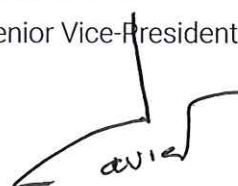
PURSUE ACTIVE COLLABORATION WITH THE OTHER ENERGIES SECTOR COMPANIES BILATERALLY AND WITHIN IPIECA

Aware of the benefits of exchange with other Energies sector companies and the added value of exchanging experience as well as peer learning workshops on security and human rights, TotalEnergies will continue to engage with IPIECA's Social Responsibility Groups and Task Forces. The Company will also actively

identify opportunities and potential synergies with other companies to better implement responsible security operations such as establishment of VPSHR group works in the countries where security and human rights are recognized as a salient issue.

Denis FAVIER

Senior Vice-President Security

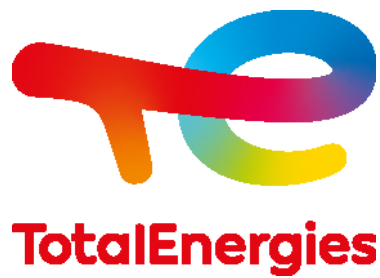


TotalEnergies is a broad energy company

that produces and markets energies on a global scale: oil and biofuels, natural gas and green gases, renewables and electricity.

Our 105,000 employees are committed to energy that is ever more affordable, clean, reliable and accessible to as many people as possible.

Active in more than 130 countries, TotalEnergies puts sustainable development in all its dimensions at the heart of its projects and operations to contribute to the well-being of people.



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