

# Human Rights Due Diligence Action Plan



# **MOZAMBIQUE LNG**

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Human Rights Due Diligence Action Plan



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# *Mozambique LNG* Human Rights Due Diligence Action Plan



# ACRONYMS

Area 1	Offshore block being developed by TEPMA1 as operator
CCSJV	Joint Venture between McDermott, Saipem and Chiyoda (Mozambique)
CLO	Community Liaison Officer
CSO	Civil Society Organisation
DUAT	Direito de Uso e Aproveitamento da Terra (Right to use and benefit from land under Mozambican law)
EPC	Engineering, Procurement and Construction
HRDD	Human Rights Due Diligence
HRIA	Human Rights Impact Assessment
IR	Industrial relations
ICSMP	Independent CSO/NGO Monitoring Platform
JTF	Joint Task Force
LNG	Liquefied natural gas
NGO	Non-governmental organization
PIIM	Project-induced in-migration
OHS	Occupational Health and Safety
SPA	Social Performance Assessment
TEPMA1	Total Exploration & Production Mozambique Area 1
VPSHR	Voluntary Principles on Security and Human Rights



## Human Rights Due Diligence Action Plan



#### **1.0 INTRODUCTION**

This document presents the TEPMA1 Human Rights Due Diligence (HRDD) Action Plan. The document describes the general approach to addressing the recommendations identified by the 2020 HRDD Assessment<sup>1</sup> and subsequently presents Gantt charts outlining the actions to be implemented in 2021 for identified salient issues.

#### 2.0 BACKGROUND

In 2015 the Mozambique LNG Project ("the Project") conducted a Human Rights Impact Assessment (HRIA). The HRIA identified four key human rights risk areas, or salient issues, namely: grievance redress and access to remedy; respect of labour rights in the supply chain; respect of human rights in security; and, land access and resettlement. Mitigations for the identified risks were embedded in the relevant project-related social management plans, including the Stakeholder Engagement Plan (that includes the Community Grievance Mechanism) the Industrial Relations Handbook, the Community-Based Security Plan, and the Resettlement Plan.

In Q4/2019, an internationally recognised third-party was contracted to implement a HRDD exercise to update the 2015 HRIA. The primary objective of the HRDD was to provide a comprehensive review of any actual and potential human rights impacts related to the current country context and phase of Project development and to provide recommendations for further strengthening the measures undertaken to address these impacts.

The HRDD report identified the following salient issues:

- Women's rights and gender equality
- Workers' rights
- Security (Community security and interaction with public security providers)
- Information and consultation
- Community health and safety
- Project-induced in-migration (PIIM)
- Access to remedy
- Resettlement

The HRDD report also presented a Human Rights Due Diligence Action Plan Framework setting out an approach to addressing recommendations. The HRDD Action Plan Framework focused on the most salient issues (i.e., those evaluated as having higher potential severity and likelihood of adverse impacts and which therefore should be prioritized by the Project) as summarized in Table 1 and further described in Section 3.

Table 1. Salient Issues Prioritised to be Addressed by the HRDD Action Plan

- General
- Women's rights and gender equality
- Workers' Rights
- Security

- Emergency Preparedness
- Occupational Health and Safety
- Environment
- Community Wellbeing

<sup>&</sup>lt;sup>1</sup> Human Rights Due Diligence Report [LINK]



#### Human Rights Due Diligence Action Plan



To facilitate prioritization and delivery of recommendations for each salient issue, the HRDD Action Plan Framework arranged the recommendations on the basis of four pillars:

- **Foundations:** To ensure that the foundations for managing the identified salient issue are in place.
- Assessment: Continuous assessment of the salient issue and where change is identified, to explain how this change is taken into account in Company decision-making processes and actions.
- **Monitoring:** To demonstrate the practical effectiveness of the actions implemented to address a salient issue and provide examples to illustrate that the salient issue is being managed effectively.
- **Communications:** To demonstrate the Company efforts to address salient issues, progress made and plans for continuous improvement.

#### 3.0 HRDD ACTION PLAN

The HRDD Action Plan used the HRDD Action Plan Framework presented in the HRDD Report to develop component Gantt charts for each identified salient issue (Appendices A-H). Each Gantt chart identifies requisite actions for each pillar (i.e. foundation, assessment, monitoring and communication) and proposes a YR 2021 schedule for the delivery of the specified actions. The following presents a summary description of the recommended actions for each salient issue.

#### 3.1 General – TEPMA1 Human Rights Framework

Addresses establishment of the TEPMA1 Human Rights Framework including: (i) recruitment of a Human Rights Lead; (ii) establishment of a Human Rights Policy; (iii) establishment of a HRDD Steering Committee; (iv) development and implementation of a HRDD Action Plan; (v) continuous assessment of evolving context and potential human rights impacts and risks; (vi) ongoing engagement with stakeholders with interest in human rights and/or potentially impacted by the Project, and; (vii) communications.

#### 3.2 Women's Rights and Gender Equality

The HRDD Assessment focused on the importance of clear commitments to women's rights in the TEPMA1 Human Rights Policy and the integration of a Gender Equity Strategy as a key platform in the HRDD Action Plan. The Gender Equity Strategy will: (i) commit to additional assessment of the Project's actual and potential gendered impacts including an update of the Gender Study; (ii) demonstrate. TEPMA1 engagement with female workers and community members to understand the nuances of potential impacts on gender and women's rights and; (iiii) ensure that principles of accessibility, non-discrimination and gender equality are included in all project actions forecast in the plan.



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#### 3.3 Workers' Rights

The current focus of the Project's Industrial Relations (IR) team is to work with the EPC to build its capacity to effectively use the IR system and manage sub-contractors' workers' rights. The Action Plan recognises the importance of continuing to use leverage with the EPC to embed and refine the Project's IR system and further recommends reinforcing the Project's IR team to play an on-going active role in oversight and capacity-building for contractors and sub-contractors.

#### 3.4 Security

Given increased insecurity in Northern Cabo Delgado and in the Project area operations specific focus on increased risks is required. In particular current focus is required on the interaction between the Joint Task Force (JTF) of the Mozambican military and police force assigned to the Project by virtue of the MOU on Security of Petroleum Operations and stationed in the Project Area of Operations and communities. The action plan identifies three main aspects:

- VPSHR ensure the continuous implementation and improvement of VPSHR training in accordance with the Total Group Rule, with priority on strengthening the various measures for managing community interactions with the JTF
- Private security –develop actions to encourage capacity-building for private security employees.
- Project Affected Communities develop and implement a specific strategy to ensure improved awareness, development of positive relations with security actors and access to remedy.

#### 3.5 Occupational Health and Safety

The HRDD recommends that the impact of COVID-19 on TEPMA1's OHS procedures has to be assessed from a human rights perspective.

#### 3.6 Emergency Response Plan

The HRDD identifies the need to develop a community emergency response plan as a salient issue and recommends that the Project develops a comprehensive Project Community Emergency Response Plan. The Project will develop a focused community emergency response plan and ensure its integration into the broader Project Emergency Response Plan.

#### 3.7 Environment

Environmental issues were not prioritized in the past HRIA or the more recent HRDD Assessment. It is anticipated that environmental issues are likely to become more salient as the Project ramps up its offshore construction activities and during the operational phase. As such on-going work on environment, ecosystem services and cultural heritage should be monitored.

#### 3.8 Community well-being

The significant resettlement plan related to the Project DUAT was one of the priority human rights issues identified in the 2015 HRIA and remains one of the salient issues for the HRDD Assessment given the wide range of potential adverse impacts on people and their well-being over the long-term.



#### Human Rights Due Diligence Action Plan



The Resettlement Plan includes a full range of livelihood restoration programs. Due to the prevailing insecurity, both physical relocation and delivery of the livelihood restoration programs have been delayed and/or experienced some dis-continuity in delivery. The Project should continuously assess the impacts of the changing context and other externalities on resettlement plan delivery and undertake adaptive management (including potentially transitional support and assistance) as appropriate.

The Project has developed and is implementing a wide range of social management plans related to community health, community-construction interface, and traffic management. Socializing and monitoring these plans with contractors, subcontractors and other third parties has been identified as a priority for ongoing due diligence.

#### 3.9 Other

In addition, ongoing reporting on the operation and performance of the community grievance mechanism has been included in this monitoring process. Both community engagement and grievances will be periodically reviewed to identify potential nascent human rights impacts and risks.

#### 4.0 IMPLEMENTATION

As described above, a 2021 workplan has been defined for each salient issue based on the four pillars namely, foundations, assessment, monitoring, communications

Responsibility for addressing the workplan for each salient issue has been assigned to the relevant functional entity and manager (Table 2).

NO	SALIENT ISSUE	HRDD FINDINGS & SALIENT ISSUES	LEAD FUNCTIONAL ENTITY
1	General	<ul> <li>Human Rights Policy</li> <li>Coordination for HRDD Action Plans</li> <li>Stakeholder engagement</li> </ul>	<ul> <li>Social Performance</li> </ul>
2	Women's rights and gender equality	<ul> <li>Women's Rights and Gender Equality</li> </ul>	<ul> <li>Gender Working Group</li> </ul>
3	Workers' rights	<ul> <li>Non-Discrimination</li> <li>Freedom for child labour</li> <li>Freedom for forced labour</li> <li>Freedom of association</li> <li>Fair and safe working conditions</li> <li>Direct workers</li> <li>Contractors</li> </ul>	<ul> <li>Workforce and Industrial Relations</li> </ul>
4	Emergency Response Plan	<ul> <li>Community to be included in Emergency Preparedness</li> </ul>	<ul> <li>Health, Safety and Environment (HSE)</li> </ul>
5	Occupational Health and Safety	<ul> <li>Community Health and Safety</li> </ul>	<ul> <li>Health, Safety and Environment (HSE)</li> </ul>

Table 2. Assignment of Identified Salient Issues by Function



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NO	SALIENT ISSUE	HRDD FINDINGS & SALIENT ISSUES	LEAD FUNCTIONAL ENTITY
6	Security	<ul> <li>VPSHR</li> <li>Interaction with private security providers Community Based Security,</li> </ul>	<ul> <li>Security</li> </ul>
7	Environment	<ul> <li>Environment</li> <li>Ecosystem</li> <li>Cultural Heritage</li> </ul>	<ul> <li>Health, Safety and Environment (HSE)</li> </ul>
8	Community well-being	<ul> <li>Information and Consultation</li> <li>Resettlement</li> <li>Community Health &amp; Safety</li> <li>Project-induced In-migration</li> <li>Social investment and local content</li> <li>Contractor Management – Social Performance</li> </ul>	<ul> <li>Social Performance</li> </ul>

As such each functional manager will:

- participate in and contribute to ongoing human rights impact and risk assessment stemming from a change in content and/or project operations
- assume primary responsibility for ensuring that the actions identified in the workplan are addressed. The functional manager may assign the component actions to specific sub-functions and/or team members to ensure the actions are addressed in accordance with the schedule outlined in the specified Gantt chart.
- ensure that progress in addressing the actions are tracked on a monthly basis such that tracking can be shared with the Human Rights Lead.
- ensure that evidence of continuous assessment and continuous improvement and/or new initiatives is collated and made available to the Human Rights Lead as required.
- support the Human Rights Lead 'trust and verify' requirements including the collation of evidence, facilitating access to staff with specific actions and facilitating field visits as required.

#### 5.0 MONITORING AND EVALUATION

The Human Rights Lead will have responsibility for monitoring the ongoing implementation of the HRDD Action. Monitoring will involve the following activities:



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- Monthly update meetings with functional leads responsible for addressing actions for each priority salient issue.
- Periodic field visits to verify continuous improvement and/or implementation of actions for each priority salient issue and assess the adequacy of these actions in addressing the identified human rights impacts and risks.
- Development of internal Monthly HRDD Action Plan progress reports.

Appendix I presents an HRDD monitoring matrix and monthly progress tracker. The Human Rights Lead will work with the Social Performance Monitoring, Evaluation, Reporting and Learning function to ensure the progress is tracked on a monthly basis, providing input into functional monthly reports and the annual report for the HRDD Action Plan.

The HRDD Steering Committee will oversee implementation of the HRDD Action Plan. The HRDD Steering Committee meets quarterly (January, April, July and October) although ad hoc meetings can be called to address critical concerns as they arise. During each meeting the Human Rights Lead will provide an update on the implementation of the HRDD Action Plan including:

- Overview of evolving context and new human rights impacts and risks
- Need for new and/or additional assessment of salient issues and/or present results of such assessments
- Progress on implementation of HRDD Action Plan and corrective actions
- Summary of engagement with Human Rights stakeholders

#### 6.0 **REPORTING**

TEPMA1 will prepare an annual report to describe implementation of the HRDD Action Plan. The annual report will provide an overview of the HRDD Action Plan (i.e., this document) and specifically provide an update regarding the delivery of actions addressing the recommendations for key salient issues. The draft annual report will be shared with the HRDD Steering Committee and once approved, the final report will be made be made available to internal and external stakeholders in both English and Portuguese.

#### 7.0 COMMUNICATION

#### 7.1 Internal Stakeholders

The Human Rights lead will provide periodic updates regarding ongoing assessment of human rights impacts and risks and delivery of the HRDD Action Plan as appropriate. The annual progress report will be shared with TEPMA1 and M&S staff as well as with relevant corporate functions (including human rights, NGO/CSO engagement, public affairs and security). As such it will also provide input for Total Human Rights reporting obligations under the VPSHR and French Corporate Duty of Vigilance Law.



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#### 7.2 External Stakeholders

The Human Rights Lead will establish and maintain relationships with Mozambican stakeholders including the Mozambican Human Rights Commission, non-government and civil society organization with an interest in Mozambique LNG Project management of human rights impacts and risks and, the Independent CSO/NGO Monitoring Platform (ICSMP). In addition, periodic updates of the progress in implementing the HRDD Action Plan will be provided through the Project's monthly CSO/NGO engagement meetings.

As described above the annual progress report will be made available in English and Portuguese. A specific meeting to present the report will be arranged with Mozambican Human rights stakeholders. The report will also be disclosed on the project website, specifically on the human rights and security page.





#### APPENDICES

- APPENDIX A 2021 ACTION PLAN TO ADDRESS GENERAL RECOMMENDATIONS
- APPENDIX B 2021 Action plan to Address Gender Recommendations
- APPENDIX C 2021 ACTION PLAN TO ADDRESS WORKERS RECOMMENDATIONS
- APPENDIX D 2021 ACTION PLAN TO ADDRESS SECURITY RECOMMENDATIONS
- APPENDIX E 2021 ACTION PLAN TO ADDRESS OCCUPATIONAL HEALTH & SAFETY RECOMMENDATIONS
- APPENDIX F 2021 ACTION PLAN TO ADDRESS EMERGENCY RESPONSE RECOMMENDATIONS
- APPENDIX G 2021 ACTION PLAN TO ADDRESS ENVIRONMENT RECOMMENDATIONS
- APPENDIX H 2021 ACTION PLAN TO ADDRESS COMMUNITY WELL BEING RECOMMENDATIONS
- APPENDIX I HRDD MONITORING FRAMEWORK



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# APPENDIX A – 2021 ACTION PLAN TO ADDRESS GENERAL RECOMMENDATIONS 2021

								202	1					
Salient Issue	Action Category	Action		Q1			Q2			Q3			Q4	
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
ALL	Assessment	A system for ongoing assessment of context and evolving human rights impacts and risks and development of appropriate templates for reporting												
		Develop a stand-alone Human Rights Policy and HRDD Action Plan in a participatory manner												
	Foundations	Nominate a Human Rights Coordinator and provide the resources needed for strong implementation if the HRDD Action Plan												
		Implement a cross-functional committee to assist with implementation of the HRDD Action Plan												
Human Rights		Complete additional stakeholder engagement and verification on salient issues identified in the HRDD Assessment to gather further information about actual impacts and stakeholder perceptions and priorities.												
Policy and	Assessment	Complete enhanced due diligence for conflict-affected area												
HRDD Action Plan	Assessment	Consider undertaking a subsequent external HRDD assessment towards the end of the construction period and/or targeted assessments on new salient issues in the interim.												
	Monitoring	Develop a template for periodic internal reporting that compiles the relevant information about the different components of HRDD across the various salient issues.												
		Consider involving the Project's civil society monitoring platform in participatory monitoring and evaluation of the HRDD Action Plan.												
	Communications	Develop a communications plan for public reporting and proactive information-sharing at local, regional and international levels that is aligned with good reporting practices in the UNGP Reporting Framework.												



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## **APPENDIX B – 2021 ACTION PLAN TO ADDRESS GENDER RECOMMENDATIONS**

								20	21					
Salient Issue	Action Category	Action		Q1			Q2			Q3			Q4	
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV	DEC
Women's Rights and Gender Equality	Foundations	<ul> <li>Include a commitment to women's rights and gender equity in the proposed Human Rights Policy, with specific references to protections against discrimination based on gender, harassment and GBV.</li> <li>Review and strengthen policies and procedures related to non-discrimination, harassment and gender-based violence accordingly.</li> <li>Include a Gender Equity Strategy as a key platform in the HRDD Action Plan Framework.</li> <li>Appoint an external and experienced gender expert as Gender Equity Coordinator</li> <li>Establish a Gender Equity Taskforce that includes gender champions from all relevant departments.</li> <li>Update Gender study</li> <li>Provide for an external gender expert visiting site, providing expert guidance and assistance and reviewing the progress, adequacy and effectiveness of all gender equality initiatives on a periodic basis</li> <li>Finalize and operationalize the Gender Position Statement that the Project is developing.</li> <li>Review and strengthen accessibility for women to raise grievances (including in relation to harassment or gender-based violence).</li> <li>Ensure the company's commitment to women's rights and equality are included in a mandatory training provided to all Project staff.</li> </ul>						TOR						
	Assessment	Ensure all data obtained is gender-disaggregated. Assessment of the nature and scope of potential impacts and stakeholder concerns from a women's rights and gender perspective in the communities, including an assessment of the current situation of GBV, which should also include an understanding of COVID-19 impacts. Update this assessment annually. Provide for an external gender audit of the workplace including an assessment of the current situation of harassment and GBV in the workplace. The audit should be conducted every 2 years.						TOR						



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								20	21					
Salient Issue	Action Category	Action		Q1			Q2			Q3			Q4	
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV	DEC
		The GBV assessments should include the following at a minimum: the level and types of GBV in communities and in the workplace, including the factors contributing to it, the capacity of the local system to investigate and address GBV and support victims, and potential Protect impacts on the current situation.												
	Monitoring	Provide for a participatory monitoring system including women from varied backgrounds in communities and in the workplace in the Gender Equity Strategy.												
	Communication	Consider how a focus on women's rights and gender equity can be used as a positive opportunity for communications and engagement with different stakeholder groups												



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## APPENDIX C – 2021 ACTION PLAN TO ADDRESS WORKERS RECOMMENDATIONS

	Action							20	21					
Salient Issue	Category	Action		Q1			Q2			Q3			Q4	
	• •		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	Foundations													
Non-	Assessment	Monitor potential discrimination in the workplace and camps via existing grievance, complaints and worker/ camp committee mechanisms related to religious minorities and workers with HIV/AIDs												
Discrimination	Monitoring	During remobilization, test the system's effectiveness in terms of verifying that contractors and sub-contractors are maintaining non-discriminatory hiring practices.												
	Communication													
	Foundations													
Freedom from Child Labour	Assessment	Develop a targeted HRDD plan to proactively screen for potential child labour risks associated with the supply chains of major suppliers before they commence activities for the Project.												
	Monitoring	Maintain records with age documentation for all workers associated with the Project												
	Communication													
	Foundations													
Freedom from Forced Labour	Assessment	Develop a targeted HRDD plan to proactively screen for potential forced labour risks associated with the supply chains of major suppliers before they commence activities for the Project.												
	Monitoring													
	Communication													
	Foundations	Continue to foster the worker committees for contractor and sub-contractor workers by providing active oversight and capacity-building support.												
Freedom of	Assessment													
Association	Monitoring													
Association	Communication	Consider how to engage with unions and other worker organizations in Mozambique as part of development of the engagement strategy for civil society organizations focused on business and human rights.												
	Foundations													
Just and Favourable	Assessment	Conduct targeted engagement and verification activities related to appropriateness of shift rotations and adequacy of the Project's minimum wage.												
Working Conditions	Monitoring	During remobilization, test the system's effectiveness in terms of verifying that contractors and sub-contractors are maintaining appropriate working and camp conditions.												



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	A							202	21					
Salient Issue	Action	Action		Q1			Q2			Q3			Q4	
	Category		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
		Review feedback from grievance mechanisms and worker committees to												
		understand if there have been potential infringements on workers' rights during												
		demobilization (e.g. related to severance and social security) or for those who have												
		been deemed as essential services (e.g. related to working hours, overtime, etc.)												
	Communication													
	Foundations	Continue to use leverage with CCSJV to embed and refine the Project's IR system.												
Contractor	Assessment												1	
Management		Reinforce the Project's IR team to continue playing a proactive role in in monitoring												
– Industrial	Monitoring	and capacity-building for contractors and sub-contractors when construction ramps												
Relations		up again.												
	Communication													
	Foundations	Include direct workers in the HRDD Action Plan Framework as a salient issue.												
		Review any future workforce reorganizations and/or changes in working conditions												
Direct	Assessment	to ensure that they respect workers' rights standards and reduce any discrepancies												
Workers		in working conditions.												
	Monitoring													
	Communication													



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# APPENDIX D – 2021 ACTION PLAN TO ADDRESS SECURITY RECOMMENDATIONS

Caliant								202	21					
Salient Issue	Action Category	Action		Q1			Q2			Q3			Q4	
issue			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
		Develop a comprehensive VPSHR Action Plan that is aligned with Total Group Rule on the VPSHR.												
	Foundations	Nominate a VPSHR Coordinator and provide the resources needed for strong implementation												
VPSHR		Use leverage with Area 4 and Government of Mozambique to play a constructive role in implementing the VPSHR Action Plan												
	Assessment													i l
	Monitoring													
	Communications													1
	Foundations	Continue to develop the layered strategy to community security to increase protection of Project-affected communities (while implementing a VPSHR Action Plan to mitigate risks related to the JTF).												
Community Security	Assessment	Use planned studies related to community security (KAP Study, Community Security Study for Layer 2, etc.) to refine stakeholder engagement, grievance mechanisms and public awareness about community security issues and the VPSHR.												
	Monitoring													
	Communications	Local communications about community security and VPSHR be determined through assessment												
	Foundations													
Constant In	Assessment	Compile information and feedback from ongoing and planned processes (HRDD Assessment, KAP Study, <b>Community Security</b> <b>Study for Layer 2</b> ) to support an updated VPSHR risk assessment												
Security Risk		Integrate VPSHR risk assessment methodology into community security risk assessments												
Assessment s	Monitoring													
	Communications	Involve affected stakeholders and <b>security partners</b> in risk assessment processes to foster better communication about security arrangements and development of multi-stakeholder approaches												



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Salient								202	21					
Issue	Action Category	Action		Q1			Q2			Q3			Q4	
issue			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
		Use leverage with Area 4 and Government of Mozambique to align formal arrangements (e.g. MoUs, Rules of Engagement, etc.) with VPSHR												
	Foundations	Develop an ongoing VPSHR training program for JTF. Consider using an NGO partner to support delivery of training.												
Interaction with public		Strengthen formal and informal channels for community members to raise concerns about Mozambican forces												
security providers		Include issues related to interaction with JTF as part of the proposed Gender Equity Strategy.												
		Ensure that incidents involving JTF are documented and reported												
	Assessment	Ensure that the tracking tools for equipment provided to the JTF are effectively implemented and documented												
	Monitoring													
	Communications													
	Foundations	Continue to use leverage with CCSJV to embed and refine the Project's IR system related to non-discrimination.												
	Toundations	Include issues related to non-discrimination in hiring and employment as part of the proposed Gender Equity Strategy.												
Interaction with private		Develop a standard operating procedure (SOP) on detention and handover to police												
security providers	Assessment	Review and update training for private security guards in line with any new training program developed for the public security guards												
	Monitoring	Ensure that the recruitment processes and background checks required for all private security companies are conducted and documented												
	Communications													



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# APPENDIX E – 2021 ACTION PLAN TO ADDRESS OCCUPATIONAL HEALTH & SAFETY RECOMMENDATIONS

								20	21					
Salient Issue	Action Category	Action		Q1			Q2			Q3			Q4	
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV	DEC
	Foundations	Include OHS in the HRDD Action Plan Framework as a salient issue for the future.												
Occupational Health and Safety	Assessment	Review any changes in the Project's OHS procedures due to COVID-19 from a human rights perspective.												
	Monitoring													
	Communication													



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# APPENDIX F – 2021 ACTION PLAN TO ADDRESS EMERGENCY RESPONSE RECOMMENDATIONS

	Action Category	Action	2021												
Salient Issue			Q1				Q2			Q3		Q4			
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV	DEC	
_	Foundations	include emergency preparedness as a salient issue for the future—both for workers and communities.													
Emergency Preparedness	Assessment														
Preparedness	Monitoring														
	Communication														



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## APPENDIX G – 2021 ACTION PLAN TO ADDRESS ENVIRONMENT RECOMMENDATIONS

						2021									
Salient Issue	Action Category	Action	Q1			Q2		Q3			Q4				
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	Q4 NOV	DEC	
	Foundations	Include environment in the HRDD Action Plan Framework as a salient issue for the future.													
Environment	Assessment														
	Monitoring														
	Communication														
	Foundations														
Ecosystem Services	Assessment	Assess community perceptions of the effectiveness of management measures for the potential loss of ecosystem services and associated stakeholder engagement and participation and adjust management and/or engagement activities as necessary.													
	Monitoring														
	Communication														
	Foundations														
Cultural Heritage	Assessment	Assess community perceptions of the (i) process of grave relocations, (ii) effectiveness of the identification and protection of intangible cultural heritage, (iii) process for categorization of archaeological sites (e.g., CH86 and site near the airstrip) and (iv) related stakeholder engagement and participation; and adjust management and/or engagement activities as necessary.													
-	Monitoring	Document progress on identification and protection of intangible cultural heritage (including those linked to ecosystem services such as traditional livelihood practices).													
	Communication														



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## APPENDIX H – 2021 ACTION PLAN TO ADDRESS COMMUNITY WELL BEING RECOMMENDATIONS

	Action Category		2021											
Salient Issue		Action	Q1			Q2	1		Q3			Q4		
	Foundations	Proactively involve affected stakeholders and the civil society monitoring platform in the development of the HRDD Action Plan Framework with a focus on reinforcing information and consultation across all salient issues.	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Information and Consultation	Assessment	Continue to implement the Project's stakeholder engagement plans and activities with focus on deepening direct engagement with affected stakeholders beyond the resettlement affected communities.												
	Monitoring	Consider involving the Project's civil society monitoring platform in participatory monitoring and evaluation of the HRDD Action Plan.												
	Communication	Provide regular updates on the implementation of the HRDD Action Plan to local stakeholders in an accessible format.												
	Foundations	Utilise the Project's above-ground risk process <sup>[1]</sup> can be used to support ongoing discussion of emerging risks and impacts in the execution of the RAP and related SP issues. <sup>[2]</sup>												
	Assessment	Continue to focus ongoing assessment on the impacts of delays in implementation of livelihood programs and providing any necessary transitional support and assistance.												
		Assess the long-term affordability of housing, infrastructure and services in Quitunda.												
Descrittlement		The creation of the Monitoring & Evaluation function within the Social Performance Department provides a strong platform for ongoing participatory monitoring of resettlement-related impacts as well as other potential human rights or social impacts.												
Resettlement	Monitoring	Continue to reinforce the Project's ability to track and communicate potential impacts and implementation of support programs at the individual household level. For more information about the Social Performance team's current priorities, see Part B – HRDD Overview Matrix.												
	Communication	Continue to reinforce the Project's ability to communicate about implementation and monitoring of the RAP, particularly in relation to livelihood-related issues.												
		Consider accelerating implementation of social investment programs that help to reduce perceived inequalities between Quitunda and other resettlement affected communities (i.e., those who ceded land for the construction of the Quitunda resettlement village).												



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								20	21								
Salient Issue	Action Category	Action	Q1			Q2			Q3			Q4					
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC			
	Foundations																
		Review any changes in the Project's community health and safety												1			
		plans and procedures that are related to COVID-19 from a human rights												1			
	Assessment	perspective.												L			
Community Health		Assess the potential health impacts on women and girls, including in												1			
and Safety		terms of sexually transmitted diseases, unwanted or early pregnancies.												<b>—</b>			
		Continue to implement the Project's plans, including those related to															
	Monitoring	community health, community-construction interface and traffic															
	0	management with focus on managing safety risk related to Quitupo,												1			
	· · ··	the transport corridor and nearshore activities.			-					-				<u> </u>			
	Communication													<b> </b>			
		Accelerate the implementation of PIIM plans and continue to												1			
	<b>- - - - - - - - - -</b>	strengthen the capacity of relevant managers in relation to PIIM.												<u> </u>			
	Foundations	Use leverage with the government, community leaders and other												1			
-		actors to build capacity and multi-stakeholder initiatives related to PIIM															
		preparedness and mitigation.												<u> </u>			
	Assessment	Assess the potential impacts on women and girls in relation to sexual exploitation and gender-based violence.												1			
Project-induced In-		The establishment of the Project's monitoring framework for PIIM is a												├───			
migration		priority to allow the Project and other actors to respond to early												1			
	Monitoring	indications of PIIM. Further information on this aspect is included in												1			
		Part B – HRDD Overview Matrix.												1			
		Continue to raise awareness of contractors and other stakeholders															
	Communication	related to potential impacts and inappropriate behaviours towards												1			
		local community members in the context of PIIM. Additional												1			
		information is included in contractor management below.															
		Consider the potential risks related to the use of the foundation model												1			
	Foundations	as a vehicle for delivery of the Afungi Community Development Fund (a												1			
		mitigation measure for economic displacement).												L			
		Upon remobilization, consult with affected stakeholders, government												1			
Benefits Creation	Assessment	and implementation partners about adapting social investment and												1			
		local content plans to the new realities of the Project and communities.												<b></b>			
		Conduct participatory monitoring and evaluation of benefits programs															
	Monitoring	to support continuous improvements and to be able to demonstrate positive human rights impacts															
	Communication																
Contractor	22	Use leverage with CCSJV and sub-contractors to strengthen the on-site															
Management –	Foundations	capacity for social performance that is commensurate with each sub-												i			
Social Performance		contractor's social risk profile.												1			

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		Action	2021											
Salient Issue	Action Category		Q1			Q2			Q3					
			JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
		Continue to raise awareness of contractors and other stakeholders related to potential impacts and inappropriate behaviours towards local community through comprehensive training and appropriate sanctions as required.												
	Assessment													
	Monitoring													
	Communication													





### APPENDIX I – HRDD MONITORING FRAMEWORK

#### Plan Tracker: General – TEPMA1 Human Rights Framework (March 2021)

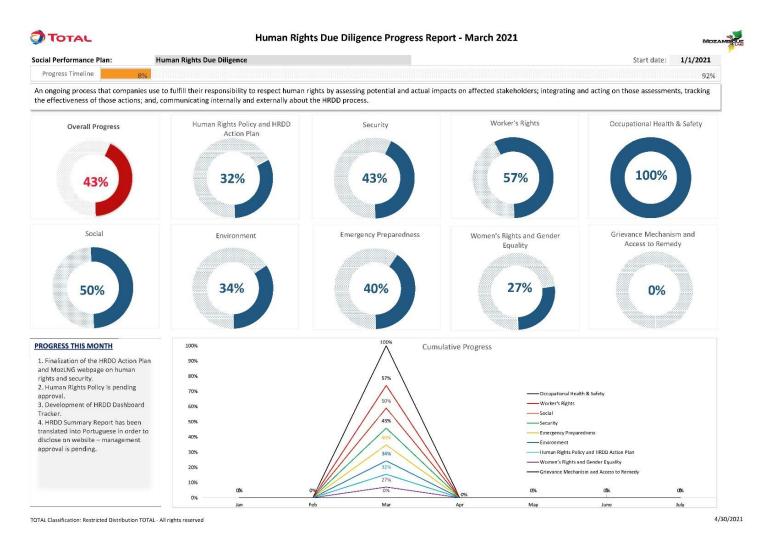
Tasks Description	Salient issue labels	Functional Area	Remaining	Progress	Jan- 21	Feb- 21	Mar- 21	Apr- 21	May- 21	Jun- 21
			-57%	43%	0%	0%	43%	0%	0%	
Human Rights Policy and HRDD Action Plan				32%	0%	0%	32%	0%	0%	0%
Ongoing assessment of content and evolving human rights impacts and risks	1. Ongoing assessment		-93%	7%	0%	0%	7%	0%	0%	0%
Develop a stand-alone Human Rights Policy and HRDD Action Plan in a participatory manner	2. Human Rights Policy & HRDD Action Plan		-40%	60%	0%	0%	60%	0%	0%	0%
Nominate a Human Rights Coordinator and provide the resources needed for strong implementation if the HRDD Action Plan	3. Human Rights Coordinator & resources		0%	100%	0%	0%	100%	0%	0%	0%
Implement a cross-functional committee to assist with implementation of the HRDD Action Plan	4. Cross-Functional Committee		-60%	40%	0%	0%	40%	0%	0%	0%
Complete additional stakeholder engagement and verification on salient issues identified in the HRDD Assessment to gather further information about actual impacts and stakeholder perceptions and priorities.	5. Verification on Salient Issues		-100%	0%	0%	0%	0%	0%	0%	0%
Complete enhanced due diligence for conflict-affected area	6. Enhanced due diligence		-55%	45%	0%	0%	45%	0%	0%	0%
Consider undertaking a subsequent external HRDD assessment towards the end of the construction period and/or targeted assessments on new salient issues in the interim.	7. External HRDD Assessment - End construction		-100%	0%	0%	0%	0%	0%	0%	0%
Develop a template for periodic internal reporting that compiles the relevant information about the different components of HRDD across the various salient issues.	8. Reporting template		-50%	50%	0%	0%	50%	0%	0%	0%
Consider involving the Project's civil society monitoring platform in participatory monitoring and evaluation of the HRDD Action Plan.	9. Monitoring - Civil society monitoring platform		-100%	0%	0%	0%	0%	0%	0%	0%
Develop a communications plan for public reporting and proactive information-sharing at local, regional and international levels that is aligned with good reporting practices in the UNGP Reporting Framework.	10. Communications plan		-80%	20%	0%	0%	20%	0%	0%	0%



Human Rights Due Diligence Action Plan



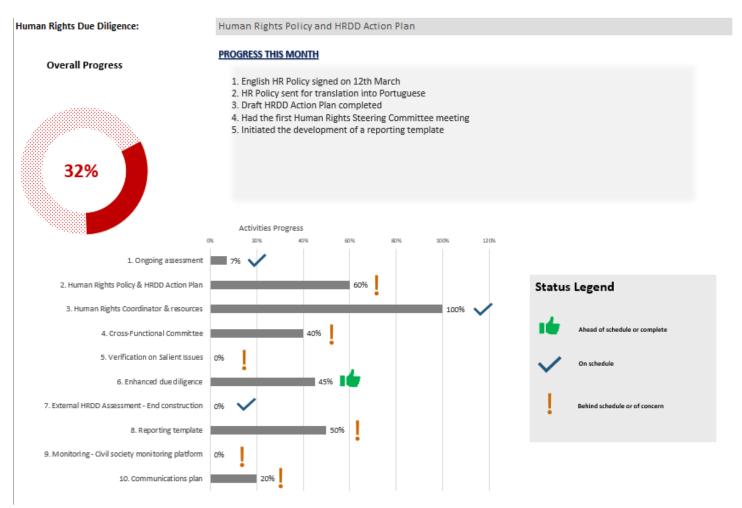
**Progress Report (March 2021)** 

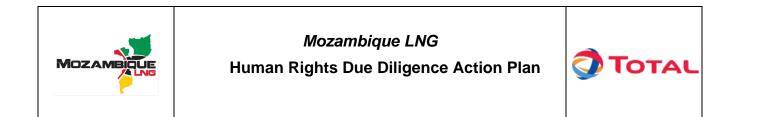






## Progress Reports/ Human Rights Policy and HRDD Action Plan Salient Issue (March 2021)





# Cumulative Progress (March 2021)

