

TotalEnergies EP Uganda

To the attention of FIDH

Kampala Dec 6th 2024

Dear Sir, Dear Madam,

With reference to the draft report, you sent us on November 12th, we would like to provide the following general comments regarding the Tilenga project.

Although we appreciate the opportunity to provide you with comments, we would like to firmly express our dismay at reading the document for two major reasons. Firstly, its content does not reflect in any way the quality of policies, mechanisms and actions taken on the ground and the progress made by TotalEnergies EP Uganda (TEPU) in the field of Human Rights. Furthermore, the draft report reflects neither our transparency practices nor our discussions over the last four years.

The way in which the report is presented is questionable and is not at all balanced or representative of the reality on the ground. Feedback from local communities indicate that TEPU's actions to address project's impacts, to remedy these and to bring benefits are appreciated. Although we recognize there is still room for improvement, TEPU rejects the false statement contained in the draft report.

Over the past four years, we have maintained continuous dialogue and shared numerous documents and information with your organization. Additionally, we have made information about the Tilenga Project publicly available. This should have enabled you to document the report more thoroughly and recognize the quality and progress of our Company's social performance.

We are surprised to find that your draft report primarily highlights some malfunctions without acknowledging the policies, mechanisms and actions we have implemented. This raises concerns about the validity of your survey methodology and the representativeness of the individuals interviewed.

Additionally, we disagree with the document's portrayal of TotalEnergies' responsibilities in the mentioned projects (Tilenga, EACOP, Kingfisher). As previously stated, TEPU serves as the operating partner for the Tilenga project and as an investing partner, alongside the operating partner CNOOC Uganda Ltd for the Kingfisher project. TotalEnergies is a shareholder in EACOP Ltd, which is responsible for the EACOP project.

As we have discussed in various occasions, whether we act as an operating partner or an investing partner, we conduct our projects and we encourage our partners to conduct projects in accordance with highest international standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs).

As mentioned in publicly available documents, [Response to BHRRC on alleged human rights abuses in Kingfisher project area.pdf](#), TEPU has previously demonstrated its commitment to exerting influence and promoting transparency. We would like to remind you that, in line with our Human Rights Policy, we take human rights issues very seriously

and remain in constant contact with our partners, including CNOOC and other stakeholders. We will continue to engage with our partners and leverage our influence to foster respect for human rights within all impacted communities.

We also observe that the draft report fails to distinguish between the Government of Uganda's sovereignty and mandate, such as for land compensation matters, and TEPU's contractual & statutory responsibilities and accountabilities. This lack of distinction contributes to a climate of confusion which is detrimental to all stakeholders and calls into question the impartiality of the draft report.

Regarding the Human Rights Defenders situation extensively highlighted in your draft report, we would like to reiterate our awareness of the need for great attention. Consistent with our internal policies and mechanisms, we regularly remind public authorities of the critical attention required for this matter.

We sincerely hope that the above remarks will be duly considered by your organization in your analysis of the projects in which TEPU is involved in Uganda. This is essential to ensure the quality and representativeness of the report but also to enable the fruitful continuation of our future exchanges, which we believe have mutually enriched both parties.

Yours Faithfully

Philippe Groueix

General Manager TotalEnergies EP Uganda