

GENERAL SPECIFICATION

Sustainable Development

GS EP SDV 103

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| Human Rights Impact Assessment (HRIA) |
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1. Scope

This General Specification defines the Company guidelines for conducting a Human Rights Impact Assessment (HRIA) once a decision has been taken to undertake the assessment. It is the basic standard required by the Company and sets out the content, phases and expected results.

2. Reference documents

The reference documents listed below form an integral part of this General Specification.

External Documents

Unless otherwise stipulated, the applicable version of these documents, including relevant appendices and supplements, is the latest revision published at the effective date of this document.

| Reference | Title |
|---|---|
| European Commission, Shift, Institute for Human Rights and Business | Oil and Gas Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights (2012) |
| HR/PUB/11/04 | Guiding principles on Business and Human Rights. Implementing the United Nations "Protect, Respect and Remedy" Framework. United Nations, 2011. |
| HR/PUB/12/02 | The Corporate Responsibility to Respect Human Rights. An Interpretative Guide. United Nations, 2012. |
| HRIAM | Guide to Human Rights Impact Assessment and Management June 2010, IFC |
| International Alert | Conflict-Sensitive Business Practice: Guidance for extractive industries. International Alert. March 2005. |
| International Labor Organization | Declaration on Fundamental Principles and Rights at Work (1998) |
| IPIECA-DIHR | Integrating Human Rights into environmental, social and health impact assessments. A practical guide for the oil and gas industry. 2013. |
| Shift | Human Rights Due Diligence in High Risk Circumstances: Practical Strategies for Businesses, New York, 2015 |
| United Nations | Universal Declaration of Human Rights (1948) |
| Voluntary Principles | Voluntary Principles on Security and Human Rights (2000) |

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Unless otherwise stipulated, the applicable version of these documents, including relevant appendices and supplements, is the latest revision published in the applicable yearly collection.

| Reference | Title |
|---------------|--|
| CH-GR-ETH-001 | Company Code of Conduct (accessible on the website www.total.com) |
| GS EP ENV 120 | Environment Impact Assessment of E&P Activities |
| GS EP ENV 501 | GIS Deliverables for HSE |
| GS EP SDV 101 | Social Baseline Study |
| GS EP SDV 102 | Social Impact Assessment |

3. Definitions and acronyms

Affected stakeholder: One or a group of external stakeholders that actually is, or potentially could be affected by the Project.

Compensation Plan: This plan defines the compensatory or remedial measures for any residual impacts identified in the Social Impact Assessment that could not be avoided when the Project was defined. These measures may include, but are not limited to, financial compensation.

Cumulative impacts: Those impacts arising from the combined effects of the different components of a Project such as factories, camps, yards, pipelines etc within the Project's area of operation. Cumulative impacts may be generated by multiple industrial projects in the same area or region.

ESIA: Environmental and Social Impact Assessment.

GIS: Geographic Information System.

HRIA: Human Rights Impact Assessment.

Human Rights: Human Rights are generally defined as basic standards of treatment to which all people are entitled, regardless of sex, national or ethnic origin, color, religion, language, disability, sexual orientation, or any other status. All Human Rights may be relevant to business and are integrated into / recognized by various international guidelines ([IPIECA-DIHR](#)). The Company as stated in [CH-GR-ETH-001](#) adheres in particular to the principles set out in the [HR/PUB/11/04](#), [International Labor Organization](#), [Voluntary Principles](#) and [United Nations](#) (Appendix 1 and Appendix 2).

Human Rights Impact: A Project can have both positive and negative impacts on the Human Rights enjoyment of individuals, groups and communities. An adverse Human Rights impact occurs when an action or omission removes or reduces the ability of an individual to enjoy her or his Human Rights ([IPIECA-DIHR](#)).

ILO: International Labor Organization.

Impact: Any impact positive or negative, potential or actual, on (i) the physical, natural or cultural environment, (ii) surrounding community, and/or (iii) human rights of individuals - community members or others, resulting from any business activity or omission, or directly linked to the Project by its business relationships.

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Impact avoidance measure: A change in the Project's design, procedures or implementation (technical, planning options etc.) which avoids a negative or potentially negative impact of the Project.

Impact mitigation measure: A change in the Project's design, procedures or implementation (technical, planning options etc.) which reduces and/or mitigates a negative or potentially negative impact of the Project but which may nevertheless leave a residual impact.

Indigenous Peoples: Broadly defined as a distinct social and cultural group possessing the following characteristics in varying degrees: Self-identification as members of a distinct indigenous cultural group; collective attachment to geographically distinct habitats or ancestral territories in the Project area and to the natural resources in these habitats and territories; customary cultural, economic, social, or political institutions that are separate from those of the dominant society or culture; a distinct language, often different from the official language of the country or region.

NGO: Non-Governmental Organization.

O&G: Oil and Gas.

Project: Any oil and gas (O&G) activity in which the Company participates and for which the impact assessment has been commissioned (e.g. exploration, construction, etc.).

Project Affected Community (PAC): Any community being subject to risks, potential or actual impacts from an O&G project within the Project's area of operation.

Project Affected Person(s) (PAP): Any individual person or group of persons subject to risks, potential or actual impacts from an O&G project within the Project's area of operation.

Project Area of Operation: The Project's area of operation includes the primary Project site(s) and related facilities, associated facilities whose viability and existence depend exclusively on the Project and whose goods or services are essential for the successful operation of the Project; areas potentially impacted by cumulative impacts from further planned development of the Project; and areas potentially affected by impacts from unplanned but predictable developments caused by the Project that may occur later or at a different location.

Residual impact: Those impacts remaining after impact avoidance and mitigation measures have been applied.

Severity: Expression of the scale of the impacts generated to stakeholders, regardless of their probability, taking into account the nature, the scope, the people affected (considering both the overall number of people affected as well as indications of systemic discrimination); whether the impact is short or long term, the remediability of the impact and the vulnerability of the affected stakeholder including their sensitivity and resilience to handle or recover from impacts (IPIECA - DIHR). In the case of *potential* impacts, severity is assessed independently of probability and is the primary factor to consider in determining the prioritization of measures to address the identified impacts.

Social Baseline Study (SBS): Initial evaluative study of the socio-economic and Human Rights context prior to any operational activity, formalized in the framework of the Exploration & Production processes.

Social Impact Assessment (SIA): Study that assesses and/or analyzes the actual and potential social or Human Rights impacts – positive and/or negative, direct and/or indirect, short, medium and/or long term, intentional and/or not – on the population affected by an O&G project.

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Social Investment Plan: Plan for managing the contribution to the human and socio-economic development of communities affected by a site. The plan is consistent with existing national and local government development plans and, usually, relies on partnerships with organizations experienced and qualified in social and economic development.

Social Management Plan: Summarizes the findings of the SIA; outlines the proposed measures for mitigation and local socio-economic development; provide estimates of the timing, frequency, duration and cost of management measures; and establish monitoring and reporting procedures.

Societal: The Societal approach includes initiatives undertaken by the Company and its assets in order to better integrate their activities into the societal context of their host communities, countries and regions, notably by contributing to human, economic and social development in those territories.

SME: Micro, Small, and Medium sized Enterprises.

Stakeholder: Any person, group of persons, or organization (external to the Company) on who/which the Project (or activity) has an actual or potential, direct or indirect, positive or negative impact, or one that has an actual or potential, direct or indirect, positive or negative impact on the Project (or activity).

Stakeholder Consultation Plan/Stakeholder Engagement Plan (SEP): Consultation and engagement are the ongoing, interactive processes between the Affiliate and its stakeholders. The consultation/engagement plan has three main components: information sharing and disclosure, dialogue (listening and exchanging) and negotiation. It includes the consultation/engagement calendar, the people involved, their roles and responsibilities, and the issues requiring consultation and engagement.

UNDP: United Nations Development Program.

Vulnerability: An individual or group's diminished or lack of capacity to understand, anticipate, cope with, resist or recover from the consequences of a potential impact or other threat. It is important not to confuse 'the vulnerability of people or groups to the Project's impact' with that of people included in 'vulnerable groups' such as indigenous people, elderly people, etc. A person may not belong to a typical 'vulnerable group' but still be very vulnerable to impacts.

4. Potential HRIA drivers

A Social Impact Assessment (SIA) ([GS EP SDV 102](#)) is carried out for all new Projects. Through data collection, stakeholder engagement and analysis, it identifies the impacts of the Project, including any adverse Human Rights impacts. It is often carried out in conjunction with the environment impact assessment ([GS EP ENV 120](#)) to produce an ESIA that studies the full range of Project impacts.

The decision to undertake an HRIA can take place at any point in time. It is recommended that the decision be taken as early as possible in the lifetime of an actual or potential Project. However, internal or external circumstances may change and warrant an HRIA to be carried out in any phase of the Project and so the need to conduct an HRIA should be reevaluated at key project milestones.

The decision as to whether or not to conduct an HRIA is taken by the Affiliate's senior management based on guidance given by societal and Human Rights specialists in the Affiliate and Headquarters.

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The need for, and scope, of a dedicated HRIA is considered in the following contexts. This list is indicative and non-exhaustive.

- Systematic or gross Human Rights abuse is occurring or has taken place in recent history; including project contexts where the State itself is committing Human Rights violations towards residents or parts of the population.
- In weak governance zones or areas with weak rule of law, where the State may be failing in its duties to protect Human Rights, or is not protecting the Human Rights of parts of the population.
- Project contexts where the host country government and/or judiciary have not addressed unresolved allegations or incidents of Human Rights breaches, or where there is insufficient access to remedy for breaches of Human Rights.
- Areas with high levels of bribery and corruption affecting performance of, for example, host country public security providers, certain public officials and/or parts of the judicial system.
- Complex land tenure regimes (including communal land rights) and the absence or poor registration of property rights in the Project area of operation.
- Project or License area is totally, or partially, situated in a conflict affected area or in an area where International Humanitarian Law¹ applies.
- Security providers with known incidents of significant and adverse Human Rights impacts, or security providers that are deployed in a context where Human Rights are not fully protected.
- Contractors with a record of Human Rights exposures, e.g. contractors with a poor labor rights record.
- Known exploitative labor conditions in the Project area of operation and host country, e.g. child or forced labor, wages below living wage etc.
- Widespread and/or systemic discrimination against vulnerable groups, or on the basis of gender, race, religion, ethnicity, sexual orientation, etc.
- Indigenous Peoples living in the area or with a traditional connection to the land on which Project activities are taking place, particularly if these communities are isolated geographically or culturally, are reliant upon natural resources for their subsistence, or do not receive effective legal recognition or protection.
- High levels of poverty and/or inequality in the Project area of operation as defined, for example, by the UNDP Human Development Indicators or the Multidimensional Poverty Index.
- Significant population influx or other in- or out-migration movement e.g. refugees, seasonal workers etc. that causes pressures on basic services or else raises Human Rights issues or concerns.

¹ International Humanitarian Law is the law that regulates the conduct of armed conflict. It is that branch of international law which seeks to limit the effects of armed conflict by protecting persons who are not participating in hostilities, and by restricting and regulating the means and methods of warfare available to combatants. It is inspired by considerations of humanity and the mitigation of human suffering. It comprises a set of rules, established by treaty or custom, that seeks to protect persons and property/objects that are (or may be) affected by armed conflict and limits the rights of parties to a conflict to use methods and means of warfare of their choice. It includes the Geneva Conventions and the Hague Conventions, as well as subsequent treaties, case law, and customary international law.

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- Where circumstances are such that integration of Human Rights into the SIA is not possible or practicable, for example because of the operating context or where potential Project partners do not recognize the potential for adverse impacts. In such circumstances, it may be better to conduct a dedicated HRIA.

5. Objectives of a Human Rights Impact Assessment

The objectives of the HRIA are to:

1. Identify affected and potentially affected stakeholders with a particular focus on those vulnerable to Human Rights impacts.
2. Meaningfully engage with stakeholders.
3. Evaluate the level of vulnerability of PAPs and PACs to impacts.
4. Identify and assess positive and negative Human Rights impacts resulting from the Company's activities.
5. Propose measures to mitigate identified negative impacts.
6. Propose measures to maximize potential positive impacts.
7. Propose indicators to track performance of impacts management measures.

In the case of an HRIA carried out in advance of operational activity, the results, particularly avoidance or mitigation measures, inform the Project design and planning processes. Every effort should be made to ensure that negative impacts are avoided and effectively mitigated.

In the case of an HRIA carried out during operations, the assessment identifies and helps reduce any adverse Human Rights impacts as well as promoting greater stakeholder trust and support for the Project.

6. International framework

The HRIA assesses the actual and potential impacts on the Human Rights of PACs and PAPs and not the risk to the Company.

The HRIA shall include a detailed explanation and description of the methodology applied including stakeholder engagement activities and responses to suggestions and comments made by stakeholders which shall be appropriately integrated into the HRIA. The Consultant shall build the HRIA methodology on evolving international good practice and established HRIA tools. The methodology and implementation shall respect Human Rights based principles of participation, inclusiveness, non-discrimination and accountability as well as the principles for stakeholder engagement (§ 12.5.3).

The standards to be applied are international Human Rights standards, those of the national legislation and those of the Company. As noted above, the Company, as stated in **CH-GR-ETH-001**, adheres in particular to the principles set out in [United Nations, HR/PUB/11/04](#), the [Voluntary Principles](#) and the [International Labor Organization](#) and other relevant principles from the Bill of Rights (Appendix 1 and Appendix 2).

In the event that international Human Rights standards directly, or indirectly, conflict with national legislation or other requirements, this shall be flagged in the HRIA, the objective being to honor the principles of internationally recognized Human Rights. It is essential to promote the Company's societal and Human Rights policy in relations with the authorities in host countries,

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to partners on whose behalf the Company is operating a license, to partners operating a license on the Company's behalf and any other business partners.

If an SBS and/or an SIA is not conducted in conjunction with the HRIA, or has been conducted at a significant interval prior to the HRIA, the Consultant carries out a gap analysis of baseline information and, if necessary, supplements or updates the SBS through an analysis of the Human Rights context and a mapping of Human Rights obligations.

The Human Rights impacts of an O&G Project may be many, and they vary according to the context, type and scale of the Project. The content shall be tailored to the local conditions and to the nature and characteristics of the Project and shall address potential risk and impacts in at least the following areas:

1. Civil and Political Rights
2. Economic, Social and Cultural Rights
3. Labor Rights
4. Gender and the rights of individuals requiring particular attention or protection, vulnerable persons and groups, in particular Indigenous People
5. Conflict (whether armed or social, or relating to e.g. land, religion)

7. Scope of the HRIA

It is important for the scope of the HRIA to be determined in order to ensure a process that results in a concrete and practical impact management plan for the Project. The scope is influenced by the drivers identified for carrying out an HRIA and other factors such as time, resources and operational needs.

Whilst the scope needs to be defined early on by either the Company or the Consultant (and then validated by the Company), it may evolve depending on findings and stakeholder input throughout the HRIA process, for example, if the findings indicate a need to focus on a particular issue. An HRIA is an iterative process that is responsive to changes in the context.

There are three approaches for the HRIA:

1. A general HRIA, covering all internationally recognized Human Rights.
2. An issue-specific HRIA, covering Human Rights impacts related to a particular issue.
3. A general HRIA which also focuses in greater detail on some specific focus areas.

(1) A general HRIA should be undertaken where there is concern over various Human Rights impacts (Appendix 3), and particularly where the host State is allegedly the perpetrator of Human Rights violations or otherwise fails in its duty to protect Human Rights. This may be most appropriate for an assessment that takes place before significant Project activities have started.

(2) An issue-specific HRIA may be required to assess Human Rights impacts in the context of a particular issue such as land related impacts, community conflict, or security. It may be appropriate either because of the local context (land scarcity), vulnerability of certain groups (entrenched gender or minority discrimination), or because of salient Human Rights risks typically associated with a particular Project activity (use of security providers), or a combination of such factors. Since it is difficult to isolate specific Human Rights, it is important that an issue-

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specific HRIA considers connections with related Human Rights during the assessment and flags any arising issues.

(3) The last approach is a combined HRIA which can be a general HRIA with sections focusing in more detail on specific Human Rights issues that have been identified as salient in the Project context, if there is a need for both. This may be most appropriate for an HRIA taking place after Project activities have started when the screening and scoping phases identify the issues requiring detailed assessment.

The Company should consult with a Human Rights expert to determine the most suitable option for a given situation. Prior to determining the most appropriate approach, the Company may mandate the Consultant to carry out some initial research and make a recommendation to the Company. When in doubt a general HRIA is preferred because it is comprehensive.

8. Human Rights Due Diligence Overview

Human Rights Due Diligence is an ongoing process by which the Company identifies, prevents, mitigates and accounts for how it addresses the adverse Human Rights impacts it causes, contributes to or is linked to through its business relationships.

Human Rights Due Diligence enables the Company to know how it is respecting Human Rights, and demonstrate to its stakeholders how it does so. It includes the process of (1) identifying and assessing Human Rights impacts (2) responding to the impacts by addressing them appropriately and acting on findings (3) tracking performance and (4) communicating and reporting on due diligence activities and findings. Throughout this process stakeholders are engaged.

The first step of identifying and assessing impacts draws on a range of information, which importantly includes (but is not limited to) Human Rights standards, the Project description and baseline information. Additional relevant information includes results from other impact assessment processes or studies commissioned for the Project.

It may be necessary to act immediately on certain findings; there may not always be a need to wait for full information on impacts before acting on findings.

Affiliates are responsible for putting in place Community Grievance Mechanisms. These are an important aspect of Human Rights Due Diligence as they facilitate the identification of negative impacts and remediation measures before, during and after the HRIA process. The Affiliate Grievance Mechanism, if it exists, should be made available to the Consultant and shared with stakeholders, particularly those being engaged with during the HRIA process, in case of any arising concerns or complaints related to current impacts or the HRIA process itself.

Figure 1 below illustrates how the HRIA forms a key part of the Company's Human Rights Due Diligence processes and how certain Due Diligence processes go beyond the HRIA process (ensuring implementation of mitigation measures and monitoring performance for example).

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Figure 1: Due Diligence Process



Adapted from: [Shift \(2015\)](#)

9. Integration in the E&P process

An HRIA can be carried out at any point in time during an industrial activity or Project. An HRIA may be carried out at the same time as an SIA if there are reasons to have two separate studies. It may also be conducted at a later point in time when the need arises.

Depending on the scope, an HRIA can take between two and 12 months to complete with most HRIA taking more than six months. If third parties are solicited then the duration may be extended. The findings are integrated into the Social Management Plan and into any calls for tender for operations contracts.

It is necessary to coordinate with other processes, for example contractor management processes, other processes governing business relationships, or separate studies on labor rights, environment, safety, security, or conflict conducted by the Company. The HRIA itself may not assess the full range of activities with Human Rights impacts to the extent these subjects have or may be addressed in other specific assessments made by the Company (e.g. if labor rights or contracting are captured in other studies they may not need to be included in the HRIA). However, the reasons for the exclusion of any Human Rights relevant topics shall be identified and explained in the HRIA.

It is also important to ensure that site or other operational staff is aware of and involved in the Human Rights analysis.

Budget and resourcing should be included in the Project planning and budget, regardless of when in the Project phase the HRIA is carried out.

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10. Responsibilities

10.1 The Company

The Affiliate's societal correspondent, or the societal Coordinator in the case of studies being managed by headquarters, is the Company representative for the HRIA. S/he liaises with the selected Consultant, from the call for tender stage, regarding the implementation, monitoring and validation of the HRIA.

The Company representative is responsible for coordination between the following parties:

- Relevant internal stakeholders including the department responsible for the Project and the Project or Asset manager, as well as other internal departments such as environment, security, contracts and procurement, legal, ethics etc.
- The Consultant.
- The local authorities, administration and any partner or national or international institution (when the assessment is required by regulations).
- Stakeholders, national or international associations and organizations likely to be contacted, and met for the purposes of the assessment.
- External stakeholders to be engaged, or communicated with for the purposes of this assessment. This includes in particular actual and potential PAPs and PACs, depending on the stage of the Project when the assessment is carried out. It may include Project contractors, suppliers and other business partners.
- Any expert hired in the host country.
- Headquarters.

The Company representative ensures:

- That a description of the Project and other relevant documents are available when necessary, indicating the Project status at the time of the assessment, and including any uncertainties and elements that need to be finalized.
- The smooth roll out of the HRIA.
- Monitoring and validation of the draft assessment.
- That the final reports are reviewed, validated and sent to the department responsible for the Project.
- That the stakeholders are informed and engaged with appropriately throughout the HRIA process.
- The disclosure and transparency of the findings of the HRIA, unless legitimate reasons such as commercial confidentiality or the protection of stakeholders require that it, or parts of it, be kept confidential.
- That the principal Project contractors are informed and engaged with during the HRIA as appropriate, especially where the contractors have responsibility for managing impacts.
- That a representative from Headquarters or the Affiliate assists the Consultant if necessary. However, it may not be appropriate for a Company representative to participate in interviews with all stakeholders.

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10.2 The Consultant

The Consultant is responsible for:

- Adapting the HRIA themes to the context, scope, size and location of the Project
- Detailing his/her methodology (based on evolving good practice for HRIA), evaluation criteria and impact ranking system so they can be discussed and agreed upon at the kick-off meeting.
- Preparing a Stakeholder Engagement Plan (SEP) for the HRIA, that is consistent with a Human Rights based approach and the principles outlined in 12.5.3, to be validated by the Company.
- Drawing up a detailed schedule for the planned activities, including a kick-off meeting, interim meetings and a close-out meeting.
- Conducting the HRIA in compliance with local laws and regulations, having identified in advance any such laws that conflict with or limit the methodology to be used.
- Interpreting the results and producing associated Geographic Information System (GIS) deliverables.
- Identifying limitations to the assessment and challenges with the implementation of the selected methodology.
- Writing the final report.

The Consultant and the Company jointly determine the organization of the logistics and security arrangements for the field mission particularly if the mission takes place in a conflict affected or security risk zone. There may be potential benefits for the Consultant to act independently of the Company while keeping the Company informed.

Monitoring and intermediate progress reports are essential to ensure that the assessment remains on track because of the risk of drift from the scope of work which can result from misunderstandings, unexpected delays, or the inclusion of irrelevant information.

At any point in time, if the Consultant discovers severe ongoing or immediate social or Human Rights impacts caused or contributed to by either the Consultant or the assessment process itself, or other Company activities, the Consultant shall report this to the Company without delay.

The Consultant shall consider the potential for being implicated in harm whilst conducting the assessment. For example, risks to stakeholders participating in stakeholder engagement processes, risks to Human Rights defenders that may oppose the Project, or risks involved with using security providers when gaining first access to conflict-sensitive areas. The Consultant shall also consider the potential of the Project having any harm during field closure or early shut-down.

10.3 Resources and potential partnerships

Contractor personnel employed for the assessment include a project manager and consultants able to organize and carry out the HRIA including the stakeholder engagement process (Human Rights expert, sociologist, anthropologist, etc.). It is also necessary to have local consultants as part of the team, to bring local knowledge and understanding of the context and to facilitate engagement with stakeholders. The Human Rights expert shall be a person with the experience and capacity to understand and evaluate Human Rights risks and potential impacts and at least

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one person in the team shall have experience in, and the ability to, engage effectively with stakeholders.

In some contexts the Consultant may be required, or may request to conduct the assessment in partnership or collaboration with a trusted third party e.g. an NGO or other organization trusted by both the Company and PAPs. The Company seeks stakeholders' views and/or advice from Human Rights experts in deciding when this is appropriate and who to involve. This may be the case, for example where there:

- have been widespread Human Rights abuses and where direct engagement with stakeholders may put them at risk and a trusted third party reduces that risk;
- is history of distrust between stakeholders and the Company or previous operators;
- are high levels of perception of corruption and a third party could validate findings and accuracy of information;
- has been or is conflict between ethnic or religious groups, and collaboration with an organization that is seen to be independent in the eyes of all the concerned ethnic or religious groups may be helpful;
- is a local law preventing consultation with certain subgroups or minorities;
- is difficulty engaging with certain groups for cultural reasons.

11. Key steps of the HRIA

The main phases of the HRIA are:

- Kick off meeting.
- Desktop research.
- Field mission which may include several rounds of stakeholder engagement.
- Intermediate meetings and progress reports.
- Reporting and interpretation.
- Presentation of results to the Company and stakeholders.
- Final report and presentation.

However, as an HRIA is adapted to the Project context, the phases may vary with more time and detail being given over to certain phases and sub-phases than others.

12. Detailed description of an HRIA

12.1 Mapping Human Rights Standards

The HRIA requires a thorough assessment of the relevant Human Rights standards that apply to the Project. International, regional and domestic Human Rights standards should be mapped and explained (Appendix 2). This provides the basis for the impact assessment and analysis.

This section shall include a description of any pertinent domestic legal, policy, administrative, criminal, and civil regulations that may apply with respect to the Human Rights to be covered by the HRIA as well as the pertinent regional or international Human Rights standards that may apply in that context. Gaps between the national requirements (including enforcement and

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practice) and internationally recognized Human Rights shall be identified. This may have been done as part of the SBS ([GS EP SDV 101](#)) or SIA ([GS EP SDV 102](#)).

12.2 Project Description

The Project shall be described in as much detail as possible. During the design phase prior to the start of in-country activities, new information on the Project design is communicated to the Consultant and the status of any impacts shall therefore be continually reviewed and updated. This iterative process assists in reducing the overall negative impacts of the Project allowing for immediate action where required. Identifying Human Rights impacts as early as possible benefits the Project and its stakeholders in seeking to avoid and mitigate negative impacts. It allows time to consider, at the Pre-Project phase, possible technical modifications that could change the Project's design and/or implementation and hence increase its acceptability to PAPs, PACs and other stakeholders.

The Project description shall include at least the following:

- Location, size, complexity and phase in the E&P process.
- Type, sequence, and duration of activities.
- Geographical context.
- Location of Project sites including all infrastructure and transport corridors as well as use of natural resources such as water.
- Location of possible camps, expected number of potential workers including contract workers and names of contractors or potential contractors when this is known.
- Uncertainties, of all types, at the time of the impact assessment, and the most likely options for dealing with them, and any optional ways of dealing with them to minimize negative impacts on stakeholders.

If operational activities have begun or the Project has been developed, technical information on the Project and its implementation is still required by the Consultant. Other information available internally to the Company may also be relevant to the Consultant. For example, the findings of other impact assessments and the avoidance and mitigation measures put in place, due diligence reports on business partners, and types of complaints received etc. The Consultant and the Company should try to identify the full range of relevant information that may be useful for the Consultant for the purposes of conducting the HRIA.

12.3 Baseline information

The SBS shall describe the Human Rights context. If an SBS or an SIA was conducted within six months of the start of the HRIA, the baseline and other information shall be reviewed and updated as necessary. If no SBS or SIA was conducted within this time frame, a Human Rights baseline assessment may be necessary in line with [GS EP SDV 101](#).

Other relevant baseline information should also be made available to the Consultant e.g. studies relating to health, safety, labor, human resources and security. The Consultant may need to carry out a gap analysis of available baseline data and propose to the Company any additional studies required to complete the baseline information.

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12.4 Evaluation of Alternatives

An evaluation of alternatives should be carried out during the pre-project phase. The analysis reviews alternative Project site locations, design or operational processes and alternative ways of avoiding and mitigating social and Human Rights impacts.

12.5 Stakeholder Identification and Engagement

12.5.1 Identification of Project Affected Stakeholders

A review of the Project's existing stakeholder identification and mapping, which may have been carried out during the SBS or SIA or separately, is undertaken. For the purposes of the HRIA, the focus is identifying stakeholders whose Human Rights are affected or potentially affected by the Project. A strong emphasis is placed on identifying PAPs and PACs if Project sites have been identified (coordinating with the ESIA). Stakeholders are identified that, for example:

- have, or allege to have, experienced Human Rights abuse by the host State or other State entity, or victims of any conflict;
- are subject to adverse impacts that may already have occurred from the Company or other business actors;
- are human rights defenders in particular those likely to speak up for increased transparency or who may oppose the Project or other business activity;
- are Indigenous Peoples;
- are marginalized, discriminated against, disenfranchised or else vulnerable individuals and groups in the community, e.g. children, disabled, members of minorities etc.;
- are refugees, migrants, nomads or recently arrived groups that may not have been identified during previous stakeholder mapping exercises;
- are invisible or without 'voice', for example children, women, youth, disabled, migrants and their families, minority groups. Particular challenges exist where the host State does not recognize minority groups etc. or where the State abuses or does not grant, ensure or fulfill the rights of any particular group such as women, illegal migrants, homosexuals;
- are vulnerable to any social or environmental impacts including identification of those needing assistance or capacity building to participate in the impact assessment; who may be more adversely affected by impacts or lack capacity to resist or recover from the impacts; who are less likely to access project benefits ([IPIECA-DIHR](#)).

Any past or historic record of stakeholders subjected to Human Rights violations, systematic injustice or discrimination shall be highlighted (regardless of who was the alleged perpetrator).

12.5.2 Engaging with Stakeholders

Engagement with stakeholders has the following purposes:

- To involve PAPs, PACS, and other stakeholders and their views in impact identification and management and so help build trust and gain stakeholder support for impact management.
- Provide opportunities for PAPs, PACS, and stakeholders to express their opinions, perceptions and concerns about: the Project; any ongoing Human Rights abuse; the HRIA process and any Human Rights impacts of the Project.

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- Enable the Project team, including principle contractors if relevant, to understand and respond to the rights, needs, concerns and priorities of stakeholders, especially PACs and PAPs, their experience or perception of the Project and its impacts.
- To engage in iterative two-way dialogue between the Company and PAPs, where possible generating joint understanding of impacts and potential measures to address any adverse impacts.
- Provide feedback as the Project ensuring that the consultation process is iterative and ongoing throughout the HRIA (and the implementation of the Project).
- To help prioritize issues for deeper analysis.

Where direct engagement or consultation with PAPs is not possible, reasonable alternatives shall be sought e.g. consulting credible and independent experts, Human Rights defenders or civil society. In some contexts, such as those affected by conflict, it may be that companies are under pressure not to consult or cooperate with particular stakeholders (for example, armed groups, Human Rights NGOs, opposition political parties or trade unions). Not engaging with such stakeholders however can create problems. In situations where direct consultation is impossible, other ways can be considered such as using third parties as go-betweens (such as NGOs or embassies) or organizing group meetings ([International Alert](#)).

The results of the stakeholder identification and engagement activities shall be carefully documented by the Consultant. Visual representation of the results shall be included using maps, matrices, charts, informational diagrams etc. The Consultant shall also develop and maintain a confidential stakeholder database and minutes of stakeholder meetings, adapted to the need to protect stakeholders. A documented 'issues and response' trail shall be maintained by the Consultant. Steps should be taken to address any potential barriers faced by PAPs to access or meaningfully engage with Project information.

12.5.3 Principles for Engagement

Engagement with stakeholders is an essential part of the HRIA and processes shall be tailored to the needs of the particular stakeholders, be gender sensitive, and enable the participation of vulnerable individuals and groups. For this purpose, the following principles for engagement shall apply throughout the HRIA process. The Consultant shall develop engagement protocols that ensure the following principles are respected and shared in advance with stakeholders to be consulted.

- *Open and Transparent:* Information relevant to the HRIA should be open and transparent to stakeholders providing them with a comprehensive understanding of how Project activities may impact them (unless legitimate reasons for commercial confidentiality or the protection of stakeholders require that it be kept confidential).
- *Listening and Dialogue:* Stakeholders should be listened to, their concerns taken seriously, and responses provided to address their concerns.
- *Participation:* Stakeholders are invited and encouraged to actively engage with the Consultant and the Company, and participate in the HRIA taking into account factors such as gender and cultural considerations.
- *Proactive:* Potential risks and impacts are communicated proactively with stakeholders.
- *Impact-focused:* Engagement with stakeholders is focused around the potential and actual negative Project impacts that may concern them.

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- **Safe Participation:** Steps are taken by the Company and the Consultant towards ensuring any stakeholder that participates in any form of engagement can do so in a safe and protected manner without risk or fear for retaliation (for example through the use of trusted third parties, individual meetings or group meetings). Stakeholders participating in engagement for the impact assessment are made fully aware of the purpose of the consultation and how their inputs or contributions are used in the HRIA process, including that their contributions and/or identity can remain confidential if they wish.
- **Effectiveness:** Information and forms of engagement should be acceptable to and effective for the individuals for whose use they were intended. Information and forms of engagement should be accessible, legitimate, transparent and Human Rights-compatible.
- **Appropriate form of engagement:** Different forms of engagement may be required for different purposes. For example, communication, consultation, deeper engagement, or seeking consent. Information provided to stakeholders should be provided in formats and for a appropriate to the stakeholder in question considering the potential need to provide assistance for the interpretation of technically complex information. Wherever possible, stakeholders should be engaged directly. Where this is not possible because it may threaten their safety, engagement should occur through legitimate and credible representatives.
- **Empowerment:** Engagement should empower stakeholders to make their voices heard. This includes clearly informing stakeholders of what they can expect in terms of feedback and responses to their inputs to the HRIA.
- **Equal and Human Rights respectful:** Everyone, without discrimination, has the right to participate on equal terms. This includes a responsibility for the Consultant and the Project to ensure a gender sensitive approach to engagement is implemented and to identify the need for any special measures to ensure that vulnerable individuals and groups are inclusively engaged.

12.5.4 Disclosure and Transparency

The process and findings of the HRIA are communicated to all relevant stakeholders in accordance with the principles for engagement unless there are legitimate reasons for not doing so. The public disclosure requirements are determined by the Company, to the greatest degree possible in collaboration with the Consultant and PAPs, and include any necessary steps to protect vulnerable individuals and/or groups that may be put at risk from the disclosure of HRIA information.

Disclosure materials are developed which are accessible to and understood by the intended audience, e.g. by developing materials such as community pamphlets (translated into local languages), non-technical summaries, posters and other presentation material.

If an HRIA is conducted at the same time as an SIA/ESIA it may be necessary to present some Human Rights findings in a separate report, for example where the State has prescribed specific rules for the format and content of regulatory SIA/ESIA. In such situations, the Company shall identify ways to communicate as many of the findings with stakeholders as transparently as possible. Where the Company is challenged for any reason to communicate the full findings, it shall strive to ensure that the relevant information about impacts is provided to affected stakeholders, and may involve a trusted third party for such purposes.

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12.6 Identification and evaluation of the impacts

Several methodologies are available for identifying and assessing a Project's impacts on stakeholders. The Consultant shall adapt or develop a methodology to assess Human Rights impacts based on evolving good practice for HRIA ([HRIAM](#), [IPIECA-DIHR](#)) and be responsive to the Project context.

12.6.1 Identifying and assessing impacts

The identification and assessment process shall be based on at least the following principles:

1. It is the actual and potential impacts on the Human Rights of PAPs and PACs and not the risk to the Company that is assessed.
2. Assessment includes all universally recognized Human Rights and be based on international Human Rights standards regardless of host State ratification. However, local laws shall be respected and the Consultant shall point out any discrepancies between local laws and international Human Rights standards.
3. Both potential and actual Human Rights impacts are assessed and potential impacts are assessed regardless of their probability.
4. Both positive and negative impacts of the Project are assessed.
5. Impact assessment methodology applies the Human Rights based principles of participation, inclusiveness, non-discrimination and accountability.
6. Impact assessment methodology integrates and responds to the perspective of potentially affected/ actually affected stakeholders, and give consideration to the stakeholders view of the severity of the impact.
7. Impact assessment includes consideration of indirect, long-term and cumulative consequences for PACs and PAPs.
8. Assessment includes impacts that are caused or contributed to by the Project, and also those that are directly linked to the Company through products, services or other activities by any of its business partners.
9. Human Rights expertise is recommended to ensure that assessment processes are sufficiently well informed; in particular in complex situations or when dealing with high levels of impact severity.
10. Contributions to local development are not be considered as a substitute to applying a mitigation hierarchy (§ 12.7.1). However, implementation should be monitored and reported back to PACs and PAPs.

The HRIA shall, for all impacts, assess and identify affected / potentially affected stakeholders, timing of the impact, probability, the activity which generates or is linked to the impact, responsibility for the impact (the Project or a business partner) and any other contextual or other factors relevant to fully understanding the impact.

12.6.2 Evaluating impacts and their severity

The Consultant shall evaluate the impacts and their severity. The evaluation of severity shall account for:

- Relevant Human Rights criteria to be proposed by the Consultant and based on existing HRIA methodologies and tools.

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- The importance and consequence of the impacts from the perspectives of the PAPs and PACs.
- Scope.
- Scale.
- Remediability.
- Considerations of indirect, long term and cumulative impacts.
- Duration of impacts.
- Vulnerability to impacts of the affected stakeholders. Particular effort should be given to evaluate impacts on vulnerable persons or groups and the use of a gender-sensitive approach.

The assessment of impacts should evaluate the differentiated but complementary duties and responsibilities of State and Company for addressing the identified adverse Human Rights impacts.

Table 1 below is an illustrative example of how impact severity could be evaluated.

Table 1: Illustrative evaluation of severity

| | |
|----------|--|
| Minor | Impacts on social context and/or people are minor. Negative impacts are of short duration and with no significant or lasting impact on the social context or people, no impact at all on vulnerable individuals. Example: Temporary presence of workers that does not interfere with people's livelihoods or lives apart from occasionally crowding public spaces and increasing littering. |
| Moderate | Impacts on the social context and/or people are moderate. Without intervention impacts are likely to persist throughout the Project duration. Residual impacts may extend beyond the duration of the Project without mitigation measures. Example: Presence of traffic causes noise and increases risk of accidents. The impacts may extend beyond the duration of the Project e.g. psychosocial problems or have impact on a farmer one of whose animals was injured, but the impacts can be eliminated or mitigated. |
| Major | Negative impacts on the social context and/or people are substantial. Changes cannot be mitigated without special intervention. The residual impacts are very likely to extend throughout the Project duration and thereafter. Example: Physical and/or economic resettlement during long term or permanent land acquisition. Resettlement is always a major intrusion into people's lives and often their Human Rights, but with careful management, risks to people can be mitigated and residual impact remedied e.g. through ensuring sustainable livelihoods for the affected stakeholders. |
| Critical | Negative impacts on the social context and/or people are severe, permanent or otherwise irremediable. They require mandatory and specific avoidance, mitigation and remediation measures. Modifications to the Project design shall be considered. Example: Sexual violence e.g. rape of marginalized children or women, excessive use of force possibly causing physical injuries or even death by security forces guarding Company installations. Regardless of whether one individual or many has been subject to these impacts, they are not remediable, requiring Project design or organizational corrections. |

Please note that there is no connection between the above example and illustrative tables 2, 3 and 4.

12.6.3 Connection of Company to impact

The analysis of impacts shall identify how the impact and the Project are connected. The analytical framework shall distinguish between the impacts that the Project causes, contributes to, or is else directly linked to through its business relationships. The way the impact and the

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Project are connected is relevant in determining appropriate actions to address any impact identified.

1. Cause: Company may be considered to be causing an impact e.g. where operational activities cause pollution of a community water source leading to negative impacts on the health or livelihoods of the local community, even where accidental.

2. Contribution: Company may be considered to be contributing to an impact for example, if a contracted security provider uses force and violence towards community members when performing duties for the Company and the Company had conducted inadequate due diligence or Human Rights training. Changing contract requirements for a Contractor without adjusting the deadline for delivery or price, hence pushing the Contractor to breach labor standards in order to deliver, would also be considered as contribution.² The Company may also contribute to cumulative impacts and these need to be identified (§ 12.8).

3. Linkage: The Companies' operations may be considered to be directly linked to an impact through its business relationships even where the Company has not caused or contributed to the impact. For example, a supplier uses forced labor in breach of its contractual agreements with the Company.

The Consultant shall clearly explain how each impact happens, when the impact occurs, identify the operational activity to which the impact is connected and identify how the Company is connected to the impact.

Where linkage exists, the Company takes steps to reduce the likelihood of the impact recurring including through exercising leverage. The Company expects that its own suppliers and subcontractors respect the same principles as the Company itself (CH-GR-ETH-001).

The Consultant shall propose a methodology for evaluating the probability of potential impacts. However, if a risk matrix is produced, it is important to ensure that probability does not influence the evaluation of severity. Regardless of probability, all Human Rights impacts should be addressed and high severity impacts should always be given high priority (see illustrative table 2 below).

Table 2: Illustrative heat map

| Probability \ Severity | Low likelihood | Moderate likelihood | Major likelihood | High likelihood |
|------------------------|----------------|---------------------|------------------|-----------------|
| Critical | a | | | |
| Major | | | | |
| Moderate | | | | |
| Minor | | | | b |

Note that this heat map is illustrative and indicative only and is context specific. From a Human Rights perspective, it is important that severity is a high priority even when low likelihood (a); whereas high likelihood but low severity (b) is not prioritized to the same extent.³

² See further examples, [HR/PUB/12/02](#).

³ See further: [European Commission, Shift, Institute for Human Rights and Business](#)

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12.6.4 Prioritizing

All Human Rights impacts that have been identified shall be addressed. However, it may not be possible to address all impacts simultaneously, in which case the actions to address the identified impacts need to be prioritized. Based on the evaluation of severity and subsequent consideration of probability, the Consultant shall propose the order in which identified impacts should be addressed, firstly prioritizing those that are severe and ongoing, or severe and likely to happen in a near future. The prioritization shall take into account the principles that are set out in this chapter.

12.7 Mitigation measures and residual impacts

12.7.1 Mitigation hierarchy

Once impacts have been identified, evaluated and prioritized, the Consultant, following consultation with the Company, shall recommend avoidance and mitigation measures for each impact and evaluate residual impact.

A mitigation measure shall be proposed following stakeholder engagement, making particular effort to engage with vulnerable PAPs. Any residual impacts of the Project may be considered acceptable only after appropriate engagement. In the final report, the Consultant shall flag whether from a Human Rights perspective there are any unacceptable levels of residual Human Rights impact.

At all times, in designing and implementing measures to address identified impacts, the following mitigation hierarchy shall be applied (based on [IPIECA-DIHR](#)):

- 1. Avoiding:** by designing or implementing the Project so as to avoid the impact altogether. By choosing, for example, the pipeline route in order to avoid physical displacement or by adapting Project organization such as selecting a contractor that has a proven track record of treating and paying employees fairly rather than selecting another cheaper contractor.
- 2. Reducing and minimizing:** where avoidance is not possible, mitigating the impact to the greatest extent possible. For example, if resettlement is unavoidable, ensuring that resettlement is undertaken in accordance with international good practice standards on resettlement, with the support of independent experts, and designing the process in collaboration with affected stakeholders.
- 3. Restoring:** where adverse impacts happen, restore as soon as possible to the condition before the impact. For example, whenever possible restoring access to land or water that has temporarily been restricted. Restoration may not always be possible, e.g. when impact has a permanent consequence for people.
- 4. Remediating:** where there has been, is or could be a loss, damage or inconvenience, remediation and participation in legitimate processes to address the issues are essential - especially where it has not been fully possible to avoid, reduce or restore.

Remediation includes but is not limited to financial compensation.⁴ For example: if workers' payments are (illegitimately) delayed, a financial compensation in addition to the outstanding salary may be suitable (or required). However, this financial compensation cannot undo the harm that may have been caused to the family during the time when there was no income, or to the child that was taken out of school and put to work to support family survival.

⁴ Remediation should not be confused with positive contributions to society, local economic development or social investment.

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Similarly, cash compensation for lost access to natural resources or land is often not the preferred method of remediation. Instead, ensuring equal access to the same or similar resource elsewhere is usually preferred. Where a severe Human Rights impact has occurred, for example sexual violence towards a community member by Project security provider, remediation may be judicial and expertise advice should be sought in the specific context. If the affected stakeholder seeks judicial remedy, the Company actively cooperates and facilitates this process.

Negative impacts may occur during Project execution that were not identified during the HRIA or SIA. A Community Grievance Procedure is put in place to facilitate the reporting of impact related grievances in order to establish remediation measures.

12.7.2 Examples of mitigation measures

The Consultant shall propose concrete measures to avoid and mitigate impacts. In the development of mitigation measures, the Consultant shall look to evolving and good international practice to find solutions. Solutions maybe technical, non-technical or financial tailored to the specific impacts, PAPs and Project context.

Optimization measures are proposed for positive impacts.

Some examples of mitigation measures are given below.

- Design the Project activity in a manner that avoids, when possible, use of the lands, territories or resources that are owned, occupied or used by (or traditionally owned, occupied or used by) Indigenous Peoples.
- In a region where individuals and/or communities rely on fishing for their livelihoods, design Project activity to enable coexistence with such individuals and communities in a manner that minimizes loss of access to fishing zones.
- In a region that has experienced ethnic or religious conflict, in close collaboration (with local partners and/ or expert Human Rights advice) develop a strategy on how to employ local people, contract with local suppliers, and/or invest plan social investment in a manner that benefits all sides of the former conflict and does not drive further tensions or divisions.
- Design vehicle movements and road safety from the perspective of children and the elderly.
- In a country with a repressive regime, and where Human Rights defenders or unions are known to campaign against business activity, explain the Company position on Human Rights to government stakeholders and proactively seek to ensure that Human Rights defenders do not have their Human Rights violated by the State for opposing business activities.
- Set planning targets that are reasonable to meet with regards to local labor market/local contractors and context e.g. providing time for union and collective bargaining processes if necessary, approving budgets for contractors that allow them to pay and treat workers in accordance with national law and international labor standards.

12.7.3 Defining "appropriate response"

Depending on how the Project is connected to the impact, different responses are necessary. The Consultant shall recommend appropriate responses not only when the Project is causing or

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contributing to an impact, but equally when action is required to utilize leverage over a business partner that is causing negative impact. For example, where the Project does not directly cause it but is contributing to it, or directly linked to it through business relationships, mitigation strategies should assess possibilities for exerting leverage (or increasing leverage) over the responsible entity. Such measures should be integrated in mitigation and management planning.

It may be necessary to involve Company staff from other disciplines in the Company in impact mitigation planning and implementation e.g. contracting and procurement, supply chain, human resources, legal, HSE, emergency planning. The Consultant and the Company shall jointly agree who needs to be involved.

12.7.4 Visual presentation of the HRIA findings

The Consultant presents the HRIA findings visually and summarily in a manner that can be clearly understood. Illustrative examples of presentation of results are found in tables 3 and 4 below.

Table 3: Illustrative table - evaluation of severity using an intensity/vulnerability matrix

| Impact intensity (including scope, scale, irremediability, short or long term) | | | | | |
|--|------------|----------|----------|----------|-------------|
| Vulnerability of individuals | 0-Very low | 1-Low | 2-Medium | 3-High | 4-Very High |
| 0-Very low | Negligible | Minor | Moderate | Moderate | Major |
| 1-Low | Minor | Moderate | Moderate | Moderate | Major |
| 2-Medium | Moderate | Moderate | Major | Major | Critical |
| 3-High | Moderate | Major | Major | Critical | Critical |
| 4-Very high | Major | Major | Critical | Critical | Critical |

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Table 4: Example of summary evaluation of the Human Rights impacts from the exploration phase

| Social / Human Rights at risk | Source of impact | Nature of impact | Description of potential impact | Severity of impact | Mitigation measures | Evaluation of residual impacts |
|--|--|------------------|---|--------------------|--|--------------------------------|
| Right to life, liberty, security of person. Right to freedom from cruel, inhumane, or degrading treatment or punishment. Right of women and children to freedom from sexual exploitation. Right to liberty of movement. Rights to an effective remedy. Rights of Indigenous People. Rights pertaining to vulnerable persons and groups. | Securing of Project area by army personnel Increased tensions in relations between population, public security forces, contract workers and Company employees | Negative | Risk of violence perpetrated by security forces during Project operation towards communities, heightened risk for most vulnerable groups, e.g. women and children to be subject to sexual exploitation and violence. At end of Project, risk of social instability during withdrawal of security forces (risk of dispersion of troops or isolated vigilant individuals / groups no longer receiving means of subsistence or remuneration). | Critical | Integrate VPSHR recommendations into the Project procedures and train army personnel. Regularly revise assessment of risks generated by security forces. Dismantle the facilities constructed for army and ensure effective withdrawal at end of operations. Regularly assess local population perception of public security forces and private security company. Establish a community grievance mechanism accessible to indigenous populations and vulnerable people and ensure remediation where impacts have been identified. | Major |
| Right to life, liberty, security of person. Right to adequate standard of living, this includes right to adequate food. Right to education. | Construction of Project main and secondary camps. Seismic lines. | Negative | Camp construction could potentially affect land exploited by the population for crop and livestock farming. Seismic lines can potentially affect both crop and livestock farming areas. Community members and individuals that rely on the land for sustaining their livelihoods may have their incomes and livelihoods adversely affected. Vulnerable individuals of these communities may have no alternative means of livelihood and children may be required to work rather than go to school. | Major | Avoid areas exploited by the population - preliminary selection of camp sites from satellite image analysis and site visit. CONTRACTOR confirms final positioning and establishes terms and conditions for occupying these areas in conjunction with customary authorities. Seismic line alignment avoids agricultural areas. Remediation including compensation procedure are implemented, when such areas are affected in any event. Compensation scale is defined before starting operations in conjunction with customary authorities and other representatives of the population. | Moderate |

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| Social / Human Rights at risk | Source of impact | Nature of impact | Description of potential impact | Severity of impact | Mitigation measures | Evaluation of residual impacts |
|--|--|------------------|---|--------------------|--|--------------------------------|
| Right to life, liberty, security of person. | Upgrading of dirt roads in block and leading to block. | Negative | Increased local traffic increases risks of accidents with people or collisions with cattle. Dirt road rehabilitation may facilitate movement of rebel groups and thereby exacerbate conflict and insecure areas. | Major | Ensure information and awareness to local population and road users. Put up fences and signs and lower speed limits where risk of accident with people or cattle is highest. Rehabilitation of certain access infrastructures to and within the block before <u>and after</u> the operations to restore dirt roads potentially damaged by passage of heavy vehicles. Monitor conflict levels in the area and include this risk in conflict preparedness management plan. | Moderate |
| Specific rights of minorities. Right to adequate standard of living, this includes right to adequate food. | Clearing and brush cutting for drilling and accessing roads. | Negative | There are no indigenous peoples living within the acquisition zone, a small group is located outside the zone. However pressures on forest linked to seismic prospecting operations (noise, clearing, etc.) could generate an indirect short term impact to indigenous peoples' livelihoods, culture, traditions. | Moderate | Engage with indigenous peoples when making decisions that may affect their way of life and rights as indigenous peoples according to international standards, in particular ILO No.169. Establish separate management plan that accounts for all specific risks and define unacceptable behaviour or action that require their consent. Draw up strict rules for all activities (e.g. prohibit hunting in certain areas) and ensure resourcing for regular controls and other enforcement mechanisms. Limit clearing to small areas and rehabilitate these areas on completion of operations. | Minor |
| Right to work. Right to enjoy just and favourable conditions of work. Right to freedom from forced or compulsory labor. | Local recruitment (The positive impacts of local recruitment should be optimized; the measures are not described here) | Negative | High expectation of employment creates tension. Certain ethnic groups risk being favoured by local contractors, generating conflict between groups. | Major | Formalisation of recruitment process to ensure non-discrimination, establishment of a committee charged with the recruitment procedure, guaranteeing credibility and transparency of the process possibly involving independent third parties and customary local partners. Limited work contract terms, enabling a maximum number of people to benefit, prioritizing gender balance. | Moderate |

12.8 Cumulative impacts

Cumulative Human Rights impacts of the Project shall be assessed, and ways for reducing and mitigating such impacts shall be examined. If there are other Company activities in the same area or region, these should also be considered. Cumulative impacts may require mitigation measures involving various stakeholders and requiring engagement with other parties, e.g. contractors, affected communities, local government, lenders, and/or regulatory agencies.

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An assessment of cumulative impacts *beyond* the specific Project or the Company's activities to include the impacts of other O&G or associated developments may be required.

An understanding of how impacts become cumulative is important in the Human Rights context. For example, various projects can jointly contribute to the pollution of air or water or over time be exacerbated by the arrival of new industrial projects. Vehicles associated with one industrial project using local roads may not affect livestock management, but a constant increase in traffic and privatization of roads may over time alter patterns of livestock movements or access to animal corridors and water sources, which could threaten the survival of animal species and ultimately affect the livelihood and culture of local communities.

The assessment of cumulative impacts that go beyond the specific Project or the Company may be included in an HRIA scope or a treated as a separate scope of work. The Consultant shall seek to understand the bigger picture of impacts and how they affect people in the area over time.

12.9 Transboundary impacts

Transboundary impacts (i.e. impacts that cross the border of the host country into neighboring countries but that are not global in nature) are identified and assessed in the HRIA. These can include environment-related Human Rights impacts or people's movement across borders, for example in-migration (e.g. people coming to Project area in hopes of jobs or improved living conditions) or out-migration (e.g. due to escalating conflict in the Project area).

13. Guidelines for management and monitoring

The Consultant shall use the results of the HRIA to prepare guidelines for a Management Plan. These guidelines complement any existing Project Social Management Plan (SMP) and the Human Rights Management Plan may be stand alone or integrated into an existing SMP. Human Rights management should also complement or be integrated into any other business planning process that controls the Project for example, safety, contracting, labor.

The purpose of the Management Plan - whether stand alone or integrated - is to ensure that the avoidance and mitigation measures for Human Rights impacts identified in the HRIA are implemented. The Plan outlines the mitigation measures that have been designed in accordance with the requirements of this Specification. It also identifies opportunities for leverage over business partners. Necessary action shall also be taken to ensure that Contractors implement mitigation strategies as relevant, for example requirements shall be integrated into contract clauses.

The Management Plan also proposes how performance is to be monitored so that progress can be measured. In particular, the Plan shall propose appropriate qualitative and quantitative indicators to measure performance in a manner that complements rather than replicates any mitigation measures outlined in the SMP. If many disciplines or functions need to be involved in the monitoring of performance, the Consultant may propose to the Company how an intra-Company working group can be established for the purposes of ensuring the timely implementation of all mitigation measures, as well as monitoring and follow-up to ensure their effectiveness.

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14. Commitment Register

The Consultant ensures that if any commitments have been made to stakeholders (avoidance, mitigation or remediation measures), these are registered in a separate or existing Commitment Register and integrated with the SMP.

15. Reporting

15.1 Provisional report

A provisional version of the report is developed by the Consultant and submitted to the Company prior to issuing the final version. Individual draft chapters may be submitted to the Company for comment during the HRIA prior to the preparation of the provisional report as appropriate and agreed upon by the Company and the Consultant. In principle, any severe Human Rights impacts identified during the assessment shall be reported without delay by the Consultant to the Company, except if this is against the stakeholders wishes for reasons of personal security, etc.

At least the following content shall be included in the report:

- A Non-technical summary
- Table of contents
- Acronyms
- Introduction
- Approach and methodology
- Human Rights standards applied: mapping of policy, legal and administrative framework (all international Human Rights are to be addressed)
- Project description
- Evaluation of Project design alternatives
- Stakeholder identification, mapping, engagement
- Description of the Human Rights baseline (including any other relevant baseline data)
- Identification and evaluation of the Human Rights impacts
- Mitigation measures and residual impacts
- Cumulative impacts
- Transboundary impacts
- Guidelines for Management and monitoring plan
- Commitment Register
- Conclusion
- Appendices shall include:
 - Summary minutes of interviews with stakeholders in a manner that ensures non-attribution and respects the confidentiality of stakeholders.

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- A presentation of the findings of the HRIA.

15.2 GIS deliverables

The Consultant is required to operate a system for information and document management that maintains confidentiality and protects stakeholders that have been engaged or provided information. Any data to be released shall only be on an aggregated basis to preserve confidentiality.

Before measuring the geographic coordinates (longitude, latitude), all GPS receiver parameters shall be calibrated and checked by the Consultant.

Any map produced in the report shall be provided under GIS format.

The Consultant shall follow the requirements laid down by **GS EP ENV 501** on GIS deliverables.

To comply with these requirements, the Company provides a GIS package as described in **GS EP ENV 501**.

15.3 Presentation of results

A meeting is organized between the Consultant and the Company in order to present the results of the HRIA to the Project team, the societal team, other Company departments, suppliers and Project partners if relevant. The Consultant shall incorporate any factual amendments or corrections of misunderstanding proposed by the Company, into the final report.

Whereas engagement should happen through the assessment process with stakeholders, all relevant stakeholders shall receive a presentation of final findings in an adapted format (focus group, private meeting, public meeting etc.). Any comments that stakeholders have made throughout the assessment process or at the final findings presentation shall be noted in the final report.

15.4 Final report and presentation

The Consultant shall prepare a summary of the findings, translation into local languages is required and the summary shall be made accessible and understandable for non-technical experts and shall be made available to stakeholders.

The final version of the report is submitted to the Company, a minimum of four paper copies plus two CD Roms containing PDF and MS Word® versions of the report and all associated documents is required.

All electronic deliverables (reports, illustration, maps, photos, analytical results, etc) are sent to Company in one of the following formats:

- MS Word® for texts
- MS Excel® for results, tables and charts
- MS PowerPoint® for presentations
- Photos in electronic format (jpg), geo-referenced to the extent possible
- GIS format for geographic coordinates

For some data, templates provided by Company shall be used.



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Bibliography

Reference

IFC

Title of the publication

Performance standards on environmental and social sustainability, International Finance Corporation, 2012

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Appendix 1 List of Core International Human Rights Instruments

The International Bill of Human Rights refers to:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights

The UN core international Human Rights instruments include additionally:

- International Convention on the Elimination of All Forms of Racial Discrimination
- Convention on the Elimination of All Forms of Discrimination against Women
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and its optional protocol
- Convention on the Rights of the Child
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- International Convention for the Protection of All Persons from Enforced Disappearance
- Convention on the Rights of Persons with Disabilities

The ILO 8 core conventions are:

1. Freedom of Association and Protection of the Right to Organize Convention, number 87
2. Right to Organize and Collective Bargaining Convention, number 98
3. Forced Labor Convention, number 29
4. Abolition of Forced Labor Convention, number 105
5. Equal Remuneration Convention, number 100
6. Discrimination (Employment and Occupation) Convention, number 111
7. Minimum Age Convention, number 138
8. Worst Forms of Child Labor Convention, number 182

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Appendix 2 International Human Rights

These are Human Rights included in the International Bill of Human Rights and some of the core international Human Rights instruments, here categorized by type of right (without reference to exact article or covenant) ([HR/PUB/12/02](#)).

Civil and Political Rights (based on the International Covenant on Civil and Political Rights)

- Right of self-determination
- Right to life
- Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment
- Right not to be subjected to slavery, servitude or forced labor
- Rights to liberty and security of the person
- Right of detained persons to humane treatment
- Right not to be subjected to imprisonment for inability to fulfill a contract
- Right to freedom of movement
- Right of aliens to due process when facing expulsion
- Right to a fair trial
- Right to be free from retroactive criminal law
- Right to recognition as a person before the law
- Right to privacy
- Rights to freedom of thought, conscience and religion
- Rights to freedom of opinion and expression
- Rights to freedom from war propaganda, and freedom from incitement to racial, religious or national hatred
- Right to freedom of assembly
- Right to freedom of association
- Rights of protection of the family and the right to marry
- Rights of protection for the child
- Right to participate in public life
- Right to equality before the law, equal protection of the law, and rights of non-discrimination
- Rights of minorities

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Economic, Social and Cultural Rights (based on the International Covenant on Economic, Social and Cultural Rights)

- Right of self-determination
- Right to work
- Right to enjoy just and favorable conditions of work
- Right to form and join trade unions, and the right to strike
- Right to social security, including social insurance
- Right to a family life
- Right to an adequate standard of living and by interpretation:
 - The right to adequate food
 - The right to adequate housing
 - Prohibition of forced evictions
 - Right to safe drinking water and sanitation
- Right to health
- Right to education
- Rights to take part in cultural life, to benefit from scientific progress, and of the material and moral rights of authors and inventors

Fundamental Labor Standards (based on ILO 8 core conventions)

(International Labor Organization)

- Freedom of association and protection of the right to organize
- Right to organize and collective bargaining
- Abolition of forced labor
- Equal remuneration
- Discrimination in employment and occupation
- Minimum age
- Worst forms of child labor

Protection of Vulnerable Groups (based on specific UN core human rights instruments and ILO treaties elaborating the rights of persons belonging to particular groups or populations) ([HR/PUB/12/02](#))

- Elimination of racial discrimination
- Rights of Indigenous Peoples⁵
- Rights of women
- Rights of national, ethnic, religious and linguistic minorities

⁵ Additionally: ILO Convention on Indigenous and Tribal Peoples, number 169



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Appendix 2

- Rights of children
- Rights of persons with disabilities
- Rights of migrant workers and their families

International Humanitarian Law (§ footnote, page 8)

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Appendix 3 Examples of Relevant Human Rights Impacts

| Topic area | Examples of relevant human rights | Relevance to O&G Industry | Viewing ESHIA through a human rights lens |
|---------------------------------------|---|---|--|
| Land and property | <ul style="list-style-type: none"> • Right to own property • Right to adequate housing • Right to a standard of living adequate for the health and wellbeing of the individual and his/her family • Right to participate freely in the cultural life of community | <p>The project may acquire land, permanently or temporarily for use during construction or operations. Communities or individuals may live on the land and use it for housing. They may use the land for agriculture, water collection, foraging or other livelihood-securing purposes. The land may also be of cultural, religious or spiritual value to communities</p> | <ul style="list-style-type: none"> • Seek to conduct meaningful consultation and engagement with communities who may depend on the land. • Consider implications for vulnerable individuals or groups including indigenous or nomadic peoples. • Also consider secondary impacts on specific groups within the community; for example, where women are primary land workers, removal of their access to work the land could also undermine their role in the community. • Seek to understand the historical record and context relating to land acquisition in the area, and check for legacy issues relating to involuntary resettlement or forced displacement. • Consider whether people using the land have title, and if not whether/how they may be compensated. • Seek restoration of housing and livelihoods where physical or economic resettlement cannot be avoided. |
| Vulnerable groups/ individuals | <ul style="list-style-type: none"> • Right to nondiscrimination • Right to self determination • Right to own property • Right to adequate housing • Right to a standard of living adequate for the health and wellbeing of the individual and his/her family • Right to the highest attainable standard of physical and mental health • Right to participate freely in the cultural life of the community • Right to equal recognition and protection under the law • Right to an effective remedy | <p>Vulnerable groups/ individuals may be subjected to discriminatory actions by the government, local businesses, educational system, health-care services and others in the community. Potential impacts from projects may disproportionately affect vulnerable populations within the local community. This may include ethnic or religious minorities, people with certain political views, women or elderly populations, people with a disability, people in poverty, or others who, for whatever reason, are at a disadvantage with respect to the mainstream, or unable to advocate for their rights.</p> | <ul style="list-style-type: none"> • Consider whether vulnerable groups/individuals are included in project consultations and stakeholder engagement, and whether they are given opportunities to express their concerns; the potential impacts of the project on these vulnerable groups/individuals may not be the same as those affecting the mainstream community. • Separate consultations or engagement efforts may be appropriate with vulnerable groups. In certain contexts, this may require the creation of safe spaces for discussion and awareness of local cultural sensitivities, which may be based on ethnicity, religion, race, gender or other aspects. To be successful, engagement with vulnerable groups may require a diverse team of representatives. • Check that local leaders or others who claim to represent the views of vulnerable members of the community or specific groups truly represent those members and have their permission, endorsement and support. • Keep in mind that vulnerable peoples or individuals may be discriminated against by the mainstream community, and be aware of social tensions that may exist between communities or groups within any one community. |

Adapted from [IPIECA-DIHR](#).