

1. Does your company have investments or operations in Myanmar or is it seriously considering investing or operating there? If so, please provide information on the nature of these investments, and which geographic areas and communities they will affect?

**Response:**

Total E&P Myanmar (TEPM) operates the Yadana gas field (under a Production Sharing Contract) with a 31.2% interest. Other participants in the project are Chevron (28.3%); Petroleum Authority of Thailand-Exploration & Production (PTT-EP, 25.5%); and Myanmar Oil and Gas Enterprise (MOGE, 15%).

The Yadana gas field is located in the Andaman Sea, approximately 60 kilometers south of the Irrawaddy Delta. Most of the 410-kilometer Yadana gas export pipeline lies offshore, with 63 kilometers onshore in southern Myanmar. The communities close to the onshore pipeline region, comprising 33 villages and home to about 50,000 inhabitants, are covered by Total Myanmar's Socio-Economic Programme.

In 2012, TEPM also acquired a 40% interest in the PSC covering the offshore Block M-11 in Martaban basin. PTTEP (PTT Exploration and Production Plc.), Thailand's national oil company is operator of that block. Further, in March 2014, TEPM won the award for a deepwater block in the Tanintharyi Offshore Area.

On a general note, in line with one of the principles of our Code of Conduct, Total ensures that its operations contribute to the economic and social development of host countries, and in particular local communities. We respect the rights of communities by identifying, preventing and mitigating impacts in particular on their environment and way of life and, where appropriate, by providing remedy. We also seek to establish dialogue and lasting relationships with these communities at a very early stage.

More details on TEPM's Corporate Social Responsibility initiatives, particularly in local communities in Myanmar can be found in our latest Socio-Economic Annual Reports (Please see attached as Appendices 1 and 2).

2. Do you have policies and procedures in place to prevent your business activities or investment from contributing to human rights abuse and social conflict in Myanmar (including, for example, human rights due diligence measures)? Please specify whether these policies and procedures apply to your company in general, or specifically to your Myanmar investment. If you have human rights policies and procedures regarding investing or operating in Myanmar, are you willing to share them for posting on our website? If so, please send them as a Word or PDF file, or, if available, as a hyperlink?

**Response:**

As a responsible, global, integrated energy company operating in more than 130 countries, including complex environments, Total's activities are guided by the following priority business principles:

- Commitment to the highest levels of **safety** and **security** in our operations as well as protecting **health** and the **environment**.
- Compliance with the highest **integrity** standards, in particular by preventing corruption, fraud and anti-competitive practices.
- Respect for internationally recognised **Human Rights** standards.

Total has policies and procedures in place both at the Group level and specifically in Myanmar, to ensure that our business activities do not contribute to any form of human rights abuse and or social conflict. These policies include:

- i) The Total Code of Conduct, available at:  
[http://mediagrp.corp.local/DRH/DRH\\_LACOM/media/02\\_Anglais/RESOURCES\\_PUBLICATIONS/Rubriques/Fichiers/TOTAL\\_code\\_conduite\\_2014\\_EN.pdf](http://mediagrp.corp.local/DRH/DRH_LACOM/media/02_Anglais/RESOURCES_PUBLICATIONS/Rubriques/Fichiers/TOTAL_code_conduite_2014_EN.pdf)
- ii) The TEPM Code of Conduct (Please see attached as Appendix 3).
- iii) The Total Human Rights Internal Guide, available at:  
[http://mediagrp.corp.local/DRH/DRH\\_LACOM/media/supports\\_image/edition/Publications/GDH\\_Web\\_VA.pdf](http://mediagrp.corp.local/DRH/DRH_LACOM/media/supports_image/edition/Publications/GDH_Web_VA.pdf)
- iv) The Total Business Integrity Guide, available at:  
[http://mediagrp.corp.local/DRH/DRH\\_ETHIQUE/media/INTEGRITE/documents/Guide-INTEGRITE\\_WEB-GB-DEF.pdf](http://mediagrp.corp.local/DRH/DRH_ETHIQUE/media/INTEGRITE/documents/Guide-INTEGRITE_WEB-GB-DEF.pdf)
- v) The TEPM Health, Safety and Environment Policy (Please see attached as Appendix 4).

In addition, Total has internal Company guidance documents applicable to our business activities which ensure responsible operations and respect for human rights. These include:

- i) E&P Community Grievance Management Manual;
- ii) TEPM Grievance Mechanism;
- iii) A Group Societal Directive;
- iv) Human Rights Impact Assessment Guidelines;
- v) Environmental, Health and Social Impact Assessment Procedures.

Total has undertaken Human Rights Training of TEPM employees and relevant stakeholders in Myanmar in collaboration with the Danish Institute of Human Rights. The UK-based independent consulting firm, GoodCorporation has also conducted extensive Ethical Assessment of our operations in Myanmar. Further, the Collaborative for Development Action (CDA), a U.S. non-profit organization that specializes in issues related to development aid and the management of projects in conflict and post-conflict environments has issued independent reports on our operations in Myanmar. The CDA reports are available at:

<http://www.cdacollaborative.org/media/52706/Total-Myanmar-Burma-Yadana-Gas-Transportation-Project-Visit-I.pdf>

<http://www.cdacollaborative.org/media/52709/Total-Myanmar-Burma-Yadana-Gas-Transportation-Project-Visit-II.pdf>

<http://www.cdacollaborative.org/media/52712/Total-Myanmar-Burma-Yadana-Gas-Transportation-Project-Visit-III.pdf>

<http://www.cdacollaborative.org/media/52718/Total-Myanmar-Burma-Yadana-Pipeline.pdf>

<http://www.cdacollaborative.org/media/52715/Total-Myanmar-Burma-Yadana-Gas-Transportation-Project-Visit-V.pdf>

<http://www.cdacollaborative.org/media/52703/Total-Myanmar-Yadana-Gas-Transportation-Project-Visit-VI.pdf>

Notably also, TEPM is proud to be part of Myanmar's Extractive Industries Transparency Initiative (EITI) process as a leader of oil & gas companies operating in Myanmar.

3. Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?

**Response:**

At the Group level, Total has an Ethics Committee comprised of members who are all well versed in our businesses and business lines. They include a Chairman, an Ethical Policy Manager and five employees each representing a different business segment. The Ethics Committee reports directly to the Chief

Executive Officer and works closely with various departments and divisions, at the corporate level and in our business segments on the communication and implementation of the Code of Conduct. Total also has a Human Rights Coordination Committee led by the Chairman of the Ethics Committee with representation from several departments including Human Resources, Public Affairs, Legal, Security, Sustainable Development, etc, which provides leadership and guidance on Human Rights issues and developments as it relates to our activities. In addition, there is a dedicated team of Human Rights lawyers within the Group's Compliance and Corporate Social Responsibility Department.

Similarly, TEPM has an Ethics Officer, a Compliance Officer and dedicated Social Responsibility, Legal, Security, Human Resources teams who together with other departments ensure the implementation of the above-mentioned policies and procedures under the supervision of the TEPM General Manager.

4. If you do not yet have human rights policies and procedures in place, do you have plans to develop them? If so, what efforts are you currently engaged in or plan to engage in on this regard?

**Response:**

As shown in **Response 2** above, Total already has human rights policies and procedures in place which we continue to improve upon periodically, in line with best international standards.

5. How does your company try to prevent or mitigate conflicts that affect its operations or the surrounding communities (including armed conflict, inter-communal conflict and violence, etc.)? Could you please list your policies, procedures or concrete activities in this regard, including community engagement and dialogue measures and revenue sharing agreements?

**Response:**

- a) Total carries out its operations responsibly and implements ethical working practices. We pay particular attention to the need for everyone to be treated fairly and with respect. Through an awareness process, we strive to make our employees familiar with and respect Myanmar's culture. We stress respect for others and non-discrimination. Our Code of Conduct contains an explicit commitment to respect internationally recognized Human Rights standards within our operations including the Universal Declaration of Human Rights, the Key Conventions of the International Labour Organisation, OECD Guidelines for Multinational Enterprises, The Voluntary Principles on Security and Human Rights, The United Nations (UN) Global Compact and The UN Guiding Principles on Business and Human Rights as endorsed by the UN Human Rights Council in 2011.
- b) TEPM works towards making other stakeholders working on its behalf in Myanmar, including partners, contractors, service providers etc to comply with our business principles as enumerated above.
- c) TEPM establishes mutual understanding with communities in the vicinity of our projects. We have created Village Communication Committees to foster dialogue with the local communities.
- d) TEPM contributes to the development of local communities through local employment opportunities, training, capacity building and other initiatives to improve living standards in the project area, focusing on priorities such as public health, education, economic development and improved infrastructure. More details can be found our latest Socio-Economic Annual Reports (Please see attached as Appendices 1 and 2).
- e) TEPM has a detailed and accessible Grievance Mechanism process in Myanmar to proactively address complaints and/or other issues that could potentially give rise to conflicts.

6. Who should communities or civil society groups contact if they have questions or concerns about your investment or operations in Myanmar? Please provide their contact information?

**Response:**

You can contact:

Mr. Xavier PREEL  
General Manager  
Total E&P Myanmar  
No. 5, Sacred Tooth Relic Lake Avenue  
Punn Pin Gone Quarter No. 5, Mayangone Township  
Yangon, The Republic of the Union of Myanmar.

Or

The Group Ethics Committee at [ethics@total.com](mailto:ethics@total.com)

7. We further invite you to respond to questions specific to your industry. Does your company have policies and procedures in place to address each of the following areas? If so, please provide details:
- a. Freedom of association and collective bargaining
  - b. Living wages
  - c. Workplace health and safety
  - d. Child labour
  - e. Forced labour
  - f. Anti-discrimination (whether based on race, gender, religion, nationality, etc.)
  - g. Environment
  - h. Land rights
  - i. Relocation

**Response:**

Kindly see **Response 2** above - the policy documents enumerated therein, particularly the Code of Conduct and Human Rights Internal Guide, adequately address the listed areas.

a) Freedom of association and collective bargaining

The Total Code of Conduct explicitly commits to “pay particular attention to employees’ working conditions, especially the respect of the individual, the absence of discrimination, freedom of association and collective bargaining, as well as the protection of their health and safety. No form of harassment is tolerated.”

Total’s Code of Conduct commits to respect internationally recognized Human Rights standards within our operations, including key ILO conventions. This includes the:

- ILO Convention n° 111 on Discrimination
- ILO Convention n° 87 on Freedom of Association and Protection of the Right to Organise
- ILO Convention n° 98 on Right to Organise and Collective Bargaining.

b) Living wages

Kindly refer to response in (a) above.

c) Workplace health and safety

Kindly refer to response in (a) above.

Total’s Code of Conduct clearly commits to “seek to ensure the highest Safety, Health, Security and Environmental standards wherever we operate”.

d) Child labour

Kindly refer to response in (a) above.

Total's Code of Conduct commits to respect internationally recognized Human Rights standards within our operations, including key ILO conventions. This includes the:

- ILO Convention n° 29 on Forced Labour
- ILO Convention n° 105 on the Abolition of Forced Labour
- ILO Convention n° 138 on the Minimum Age
- ILO Convention n° 182 on the Worst Forms of Child Labour.

e) Forced labour

Kindly refer to response in (d) above.

f) Anti-discrimination (whether based on race, gender, religion, nationality, etc.)

Kindly refer to response in (a) above.

g) Environment

Kindly refer to response in (c) above.

Total's Code of Conduct commits to "respect the natural environment and the culture of host countries". Further, it commits to "respect the rights of communities by identifying, preventing and mitigating impacts in particular on their environment and way of life and, where appropriate, by providing remedy".

h) Land rights

In line with the Total Code of Conduct, Total pays special attention to the rights of local communities in the countries where we work, including property rights. We ensure that properties are acquired through a transparent process in accordance with applicable local and international laws and that land owners are fairly compensated for any loss caused directly by our operations.

i) Relocation

Kindly refer to response in (h) above.

The Total Code of Conduct provides for the design and implementation of effective remediation processes in particular towards vulnerable groups, including indigenous peoples. Total has a Charter on Indigenous and Tribal People, available at:

[http://reflex.corp.local/Lists/reflex\\_Doc\\_Master\\_Files/Attachments/211/CH-GR-SBS-001\\_en\\_1.pdf](http://reflex.corp.local/Lists/reflex_Doc_Master_Files/Attachments/211/CH-GR-SBS-001_en_1.pdf)