



TOTAL E&P NORGE AS

Procedure

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Title TEPN Grievance mechanism procedure

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1 Purpose

This document outlines the Company's community Grievance Mechanism, the process for receiving, acknowledging, investigating, resolving, and closing community grievances (or complaints). The Company views complaints as an important part of managing impacts and encourages community members to submit concerns as they arise. In this way, the grievance mechanism serves as an integral part of the Company's approach to community engagement and risk mitigation, contributing to the Company's License to Operate.

Complaints received by the company provide opportunities to inform and improve how the Company conducts business and to learn lessons so that conditions which could lead to similar grievances are prevented in the future. The Company is committed to a consultative, fair, and equitable working relationship with community members who express concerns. The Company is also committed to ensuring that no complainants will be subject to retaliation by either the Company or other community members when they voice their concerns and participate in the grievance resolution process.

This document outlines the non-judicial Company Grievance Management procedure, including the steps the Company takes to address community complaints.

2 Principles

The Grievance Mechanism is based on:

- The United Nation Guiding Principles (UNGP) Total adheres with,
- The Group rule on Stakeholder and Local Impact Management (CR-GR-HSE-412),

and is intended to comply the following effectiveness criteria:

- Legitimate : enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes,
- Accessible: being known to all stakeholders groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access,
- Predictable : providing a clear and known procedure with an indicative timeframe for each stage, and clarity on the types of process and outcome available and means of monitoring implementation,
- Equitable : seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms,
- Transparent : keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake,
- Rights-compatible: ensuring that the complainant is protected from reprisals from others and outcomes and remedies accord with internationally recognized human rights,
- A source of continuous learning : drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms,
- Based on engagement and dialogue: consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances.

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3 Scope and application

3.1 Perimeter of the Procedure

This procedure applies to all stakeholders' concerns or grievances raised in connection with the Company or its related contractors' activities.

This Procedure will be revised periodically based on experience, feedback during its implementation and with regards to the Company's operations.

3.2 Dealing with concerns, questions or requests

The present procedure is not meant to handle concerns, questions or requests from stakeholders. However, concerns and questions will be handled seriously and respectfully as an integral part of stakeholder engagement especially at the community level. They will inform operational practice and their management and to keep them from escalating into grievances, they will be:

- Responded to as quickly as possible;
- Monitored to inform ongoing stakeholder engagement;
- Recorded in the Company's database.

3.3 Limits and redirection of complaints

The Company will evaluate all complaints received and will provide a response. Some complaints may be related to factors not connected to the Company. In these cases, the Company will send a written explanation of why it feels the complaint does not require further action by the Company.

There are no restrictions on the type of Complaint a stakeholder can raise under this procedure. However, when a grievance is received that is more appropriately handled under a separate process established for that purpose, it will be re-directed so as to prevent parallel processes being followed. For example:

- Complaints from Project's employees regarding their contract or work conditions are covered by specific procedures set up by the Human Resources department. Complaints from Contractor's employees are redirected to their employer unless their concern is related to labour welfare issues.
- Complaints of a commercial nature made by partners or suppliers of goods and services are forwarded to the Company entities in charge of relations with these third parties (Commercial department and Contract & Procurement department);
- Grievances already introduced in a court of law are redirected to the Legal department but should be tracked the grievance process
- Complaints from authorities or a national company are forwarded to the General Manager or the External Affairs department, except when they deal with grievances from local communities;
- Complaints regarding Social and Environmental Investment are redirected to the Social Performance entity or the General Manager;

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- Complaints related to Ethics, allegations of bribery and/or corruption, and/or any other violations of PPT's Code of Conduct are forwarded to the Compliance Officer.
- Complaints related to damages covered by insurance and requiring oversight by the legal team (such as car accident affecting the vehicle of a community member).

The right of the complainant to seek legal redress is not affected by their use of the Company Grievance Mechanism.

4 Definitions and abbreviations

For the purposes of this document, the following terms and definitions apply.

Acronym / Term	Definition
Company	Represents the Affiliate or the Project.
Complainant	Person, group of persons or organization that considers it has been adversely affected by activities carried out under the Company's supervision and presents/files a grievance.
Concern	Question, request for information or general perception regarding the activities of the Company or its contractors, which is not a grievance, but might become one.
Contractor/Subcontractor	An individual or firm that has entered into a contract to provide goods or services to the Company. The term covers parties directly contracted by the Company and those contracted by a Contractor of the Company, also referred to as subcontractors.
Grievance/Complaint	Complaint and Grievance can be used interchangeably as the expression (in any form) of dissatisfaction (whatever its degree) regarding a specific impact, real or perceived, associated with the Company's activities.
Recipient	Any person who receives a complaint related to Company activities – Company staff; contractor staff; local authority.
Stakeholders	Refers to all civil organizations, communities, indigenous people that may impact on the Company or be affected by its activities.

5 Roles and responsibilities

Roles and responsibilities under this procedure are as follows.

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Role	Responsibility
General Manager	<ul style="list-style-type: none"> Approves and signs the Grievance procedure and is accountable for Grievance Management. Ensures the Company gets the resources (human and financial) to manage efficiently grievances. Gives the final approval of any resolution offered to a complainant.
HSEQ Director	<ul style="list-style-type: none"> Responsible for this Grievance Management procedure, including updating of the procedure based on lessons learned. Receives complaints from recipients, ensures complaints have been acknowledged and that a response is provided to the complainant in a timely and fair manner. Ensures remedies to grievances are compatible with international Human Rights standards. If necessary, seek for support for Human Rights external expertise. Maintaining documentation of grievances and the handling of them. Prepares yearly reports with an analysis of KPI. Promotes awareness and understanding of the existence and purpose of the Grievance Management procedure within the workforce, for them to know what to do in case they become recipients of a complaint.
Recipient (any employee, incl. Contractors)	<ul style="list-style-type: none"> Must be aware and understand the procedure, Refers complaints to the HSEQ Director.
Ethics & Integrity Committee	<ul style="list-style-type: none"> In matters covered by this Procedure, the Ethics & Integrity Committee shall assess whether representatives from Operations, HSE, Security and/or Legal departments shall be represented if relevant. Responsible for conducting investigations of a complaint, proposing resolutions and implementing corrective actions. Regularly reviews the grievances and their causes to identify changes to be brought to operating procedures and contractors' practices. Approves the solutions to be presented to the complainant.

6 Protection of complainants

6.1 Complainant rights, confidentiality and anonymity

In compliance with international standards, this procedure protects the complainant's rights to access to information, access to the grievance procedure, and the right to have one's confidentiality and/or anonymity protected, if requested.

The grievance mechanism encourages community members to openly exchange views and concerns about operations with the Company, to flag issues and give the Company an opportunity to modify its operational practices as necessary. Confidentiality will be observed at all times to maintain confidence in the community grievance mechanism and ensure compliance with relevant laws. Complainants may wish to:

- Raise a concern in confidence:** Details will not be disclosed when a complainant asks the Company to protect identity, and will remain secure with those Company staff investigating the complaint. However, the situation may arise where it will not be possible to resolve the complaint without revealing

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identity (for example, when evidence needs to be presented in court). In this case, the Company will discuss with the complainant whether and how best to proceed.

- **Raise a concern anonymously:** Complainants raising a concern anonymously need to provide sufficient facts and data to enable the Company to look into the matter without assistance. The Company will make every effort to evaluate anonymous complaints; however, anonymity may make it more difficult to investigate, protect the position of the complainant, offer and implement resolution, and give feedback.

Disclosure of personal information should also be regulated by the relevant privacy laws for the country.

Any complainant can be accompanied by a friend, a family member or a community leader at the different stages of the Grievance Management process.

This procedure seeks to manage potential conflicts of interest by identifying the various roles and responsibilities of Company's staff involved in the grievance procedure and by avoiding placing individuals in positions where conflicts of interest could be perceived to arise.

6.2 Retaliation

Complainants may choose not to use grievance mechanisms because they have concerns about the consequences. For example, they may perceive that submitting a grievance may negatively impact their employment opportunities with the Company or its contractors. When concerns about retaliation or victimisation are raised, they will be investigated under Total's Code of Conduct procedure.

6.3 Legal framework

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

7 Promotion and accessibility of the Grievance Mechanism

The Company's Grievance Mechanism shall be promoted widely among stakeholders as early as possible, before any new activities on the ground and on a regular basis, in order to ensure that stakeholders know that the company is open to receiving and resolving grievances.

The HSEQ Director will ensure that the Grievance Procedure is understood by providing clear information to staff and external stakeholders. Company will publish information about the procedure, including contact details, on its internet page.

Any employee (including Contractors' employees) may be approached by a potential complainant and thus be a recipient. In such an event, the recipient is responsible for forwarding the complaint to the HSEQ Director and for providing the complainant with a brief description of the Grievance procedure. Therefore, Project and Contractor staff needs to be made aware of the existence and understand the purpose of the Grievance Management procedure and the different roles and responsibilities. In addition to be included in Company's Company Management System (CMS), Company will publish information about the procedure on its intranet.

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8 The Grievance Management Procedure

8.1. Receiving a complaint

Concerns or complaints can be deposited in any form to the HSEQ Director either by letter, phone or e-mail. Contact details is provided on Company's internet page.

8.2. Evaluate, assign

The HSEQ Director shall bring the complaint to the Ethics & Integrity Committee. The Ethics & Integrity Committee shall within 14 days of the complaint being received, decide if the complaint falls within the scope of this procedure.

8.3. Recording & acknowledging of a complaint

If the HSEQ Director receives a complaint orally, he/she shall document the complaint in writing through filling out a Grievance Registration form (Appendix 1).

The HSEQ Director shall send a written acknowledgement to the complainant (Appendix 2). file all complaints received and all other documentation concerning the matter, in TEPN's electronic archiving system.

8.4. Processing of a complaint

The Ethics & Integrity Committee shall assess the complaint and propose a solution to be offered to the complainant. The Ethics & Integrity Committee shall also assess whether further investigation of the matter is necessary, and if so, conduct such investigations. The proposed solution to the matter shall be presented to the General Manager for final approval.

Potential solutions may include further information or explanation, apologising for the disturbance caused and/or corrective actions planned to remove the nuisance.

The HSEQ Director shall communicate the proposed solution to the complainant within 30 days after reception. This communication shall be documented in writing through filling out a Grievance acceptance form (Appendix 3).

If the complainant does not accept the solution offered, the HSEQ Director shall inform the affiliate's General Counsel that there is a potential risk of legal proceedings. From then on, the complaint is handled by the Legal department.

If the complainant accepts the solution, he will sign the acceptance form (Appendix 3), which shall include the description of the solution and the schedule for implementation of the solution agreed with the complainant.

If the Ethics & Integrity Committee decides that the grievance is unfounded, this will be explained to the complainant through the Closure form for an unfounded grievance (Appendix 4).

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8.5. Closure of the Grievance

A grievance is considered closed when the solution is properly implemented in accordance with the agreement between the parties; the complainant will then sign the Closure form (Appendix 5).

9 Performance, monitoring and reporting

Logging and documenting grievances is an important step that allows a Grievance Mechanism to contribute to ongoing Human Rights due diligence efforts. Keeping full records can help ensure grievances are handled within a reasonable timeframe and provides an important repository of information if grievances are reopened. Record keeping can also help to track trends or patterns in concerns and grievances, allowing emerging issues to be flagged and understood at an early stage. Each grievance form will have its own unique reference and will be recorded in the grievance register.

The HSEQ Director reports internally on the performance of the complaints mechanism to the affiliate's Management team on an annual basis. Data analysis on the types of complaints received and the lessons learned will help to avoid recurrences and sustain positive relationships with stakeholders. The following key performance indicators (KPI's) should be used:

No	Theme	Description	Target
1	Receipt of Grievances	% of grievances acknowledge in time	80% of grievances are acknowledged by letter within 5 calendar days of receipt.
2	Grievances resolution time	% of grievances timely respond analysis of the time required to acknowledge, investigate, solve and close out Complaints against set targets	At least 80% of grievances closed within 60 calendar days. Other 20% closed within not more than 90 calendar days.
3	Performance of mechanism	% of grievances resolved in the first and second levels	At least 80% of grievances are closed at first and second levels.
4	Nature of the Grievances	The analysis of the number and the nature of complaints received by type of complaints; The analysis of the number and the nature of complaints in relation to geographical area and/or Project activity and/or Contractor;	Help to monitor and identify the weaknesses of the performance of the entity; Identify the repetition of the same grievances.
5	Learning ability & key themes to focus on	% of repeat grievances	To have a 80% decrease of repeat grievances after one year The intention is to learn from grievances and respond to them in a manner that, over time, reduces their rate of occurrence.

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6	Effectiveness of the mechanism	% of satisfaction on process	To have 80% of complainant satisfied after signing the Grievance Acceptance and Closure Forms.
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10 References

10.1 Internal

Reference	Title
CH-GR-ETH-001	Code of Conduct
DIR-GR-SBS-001	Societal Directive
POL-GR-SBS-001	Societal Policy
CR- GR-HSE-412	Stakeholder and Local Impact Management
GM EP SDV 202	Community grievance management

10.2 External

Reference	Title
United Nations 2011	Guiding principles on business and human rights. Implementing the United Nations “Protect, Respect and Remedy” Framework, United Nations
IFC Standards 2012	Performance standards on environmental and social sustainability, International Finance Corporation
IPIECA 2015	Community Grievance mechanisms on the Oil and Gas industry
ICMM 2019	Handling and Resolving Local-level Concerns and Grievances
IAIA CAO 2020	Effective Project level Grievance Mechanisms in a changing landscape, conference and toolkit

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Appendix 1 - Grievance Registration form (example)

TOTAL E&P NORGE AS	
Grievance form (in 2 copies: one for Complainant and one for the Recipient)	
Grievance Number:	Date:
Form filled by (Complainant, witness or Recipient):	
Complainant Name: Contact details (phone, e-mail...): Address: Request for confidentiality? Yes / No	Project Name and position of Recipient: Contact details (phone, e-mail...): Name of Grievance Administrator:
Location where grievance is received: Location where grievance is related to: Description:	
Signature of Complainant	Name, position, Signature of Recipient
Name, contact details and signature of witness	

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Appendix 2 - Acknowledgement letter (example)

TOTAL E&P NORGE AS

<< Name and address of Complainant >>

<< Date >>

Object: Grievance acknowledgement

Ref.: Details concerning your Grievance, number << Grievance form number >>

Dear Mrs/Ms//Mr. << Name of Complainant >>,

I hereby confirm that your grievance has been received on << date of reception of the Grievance >> and is currently undergoing investigation.

Total E&P Norge AS takes community concerns seriously, and we thank you for submitting your grievance. We will make every effort to ensure that your complaint is considered quickly and fairly. Our company has a grievance mechanism process that we follow to consider and resolve complaints. In accordance with our grievance mechanism procedures, we will determine whether your complaint is eligible for our grievance resolution process and consider next steps, as relevant. We will contact you during this period should we need more information.

We will contact you within a maximum of 30 days in order to advise you of the procedure to be followed and to propose a suitable response.

In this regard, the undersigned will be your information and contact point in Total E&P Norge AS.

Yours sincerely,

<< Name, signature >>
HSEQ Director

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Appendix 5 - Grievance acceptance form (example)

TOTAL E&P NORGE AS
<u>Grievance number and short description (as a reminder):</u>
<u>Name, address, phone number of the complainant:</u>
<u>Description of the complainant's demands and other factual circumstances</u> (the cause of the damage, the evaluation of the damage):
<u>Description of the final solution</u> (nature of the compensation - works or financial) proposed by [<i>name of the affiliate</i>]:
<u>Planned schedule for the implementation of the solution:</u>
<u>Date, name, position and signature</u> (as applicable, <u>of the CLO</u> and/or the Grievance Administrator or another representative of the affiliate):
Complainant's acceptance: I, the undersigned _____, hereby accept the solution proposed by [<i>name of the affiliate</i>] and described above. As soon as this solution is implemented, I will make no further complaint and waive any subsequent recourse on the same grounds. Date and signature of the complainant:
Witness: I, the undersigned, _____, acting as witness to the complainant, hereby confirm that the complainant has accepted the solution proposed by [<i>name of the affiliate</i>], with full knowledge of the facts. Name, address, date and signature of the witness:

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Appendix 4 - Close out letter for an unfounded grievance (example)

TOTAL E&P NORGE AS

<< Name and address of Complainant >>

<< Date >>

Object: Decision from the Total E&P Norge AS Ethics & Integrity Committee

Ref.: Details concerning your Grievance, number << Grievance form number >>

Dear Mrs/Ms/Miss/Mr. << Name of Complainant >>,

Upon decision of the Total E&P Norge AS Ethics & Integrity Committee held on << Date of Committee meeting>>, we regrettably have to inform you that no further solution can be proposed by Total E&P Norge AS in response to your Grievance. Your Grievance is therefore considered closed by Total E&P Norge AS and no further action will be taken.

Yours sincerely,

<< Name, signature >>
HSEQ Director

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Appendix 5 - Grievance closure form (example)

TOTAL E&P NORGE AS

Grievance number and short description (as a reminder):

Name, address and phone number of the complainant:

Description of the complainant's demands and other factual circumstances (the cause of the damage, the evaluation of the damage):

Date, name, position and signature (as applicable, **of the CLO** and/or the Grievance Administrator or another representative of the affiliate):

Acknowledgment by the complainant of the solution's implementation:

I, the undersigned, _____, hereby recognize that the solution proposed by [name of the affiliate] and described above has been completely implemented to my entire satisfaction.

Date and signature of the complainant:

Witness: I, the undersigned, _____, acting as witness of the complainant, hereby confirm that the solution described above has been completely implemented by [name of the affiliate]

Name, address, date and signature of the witness: