



EO100 Standard Revision Tool
Side-by-side comparison of EO100 2012 (A) and proposed revisions for 2014 Public Comment Period

Principle 1: CORPORATE GOVERNANCE, TRANSPARENCY & BUSINESS ETHICS	Principle 2: HUMAN RIGHTS, SOCIAL IMPACTS & COMMUNITY DEVELOPMENT	Principle 3: INDIGENOUS PEOPLE'S RIGHTS	Principle 4: FAIR LABOR & WORKING CONDITIONS	Principle 5: CLIMATE CHANGE, BIODIVERSITY & ENVIRONMENT
1.1 LEGAL COMPLIANCE	2.1 HUMAN RIGHTS	3.1 FREE, PRIOR & INFORMED CONSENT (FPIC)	4.1 LABOR AND WORKING CONDITIONS	ENVIRONMENTAL MANAGEMENT
1.2 FINANCIAL DISCLOSURE	2.2 FAIR, INCLUSIVE ENGAGEMENT & CONSULTATION	3.2 ENGAGEMENT & PARTICIPATION	4.2 CHILD LABOR	5.1 ENVIRONMENTAL MANAGEMENT
1.3 BRIBERY, CORRUPTION, MONEY LAUNDERING AND FINANCING OF TERRORISM	2.3 HUMAN RIGHTS AND SECURITY PERSONNEL	3.3 CULTURAL IMPACTS	4.3 FORCED LABOR	5.2 MITIGATION HIERARCHY
1.4 MANAGEMENT SYSTEMS	2.4 RESETTLEMENT	3.4 USE OF TRADITIONAL NATURAL RESOURCES	4.4 FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING	5.3 SPILL PREVENTION & EMERGENCY PREPAREDNESS
1.5 CONTRACTORS	2.5 UNCONTROLLED SETTLEMENTS	3.5 CULTURE-BASED INTELLIGENCE & TRADITIONAL KNOWLEDGE	4.5 EQUAL OPPORTUNITIES AND TREATMENT	5.4 WASTE PRODUCTION & MANAGEMENT
1.6 TRANSPARENCY & DISCLOSURE	2.6 LAND RIGHTS	3.6 VOLUNTARY ISOLATION	4.6 WORKING HOURS & LEAVE	5.5 REMEDIATION OF ENVIRONMENTAL LIABILITIES
	2.7 COMMUNITY HEALTH & SAFETY		4.7 REMUNERATION	5.6 CLOSURE AND RESTORATION
	2.8 SUSTAINABLE COMMUNITY INVESTMENT		4.8 WORKPLACE GRIEVANCES	ATMOSPHERIC IMPACTS
	2.9 GRIEVANCE MECHANISM		4.9 OCCUPATIONAL HEALTH & SAFETY	5.7 GREENHOUSE GAS EMISSIONS
			4.10 EMERGENCY PREPAREDNESS & RESPONSE PLANNING	5.8 OZONE DEPLETION
				5.9 FLARING
				ECOSYSTEM IMPACTS
				5.10 BIODIVERSITY & ECOLOGY
				5.11 AIR
				5.12 WATER
				5.13 LAND
				AMBIENT IMPACTS
				5.14 VISUAL AND AMBIENT IMPACTS

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
PRINCIPLE 1: CORPORATE GOVERNANCE, ACCOUNTABILITY & BUSINESS ETHICS		PRINCIPLE 1: CORPORATE GOVERNANCE, <u>TRANSPARENCY</u> & BUSINESS ETHICS	
<i>Oil and gas exploration and production activities must be carried out in compliance with all applicable laws, regulations and administrative requirements of the country in which the operations take place. Operations activities are compliant with the aims of listed international treaties and conventions to which the country is a signatory, as well as to voluntary standards considered the norm.</i>		<i>Oil and gas exploration and production activities must be carried out in compliance with all applicable laws, regulations and administrative requirements of the country in which the operations take place. Activities are carried out using effective management systems and respect international treaties and conventions to which the host country is a signatory, as well as to voluntary standards considered best practice.</i>	
1.1 LEGAL COMPLIANCE: Operator shall be in compliance with applicable laws, regulations and international agreements; with national and local laws and administrative requirements; and international agreements signed by the country of operation.	Operator has implemented policies, procedures and other mechanisms to guarantee compliance with all applicable local and national legal, regulatory and administrative requirements, including regular updates and amendments to these requirements. Operator has made a public and documented commitment to comply with: a) all applicable local and national legal, regulatory and administrative requirements. b) the principles of international agreements to which the country of operation is a signatory (whether those agreements have been transposed into national law or not).	1.1 LEGAL COMPLIANCE: Operator is in compliance with applicable laws, regulations and international agreements; with national and local laws and administrative requirements, host country or production sharing agreements ; and international agreements signed by the country of operation and their interpretation by international interpretive bodies . Where regional, national, and local laws are not aligned with international norms, the Operator applies the higher of the two standards.	Operator shall establish a mechanism to guarantee compliance with all applicable local and national legal, regulatory and administrative requirements, including regular updates and amendments to these requirements. Operator has made a public and documented commitment to comply with: a) all applicable local and national legal, regulatory and administrative requirements. b) the principles of international agreements to which the country of operation is a signatory (whether those agreements have been transposed into national law or not). Operator shall pay fees, royalties, taxes and other legally required payments according to the requirements of the host country.
1.3 FIDUCIARY COMPLIANCE & DISCLOSURE: Operator shall ensure payment of fees, royalties, taxes and other legally required payments align with the requirements of the host country. Operator shall formally support implementation of EITI.	Operator formally supports EITI implementation, and in accordance with EITI, publicly discloses what it pays for resource extraction rights on the project. In accordance with EITI, Operator discloses proof of payment of all legally required fees, royalties and taxes.	1.2 FINANCIAL DISCLOSURE: Operator ensures payment of fees, royalties, taxes and other payments align with the requirements of the host country. Operator formally supports implementation of EITI , including encouraged elements of EITI implementation .	Operator shall formally support EITI implementation and country level initiatives. In accordance with EITI, Operator shall publicly disclose what it pays for resource extraction rights on the project and proof of payment of all legally required fees, royalties and taxes as well as all other information to be disclosed under the EITI .
1.2 Governance, Policies & Codes of Conduct: Operator shall establish policies, codes of conduct and requirements for employees, service providers, and contractors to carry out business activities to a high ethical standard, ensuring integrity, transparency and compliance with applicable laws.	Operator has developed and implemented specific policies, codes of conduct and requirements for employees, service providers, and contractors to carry out business activities to a high ethical standard and in a manner that ensures integrity, transparency and compliance with applicable laws.	1.3 BRIBERY, CORRUPTION, MONEY LAUNDERING AND FINANCING OF TERRORISM: Operator does not engage in bribery and/or corruption, money laundering, financing of terrorism, or financing of other forms of violence.	Operator shall establish a mechanism for employees, service providers, and contractors that prohibits, prevents and combats bribery, corruption, money laundering and financing of terrorism and of other forms of violence.

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
1.4 BRIBERY & CORRUPTION: Operator shall not engage in bribery and/or corruption.	Operator's code of conduct, and/or its equivalent, includes a chapter on policies to combat bribery and corruption. This code of conduct is made public to employees and stakeholders. Operator has a zero tolerance policy for bribery and corruption.		<i>Consolidated above</i>
1.5 MONEY LAUNDERING/ TERRORISM: Operator shall not tolerate money laundering and/or financing of terrorism and other forms of violence.	Operator's code of conduct, and/or its equivalent, includes a chapter on policies to combat money laundering and/or financing of terrorism and other forms of violence. Under this code of conduct, Operator does not tolerate money laundering or financing of terrorism and other forms of violence. This code of conduct is made public to employees and stakeholders.		<i>Consolidated above</i>
<p><i>From Principle 6: Project Life Cycle Management</i></p> <p>6.2 RECOGNIZED MANAGEMENT SYSTEMS: Operator shall conform to the requirements of a formal management system recognized by EO.</p>	Operator conforms to the requirements of a formal management system recognized by EO. Recognized systems include the American Petroleum Institute (API), Model Environmental, Health and Safety (EHS) System; ISO14001: 2004, Environmental management systems - Requirements with guidance for use; and OHSAS 18001, Occupational Health and Safety Management System. Company proprietary systems are also acceptable provided they are similar in functionality, scope and commitment of company leadership to these systems.	1.4 MANAGEMENT SYSTEMS: Operator implements effective social and environmental management systems including impact assessments, monitoring, risk management and mitigation.	<p>Management System:</p> <p>Operator shall incorporate all the elements (Principles, Objectives, and Performance Targets at least at the level of PT1) specified in the EO100™ Standard into its management system.</p> <p>The scope of the Management System shall be defined and documented and shall include all aspects of operating activities related to environment, labor, health, safety, risk management and community affairs.</p>
6.4 INCLUDED ELEMENTS: Operator shall incorporate all the elements (Principles, Provisions, and Performance Targets at least at the level of PT1) specified in the EO100™ Standard into its management system or high-level document directing the operations of the project.	Operator has adopted a directive, memorandum of intent, or similar position statement from top management (i.e., corporate-level or country-level authority) that commits to incorporating all elements (Principles, Provisions, and Performance Targets at least at the level of PT1) specified in the EO100™ Standard into the planning and implementation of the project.		<p>Commitment:</p> <p>Operator shall adopt a directive, memorandum of intent, or similar position statement from top management (i.e., corporate-level or country-level authority) that commits to implementing the EO100™ Standard into the operations of the project.</p>
6.1 INTERNATIONAL INDUSTRY STANDARDS: Operator shall use international industry standards of practice and care for each stage of the project life cycle, from exploration through closure.	Operator has developed, implemented and maintains procedures to identify, access, and apply all applicable international standards regarding good practice.		<p>International Industry Standards:</p> <p>Operator shall use international industry standards of practice and care for each stage of the project life cycle, from exploration through closure.</p> <p>Operator has developed, implemented and maintains procedures to identify, access, and apply all applicable international standards regarding good practice.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
<p>6.5 ECONOMIC, ENVIRONMENTAL & SOCIAL IMPACT ASSESSMENTS: Operator shall commission independent Economic, Environmental and Social Impact Assessments for each phase of the project using a recognized international standard to identify impacts and appropriate mitigation measures at each stage of the project life cycle, from exploration through closure.</p>	<p>Operator has developed and implemented a procedure to assess potential social and environmental impacts during the entire project life cycle, in accordance with the requirements of ISO 14040 Section 3.9. Operator has conducted a study to mitigate the impacts of transportation during the project planning phase and all subsequent phases. A plan for implementation has been agreed upon with stakeholders.</p>		<p>Impact Assessments:</p> <p>Operator shall conduct Environmental, Social, Economic, and Health Impact Assessments for each phase of the project using recognized international standards to identify impacts and appropriate mitigation measures at each stage of the project life cycle, from exploration through closure.</p>
<p>6.6 SECONDARY & CUMULATIVE IMPACTS: Operator shall identify and take steps to avoid and/or mitigate indirect and cumulative impacts, in consultation with relevant stakeholders.</p>	<p>Operator has conducted an indirect and cumulative impact assessment and has developed a corresponding plan to avoid, prevent, minimize, reduce or offset adverse indirect and cumulative impacts on people and the environment.</p>		<p>Secondary and Cumulative Impacts:</p> <p>Operator shall conduct indirect, secondary and cumulative impact assessments, including an evaluation of the effects of transportation related to project activities and of local purchasing on the prices of local goods and services.</p>
<p>5.14 MONITORING: Operator shall implement a comprehensive monitoring program for emissions and discharges and the state of water, air, land and biodiversity resources. Operator shall develop opportunities to involve local communities, if any, in monitoring activities.</p>	<p>Operator has a comprehensive monitoring program for emissions and discharges to water, air, and land.</p> <p>Operator has established the parameters to be monitored and monitoring locations with appropriate government agencies and supplements these with additional parameters and locations selected by key stakeholders (e.g. local communities, Indigenous Peoples, academics and NGOs). Operator collects samples and data in conformance with guidance from appropriate government agencies. All samples are analyzed in independent and accredited laboratories.</p>		<p>Monitoring:</p> <p>Operator shall implement a comprehensive monitoring program for social and environmental impacts, including monitoring of emissions and discharges to water, air, land and of biodiversity resources.</p> <p>Operator shall develop opportunities to involve local communities, if any, in monitoring activities.</p>
<p>5.15 REPORTING & DISCLOSURE: Operator shall publicly report data related to environmental impacts and mitigation activities.</p>	<p>Operator reports the results of monitoring activities to the relevant regulatory agencies and makes such results publicly available in a timely manner (via appropriate disclosure methods for local communities, Indigenous Peoples and other non-technical stakeholders).</p> <p>Operator publicly discloses calculation methods used to estimate or model environmental impacts, as applicable.</p> <p>If Operator uses hydraulic fluids during well completion or to stimulate production, Operator publicly discloses all components of those fluids.</p>		<p>Operator shall report the results of monitoring activities to the relevant regulatory agencies and makes such results publicly available in a timely manner (via appropriate disclosure methods for local communities, Indigenous Peoples and other non-technical stakeholders).</p>

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<p><i>From Principle 2: Human Rights, Social Impacts & Community Development</i></p> <p>2.6 RISK MITIGATION, MANAGEMENT: Operator shall manage and/or minimize, restore, and/or compensate for adverse impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts and the vulnerability of affected communities.</p>	<p>Via impact assessment studies, Operator has developed and implemented a plan to manage and/or minimize, restore, and/or compensate for adverse impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts and the vulnerability of affected communities.</p>		<p>Risk Mitigation and Management:</p> <p>Operator shall manage and/or minimize, restore, and/or compensate for direct and indirect adverse health, economic, social, human rights and environmental impacts commensurate with the nature and scale of such impacts and the vulnerability of affected communities.</p> <p>Remedies are culturally appropriate and consistent with community expectations, host country domestic law, and international standards.</p>
		<p>1.5 CONTRACTORS: Contractors working on and around the project site uphold ethical, social and environmental standards in line with the requirements of the EO100™ Standard.</p>	<p>Operator shall have a mechanism for ensuring contractors adhere to the social, ethical, labor, human rights and environmental standards contained in the EO100™ Standard.</p>
<p>1.6 TRANSPARENCY & DISCLOSURE: Operator shall fully, accurately and freely disclose all social and environmental policies, activities and performance in accordance with recognized sustainability reporting best practices.</p>	<p>Operator fully, accurately and freely discloses to public and employees all its social and environmental policies, activities and performance in accordance with recognized sustainability reporting best practices.</p>	<p>1.6 TRANSPARENCY & DISCLOSURE: Operator provides stakeholders with free and reasonable access to information about the Operator's social and environmental policies, activities and performance.</p>	<p>Operator shall fully, accurately and freely disclose to public and employees all its social and environmental policies, activities and performance in accordance with recognized sustainability reporting best practices.</p> <p>Public disclosure to affected communities shall be done in their local language(s) and in a reasonably accessible format.</p>
<p><i>From Principle 2: Human Rights, Social Impacts & Community Development</i></p> <p>2.2 HUMAN RIGHTS PERFORMANCE DISCLOSURE: Operator shall publicly report incidents of human rights violations related to the project seeking certification and actions taken to address these violations.</p>	<p>Operator publicly reports total number of incidents of human rights violations related to the project seeking certification and actions taken to address these violations.</p> <p>If there are violation claims within the last five years, there is evidence that Operator has investigated those claims promptly, thoroughly and in good faith.</p>		<p><i>Consolidated above</i></p>
<p>2.16 REPORTING & DISCLOSURE: Operator shall identify and publicly report the environmental and social risks and impacts on communities within the project area of influence.</p>	<p>Operator publicly reports the environmental and social risks and impacts on communities within the project area of influence as well as the nature and degree of the expected direct and indirect economic, social, cultural and environmental impacts.</p> <p>Throughout the life of the project, Operator publicly reports its social, economic and environmental practices and performance.</p>		<p><i>Consolidated above</i></p>

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<p><i>From Principle 4: Indigenous Peoples' Rights</i></p> <p>4.7 TRANSPARENCY & DISCLOSURE: Operator shall publicly report information related to its activities concerning Indigenous Peoples.</p>	<p>Operator publicly reports information related to its activities concerning Indigenous Peoples, including all legally required information and additional information negotiated with Indigenous Peoples. However, in the event that Indigenous Peoples request that certain information be kept confidential, Operator withholds such information where it is lawful to do so and where it is not otherwise in contradiction with the requirements of the EO100™ Standard.</p>		<p><i>Consolidated above</i></p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
Principle 2: HUMAN RIGHTS, SOCIAL IMPACTS & COMMUNITY DEVELOPMENT		Principle 2: HUMAN RIGHTS, SOCIAL IMPACTS & COMMUNITY DEVELOPMENT	
<i>Operator must identify and prioritize project-affected stakeholders and act proactively to respect and promote their rights and to discover, understand and respond to their concerns. Operator shall be accountable for reporting and communicating with stakeholders on project-related decisions, practices and performance. (Additional specific Provisions regarding the rights of Indigenous Peoples are listed under Principle 4.)</i>		<i>Operator must identify and prioritize project-affected stakeholders and act proactively to respect and promote their rights and to discover, understand and respond to their concerns. Operator shall be accountable for reporting and communicating with stakeholders on project-related decisions, practices and performance. (Additional specific Provisions regarding the rights of Indigenous Peoples are listed under Principle 3.)</i>	
2.1 COMMITMENT TO Human Rights: Operator shall commit to respect the human rights set in the United Nations Universal Declaration of Human Rights within its sphere of influence and implement the United Nations Guiding Principles on Business and Human Rights.	Operator has developed and implemented a policy and has made a public and documented commitment to respect the human rights set out in the United Nations Universal Declaration of Human Rights within its sphere of influence, and to implement the United Nations Guiding Principles on Business and Human Rights.	2.1 HUMAN RIGHTS: Operator respects the human rights set out in the United Nations Universal Declaration of Human Rights within its sphere of influence, and implements the United Nations Guiding Principles on Business and Human Rights. Where regional, national, and local laws provide different standards of human rights protection than what is required under international law, the Operator respects the higher of the two standards.	Operator shall establish a mechanism to respect for human rights in line with the UN Guiding Principles on Business and Human Rights, including a policy commitment to respect human rights; a due-diligence process to identify, prevent, mitigate and account for how the Operator addresses human rights; and process to enable the remediation of any adverse human rights impacts the Operator causes or contributes to.
2.3 HUMAN RIGHTS VIOLATIONS: Operator shall not have been found guilty of human rights violations (i.e., a final verdict of guilty after exhausting all appeals) on any project within recent history.	Operator has not been found guilty (i.e., final verdict of guilty after exhausting all appeals) of a violation of human rights for any of its activities in the country of operation, within the previous three years.		Operator shall not have been found responsible for or complicit in any serious human rights infringements in a final and affirmative legal finding after exhausting all appeals made by a properly constituted legal body operating under recognized standards of the rule of law, in any of its operations within the previous five years.
2.2 HUMAN RIGHTS PERFORMANCE DISCLOSURE: Operator shall publicly report incidents of human rights violations related to the project seeking certification and actions taken to address these violations.	Operator publicly reports total number of incidents of human rights violations related to the project seeking certification and actions taken to address these violations. If there are violation claims within the last five years, there is evidence that Operator has investigated those claims promptly, thoroughly and in good faith.		If there are infringement claims within the last five years, there is evidence that Operator has investigated those claims promptly, thoroughly and in good faith.
			The appropriate form of monetary and non-monetary reparations shall be decided case by case through transparent, participatory processes and shall be in line with the UN Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law.
2.4 Engagement & Consultation Policy: Operator shall have a policy, strategy and management system that direct its approach to managing stakeholder engagement activities.	Operator has a policy, strategy and management system that direct its approach to managing stakeholder engagement activities developed in accordance with AA1000 Stakeholder Engagement Standard principles. Operator's policy includes mechanisms to identify and involve stakeholders in the planning and implementation of the socio-environmental components of the project.	2.2 FAIR, INCLUSIVE ENGAGEMENT & CONSULTATION: Operator undertakes a process of fair, representative and non-discriminatory consultation, and engages with and communicates honestly, frequently and collaboratively with project-affected stakeholders.	Operator shall establish a mechanism that directs its approach to identifying stakeholder needs and to managing stakeholder engagement activities developed in accordance with AA1000 Stakeholder Engagement Standard principles.
2.5 FAIR, INCLUSIVE ENGAGEMENT & CONSULTATION: Operator shall undertake a process of fair, representative and non-discriminatory consultation with stakeholders who are subject to identified risks and adverse impacts from the project.	Engagement Activities: Through a Stakeholder Needs Assessment, Operator successfully documents stakeholder needs, identified in accordance with mutually agreed-upon mechanisms and demonstrates development and implementation of a process to further consult with specific stakeholders subject to identified risks and adverse impacts from the project.		Operator's mechanism shall include public and participatory processes to identify and involve legitimate and representative stakeholders in the planning and implementation of the socio-environmental components of the project, including how the Operator identifies legitimate community representatives and how it provides for the participation of minorities and vulnerable groups.
2.8 FAIR PARTICIPATION & REPRESENTATION: Operator shall ensure that engagement activities involve bodies and organizations (e.g., councils of elders or village councils) and will not exclude participation based on gender, social status, religious affiliation or spiritual practice, language, literacy, formal education, age or other considerations.	Operator demonstrates it has taken steps to ensure that engagement activities do not exclude participation based on gender, social status, religious affiliation or spiritual practice, language, literacy, formal education, age or other considerations.		Operator shall take steps to ensure that engagement activities do not exclude participation based on gender, social status, religious affiliation or spiritual practice, language, literacy, formal education, age or other considerations.
			Operator shall not conduct engagement activities in a way that creates an economic barrier to participation of affected communities.
			Where stakeholder engagement is the responsibility of the host government, the Operator shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the objectives of the provisions of 2.2 FAIR, INCLUSIVE ENGAGEMENT & CONSULTATION. If the process conducted by the government does not meet the relevant requirements of these provisions, Operator shall conduct a complementary process and, where appropriate, identify and implement supplemental actions.

<p>2.7 HUMAN RIGHTS AND SECURITY PERSONNEL: Operator shall strive to ensure that security forces providing security in and around the project act in a manner consistent with respect for the human rights of workers, contractors, and communities in line with national laws and international human rights standards.</p> <p>At the outset of project activities, Operator shall assess the human rights-related security risks in its operating environment to determine the appropriate strength and type of security force. Before engaging security forces, Operator shall agree with the host government the need for and adequate strength and type of security.</p> <p>Operator shall require that all security personnel guarding its facilities are vetted for their human rights record. Operator shall require that private security personnel and shall make every reasonable effort to ensure that public security personnel are trained on human rights, including the rights of vulnerable populations, and the appropriate use of force as per international standards. Operator shall have procedures in place for investigating and remediating alleged abuses by security personnel or, where appropriate, for referring the matter to the relevant authorities.</p> <p>Operators shall actively avoid deploying their own security forces and discourage the host government from deploying armed security forces to respond to peaceful protests affecting the Operator's facilities or activities.</p> <p>Operator shall engage affected communities at all stages of risk assessment, security planning, and deployment and shall seek to disclose the nature of security arrangements.</p>	<p>Risk Assessment: Operator has performed a thorough and timely risk assessment in consultation with communities to assess human rights-related security risks in accordance with the Voluntary Principles on Security and Human Rights. Assessments have been carried out as early as possible and are updated regularly as needed.</p> <p>Where public security forces are used, the Operator has an agreement with the government with regards to the need, strength, and type of security to be provided.</p> <p>Operator has a policy and procedures in place that effectively avoid deploying their own security forces and discourages the government from deploying armed security forces to respond with force to peaceful protests.</p>	<p>2.3 HUMAN RIGHTS AND SECURITY PERSONNEL: Operator strives to ensure that security forces providing security in and around the project act in a manner consistent with respect for the human rights of workers, contractors, and communities in line with national laws and international human rights standards.</p> <p>Operator engages affected communities at all stages of risk assessment, security planning, and deployment.</p>	<p>Risk Assessment: Operator shall perform a thorough and timely risk assessment in consultation with communities to assess human rights-related security risks in accordance with the Voluntary Principles on Security and Human Rights. Assessments have been carried out as early as possible and are updated regularly as needed.</p> <p>Where public security forces are used, the Operator shall establish an agreement with the government with regards to the need, strength, and type of security to be provided.</p> <p>In particular, the Operator shall require that use of force is permitted only in direct proportion to the nature and extent of the threat under the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials for preventive and defensive purposes.</p>	
			<p>Operator shall actively avoid deploying their own security forces and discourages the government from deploying armed security forces to respond with force to civil demonstrations and protests affecting the Operator's facilities or activities.</p>	
		<p>Due Diligence: Operator, or its contractors, has conducted a review of the human rights records of individuals, firms, and government forces involved in its security arrangements. Where that review has identified that an individual, firm, or public agency has been involved in human rights abuses, the Operator has raised the matter with the security provider or with appropriate public authorities and required that the concerned individuals, firms, or agencies are replaced, or properly trained before they are deployed and closely monitored.</p> <p>Operator's contractual relationships with security providers ensure that the security personnel will adhere to international norms and standards for law enforcement with regard to human rights and include the right to terminate any contractual relationships for non-compliance.</p> <p>If the Operator is required to use public security forces, the Operator has taken all reasonable steps to remove individuals from units known for human rights abuses and monitors the performance of the public security forces protecting it on an ongoing basis.</p>	<p>Due Diligence: Operator, or its contractors, shall conduct a review of the human rights records of individuals, firms, and government forces involved in its security arrangements. Where that review identifies that an individual, firm, or public agency has been involved in human rights abuses, the Operator shall raise the matter with the security provider or with appropriate public authorities and shall require that the concerned individuals, firms, or agencies are replaced, or properly trained before they are deployed and closely monitored.</p> <p>Operator's contractual relationships with security providers shall ensure that the security personnel will adhere to international norms and standards for law enforcement with regard to human rights and include the right to terminate any contractual relationships for non-compliance.</p> <p>If the Operator is required to use public security forces, the Operator shall take all reasonable steps to remove individuals from units known for human rights abuses and monitors the performance of the public security forces protecting it on an ongoing basis.</p>	
		<p>Training: Operator ensures that private security personnel at both the management and the field levels receive training on security and human rights. Operator makes every reasonable effort to ensure that public security personnel receive training on security and human rights by communicating expectations around appropriate conduct of security personnel and supporting the availability of training resources for public security forces.</p> <p>Training should be conducted in accordance with the Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Providers. In particular, the Operator shall require that use of force is permitted only in direct proportion to the nature and extent of the threat under the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the Use of Force and Firearms by Law</p>		<p>Training: Operator shall ensure that private security personnel at both the management and the field levels receive training on security and human rights. Operator shall make every reasonable effort to ensure that public security personnel receive training on security and human rights by communicating expectations around appropriate conduct of security personnel and supporting the availability of training resources for public security forces.</p> <p>Training should be conducted in accordance with the Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Providers.</p>
		<p>Investigation and Remediation: Operator has developed a grievance mechanism, in conjunction with affected stakeholders and in line with Provision 2.11 Grievance Mechanism, which allows workers, contractors, and communities to raise concerns about the Operator's security arrangements. Operator has a process for documenting and investigating such concerns and remediating abuses where allegations are confirmed.</p> <p>Operator does not tolerate offenses by security forces that result in human rights violations and takes immediate and appropriate action to terminate relationships with culpable security providers and notify relevant authorities. Where concerns involve public security forces, the Operator undertakes to bring the concerns to the attention of the highest levels of government. Remedies are culturally appropriate and consistent with community expectations, host country domestic law, and international standards on remedies for human rights abuses.</p>		<p>Investigation and Remediation: Operator shall have procedures in place for investigating, documenting and remediating alleged abuses by security personnel or, where appropriate, for referring the matter to the relevant authorities.</p> <p>Operator shall not tolerate offenses by security forces that result in human rights violations and takes immediate and appropriate action to terminate relationships with culpable security providers and notify relevant authorities. Where concerns involve public security forces, the Operator shall undertake to bring the concerns to the attention of the highest levels of government.</p>
	<p>Transparency: Operator discloses or encourages the relevant public authorities to disclose to the public the security arrangements for the site, including any equipment transfers and financial support, where feasible and taking into account associated security concerns.</p>		<p>Transparency: Operator shall disclose or encourages the relevant public authorities to disclose to the public the security arrangements for the site, including any equipment transfers and financial support, where feasible and taking into account associated security concerns.</p>	

<p>2.9 RESETTLEMENT: Operator shall strive to avoid the resettlement (especially involuntary resettlement) of people from areas affected by the project, and shall consider feasible alternative project designs to do so.</p>	<p>Operator considers feasible alternative project designs to avoid the resettlement (especially involuntary resettlement) of people from areas affected by the project, including those from communally held lands and natural resources subject to traditional possession or under customary use. For Indigenous Peoples, if such resettlement is unavoidable, Operator obtains FPIC. Operator has assessed potential for resettlement and if necessary has developed and implemented a Resettlement Action Plan in accordance with international standards (IFC). This plan has been made public.</p>	<p>2.4 RESETTLEMENT: Operator actively takes steps to avoid the resettlement (especially involuntary resettlement) of people from areas affected by the project, and shall consider feasible alternative project designs to do so.</p> <p>Operator does not conduct activities in areas where Free, Prior and Informed Consent for resettlement of Indigenous Peoples has not been obtained.</p>	<p>Operator shall consider feasible alternative project designs to avoid the resettlement (especially involuntary resettlement) of people from areas affected by the project, including those from communally held lands and natural resources subject to traditional possession or under customary use.</p>
			<p>Operator shall assess potential for resettlement and if necessary shall develop and implement a Resettlement Action Plan in consultation with affected communities and in accordance with international standards (IFC). In the case of projects involving economic displacement only, Operator shall develop a Livelihood Restoration Plan to compensate affected persons and/or communities in accordance with IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement (2012).</p> <p>This plan shall be made public and be made available in a format and language accessible to affected communities.</p>
			<p>When displacement cannot be avoided, Operator shall obtain the FPIC of local communities and shall provide appropriate compensation to help improve or restore standards of living or livelihoods of affected communities in accordance with IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement (2012).</p> <p>Compensation standards shall be transparent and applied consistently to all communities and persons affected by the displacement.</p>
			<p>In cases of involuntary resettlement, Operator shall adhere to IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement (2012).</p> <p>Operator shall also consider community requests for resettlement due to human health, environmental or economic impacts of the operations.</p>
			<p>Where resettlement is the responsibility of the host government, Operator shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the objectives of the provisions of 2.4 RESETTLEMENT.</p> <p>If the process conducted by the government does not meet the relevant requirements of these provisions, Operator shall conduct a complementary process and, where appropriate, identify and implement supplemental actions.</p>
<p>2.10 UNCONTROLLED SETTLEMENTS: Operator shall strive to avoid conditions that could lead to the development of uncontrolled settlements in the vicinity of the project.</p>	<p>Operator avoids activities that promote uncontrolled settlements in areas under its responsibility. Operator effectively implements design and management strategies to control settlements, and minimizes the construction and/or opening of new access routes that facilitate settlement.</p>	<p>2.5 UNCONTROLLED SETTLEMENTS: Operator strives to avoid conditions that could lead to the development of uncontrolled settlements in the vicinity of the project, in accordance with local laws.</p>	<p>Operator shall avoid activities that promote uncontrolled settlements in areas under its responsibility. Operator effectively implements design and management strategies to control settlements, and minimizes the construction and/or opening of new access routes that facilitate settlement.</p>
<p>2.6 RISK MITIGATION, MANAGEMENT: Operator shall manage and/or minimize, restore, and/or compensate for adverse impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts and the vulnerability of affected communities.</p>	<p>Via impact assessment studies, Operator has developed and implemented a plan to manage and/or minimize, restore, and/or compensate for adverse impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts and the vulnerability of affected communities.</p>	<p><i>Consolidated under Principle 1</i></p>	
		<p>2.6 LAND RIGHTS: Operator respects affected communities' socially or legally (including customary laws) recognized entitlements to access, use and control of areas of land and related natural resources.</p>	<p>Before purchasing or leasing land, Operator shall consult with all affected communities, including vulnerable persons or groups such as women, landless, and the rural poor.</p> <p>Where affected communities include Indigenous Peoples, Operator shall apply the Objectives of EO100 Principle 3: Indigenous Peoples' Rights.</p>
			<p>Operator shall not engage in or support forced evictions and shall strive to ensure that no coercive measures are taken to affect land use or occupancy by local people in order to obtain transfer of their property interests.</p>
			<p>Operator shall compensate for land use and acquisition or leasing in accordance with fair market values and equitable restitution that results in the same or better livelihood levels.</p>
			<p>Operator's activities shall not prevent access to arable land and natural resources.</p>
<p>2.12 COMMUNITY Health & Safety: Operator shall promote community health, including by monitoring indicators of community health, such as early indicators of potentially negative impacts for which Operator may have some responsibility, and indicators of the overall health conditions of the community.</p>	<p>Operator has established, implemented, and maintains procedures to monitor the health of the local community, with stakeholder involvement. Operator contributes to the provision of medical services to the local community, coordinating with stakeholders as necessary.</p>	<p>2.7 COMMUNITY HEALTH & SAFETY: Operator promotes community health, including by monitoring indicators of community health and by avoiding the risk of community exposure to health and safety hazards.</p>	<p>Operator shall establish a mechanism to identify risks to and monitor the health of the local community, with stakeholder involvement.</p> <p>The mechanism shall include the participatory identification of key health indicators, including early indicators of potentially negative impacts, and the measurement of baseline data against those indicators.</p>
			<p>Operator shall contribute to the provision of medical services to the local community, coordinating with stakeholders as necessary.</p>

			Operator shall avoid or minimize the potential for community exposure to risks associated with operational accidents, construction hazards, environmental health impacts, hazardous materials and substances, and diseases that could result from project activities.
			Operator shall engage with affected communities, local government agencies, and other relevant parties, in preparations to respond effectively to emergency situations that pose risks to the local population.
2.13 SUSTAINABLE COMMUNITY INVESTMENT: Operator shall identify and pursue opportunities to support long-term and/or sustainable improvements to affected communities and residents' quality of life.	Operator has engaged with local communities to identify and prioritize any long-term and/or sustainable improvements to their quality of life. Operator has identified programs to support and has developed and implemented a plan to address these opportunities over the duration of the project.	2.8 SUSTAINABLE COMMUNITY INVESTMENT: Operator supports the development of communities where operations take place through initiatives that promote sustainable improvements in affected communities and residents' quality of life.	Operator shall identify and prioritize sustainable community investment programs and shall develop and implement a plan to address these opportunities over the duration of the project. The programs shall be developed with the participation of local communities and shall be in line with culturally appropriate models of sustainable development.
2.14 ECONOMIC & SOCIAL OPPORTUNITIES: Operator shall identify and provide appropriate opportunities for employment, training and other services to communities within or adjacent to the project area.	Local Content: Operator has established, implemented and maintains a procedure to determine the proportion of employment opportunities available to community members, both with Operator and its contractors. This procedure includes an identification of Operator's demand for labor and the community's real and potential labor supply capacity.		Local Content: Operator shall engage with local communities to identify and provide appropriate opportunities for employment, training and other services to communities within or adjacent to the project area. Operator shall establish a mechanism to determine the proportion of employment opportunities available to community members, both with Operator and its contractors. This mechanism includes an identification of Operator's demand for labor, goods and services and the community's real and potential capacity to meet that demand.
2.15 COMMUNITY DEVELOPMENT AGREEMENTS (CDAs): Operator shall determine opportunities for community development agreements and shall collaborate with community stakeholders to establish such agreements. Operator shall carry out terms of this Agreement in a timely, equitable and culturally appropriate manner as agreed to with affected communities.	Operator has identified opportunities for CDAs and has collaborated with community stakeholders to establish such agreements. Operator demonstrates steps taken for determination, delivery, and distribution of compensation and other benefit sharing measures to affected communities in a manner which takes into account community laws, institutions, and customs as well as their level of interaction with mainstream society.		Community Development Agreements (CDAs): Operator shall identify opportunities and create mechanisms to collaboratively develop CDAs and shall engage with community stakeholders to establish such agreements. Where such agreements are in place , Operator shall carry out the terms of the agreement in a timely, equitable and culturally appropriate manner as agreed to with affected communities. CDAs shall complement and align with local government community development plans, where they exist.
2.16 REPORTING & DISCLOSURE: Operator shall identify and publicly report the environmental and social risks and impacts on communities within the project area of influence.	Operator publicly reports the environmental and social risks and impacts on communities within the project area of influence as well as the nature and degree of the expected direct and indirect economic, social, cultural and environmental impacts. Throughout the life of the project, Operator publicly reports its social, economic and environmental practices and performance.	<i>Consolidated under Principle 1</i>	
2.11 GRIEVANCE MECHANISM: Operator shall develop, implement and maintain a grievance mechanism to accommodate, understand, document, and address complaints, comments, and expectations of stakeholders.	Operator has developed, implemented and maintains a grievance mechanism to accommodate, understand, document, and address complaints, comments, and expectations of stakeholders.	2.9 GRIEVANCE MECHANISM: Operator establishes a project-level grievance mechanism for individuals and communities who may be adversely impacted in order to address grievances early and remediate them directly.	Operator shall develop, implement, communicate and maintain a grievance mechanism to accommodate, understand, document, and address complaints, comments, and expectations of stakeholders. The grievance mechanism shall allow for grievances related to any area of the EO100 Standard Principles and Objectives. The grievance mechanism shall not restrict communities' access to judicial remedies
			The grievance mechanism shall meet the effectiveness criteria for non-judicial grievance mechanisms established by the UN Guiding Principles on Business and Human Rights.
			Affected communities bringing grievances shall be entitled to choose their own advocate (lawyer or advisor) to accompany and/or represent them.
			Proceedings of grievances shall be made available in a format and language accessible to the party or parties involved.
			The grievance mechanism shall be freely and economically available to all interested parties.

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
Principle 3: INDIGENOUS PEOPLE'S RIGHTS		Principle 3: INDIGENOUS PEOPLE'S RIGHTS	
<i>Oil and gas exploration and production activities must be carried out in ways that recognize, respect and address the specific rights, traditions and cultural implications for Indigenous Peoples whose territory or livelihoods may be affected by the project.</i>		<i>Oil and gas exploration and production activities must be carried out in ways that recognize, respect and address the specific rights, traditions and cultural implications for Indigenous Peoples whose territory or livelihoods may be affected by the project.</i>	
4.1 FREE, PRIOR & INFORMED CONSENT (FPIC): Operator shall obtain the FPIC of the affected communities of Indigenous Peoples when the proposed project is on or may affect lands traditionally owned by or under the customary use of Indigenous Peoples.	Operator has developed a policy specifically for engaging with Indigenous Peoples which includes procedures to implement the principle of free, prior and informed consent both before and during activities that are conducted on or affect land, territory, or resources to which Indigenous Peoples are entitled through traditional ownership or any other traditional use or occupation, as well as those that have been acquired by other means, such as migration, displacement or relocation. The policy and procedure are consistent with Indigenous Peoples' internal organizational structures. This policy is available to all interested stakeholders.	3.1 FREE, PRIOR & INFORMED CONSENT (FPIC): Operator shall obtain the FPIC of the affected communities of Indigenous Peoples when the proposed project may affect the rights of Indigenous Peoples as established in the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous and Tribal Peoples, and in the Constitution of the country of operation.	Operator shall develop a mechanism specifically for engagement with Indigenous Peoples consistent with their internal organizational and decision-making structures which includes a mechanism to implement the principle of free, prior and informed consent in accordance with best practices in emerging standards and norms. Operator shall apply FPIC in the following situations or any other that are required by local laws: <ul style="list-style-type: none"> • When a project affects Indigenous Peoples' lands and natural resources subject to traditional ownership or under customary use; • When the Operator proposes to store or dispose of hazardous materials on Indigenous Peoples' land or territories; • When a project occasions the relocation of Indigenous Peoples from lands and natural resources subject to traditional ownership or under customary use; • When a project may significantly impact critical cultural heritage that is essential to the identity and or cultural, ceremonial or spiritual aspects of indigenous peoples lives; or • When the Operator proposes to use the cultural heritage including traditional knowledge, innovations and or practices of Indigenous Peoples for commercial purposes.
			Where FPIC was not obtained by the host government, prior concession holder, or by the company, Operator shall conduct a complementary consultation process and, where appropriate, identify supplemental actions.
4.2 ENGAGEMENT & PARTICIPATION: Operator shall undertake a process of fair, representative and non-discriminatory engagement and consultation with potentially affected communities of Indigenous Peoples.	Policy: Operator has a policy, strategy and management system that direct its approach to managing engagement activities with potentially affected communities of Indigenous Peoples.	3.2 ENGAGEMENT & PARTICIPATION: Operator shall undertake an inclusive process of fair, representative and non-discriminatory engagement and consultation with potentially affected communities of Indigenous Peoples.	In all cases where stakeholder consultation took place, the operator shall demonstrate the participation of the legitimate, traditional and/or legal representatives of potentially affected communities of Indigenous Peoples in all project phases. Operator shall also demonstrate participation from diverse members of community (including women and discriminated groups) when traditional structures allow it.
	Engagement: Operator has conducted a stakeholder mapping exercise and identified the legitimate and/or legal representatives. Operator has developed mechanisms to ensure the effective engagement of the legitimate and/or legal representatives of Indigenous Peoples' organizational structures.		Operator shall demonstrate that a clear majority of traditional and/or legal representatives of affected communities of Indigenous Peoples are satisfied with the results of engagement activities.
	Participation: Operator has developed and implemented procedures, manuals, methodologies, and/or guidelines to ensure that the criteria and expectations of affected communities of Indigenous Peoples be considered in decision-making processes.		Operator shall not conduct engagement activities in a way that creates an economic or cultural barrier to participation of Indigenous Peoples.
	Government Agents: Where a government agency has oversight for managing Indigenous Peoples' issues, Operator collaborates with the agency, to the extent feasible and permitted by it, to achieve outcomes that are consistent with the Provisions of Principle 4 of the EO100™ Standard and compliant with government requirements.		Government Agents: Where a government agency has oversight for managing Indigenous Peoples' issues, Operator collaborates with the agency, to the extent feasible and permitted by it, to achieve outcomes that are consistent with the objectives of this Principle and are compliant with government requirements.

<p>4.3 CULTURAL IMPACTS: Operator shall strive to avoid adverse impacts on critical cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples' lives.</p>	<p>Exploration and production contract(s) clearly include Operator's commitment to recognize, respect and comply with Indigenous Peoples' rights to use, develop and control the lands, territories and resources under their possession, in accordance with the national laws of the host country and international treaties. This commitment is made public and duly communicated to stakeholders, including Indigenous Peoples.</p> <p>If a project may significantly impact critical cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples' lives, Operator takes steps to avoid such impacts. Where projects impact cultural heritage—especially given the profound relationship between Indigenous Peoples and their lands—Operator obtains FPIC of the affected Indigenous Peoples.</p> <p>If construction or operation of the project site prevents access to previously accessible cultural heritage sites being used by, or that have been used by, affected communities within living memory for long-standing cultural purposes, Operator allows continued access to the cultural site or provides an alternative access route, subject to health, safety, and security considerations.</p>	<p>3.3 CULTURAL IMPACTS: Operator shall strive to avoid adverse impacts on cultural heritage that is essential to the identity and cultural, ceremonial, or spiritual aspects of Indigenous Peoples' lives.</p>	<p>Where a project directly or indirectly impacts cultural heritage. Operator obtains FPIC of the affected Indigenous Peoples in accordance with best practices in emerging standards and norms.</p> <p>If a project may significantly impact cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples' lives, Operator shall take steps to avoid or minimize such direct or indirect impacts.</p> <p>If construction or operation of the project site prevents access to previously accessible cultural heritage sites being used by, or that have been used by, affected communities within living memory for long-standing cultural purposes, Operator shall allow continued access to the cultural site or provides an alternative access route, subject to health, safety, and security considerations.</p>
<p>4.5 USE OF TRADITIONAL NATURAL RESOURCES: Operator shall protect the traditional natural resource use by Indigenous Peoples (land, water, landscape, flora and fauna) during all project phases.</p>	<p>Operator's development plans, as well as the environmental and social impact assessments, considers the participatory identification and assessment of traditional natural resource use by Indigenous Peoples (land, water, landscape, flora and fauna) during all project phases.</p>	<p>3.4 USE OF TRADITIONAL NATURAL RESOURCES: Operator protects the traditional natural resource use by Indigenous Peoples (land, water, landscape, flora and fauna) during all project phases.</p>	<p>Operator's development plans, as well as the environmental and social impact assessments, shall include the participatory identification and assessment of traditional natural resource use by Indigenous Peoples (land, water, landscape, flora and fauna) during all project phases.</p>
<p>4.6 CULTURE-BASED INTELLIGENCE: Where a project proposes to use the cultural heritage including knowledge, innovations, or practices of Indigenous Peoples for commercial purposes (including project-related activities), Operator shall inform the affected communities of Indigenous Peoples of their rights under national law, the scope and nature of the proposed project, and the potential consequences of such development.</p>	<p>Where a project proposes to use the cultural heritage including knowledge, innovations, or practices of Indigenous Peoples for commercial purposes (including project-related activities), Operator informs the affected communities of:</p> <ul style="list-style-type: none"> a) Their rights under national law; b) The scope and nature of the proposed project; c) Potential consequences of such development; <p>And Operator shall:</p> <ul style="list-style-type: none"> d) Obtain FPIC of the affected communities of Indigenous Peoples; and e) Ensure fair and equitable benefits from operationally applied knowledge, innovation, or practice. 	<p>3.5 CULTURE-BASED INTELLIGENCE & TRADITIONAL KNOWLEDGE: Operator respects Indigenous Peoples' right to maintain, control, protect and develop their intellectual property over their cultural heritage, traditional knowledge, and traditional cultural expressions.</p>	<p>Where a project proposes to use the cultural heritage including knowledge, innovations, or practices of Indigenous Peoples for commercial purposes (including project-related activities), Operator shall inform the affected communities of:</p> <ul style="list-style-type: none"> a) Their rights under national and international law; b) The scope and nature of the proposed commercial development and use; c) Potential consequences of such development and use; <p>And Operator shall:</p> <ul style="list-style-type: none"> d) Obtain FPIC from the affected communities of Indigenous Peoples in accordance with best practices in emerging standards and norms; and e) Ensure fair and equitable benefits and compensation from operationally applied knowledge, innovation, or practice.
<p>4.4 VOLUNTARY ISOLATION: Operator shall develop and implement procedures to respect the rights of Indigenous Peoples in isolation, including response mechanisms in case of incidental contact.</p>	<p>Operator has developed and implemented procedures to respect the rights of Indigenous Peoples in isolation, including response mechanisms in case of incidental contact. Operator does not conduct activities in locations where there is evidence of Indigenous Peoples in isolation. The precautionary principle is applied: If there is evidence of Indigenous Peoples in isolation, Operator immediately informs the relevant government authorities and self-imposes strict measures to respect their rights. Free, prior and informed consent does not apply to this indicator.</p>	<p>3.6 VOLUNTARY ISOLATION: Operator shall respect the rights of Indigenous Peoples in isolation and initial contact in accordance with the UN Guidelines on the Protection of Indigenous Peoples in Voluntary Isolation and in Initial Contact in the Amazon Basin, El Chaco, and Eastern Paraguay.</p>	<p>Operator shall establish a mechanism to respect the rights of Indigenous Peoples in isolation and initial contact, in accordance with the principles of respect for their rights to self-determination, to their lands territories and resources; to health; and to participation, consultation and free, prior and informed consent of the peoples affected.</p> <p>The mechanism shall include an environmental and social risk analysis and response mechanisms in case of incidental contact.</p> <p>Operator does not conduct activities in locations where there is evidence of Indigenous Peoples in isolation.</p> <p>The precautionary principle is applied: If there is evidence of Indigenous Peoples in isolation, Operator immediately informs the relevant government authorities and self-imposes strict measures to respect their rights.</p>

<p>4.7 TRANSPARENCY & DISCLOSURE: Operator shall publicly report information related to its activities concerning Indigenous Peoples.</p>	<p>Operator publicly reports information related to its activities concerning Indigenous Peoples, including all legally required information and additional information negotiated with Indigenous Peoples. However, in the event that Indigenous Peoples request that certain information be kept confidential, Operator withholds such information where it is lawful to do so and where it is not otherwise in contradiction with the requirements of the EO100™ Standard.</p>	<p><i>Consolidated into general disclosure requirement under Principle 1</i></p>
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2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
Principle 4: FAIR LABOR & WORKING CONDITIONS		Principle 4: FAIR LABOR & WORKING CONDITIONS	
<p><i>The rights of workers are recognized and respected in accordance with ILO Core Standards* as well as Part IV of the ILO Convention 155, The Occupational Safety and Health Convention (1981). The term 'workers' includes direct employees whether full or part time, as well as workers provided by, or working for, contractors and subcontractors.</i></p> <p><i>* ILO Conventions numbers 29, 87, 98, 100, 105, 111, 138 and 182 are "Core Standards" covered by the 1998 ILO Declaration on Fundamental Principles and Rights at Work and its follow up.</i></p>		<p><i>The rights of workers are recognized and respected in accordance with ILO Core Standards* as well as ILO Convention 155, The Occupational Safety and Health Convention (1981). The term 'workers' includes direct employees whether full or part time, as well as workers provided by, or working for, contractors and subcontractors.</i></p> <p><i>* ILO Conventions numbers 29, 87, 98, 100, 105, 111, 138 and 182 are "Core Standards" covered by the 1998 ILO Declaration on Fundamental Principles and Rights at Work and its follow up.</i></p>	
<p>3.1 LABOR AND WORKING CONDITIONS POLICY: Operator shall define and make publicly available its employment policy.</p>	<p>Operator demonstrates and has made publicly available its employment policy, which addresses all issues raised in the Provisions noted under Principle 3 of the EO100™ Standard.</p>	<p>4.1 LABOR AND WORKING CONDITIONS: Operator respects the rights of workers, in accordance with the International Labor Organisation's (ILO) Core Conventions.</p>	<p>Operator shall define and make publicly available in relevant local languages its employment policy. The Employment Policy addresses all issues raised in Principle 4 of the EO100™ Standard.</p> <p>Operator shall provide workers with documented information that is clear and understandable, regarding their rights under national labor and employment law.</p>
			<p>Operator shall have a mechanism for ensuring that contractors respect workers' rights and meet performance requirements equivalent to or compatible with Principle 4 of the EO100™ Standard.</p>
<p>3.2 CHILD LABOR: Operator shall not engage in or support the employment of children, in accordance with ILO Convention 138 and Recommendation 146, unless sanctioned by national and/or local government.</p>	<p>Operator has developed and implemented an employment policy it has made available to the public which contains a clause prohibiting child labor. Operator applies the same standard to its contractors.</p>	<p>4.2 CHILD LABOR: Operator does not engage in or support the employment of children, in accordance with ILO Convention 138, ILO Recommendations 146 and 190.</p>	<p>Operator's employment policy shall include a clause prohibiting child labor.</p> <p>The policy shall include protections for young workers, where young workers are or may be engaged in employment.</p> <p>Operator applies the policy to its contractors.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
3.3 FORCED LABOR: Operator shall not use forced labor (including bonded, indentured or prison labor), nor restrict the freedom of movement of employees.	Operator's policy prohibits forced labor in any form, and applies this policy to its contractors.	4.3 FORCED LABOR: Operator does not use forced or compulsory labor (including bonded, indentured or prison labor), nor restricts the freedom of movement of employees in accordance with ILO Convention 105. Operator does not engage or support human trafficking.	Operator employment policy includes a clause prohibiting forced labor in any form. Operator applies the policy to its contractors.
			Operator shall not retain original copies of employees' personal documentation, nor require any form of deposit, fee, or equipment advance from employees either directly or through recruitment agencies.
3.4 FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING: Operator shall not prevent direct and indirect employees from associating freely; shall not prevent collective bargaining; and shall adhere to collective bargaining agreements, where such agreements exist. Or, where laws prohibit these freedoms, Operator shall not restrict parallel means for independent and free association and bargaining.	Operator's policy explicitly states it does not prevent employees from associating freely; it does not prevent collective bargaining and it adheres to collective bargaining agreements where they exist. Where laws prohibit these freedoms, Operator does not restrict parallel means for independent and free association and bargaining.	4.4 FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING: Operator does not prevent workers from associating freely; engages in good faith in free collective bargaining; and adheres to collective bargaining agreements, where such agreements exist, in accordance with ILO Conventions 87, 98 and 135.	Operator's employment policy explicitly states it respects workers' rights to freedom of association and collective bargaining. Operator shall adhere to collective bargaining agreements where they exist.

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
<p>3.5 DISCRIMINATION: Operator shall not practice or condone any form of discrimination in the workplace.</p>	<p>Operator’s policy states it does not practice or condone any form of discrimination in the workplace in terms of hiring, remuneration, overtime, access to training, promotion, termination or retirement based on race, ethnicity, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, pregnancy status, physical appearance, HIV status, age, or any other applicable prohibited basis. All individuals who are “Fit for Work” are accorded equal opportunities and are not discriminated against on the basis of factors unrelated to their ability to perform their job as outlined in ILO Convention 111 and UN Global Compact Principle 6. In addition, Operator provides guest or migrant workers with the same benefits and protections as nationals or non-migrants.</p>	<p>4.5 EQUAL OPPORTUNITIES AND TREATMENT: Operator provides equal opportunities and fair treatment of workers and does not practice or condone any form of discrimination in the workplace in accordance with ILO Conventions 100 and 111.</p>	<p>Operator’s employment policy states it does not practice or condone any form of discrimination in the workplace in terms of hiring, remuneration, overtime, access to training, promotion, termination or retirement based on race, ethnicity, caste, national or social origin, religion, disability, gender, sexual orientation, union membership, political affiliation, marital status, pregnancy status, physical appearance, HIV status, age, or any other applicable prohibited basis.</p> <p>All individuals who are “Fit for Work” are accorded equal opportunities and are not discriminated against on the basis of factors unrelated to their ability to perform their job.</p> <p>Operator provides guest or migrant workers with the same benefits and protections as nationals or non-migrants.</p>
			<p>Operator shall prohibit sexual harassment and other forms of mentally or physically abusive behavior in the workplace and in employer-provided accommodations.</p>
<p>3.8 DISCIPLINE & GRIEVANCES: Operator shall establish and communicate to all direct and indirect employees its disciplinary processes and related standards and mechanisms for employee grievance registration and investigation.</p>	<p>Employee Grievances: Operator has developed and implemented an effective and transparent grievance mechanism and investigation process and has clearly explained these to all employees. Records of employee grievances raised are treated confidentially. Investigation is completed in a timely fashion.</p>		<p>Operator shall establish fair disciplinary practices and communicate its disciplinary process to all workers.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
			Operator shall not make deductions for disciplinary purposes except where permitted by national law and permitted by a freely negotiated collective bargaining agreement.
	Corporal Punishment: Operator's employment policy explicitly prohibits corporal punishment under any circumstances, as well as harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation in any circumstances.		Operator's employment policy explicitly prohibits corporal punishment under any circumstances, as well as harsh or degrading treatment, coercion or intimidation in any circumstances.
3.9 WORKING HOURS & LEAVE: Operator shall apply normal working hours, rest days, and legally mandated leave in accordance with applicable law and ILO Conventions 1, 14 and 132.	Working Hours: Operator applies normal working hours that comply with applicable law. Where no specific laws and regulations exist, working hours do not exceed, on a regular basis, a maximum of 48 hours per working week in accordance with ILO Convention 1. If overtime is required for business needs, Operator pays overtime to its employees according to applicable law. Where no specific laws and regulations exist, overtime is voluntary and except in special circumstances (for example on fly-in, fly-out sites) is limited to a maximum of 12 hours in a week.	4.6 WORKING HOURS & LEAVE: Operator applies normal working hours, rest days, and legally mandated leave in accordance with applicable law and ILO Conventions 1, 14, 132 and 183 .	Working Hours: Operator shall apply normal working hours that comply with applicable law. Working hours do not exceed, on a regular basis, a maximum of 48 hours per working week. If overtime is required for business needs, Operator pays overtime to its workers according to applicable law. Overtime is voluntary and except in special circumstances (for example on fly-in, fly-out sites) is limited to a maximum of 12 hours in a week.
	Operator provides employees with all legally mandated leave, including maternity and paternity, compassionate and paid annual leave. Where no applicable law exists, paid annual leave is provided in accordance with ILO Convention 132. Operator provides all employees with at least one rest day in seven consecutive working days in accordance with ILO Convention 14.		Leave: Operator shall provide workers with all legally mandated leave, including maternity and paternity, compassionate and paid annual leave. Operator provides all employees with at least one rest day in seven consecutive working days.

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
<p>3.10 PAYMENT, WAGES, DOCUMENTATION & FEES: Operator shall pay employees a wage based on the higher of either the applicable legal minimum wage plus associated statutory benefits, or the prevailing industry standards. Operator shall retain appropriate employee records and shall not require the payment of fees from employees as a condition of hiring or employment.</p>	<p>Wages: Operator demonstrates that it pays employees a wage based on the higher of either the applicable legal minimum wage plus associated statutory benefits, or the prevailing industry standards. It has taken steps to ensure:</p> <ul style="list-style-type: none"> a) It makes payment to the employee on a regular and pre-determined basis. b) Payment is made by bank transfer or in cash or check form, in a manner and location convenient to the employees. c) All payments by a wage slip which clearly details wage rates, benefits and deductions where applicable. d) No deductions from wages are made without following due process. e) Employees are not forced to buy provisions from Operator-owned businesses or facilities. f) Obligations to employees under applicable law relating to labor or social security arising from the regular employment relationship are not avoided through the use of labor-only contracting, subcontracting, or home-working arrangements; or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment; or through the excessive use of fixed-term contracts of employment. 	<p>4.7 REMUNERATION: Operator pays workers a living wage plus associated statutory benefits.</p>	<p>Wages: Operator shall pay workers a wage based on the higher of either the applicable legal minimum wage or the prevailing industry standards, plus associated statutory benefits.</p> <p>Operator shall take steps to ensure:</p> <ul style="list-style-type: none"> a) Wages are sufficient to meet the basic needs of workers and provide some discretionary income. b) It makes payment to its workers on a regular and pre-determined basis. c) Payment is made by bank transfer or in cash or check form, in a manner and location convenient to the workers. d) All payments include a wage slip which clearly details wage rates, benefits and deductions where applicable. e) No deductions from wages are made without following due process. f) Workers are not forced to buy provisions from Operator-owned businesses or facilities. g) Labor-only contracting arrangements or consecutive short term contracts are not used to avoid obligations under applicable law relating to labor or social security.

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
	<p>Documentation & Fees: Operator demonstrates that it does not retain original copies of employees' personal documentation, nor require any form of deposit, fee, or equipment advance from employees either directly or through recruitment agencies. Operator demonstrates that it retains appropriate employee records, including records of piece rate and wage payments as well as working hours, for all staff employed, whether on a full time, part time or seasonal basis.</p>		<p>Operator shall retain appropriate worker documentation, including records of wage payments as well as working hours, for all workers employed, whether on a full time, part time or temporary basis.</p>
<p>3.8 DISCIPLINE & GRIEVANCES: Operator shall establish and communicate to all direct and indirect employees its disciplinary processes and related standards and mechanisms for employee grievance registration and investigation.</p>	<p>Employee Grievances: Operator has developed and implemented an effective and transparent grievance mechanism and investigation process and has clearly explained these to all employees. Records of employee grievances raised are treated confidentially. Investigation is completed in a timely fashion.</p>	<p>4.8 WORKPLACE GRIEVANCES: Operator establishes and communicates to all direct and indirect workers its mechanisms for workplace grievance registration and investigation.</p>	<p>Operator has developed and implemented an effective and transparent grievance mechanism and investigation process and has clearly explained these to all workers.</p> <p>Records of workplace grievances raised are treated confidentially. Operator has formally documented and investigated workplace grievances as well as Operator's response and any outcome. Investigation is completed in a timely fashion.</p> <p>Results of grievances are included in Operator's management reviews and improvement plans.</p>
			<p>Operator shall ensure contractors have access to workplace grievance mechanisms or shall require contractors to provide grievance mechanisms for workers.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
3.6 OCCUPATIONAL HEALTH & SAFETY: Operator shall provide safe and healthy working conditions, training and other arrangements for employees.	Management System: Operator has developed/adopted and implemented an occupational health, safety, and environmental management system recognized by EO. The system is audited internally and by external accredited auditors within 12 months after initial implementation, and at least every 36 months thereafter.	4.9 OCCUPATIONAL HEALTH & SAFETY: Operator provides safe and healthy working conditions for direct and indirect workers, in accordance with ILO Conventions 155, 174, 148 and 161.	Management System: Operator has developed and implemented an occupational health, safety, and environmental management system. The system is regularly audited internally and by external accredited auditors.
	Working Conditions: Operator provides safe and healthy working conditions for direct and indirect employees, in accordance with ILO's Core Conventions.		<i>Consolidated into Objective</i>
	Risk Assessments: Operator has developed/adopted and implemented a risk management system for the analysis, identification, documentation and communication of all identified hazards and risks to workers, and has planned measures to eliminate or reduce these hazards and risks. There is active worker participation in all of these phases.		Risk Assessments: Operator shall conduct risk analysis, identification, documentation and shall communicate all identified hazards and risks to workers. Operator shall develop and implement measures to eliminate or reduce identified hazards and risks. Operator takes immediate actions to protect the safety of workers where conditions are immediately dangerous to life or health. Workers participate actively in all of these phases.
	Procedures: Operator ensures that appropriate procedures are in place to prevent accidents and injury to health arising from, or linked to, the course of work-related activities and operations at a facility.		Procedures: Operator shall implement appropriate procedures to prevent accidents and injury to health arising from, or linked to, the course of work-related activities and operations at a facility.

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
	<p>Worker Safety Equipment: Operator and its contractors have implemented a program for the administration of Personal Protective Equipment (PPE), which includes criteria for its selection and acquisition, and training in its use, maintenance and storage. The PPE program complies with applicable norms including OSHA, ANSI, NIOSH, UL and/or the corresponding EU directives.</p>		<p>Worker Safety Equipment: Operator and its contractors have implemented a program for the administration of Personal Protective Equipment (PPE), which includes criteria for its selection and acquisition, and training in its use, maintenance, storage and support for PPE procurement as needed. The PPE program complies with applicable norms including OSHA, ANSI, NIOSH, UL and/or the corresponding EU directives.</p>
	<p>Training: Operator has implemented a training program to ensure worker compliance with the practices and procedures established by the occupational health, safety and environmental management system as part of performance evaluations at least once per year.</p>		<p>Training: Operator shall provide regular training to workers on the occupational health, safety and environmental management system.</p>
	<p>Health & Safety Information: Operator makes information about health and safety available to employees and contractors in an understandable form and in appropriate languages. Material Safety Data Sheets (or equivalent necessary information) are accessible where all hazardous substances are in use, and the risks associated with use of hazardous substances are clearly communicated to all employees who work with them.</p>		<p>Health & Safety Information: Operator shall make information about health and safety available to workers in an understandable form and in appropriate languages. Material Safety Data Sheets (or equivalent necessary information) are accessible where any hazardous substances are in use, and the risks associated with use of hazardous substances are clearly communicated to all workers who use or work near them.</p>
	<p>Health & Safety Committee or Equivalent: Operator provides employees and contractors with a mechanism, such as a joint health and safety committee, by which they can raise and discuss health and safety issues with management.</p>		<p>Health & Safety Committee or Equivalent: Operator shall provide workers with a mechanism, such as a joint health and safety committee, by which they can raise and discuss health and safety issues with management.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
	<p>Refusal to Work: Operator's policy includes the workers' right to refuse to work in conditions that are unsafe, threaten their person or work group in any way, or go against Operator's policies or code of conduct. Operator trains workers in these rights.</p>		<p>Refusal to Work in Conditions Immediately Dangerous to Life or Health: Operator's health & safety policy and training shall include workers' right to refuse to work in conditions that are unsafe, hazardous or life threatening or go against Operator's health & safety policies or code of conduct.</p>
	<p>Incident Reporting: Occupational accident and illness/disease recording and notification practices comply with the ILO Code for Recording and Notification of Occupational Accidents and Diseases.</p>		<p>Incident Reporting: Operator shall maintain documentation of all health and safety incidents. Occupational accident and illness/disease recording and notification practices comply with the ILO Code for Recording and Notification of Occupational Accidents and Diseases.</p>
	<p>Worker & Family Wellness: Operator's management systems for occupational health and safety promote access to complete physical, mental and social well-being for employees.</p>		<p>Worker & Family Wellness: Operator shall promote complete physical, mental and social well-being for workers and their families.</p>
	<p>Facilities: Operator provides access to adequate on-site health and medical facilities, including clearly marked first aid provisions, and develops procedures for transportation of workers with more serious health concerns to adequate local hospitals or medical facilities.</p>		<p>Facilities: Operator provides access to adequate on-site health and medical facilities, including clearly marked first aid provisions, and develops procedures for transportation of workers with more serious health concerns to adequate local hospitals or medical facilities.</p>
			<p>Worker Accommodation: Where accommodation is provided by the Operator or its contractors, Operator shall ensure safe and healthy living conditions for workers.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
<p>3.7 EMERGENCY PREPAREDNESS & RESPONSE PLANNING: Operator shall prepare for, and demonstrate its capacity to respond to, operational emergencies and incidents.</p>	<p>Planning & Response Training: Operator demonstrates it has implemented its plan, that it has appropriate equipment, and permanent control points to respond to emergencies in a manner which prioritizes worker health and safety; and in a manner which complies with national laws and international standards. Operator holds training and drills regularly. Operator documents the training, drills and performance after emergency events. Continual improvements are sought, based on disclosure to and feedback from responsible government agencies.</p>	<p>4.10 EMERGENCY PREPAREDNESS & RESPONSE PLANNING: Operator has the capacity to respond to operational emergencies and incidents in a manner which prioritizes worker health and safety.</p>	<p>Planning & Response Training: Operator has implemented a plan, has appropriate equipment, and permanent control points to respond to emergencies in compliance with national laws and international standards. Operator shall hold training and drills regularly. Operator shall document the training, drills and performance after emergency events. Continual improvements are sought, based on disclosure to and feedback from stakeholders and responsible government agencies.</p>
	<p>Equipment: Operator has installed appropriate alarms, warning devices and fire safety mechanisms. This includes firefighting equipment; clearly marked, unlocked and unblocked emergency exits and escape routes; and emergency lighting in all facilities. If security concerns are present at the project site, then Operator has appropriate equipment to identify and respond to security related threats.</p>		<p>Equipment: Operator has installed appropriate alarms, warning devices and fire safety mechanisms. This includes firefighting equipment; clearly marked, unlocked and unblocked emergency exits and escape routes; and emergency lighting in all facilities. If security concerns are present at the project site, then Operator has appropriate equipment to identify and respond to security related threats.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
	<p>Evacuation Plans & Procedures: Operator has developed and implemented procedures and evacuation plans for all reasonably foreseeable emergencies. Operator has taken steps to: ensure procedures and plans are accessible or clearly displayed throughout their facilities; ensure these are maintained; regularly test these procedures (including the conduct of evacuation drills), and update them periodically. Operator's emergency response plans are developed and maintained in collaboration with potentially affected communities, workers and their representatives, and relevant agencies.</p>		<p>Evacuation Plans & Procedures: Operator has developed and implemented procedures and evacuation plans for all reasonably foreseeable emergencies.</p> <p>Operator has taken steps to ensure procedures and plans are accessible and clearly displayed throughout their facilities; ensure these are maintained; regularly test these procedures (including the conduct of evacuation drills), and update them periodically.</p> <p>Operator's emergency response plans are developed and maintained in collaboration with potentially affected communities, workers and their representatives, and relevant agencies.</p>
	<p>Documentation & Investigation: Operator has formally documented and investigated Health and Safety incidents, as well as Operator's response and any outcome from such incidents. Results of the investigation are included in Operator's Health and Safety reviews and process improvement plans.</p>		<p>Documentation & Investigation: Operator has formally documented and investigated Health and Safety incidents, as well as Operator's response and any outcome from such incidents. Investigations shall include a root cause analysis and identification of corrective and preventive measures. Results of the investigation are included in Operator's Health and Safety reviews and process improvement plans.</p>

2012 PROVISION	2012 PERFORMANCE TARGET	REVISED OBJECTIVE	REVISED PERFORMANCE TARGET 1
Principle 5: CLIMATE CHANGE, BIODIVERSITY & ENVIRONMENT		Principle 5: CLIMATE CHANGE, BIODIVERSITY & ENVIRONMENT	
<i>Oil and gas exploration and production activities must be carried out in ways that minimize negative impacts and maximize positive impacts on the biophysical environment and the people living in that environment.</i>		<i>Oil and gas exploration and production activities must be carried out in ways that minimize negative impacts and maximize positive impacts on the biophysical environment and the people living in that environment throughout the project life cycle and using sustainable approaches to resource use .</i>	
ENVIRONMENTAL MANAGEMENT			
5.1 ENVIRONMENTAL POLICY: Operator shall define and make publicly available its Environmental Policy.	Operator defines and makes publicly available its Environmental Policy, which has equal importance to other Operator's Business Policies. Environmental Policy addresses all issues raised in Principle 5 of the EO100™ Standard including, in particular, commitment to meet or exceed all relevant environmental legislation; the application of the mitigation hierarchy; the protection of air, water, land, and ecosystems; use of technologies and practices to minimize emissions, energy and water use, surface disturbance, and the generation of wastes; and meaningful engagement with stakeholders on potential environmental issues and impacts.	5.1 ENVIRONMENTAL MANAGEMENT: Operator carries out oil and gas exploration and production activities in ways that minimize negative impacts and maximize positive impacts on the biophysical environment, including land, water, air and biodiversity; and the people living in or otherwise directly dependent upon that environment.	Operator shall define and disseminate to stakeholders in relevant local languages its Environmental Policy, which has equal importance to other Operator's Business Policies. Environmental Policy addresses all issues raised in Principle 5 of the EO100™ Standard including, in particular, commitment to meet or exceed all relevant environmental legislation; the application of the mitigation hierarchy; the protection of air, water, land, and ecosystems; use of technologies and practices to minimize emissions, energy and water use, surface disturbance, and the generation of wastes; and meaningful engagement with stakeholders on potential environmental issues and impacts.
5.2 MITIGATION HIERARCHY: Operator shall apply the mitigation hierarchy: avoid, prevent, minimize, reduce or offset adverse impacts on people and the environment, when addressing environmental risks and impacts throughout the life of the project.	Operator demonstrates that it has prioritized avoidance and prevention of impacts over minimization and reduction; offsetting is considered only when other approaches have been demonstrated as technically or financially infeasible.	5.2 MITIGATION HIERARCHY: Operator avoids adverse impacts on people and the environment, when addressing environmental risks and impacts throughout the life of the project.	Operator shall demonstrate that it has prioritized avoidance and prevention of impacts over minimization and reduction. Where avoidance is not possible, Operator considers options to minimize, rehabilitate and restore areas affected by environmental impacts of the project. Offsetting is considered only when not precluded and as a last resort when other approaches have been demonstrated as technically or financially infeasible.
5.12 SPILL PREVENTION & EMERGENCY PREPAREDNESS: Operator shall prepare for, and demonstrate its capacity to respond to, environmental incidents.	Spill Prevention: Operator has developed/adopted and implemented engineering specifications, construction practices, operational procedures, contingency plans, appropriate equipment, and permanent control points to minimize the risk of spills and evaluates the contingency plans at least annually. Operator reports any spills promptly to regulating authorities, and takes appropriate actions to identify and address the factors contributing to the spill.	5.3 SPILL PREVENTION & EMERGENCY PREPAREDNESS: Operator prevents spills and prepares for, and demonstrates its capacity to respond to, environmental incidents.	Spill Prevention: Operator has developed/adopted and implemented engineering specifications, construction practices, operational procedures, contingency plans, appropriate equipment, and permanent control points to minimize the risk of spills and evaluates the contingency plans at least annually. Operator reports any spills promptly to regulating authorities, and takes appropriate actions to identify and address the factors contributing to the spill.
	Emergency Preparedness and Response Planning: Operator implements plans, appropriate equipment, and permanent control points to respond to emergencies. Plans comply with national laws and international standards. Training and drills are held regularly. The trainings, drills and performance assessments after emergency events are documented. Continual improvements are made based on disclosure to and feedback from responsible government agencies.		Emergency Preparedness and Response Planning: Operator shall implement plans, appropriate equipment, and permanent control points to respond to emergencies. Plans comply with national laws and international standards. Plans address potential risks for nearby communities, where relevant. Continual improvements are made based on disclosure to and feedback from responsible government agencies.
5.11 WASTE PRODUCTION & MANAGEMENT: Operator shall minimize the production of hazardous wastes and develop and implement waste management plans to address the production, storage and disposal of produced water, drilling waste, other wastes specific to oil and gas exploration and production and general wastes.	Operator demonstrates that a comprehensive waste management plan for both hazardous and non-hazardous wastes has been developed and implemented. Operator uses best management practices for the handling and storage of hazardous and non-hazardous waste.	5.4 WASTE PRODUCTION & MANAGEMENT: Operator minimizes the production of hazardous wastes and develop and implement waste management plans to address the production, storage and disposal of produced water, drilling waste, other wastes specific to oil and gas exploration and production and general wastes.	Operator shall demonstrate that a comprehensive waste management plan in line with international standards for the handling, storage, treatment and disposal of both hazardous and non-hazardous wastes has been developed and implemented. Operator shall obtain Free, Prior and Informed Consent from Indigenous Peoples for disposal of hazardous waste in their territories. Operator demonstrates regular reductions in the generation of hazardous and nonhazardous wastes (measured on a per-BOE basis).
5.16 REMEDIATION OF ENVIRONMENTAL LIABILITIES: Operator shall undertake work to identify and address pre-existing and 'orphan' environmental liabilities.	Operator prepares an initial inventory of pre-existing environmental liabilities.	5.5 REMEDIATION OF ENVIRONMENTAL LIABILITIES: Operator identifies and addresses pre-existing and 'orphan' environmental liabilities.	Operator shall prepare an inventory of pre-existing environmental liabilities. Operator develops and implements a plan to remediate pre-existing environmental liabilities within the project area. Where remediation is the legal obligation of another entity contracted by the state, Operator shall encourage remediation and report to the appropriate authorities where those obligations are not fulfilled.

5.17 CLOSURE: Operator shall ensure that financial provision for closure and remediation is planned with the end goal of full restoration of land and water resources to an end state agreed upon with stakeholders, including regulators, local communities and Indigenous Peoples.	Financial Mechanisms for Closure and Restoration: Operator, with stakeholder involvement, estimates the financial costs of the project's closure and restoration phase and refines estimates at least every two years; estimates are subject to independent review and verification.	5.6 CLOSURE AND RESTORATION: Operator ensures that financial provision for closure and remediation is planned with the end goal of full restoration of land and water resources to an end state agreed upon with stakeholders, including regulators, local communities and Indigenous Peoples.	Closure Plan: Operator shall develop a closure plan in collaboration with stakeholders and independent experts. Operator implements actions associated with the closure plan at appropriate times, and has allocated the necessary funds for full implementation of decommissioning and restoration activities .
	Closure Plan: In countries whose legislation does not include a closure plan, Operator develops a closure plan in collaboration with stakeholders and independent experts. Operator implements actions associated with the closure plan at appropriate times, and has allocated the necessary funds for full implementation upon project closure.		Financial Mechanisms for Closure and Restoration: Operator, with stakeholder involvement, shall estimate the financial costs of the project's closure and restoration phase and refines estimates at least every two years; estimates are subject to independent review and verification.
ATMOSPHERIC IMPACTS			
5.3 CLIMATE CHANGE: Operator shall strive to reduce production and release of greenhouse gases (GHGs) (accounting for changes in production) including reductions through the application of carbon capture and storage.	Inventory of GHG Emissions: The operator has adopted an accounting and reporting standard for GHG. Operator maintains an inventory of GHG emissions, which is updated annually or following material changes to equipment or processes (whichever is more frequent).	5.7 GREENHOUSE GAS EMISSIONS: Operator strives to reduce production and release of greenhouse gases (GHGs) (accounting for changes in production) including reductions through the application of carbon capture and storage.	Inventory of GHG Emissions: The operator has adopted an accounting and reporting standard for GHG.
			The methodology to measure and calculate GHG emissions is disclosed to stakeholders.
			Operator maintains an inventory of GHG emissions, which is updated annually or following material changes to equipment or processes (whichever is more frequent).
	Reduction of GHG Emissions: GHG emissions from production are reduced at source or through carbon capture and storage; the average annual trend in GHG emissions in the three year period preceding the audit has been a reduction of at least 1% per year on average, assessed on a per-BOE basis.		Reduction of GHG Emissions: Operator shall demonstrate regular reductions in GHG emissions from production at source or through carbon capture and storage.
			GHG reduction plans include plans for climate change adaptation.
5.10 OZONE DEPLETION: Operator shall comply with or exceed the requirements established by the Montreal Protocol on Substances that Deplete the Ozone Layer when using ozone-depleting substances (ODS).	Inventory of ODS: Operator maintains an inventory of ODS used, which is updated annually or following material changes to equipment or processes (whichever is the more frequent). The methodology to measure ODS used is disclosed to regulators.	5.8 OZONE DEPLETION: Operator complies with or exceeds the requirements established by the Montreal Protocol on Substances that Deplete the Ozone Layer when using ozone-depleting substances (ODS).	Inventory of Ozone-Depleting Substances (ODS) Operator shall maintain an inventory of ODS used, which is updated annually or following material changes to equipment or processes (whichever is the more frequent). The methodology to measure ODS used is disclosed to regulators.
	Reduction in the Use of Ozone Depleting Substances (ODS): Operator demonstrates regular reductions in the use of ODS (adjusted for quantity of production) and eliminates ODS in line with the Phase-out Management Plan noted in the Montreal Protocol on Substances that Deplete the Ozone Layer.		Reduction in the Use of Ozone Depleting Substances (ODS): Operator shall demonstrate regular reductions in the use of ODS (adjusted for quantity of production) and eliminate ODS in line with the Phase-out Management Plan noted in the Montreal Protocol on Substances that Deplete the Ozone Layer.
5.13 FLARING: Operator shall implement a program for reductions in flaring (accounting for changes in production).	The trend in the volume flared in the three-year period preceding the audit has been at least a 5% average annual reduction (measured on a per-BOE basis). No gas is vented to the atmosphere except in emergency cases. The calculation of the average annual reduction should not include gas vented during emergencies. Operator ensures that local communities cannot access areas where flaring occurs. Local communities are educated on the risks of entering these areas.	5.9 FLARING: Operator does not burn or flare gas produced from operations except in emergencies.	No gas is vented to the atmosphere except in emergency cases. Operator demonstrates regular reductions in the use of the volume flared and has a plan for eliminating flaring except for emergency cases in line with the World Bank's Global Gas Flaring and Venting Reduction Voluntary Standard.
			Operator ensures that local communities cannot access areas where flaring occurs. Local communities are educated on the risks of entering these areas.
ECOSYSTEM IMPACTS			
5.4 BIODIVERSITY & ECOLOGY: Operator shall apply best practices in project design, construction and operation to ensure the healthy functioning of ecosystems and sustainability of natural resources affected by its activities. Operator shall take actions to protect the integrity of High Conservation Value Areas (HCVAs) and Critical Habitat.	Biodiversity and Ecosystem Management: Operator assesses, and has independently verified, the significance of project-related impacts on biodiversity and ecosystem functioning, including the identification of HCVAs or Critical Habitat potentially affected by project activities	5.10 BIODIVERSITY & ECOLOGY: Operator shall apply best practices in project design, construction and operation to ensure the healthy functioning of ecosystems and sustainability of natural resources affected by its activities. Operator shall take actions to protect the integrity of areas of significant biodiversity value .	Biodiversity and Ecosystem Management: Operator assesses, and has independently verified, the significance of project-related impacts on biodiversity and ecosystem functioning, including the identification of High Conservation Value Areas (HCVAs) and Critical Habitat potentially affected by project activities in line with IFC Performance Standard 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources .
	Protection and Conservation of HCVAs and Critical Habitat: Operator does not implement project activities in Critical Habitat unless it can be clearly shown that there are no short or long term negative impacts on biodiversity values for which the Critical Habitat was designated (species and their established populations).		Protection and Conservation of Critical Habitat: Operator does not implement project activities in Critical Habitat, unless it can be clearly shown that there are no short or long term negative impacts on biodiversity values for which the Critical Habitat was designated (species and their established populations).

5.7 AIR: Operator's project shall improve or not materially change the quality of air with respect to emissions of gases and particulates in affected airsheds.	The quality of air in affected airsheds is materially unchanged by oil and gas activities and all emissions to air comply with national standards or international standards (whichever is more stringent relevant to the pollutant(s) of interest).	5.11 AIR: The quality of air in affected airsheds is improved or not negatively affected by the Operator's activities and all emissions to air comply with national standards or international standards (whichever is more stringent relevant to the pollutant(s) of interest).	Operator shall gather baseline data on air quality. The treatment of emissions of gases and particulates and the implementation of other environmental management procedures ensure that the quality of air in affected airsheds is not negatively affected by project activities and all emissions are compliant with World Bank Group Environmental, Health, and Safety Guidelines or applicable national government requirements, whichever is more strict.
5.6 WATER: Operator's activities shall improve or not materially change the quality and quantity of groundwater and surface water in affected terrestrial and marine areas. Discharges to water shall meet or exceed international standards and have no negative impacts on human health, and minimal negative impacts on ecosystem health and the use of water to meet social, cultural, economic and environmental needs.	Water Use: Operator uses best management practices to minimize its use of water. Operator does not use surface water for enhanced oil recovery operations, unless approved by the relevant government permitting authority.	5.12 WATER: Operator's activities improve or do not negatively affect the quality and quantity of groundwater and surface water in affected terrestrial and marine areas. Discharges to water shall meet or exceed international standards and have no negative impacts on human health, ecosystem health and the use of water to meet social, cultural, economic and environmental needs.	Water Use: Operator minimizes its use of water. Operator shall assess, document, procure, where necessary, and respect water rights and water use rights, of local and indigenous communities, both formal and informal, that are affected by the site's water use. Water use shall be sustainable relative to community use and renewable supplies. Operator shall not use surface water unless approved by the relevant government permitting authority.
	Water Quantity: Operator has performed a preliminary assessment to evaluate the need for a full-scale Environmental Flow Assessment (EFA). Either the EFA or the preliminary assessment (as applicable) has been completed and defines environmental flow requirements using an appropriate methodology that involves input from key stakeholders on desired ecological outcomes. Environmental flow requirements and desired ecological outcomes are met consistently.		Operator has evaluated the need for a full-scale Environmental Flow Assessment (EFA) to define environmental flow requirements using an appropriate methodology that involves input from key stakeholders on desired ecological outcomes. Environmental flow requirements and desired ecological outcomes are met consistently.
			Operator publicly discloses potentially hazardous components and their overall concentration in fracturing fluid used during well completion or to stimulate production.
	Water and Aqueous Discharge Quality: The treatment of effluents and the implementation of other environmental management procedures ensure that the quality of surface water and groundwater in affected catchments and aquifers is materially unchanged by project activities and all discharged effluents are compliant with World Bank Group Environmental, Health, and Safety Guidelines or applicable national government requirements, whichever is more strict.		Water and Aqueous Discharge Quality: Operator shall gather baseline data on water quality. The treatment of effluents and the implementation of other environmental management procedures ensure that the quality of surface water and groundwater in affected catchments and aquifers is materially unchanged by project activities and all discharged effluents are compliant with World Bank Group Environmental, Health, and Safety Guidelines or applicable national government requirements, whichever is more strict.
	Sedimentation: Technical specifications and guidelines for design, engineering and construction are developed and implemented to avoid and limit the movement of sediments into surface waters within or outside the project boundary. Total suspended solids (TSS) in water bodies affected by the project are less than 50 mg/L or comply with national standards (whichever is more stringent), or are congruent with local background conditions.		Sedimentation: Operator shall develop and implement technical specifications and guidelines for design, engineering and construction to avoid and limit the movement of sediments into surface waters within or outside the project boundary.
5.5 LAND: Operator shall minimize the clearance of land and maximize ongoing restoration; land capability and soil quality in uncleared areas shall be maintained or enhanced.	Area of Cleared Land: Pre-feasibility and Feasibility Studies as well as Environmental and Social Impact Assessments (ESIA) include consideration of alternatives that minimize the clearance of land. Operator will carry out a systematic approach for site selection, in consultation with affected people, with consideration of the Infrastructure Footprint.	5.13 LAND: Operator minimizes the clearance of land and maximize ongoing restoration; land capability and soil quality in uncleared areas shall be maintained or enhanced.	Area of Cleared Land: Operator shall conduct pre-feasibility and Feasibility Studies as well as Environmental and Social Impact Assessments (ESIA). ESIA's include consideration of alternatives that minimize the clearance of land and quantify the amount of soil to be disturbed. Operator shall carry out a systematic approach for site selection, in consultation with affected people, with consideration of the Project Footprint.
	Soil Quality and Conservation: The Environmental and Social Impact Assessments (ESIA) define: a) Current land use and land capability; b) The physical and chemical characteristics of all soils that will be disturbed or moved; c) The type and volume of soil to be removed and therefore potentially available for rehabilitation work; d) Mitigation measures to prevent or minimize impacts to soil quality and land capability and enhance beneficial effects; and e) Appropriate locations and procedures for topsoil storage and reuse.		Soil Quality and Conservation: Operator shall implement appropriate measures to prevent erosion of soil and non-soil materials as part of the project design and operation. Operator shall implement appropriate measures to avoid and limit the movement of sediments onto land within the boundary of the project as part of the project design, engineering and construction.
	Area Affected by Sedimentation: Operator implements best practices for design, engineering and construction to avoid and limit the movement of sediments onto land within the boundary of the project for which certification is sought.		<i>Consolidated above</i>
	Area Affected by Erosion: Appropriate measures to prevent the erosion of soil and non-soil materials are planned, implemented and managed as part of the project design and operation. No more than 10% of the Infrastructure Footprint exhibits signs of erosion from any activity associated with the project.		<i>Consolidated above</i>

	Ongoing Land Restoration: Ongoing restoration using native species during operation is used to minimize the area of unrestored land. Restoration activities for any unrestored land are developed in consultation with stakeholders (including local communities and Indigenous Peoples) and completed within 12 months of the termination of operation/production or within 3 months of the cessation of exploration activities or, in the case of seasonal constraints, at the earliest possible opportunity.		Ongoing Land Restoration: Operator shall use native species to minimize the area of unrestored land. Operator shall develop restoration activities for any unrestored land in consultation with stakeholders (including local communities and Indigenous Peoples) in line with the closure and reclamation plan. Operator shall initiate restoration activities during or immediately following the termination of operation/production or the cessation of exploration activities or, in the case of seasonal constraints, at the earliest possible opportunity.
AMBIENT IMPACTS			
5.8 NOISE, LIGHT & HEAT: Operator shall strive to have minimal negative impacts on human and ecosystem health related to emissions of noise, light and heat.	Noise: Operator integrates noise prevention and mitigation with project design and operational activities. Exposure levels at noise-sensitive receptors comply with national or international standards (whichever is more stringent). In exceptional circumstances, and in coordination with appropriate regulatory bodies, higher exposure levels may be acceptable provided the exposure is non-continuous and temporary in nature.	5.14 VISUAL AND AMBIENT IMPACTS: Operator avoids or minimizes negative impacts on of project activities on landscape features, character and aesthetics and on human and ecosystem health related to emissions of noise, light, heat, and odors.	Noise: Operator shall integrate noise prevention and mitigation with project design and operational activities. Exposure levels at noise-sensitive receptors comply with national or international standards, such as the World Bank Group Environmental, Health, and Safety Guidelines (whichever is more stringent). In exceptional circumstances, and in coordination with appropriate regulatory bodies, higher exposure levels may be acceptable provided the exposure is non-continuous and temporary in nature.
	Light: Operator integrates light pollution prevention and mitigation methods with project design and operational activities and follow generally accepted international best practice such as inward or downward pointing lights (taking into consideration occupational health and safety and security requirements for appropriate lighting).		Light: Operator shall integrate light pollution prevention and mitigation methods with project design and operational activities and follow generally accepted international best practice (taking into consideration occupational health and safety and security requirements for appropriate lighting).
	Heat: Operator identifies and characterizes sources of excessive heat associated with the project and with which people or wildlife could come into contact. All heat sources that are not fenced or otherwise protected are labeled with visible precautionary signs in local languages.		Heat: Operator shall identify and characterize sources of excessive heat associated with the project and with which people or wildlife could come into contact.
			All heat sources that are not fenced or otherwise protected are labeled with visible precautionary signs in local languages.
			Odors: Operator shall identify sources of odor pollution associated with the project and with which be detected by people or wildlife. Operator shall eliminate or substantially mitigate odor emissions associated with the project that may affect or disturb people or wildlife.
5.9 VISUAL: Operator shall avoid or minimize negative impacts of project activities on landscape features, character and aesthetics.	Operator has identified the landscape resource (landscape features, character and aesthetics) and visual receivers likely to be affected by the project; evaluated the sensitivity of the landscape features and character to the likely effects of the project and integrated design and operational features to minimize the impact of project infrastructure, transport-related infrastructure, lighting, emissions and other project-related developments. Operator takes particular care to avoid impacts in landscapes that have special economic, cultural, or spiritual value for local communities or Indigenous Peoples.		Landscape and Visual Impacts: Operator has identified the landscape resource (landscape features, character and aesthetics) and visual receivers likely to be affected by the project and their sensitivity to potential project impacts. Operator shall minimize the impact on the landscape resource of project infrastructure, transport-related infrastructure, lighting, emissions and other project-related developments. Operator shall take particular care to avoid impacts in landscapes that have special economic, cultural, or spiritual value for local communities or Indigenous Peoples.
5.14 MONITORING: Operator shall implement a comprehensive monitoring program for emissions and discharges and the state of water, air, land and biodiversity resources. Operator shall develop opportunities to involve local communities, if any, in monitoring activities.	Operator has a comprehensive monitoring program for emissions and discharges to water, air, and land. Operator has established the parameters to be monitored and monitoring locations with appropriate government agencies and supplements these with additional parameters and locations selected by key stakeholders (e.g. local communities, Indigenous Peoples, academics and NGOs). Operator collects samples and data in conformance with guidance from appropriate government agencies. All samples are analyzed in independent and accredited laboratories.		<i>Consolidated in Principle 1</i>
5.15 REPORTING & DISCLOSURE: Operator shall publicly report data related to environmental impacts and mitigation activities.	Operator reports the results of monitoring activities to the relevant regulatory agencies and makes such results publicly available in a timely manner (via appropriate disclosure methods for local communities, Indigenous Peoples and other non-technical stakeholders). Operator publicly discloses calculation methods used to estimate or model environmental impacts, as applicable. If Operator uses hydraulic fluids during well completion or to stimulate production, Operator publicly discloses all components of those fluids.		<i>Consolidated in Principle 1 and Objective on Water</i>