From: Date: Tue, Mar 11, 2025 at 10:50 AM Subject: RE: Right of Reply: Forthcoming website launch on human rights performance of ESG rating firms and index providers To: Cc:
Dear Mr Scott,
We have taken note of your letter sent to and understand from this letter that your organization is about to launch a website "which tracks the flow of ESG-labeled investment towards companies implicated in social, environmental and human rights abuses".
First of all, please note that contrary to what you indicate, a non-response from us could not, under any circumstances, mean that the assertions you are relaying are correct.
We regret that your request contains factually incorrect statements, such as, for example, the one relating to the number of people displaced by the Tilenga and EACOP projects. The figure of 100,000 mentioned in various reports, refers to people who own an asset, i.e., farmland or animal grazing land, on the pipeline route. As publicly stated at multiple occasions, under no circumstances will all these people be displaced. Among them, the number of displaced people amounts to a total of 775 households, or approximately 5,000 people, rehoused in the vicinity and in better conditions, on acquired land of 5,600 hectares.
In addition, we note that your letter lists a number of allegations against TotalEnergies brought forward by civil society and media, without citing our company's position and quoting the right of response that we have already made public. For the sake of transparency and equal treatment, we invite you, as does the NGO BHRRC for example, which you mention several times, to publish extensively all the responses made publicly available by our Company.
In this respect, you will note that TotalEnergies has made public a large number of documents of which you cannot be unaware. With regard to the subjects you mention:

Referring to Peru:

Peru 2024-06-04

Peru 2023-07-24

Referring to Mozambique:

Mozambique 2024-11-26

Mozambique 2024-09-26

Mozambique 2024-03-01

Mozambique 2023-10-11

Mozambique 2023-05-23

Mozambique LNG report.pdf

In addition, you will find in the attached document (Annex response IDI) a list of publicly available documents relating to the Tilenga and EACOP projects and corresponding links.

With respect to you referring to legal complaint or lawsuits faced by the Company, we urge you to consider that, to date, none of the legal actions to which you refer has resulted in a conviction against our company.

The complaint regarding Russia has been definitively dismissed, and the other proceedings are still ongoing.

Please also find additional documents here below regarding Russia:

https://www.lemonde.fr/international/article/2022/08/24/comment-le-gaz-de-totalenergies-sert-de-carburant-aux-avions-de-combat-russes-en-ukraine 6138867 3210.html

Russia 2022-09-09

Russia 2022-08-24

Russia 2022-03-22

Referring to the "Climate" complaint, please note that the Paris Public Prosecutor's office recently dismissed a criminal complaint filed against TotalEnergies in relation to climate change. The prosecution department has considered that TotalEnergies activities are legal and not in breach of any law or regulation.

Climate 2025-02-20

t last, we regret that your organization did not follow up on the dialogue proposal sent to your olleague We would like to reiterate this proposal, as we believe it ould help to improve mutual understanding on important issues. Please also note that for any urther request, you are kindly invited to contact our social engagement team
/e look forward to hearing from you.
ncerely yours.
TotalEnergies SE

2 place Jean Millier

92400 - Courbevoie - FRANCE

TotalEnergies

Au cas où il ne vous serait pas destiné, merci de le supprimer et d'en avertir immédiatement l'expéditeur.

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which it has been sent. If you are not the intended recipient, please delete it and notify the sender immediately.

TotalEnergies Response to Inclusive Development International Uganda and Tanzania ANNEX

March 10th, 2025

TEPU and EACOP "the companies", have committed to deliver the Tilenga and EACOP projects in line with Ugandan Laws and International standards. As constantly reminded, and as listed in the below documents, our Company is also open to engaging with any stakeholders interested in understanding how we are addressing those risks.

You will find here below the extensive information already made publicly available :

A- General information:

- TotalEnergies Universal Registration Document 2023 (page 167)
 TotalEnergies 2023 Universal Registration Document
- Our Group's CEO response at the French Senate (June 2024)
 CE Obligations de TotalEnergies: compte rendu de la semaine du 29 avril 2024

B- Specific information:

Human Rights

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

- TEPU Human Rights Policy https://totalenergies.ug/system/files/atoms/files/human_rights_policy.pdf

TEPU's work on human rights aligns with the Ugandan National Action Plan for Business and Human Rights2 and is increasingly recognized by local players including civil society organizations, and Non Governmental Organizations (NGOs) which have commended TEPU for its integration of Human Rights in its activities at various engagements.

- Tilenga Annual Human Rights report, 2023 Tilenga Annual Human Rights report, 2023

Eacop commits to respect human rights and applicable laws in all its activities and to implement the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Principles, the OECD guidelines for Multinational Enterprises, the fundamental conventions of the International Labour Organization and the Voluntary Principles on Security and Human Rights.

- EACOP Human Rights Policy:

Human Rights Policy - EACOP -

Human Rights Defenders

We have repeatedly communicated in the past on the way TEPU and Eacop take to respect the rights of HRDs and to exercise leverage on relevant authorities in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and we invite you to consult the below publicly made available documents.

TEPU recognizes 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 also recognizes the International Finance Corporation (IFC) Position adopted in 2018 on Retaliation Against Civil Society and Project Stakeholders. "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".

- TEPU statement on Human Rights defenders statement on human rights defenders word 0.pdf

It is worth reminding that in April 2021, TEPU had commissioned Michel Forst - a consultant, specialized in Human Rights, previously Special Rapporteur on the situation of Human Rights Defenders for the Office of the United Nations High Commissioner for Human Rights (OHCHR) - to provide an independent report summarizing observations collected in the field, including recommendations regarding TEPU public statements on Uganda's Human Rights Defenders, recommendations on management of grievances related to Human Rights Defenders, and applicable internal procedures. The report and action plan have been made public here below.

Tilenga & EACOP: two projects rigorously researched and assessed | TotalEnergies.com

Whenever TEPU is alerted of allegations of threats, intimidation, harassment, or violence against Human Rights Defenders in relation to its activities or EACOP's Ltd activities in Uganda, the country security team will typically visit the police station, request information on the protestors' welfare, and advocate for the need to respect the human rights of the HRDs. Where particular concerns are raised in this regard, TEPU through the Country Security Team or the Managing Director may escalate its engagement for instance by contacting the Commander of the Uganda Oil and Gas Police, the Ministry of the Internal Affairs or even, where appropriate, higher levels of government.

- Response to Human Rights Watch re Human Rights defenders (october 2023) uganda1123 annex b.pdf

As you know, the Companies, TotalEnergies EP Uganda and EACOP Ltd are both committed to the respect of human rights, including the right to freedom of expression and assembly as stated in their respective Human Rights Policy. To ensure that the Government Security Forces equally respect these rights, the Companies have maintained regular engagement with them. The Companies take a proactive approach to ensuring that the project is implemented in accordance with internationally

recognized human rights standards and the Voluntary Principles on Security and Human Rights (VPSHR). Below documents and responses which are publicly available, illustrate Companies respect HRDS and exercise leverage.

During the recent protests of 9th and 26th August 2024, TEPU's security department closely monitored the two cases of arrests and detention. In both instances, we engaged with the police to ensure that the demonstrators' rights and well-being were respected throughout the legal proceedings. All 47 arrested protestors of August 9th, 2024, were released the same day after identifying themselves, while the 20 protestors from 26th August 2024 demonstration were charged in court.

- Response to BHRRC re demonstrations of August 9th and 26th in Kampala Total Energies response August 2024.pdf

Regarding the arrest of 15 activists on 11th November 2024, the Companies were made aware of the arrests through social media. Our team promptly engaged with the Officer in Charge of Operations, and 2 other senior officers at the Central Police station where the activists were being held, to remind the Police of the need to ensure that legal due process is followed, the protestors are treated well, and their rights are respected while in detention

Response to BHRRC re demonstrations of November 11th 2024
 TotalEnergies' response to the arrest of 15 anti-EACOP protestors in Uganda

Land acquisition, livelihood, social performance

TEPU sustainability initiatives include those required by laws and policies, and those that are discretionary and aim to manage social risks and negative impacts, as well as to maximize the socioeconomic development impact of its projects, in line with the Government of Uganda's commitments to the sustainable development goals.

- TEPU social report (land access, livelihood, access to health, water energy, national content, skilling, education, diversity and inclusion...).

social report 2024 0.pdf

The Tilenga Land acquisition process is guided by the Land Acquisition Resettlement Framework (LARF) and Resettlement Action Plans (RAPs), which were developed by the project Joint Venture Partners together with government and in consultation with NGOs, communities, and other key stakeholder within the sector. This was approved by the Ministry of Energy and Mineral Development (MEMD) with the Ministry of Lands Housing and Urban Development (MLHUD). The guiding documents are compliant with laws of Uganda, and consistent with International Finance Corporation (IFC) Performance Standards

 Let's Talk, The Tilenga Land Acquisition Process -https://totalenergies.ug/system/files/atoms/files/lets_talk_bulletin_-_land_acquisition_--final.pdf As of November 2024, 99% of compensation agreements have been signed for Tilenga and EACOP. These agreements are supplemented by measures in favor of employment, education and respect for women's rights in order to significantly improve the living conditions of the people affected.

- EACOP land acquisition situation as of November 2024:
 Land Acquisition & Resettlement Status EACOP –
- Response to Human Rights Watch (land acquisition process June 2023) uganda0723_annexB.pdf

Kingfisher and CNOOC:

Please note that in the joint-ventures that are not operated by us, we strive to ensure that the partner who operates the joint venture adheres to principles that are equivalent to those set out in our Code of Conduct. In particular, we encourage our partners to respect human rights and conform to the highest international standards in this area, not only by including human rights clauses in contracts, but also by raising awareness among representatives in the joint ventures and key personnel (e.g., asset managers) of the importance of respect of this topic, in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP). Please find here below for your information the Response to BHRRC re a report by Justice Finance International Response to BHRRC on alleged human righs abuses in Kingfisher project area.pdf

Human Wildlife conflicts

As previously mentioned in our correspondence, TEP Uganda has been working with Wildlife Conservation Society (WCS) and the Uganda Wildlife Authority (UWA) in monitoring the ranging behaviour of elephants in and around Murchison Falls National Park. The program involves GPS collaring of female and male elephants to understand their individual movement patterns, and this has been ongoing since 2013. The data so far shows that the core ranges of collared individuals outside the park boundary have not changed since commencement of oil and gas activities, and contrary to the claims, it is reasonable to assume that it is not directly linked to the activities ongoing inside the park.

- For more information, please refer to below TEPU biodiversity report (page 38). totalenergies_ep_uganda_biodiversity_report_2024.pdf

Avoiding and Reducing impacts such as visual and noise disturbances are of utmost importance and have been a major focus for our project teams since the initial design studies in 2015. Please see above mentioned TEPU biodiversity report (page 27).

totalenergies_ep_uganda_biodiversity_report_2024.pdf