Human Rights Due Diligence Manual for Petrobras' own E&P and refining operations

2022

LIST OF ACRONYMS

HRIA	Human Rights Impact Assessment
ANP	National Agency of Petroleum, Natural Gas and Biofuels
HRDD	Human Rights Due Diligence
E&P	Exploration and Production
WG	Working Group
ISC	Protective Intelligence and Corporate Security
OCDE	Organization for Economic Co-operation and Development
OIT	International Labor Organization
ONU	United Nations
OHCHR	Office of the High Commissioner for Human Rights
GPs	United Nations Guiding Principles on Business and Human Rights
HSE	Safety, Environment and Health

SUMMARY

2

PUBLIC

CONTEXT OF PETROBRAS' E&P AND REFINING OPERATIONS

Founded in 1953, Petrobras is a publicly traded Brazilian company, with the Brazilian Federal Government as its largest shareholder[1]. It stands out as one of the world's largest producers of oil and natural gas and as a world leader in exploration and production (or simply "E&P") in deep and ultra-deep waters. The company operates primarily in the exploration, production, refining, generation, and commercialization of energy.

The scope of this Manual covers Petrobras' core exploration and production (E&P) and oil refining operations, which are the company's central activities and include **onshore** and **offshore operations, evaluation, development, production, and incorporation** of oil reserves.

Table 1: Description of the Exploration and Production phases of oil and natural gas

Exploration Phase	Production Phase
The exploration phase precedes the production phase and aims to discover and evaluate oil and/or natural gas deposits. If the company does not find it, it can return the area to the Union and, if it does, the company must assess whether the discovery is economically viable or not. If the company understands that the discovery is commercial, it must declare this to the ANP through a "declaration of commerciality". Otherwise, the company may choose to continue exploring the area (within the period provided for in the notice) or return it in whole or in part to the Union.	After the development plan is approved, the area delimited by the company becomes a producing field and the contract enters the production phase, which is divided into two stages. The first is production development, in which companies prepare the necessary infrastructure for the field to produce. Finally, there is the production stage itself, in which the operators actually produce oil and/or natural gas. It is the longest stage of the entire life cycle of an oil field, and can extend for decades depending on the productive capacity of the field.

Source: [National Agency of Petroleum, Natural Gas and Biofuels,](.) (2022).

Currently, Petrobras' activities are focused on drilling offshore fields in **deep and ultra-deep waters**, which together accounted for 95% of total oil production in 2021[2]. Petrobras has **refineries** in several regions of the national territory.

The company's main producing basins are the Campos Basin (ES/RJ) and the Santos Basin (PR/SC/SP/RJ), the latter being the main source of future growth in Petrobras' proven reserves and oil production[3]. The company is currently seeking to expand production to the region known as the "Equatorial Margin", which covers the Foz do Amazonas, Pará-Maranhão, Barreirinhas, Ceará and Potiguar basins. The region goes from Rio Grande do Norte to Oiapoque, in Amapá, a territory with different socioeconomic characteristics from the basins explored by the company until then, especially because it is where indigenous peoples and

---

[1] The Brazilian Federal Government holds 28.67% of Petrobras' total shares, followed by foreign investment (24.67%) and American Depositary Receipts (ADRs) (19.91%). The Federal Government owns 50.26% of the ordinary shares that confer voting rights and participation in decisions, followed by Level 3 ADRs (27.74%). On the other hand, the largest proportion of preferred shareholders comes from foreign investment (39.62%), followed by BNDESPar (16.07%). Petrobras, "Shareholding Structure" (2022).

[2] Petrobras, "Exploration and production of oil and gas" (2022).

[3] Petrobras, "Basins" (2022); Petrobras, "Sustainability Report 2021".

traditional communities are located. The project is in the environmental licensing phase and has not started drilling[4].

Figure 2: Locations of E&P activity

Source: Petrobras, 2022.

---

[4] EPBR, "Petrobras expects to start drilling in the equatorial margin in November" (2022).

1. INTRODUCTION

## 1.1. What is human rights due diligence? Why is it relevant for companies?

- All human beings have the right to the same freedoms and rights considered essential for a dignified life, which have been recognized and protected in various international instruments, ratified by States and enshrined in the Universal Declaration of Human Rights. These encompass civil, political, cultural, economic, and social rights[5]. These rights must be respected not only by the State and individuals, but also by companies in the course of their activities.

- In 2011, after a series of landmark cases highlighted the interface between business activities and human rights violations, the United Nations Human Rights Council unanimously approved the Guiding Principles on Business and Human Rights (GPs) and established the Working Group (WG) on Business and Human Rights to promote, disseminate, and implement the GPs. By providing clear guidelines on what is expected of companies regarding their responsibility to respect human rights, the GPs established a new paradigm for responsible business conduct.

- The GPs are based on three pillars, whose responsibilities are defined as follows:

    ○ **Protect**: **States** have a duty to **protect** and guarantee human rights and fundamental freedoms within their territories and jurisdictions[6].

    ○ **Respect**: **Companies** have a responsibility to **respect** human rights in their operations and throughout their value chains. In practical terms, this means not only making a public commitment to respect human rights, but also implementing a continuous **due diligence** process to prevent and mitigate negative impacts on people.

    ○ **Remedy**: Both **States** and **companies** must provide effective and adequate **redress** when negative impacts resulting from business activities are identified.

- Although it is relatively easy for a company to claim that it respects human rights, it needs to **know and be able to demonstrate** that it is respecting human rights. In practice, this requires action on the part of companies, which need to have policies and processes in place that are adequate to respect human rights. According to the Guiding Principles (GPs), these policies and processes encompass a political commitment, a due diligence process, and processes that enable the remediation of identified adverse impacts.

---

[5] For example, civil and political rights include: the right to life; the right not to be subjected to torture or cruel, inhuman or degrading treatment or punishment; the right not to be subjected to slavery and the slave trade; the right to liberty and security of person; the right to freedom of movement; the right to equality before the courts; the right to freedom of thought, conscience, religion and expression; and economic, social and cultural rights include the rights to adequate food, adequate housing, education, health, social security, participation in cultural life, water, sanitation and work.

[6] The obligation of States is supported by the duty to comply with international human rights treaties and conventions, such as the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (1966), and the International Covenant on Economic, Social and Cultural Rights (1966).

PETROBRAS

- Human Rights Due Diligence (HRDD) consists of the ongoing management process that a company must undertake to fulfill its responsibility to respect rights and avoid impacts on human rights, within the circumstances relevant to its sector and operational context. Typically, negative impacts on human rights result from a lack of analysis of both the risks arising from its activities and how the company could have acted to reduce the impacts generated.

- Guiding Principle No. 17 establishes that HRDD "will vary in complexity according to the size of the company, the risk of severe impacts on human rights, and the nature and context of its activities and operations." Thus, **although there is no single formula for implementing HRDD in companies**, there is a consensus that HRDD **should observe certain guidelines** set out in the GPs (which are presented in each section of this Manual).

Figure 2: Schematic representation of human rights due diligence for companies
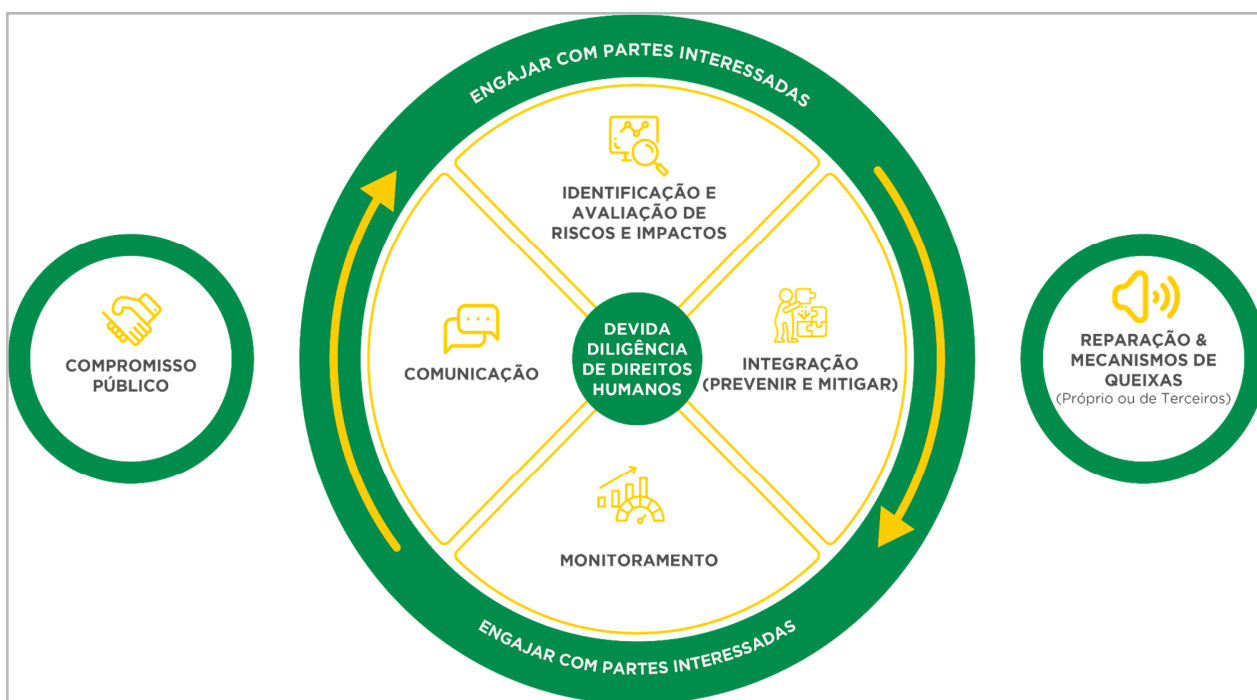
- With the strengthening of the human rights agenda, there is a growing expectation that companies not only commit to respecting human rights, but also demonstrate how they are implementing it. These expectations are expressed by various stakeholders, such as the media, civil society, sectoral entities, investors, and intergovernmental bodies. Since their launch, the Guiding Principles (GPs) have been incorporated into or served as inspiration for legislative advancements, governmental

7

measures, and voluntary initiatives by companies, industries, and intergovernmental[7] organizations. Furthermore, there is a growing expectation from investors regarding corporate transparency in managing human rights impacts and risks.

1.2. How can companies be involved with negative impacts on human rights? And what should be done?

Companies can be involved in human rights impacts in three ways, described below and represented in Figure 3.

How can companies impact human rights?
A company **has an impact** through its activities when its actions directly impede or reduce a person's or community's ability to enjoy a human right.

The company **contributes to the impact** through its activities, either directly or through another entity (government, company). This contribution can occur in two ways:
    i) when it contributes to an impact through its activities, but the impact is not solely the result of its activity, but also the result of actions by other entities; or
    ii) when the company contributes – by pressuring, facilitating, or financing – to a third party causing adverse impacts.

The company is **directly related** to an adverse impact. This occurs when the company does not contribute to the impact, but **maintains business relationships with the entity that is causing the impact** through its operations, products, or services.

---

[7] For example, the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guide for Responsible Business Conduct, the Equator Principles, the International Finance Corporation's (IFC) Performance Standards on Social and Environmental Sustainability, the German Law on Due Diligence on Human Rights in the Supply Chain, and the Norwegian Transparency Act, among others.

Figure 3: Examples of corporate involvement with impacts on human rights.
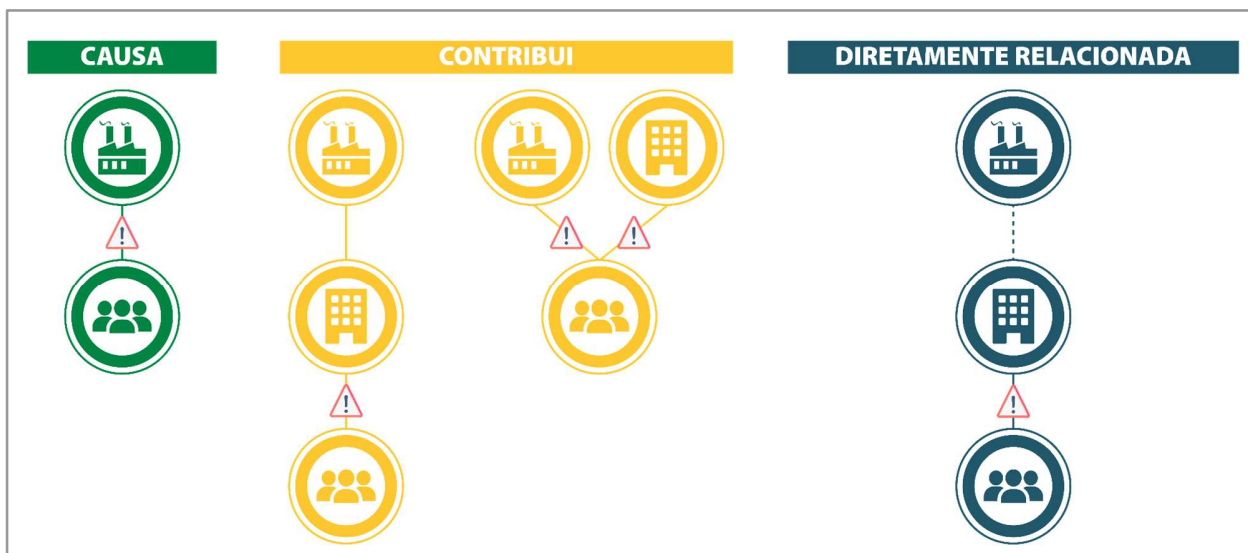
Source: Figure created based on [The corporate responsibility to respect human rights](#) (2012).

The type of response the company is responsible for will depend on its degree of involvement in the damage caused [8]

---

[8] OHCHR, "[The corporate responsibility to respect human rights](#)" (2012).

Figure 4: Examples of corporate liability according to its involvement in the damage.
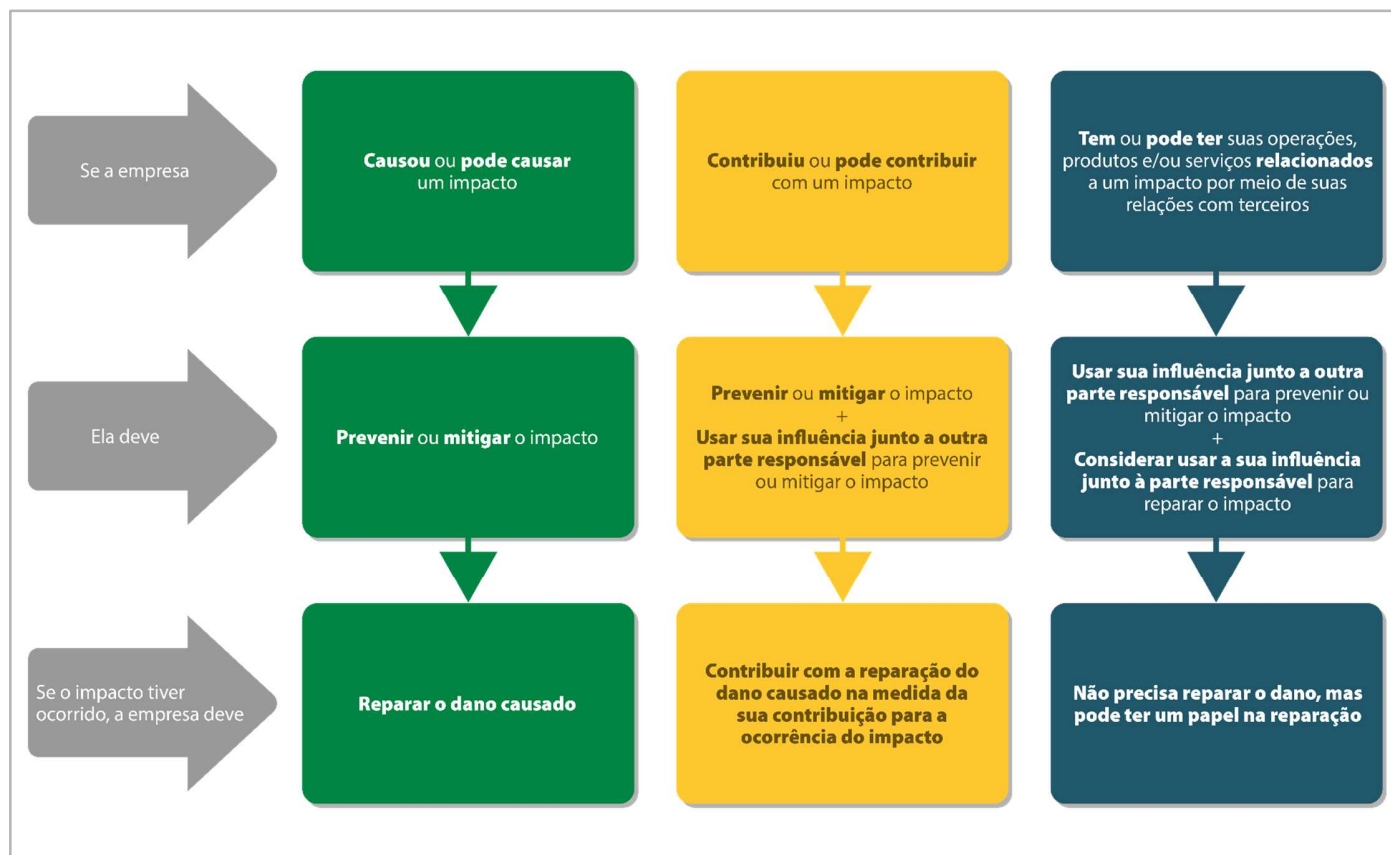
Source: Figure created based on The corporate responsibility to respect human rights: An Interpretive Guide (2012).

1.3. Why is human rights due diligence relevant to Petrobras' E&P and Refining operations?

- Like other companies, Petrobras can cause, contribute to, or be directly related to negative impacts on human rights through its activities and throughout its value chain. E&P and Refining activities present inherent negative risks to human rights, with notorious cases of impacts that have occurred in the oil and gas sector, including in Brazil[9]

- In addition, the installation of Petrobras operations in certain regions can cause changes in social and economic dynamics that may also be associated with or potentiate negative impacts on human rights. For example, the arrival of a new business can generate the migration of workers, an increase in the local population and a consequent increase in demand for public service infrastructure, real estate speculation, among others.

---

[9] For example, in 2010, a British Petroleum (BP) platform exploded in the Gulf of Mexico, killing 11 workers, spilling millions of barrels of oil into the sea for nearly three months, and affecting fishing communities.

- Petrobras operates in locations in Brazil where there are systemic issues that contribute to the vulnerability of local populations and consequently increase the risk of human rights impacts, such as high poverty rates, low levels of education, land disputes, among others.

Systemic Issues

Systemic issues refer to problems or challenges that prevail in a context and are driven by root causes outside the immediate control of the company. Systemic issues can arise due to failures of the State to fulfill its duty to protect and promote human rights. While it is not the responsibility of companies to solve systemic issues, companies have a responsibility to address the adverse impacts they cause or contribute to, even when operating in contexts where systemic issues are prevalent.

- . In addition to all companies being responsible for respecting human rights, the GPs emphasize the responsibility and strategic role that state-owned enterprises have in relation to respect for international human rights standards[10]: States are the guarantors of the international human rights regime, therefore, "the closer a company is to the State or the more it depends on state authority or public resources, the more justified it is for the State to ensure respect for human rights"[11]. In this sense, in 2016, the UN Working Group on Business and Human Rights stated that States should ensure that the companies they control: (a) do not obstruct justice; (b) fully cooperate with judicial and non-judicial complaint mechanisms; and (c) fully comply with their responsibility to respect human rights, including redressing human rights abuses that they may be causing or contributing to[12].

---

[10] Guiding Principle No. 4: "States should adopt additional protective measures against human rights violations committed by enterprises they own, control, or that receive significant support and services from state bodies, such as official export credit agencies and official insurance or investment guarantee agencies, requiring, where appropriate, human rights due diligence."

[11] Federal Government, "Guiding Principles on Business and Human Rights: implementing the United Nations' "protect, respect and remedy" parameters" (2011).

[12] OHCHR, "Report of the Working Group on the issue of human rights and transnational corporations and other business enterprises: Leading by example - The State, State-owned enterprises, and Human Right" (2016).

1.4. What should be the focus of human rights due diligence in Petrobras' E&P and Refining operations?

The primary objective of the HRDD is to prevent **negative impacts on people**. Therefore, the focus of the HRDD begins and ends with individuals whose rights are potentially affected by business activities. In this way, it is important to distinguish the concept of **rightsholders** from other concepts used to refer to a broader public that interfaces with corporations, such as "**interested parties**"[13] (also called **stakeholders**) or, in the case of Petrobras, "**ç**":

- **Publics of interest (Stakeholders):** These are "groups of individuals and/or organizations with common social, political, economic, environmental, or cultural concerns and/or needs that establish or may establish relationships with Petrobras and are capable of influencing – or being influenced by – the company's activities, business, and/or reputation." This concept is used to establish ongoing communication and relationship practices for each stakeholder. Stakeholders whose rights may be impacted should be referred to as rightsholders.

- **Rightsholders** are individuals or social groups, such as direct and indirect employees and communities in the area of influence, whose human rights may be affected by the company. The group of rightsholders can be large and diverse, including even those who do not have direct interaction with the operations but are affected by them, for example, residents of more distant communities who still feel their effects (e.g., fishermen who are affected by a sea current).

Thus, although the HRDD includes steps similar to the management processes of so-called "corporate risks" or "business risks" - which include analyses of financial, reputational and operational risks - the HRDD distinguishes itself by focusing on the risk of **negative impact on rightsholders**.

Respecting vs. Promoting Human Rights

Although human rights interface with other agendas relevant to corporate sustainability, such as the Sustainable Development Goals (SDGs)[14], it is important to distinguish the objectives of the different agendas for the effective implementation of HRDD.

Projects or initiatives that a company develops to support or promote human rights and generate benefits for society are not the same as the responsibility of companies to respect human rights and implement HRDD to prevent, mitigate, and repair **negative impacts**. This responsibility cannot be reduced or replaced by companies' efforts to make social investments or engage in philanthropic activities.

---

[13] According to the parameters and references of the IFC, which have become one of the main international references in the management of socio-environmental impacts of development projects, stakeholders are those individuals, groups or entities that have an interest in the activities of a company - whether financial, social, environmental or other - and may affect or be affected by its activities, positively or negatively.

[14] United Nations Brazil, "ODS".

On the other hand, preventing negative impacts and meaningfully engaging with human rightsholders in this process can contribute to the company simultaneously maximizing the benefits it seeks to generate in the territories where it operates.

1.5. How can we ensure that respect for human rights is integrated into the company?

Once a commitment to respecting human rights has been made, it is important that this commitment is reflected in effective actions. Numerous factors can contribute to the implementation of effective human rights governance, and it is essential that respect for human rights becomes an integral component of the company's culture and way of operating. To this end, companies should adopt measures to strengthen governance and knowledge, such as:

- **Offer** general **internal training** so that all employees, both direct and outsourced, are aware of the company's commitment and the importance of HRDD, as well as training for professionals in specific areas regarding the challenges and contributions of each area in the process.

- **Assign responsibility to the appropriate levels and functions:**

  - Initially, one area of the company may take the lead, but as the implementation of HRDD progresses, more areas should be involved to ensure there is cross-functional support for the process, and cross-functional bodies such as Working Groups may also be created.

  - Specialized bodies can also be created to support the resolution of dilemmas and provide guidance, such as a panel or committee of experts (internal only or internal and external) who have technical knowledge and expertise in resolving human rights issues relevant to the company (e.g., priority themes). Throughout the implementation of management tools for human rights defense, it is recommended to schedule time for consultation and validation with human rights defense experts (as proposed in the description of management tools in Annex 3).

  - The review and validation of processes by external experts provides greater impartiality to the processes, contributing to good human rights governance.

  - Senior leadership should be involved in defining goals, incentives, and disincentives in order to promote a corporate culture that respects human rights and lead the necessary changes.

Figure 5: Involvement of different levels of the company in HRDD

> Involvement of the Board of Directors or advisory committees in monitoring the management of risks and impacts on human rights.

Board of Directors

> Executive management oversees and ensures that the entire company is aligned with the responsibility of respecting human rights as a minimum standard of conduct. Decision-making and resource allocation processes enable the implementation of effective measures to identify, prevent, mitigate, and remedy impacts on human rights.

Executive Board

> At the operational level, responsibility for implementing and overseeing measures to identify, prevent, mitigate, and remedy human rights impacts should be assigned to the appropriate levels and functions within the company.

Various areas

Source: Figure elaborated based on [The corporate responsibility to respect human rights: An Interpretive Guide](#) (2012).

- **Develop specific procedures/standards or revise existing procedures/standards** to integrate the methodologies and processes necessary for HRDD.

- **Develop or expand reward and recognition systems** to include respect for human rights, for example, establishing human rights-related goals for managers, linking performance bonuses to human rights goals and KPIs, and integrating respect for human rights among the competencies used in employee evaluations.

- **Encourage a technical approach to risks and negative impacts on human rights**, in addition to discussions about positive impacts and actions to promote human rights, for example through the creation of forums for sharing challenges and best practices.

1.5.1. Development of internal capacity and support from human rights experts.

The implementation of the different stages and processes of the HRDD requires knowledge of processes and best practices in corporate risk and impact management on human rights, knowledge of the scope of protection of the human rights being protected, and mastery of specific methodologies for the meaningful participation of rightsholders. In this sense, it is important that knowledge of international human rights law be accompanied by an understanding of the guidelines and interpretations of UN bodies, such as the general comments of the Committee on Economic, Social and Cultural Rights and clarifications from special rapporteurs, as well as the regional jurisprudence of the Inter-American Human Rights System.

Therefore, when companies are building their internal capacity to understand human rights issues, it is important to have the support of internal and/or external human rights experts. The degree of external support may depend on the company's capabilities, its goals, and the complexity of its negative human rights impacts.

Especially in the initial implementation phase of the tools indicated in this Manual, it is recommended that the company obtain expert support at key moments in the processes, until the company's internal capacity and processes are consolidated. Therefore, in the description of the tools below, **key moments** where review and validation by experts is recommended during the development of the company's internal capacity have been indicated. It should be noted, however, that in addition to contributing to a greater understanding of the subject matter, the review of diagnoses, mappings, and analyses by **external experts** contributes to good governance of the human rights agenda within the company by providing greater impartiality to internal processes. The review can occur through different structures, such as an advisory panel of internal and/or external experts, specialized consulting, etc.

2. IMPLEMENTING HRDD IN PETROBRAS' E&P AND REFINING OPERATIONS

Considering that Petrobras has made a **public commitment** to respect human rights through its Human Rights Guidelines, the company must implement a due diligence process appropriate to its size and complexity, considering the risks inherent in its activities and operational context.

For large companies, the full and consistent implementation of the Human Rights Guidelines across all operations simultaneously is a major challenge. Given that Petrobras' E&P and Refining activities are carried out in several operational units and distributed across different regions of the country, the Human Rights Guidelines should be implemented through a process **that allows the company to progressively deepen its scope and continuously improve its internal processes**.

This manual is structured as follows:

1. The Manual is divided into sections that correspond to the stages of the HRDD process (represented in Figure 2 above)[15]:

---

[15] How can the implementation of effective complaint and grievance mechanisms contribute to the processes of identifying and assessing risks and impacts, and to repairing damages? These elements are addressed.

   a. **Identification and assessment of risks and impacts on human rights;**
   b. **Integration of results and monitoring of the effectiveness of responses; and**
   c. **Communication on the management of risks and impacts on human rights;**
   d. **Reparation of impacts;**
   e. **Complaint/Reporting Mechanisms**

2. At the beginning of each section, the main guidelines established in the GPs regarding the HRDD are presented;

3. Within each section, the respective tools/procedures to be adopted by Petrobras in the execution of its HRDD are presented (more details about each tool are available in Annex 3);

4. At the end of each section, the main gaps in the company's HRDD management are presented, along with recommendations for strengthening existing company processes that can contribute to HRDD.

5. The Manual presents explanatory boxes throughout the text, in two colors: yellow and green. The yellow explanatory boxes are used to highlight points of attention, and the green ones to provide examples and details.

It is important to clarify that although presented in sequential steps, in practice, the due diligence process should be:

➔ **Iterative**, since different risk and impact identification and management processes can be carried out simultaneously and at different scales (for example, at the national and local levels), feeding into and improving each other.

➔ **Responsive**, anticipating feedback loops so that the company can learn from what worked and what didn't, and thus continuously improve its HRDD process;

➔ **Adaptable**, as the company must be able to respond appropriately to possible changes in its risk profile as circumstances evolve (e.g., changes in the country's regulatory framework, expansion of operations into new areas, new business relationships).

Table 1 - Summary of tools/processes for implementing HRDD at Petrobras (a description of each is presented in Annex 3)

Tools	Scope	Objective	Results	Frequency
Step: Identification and assessment of risks and impacts (Section 2.1)				
1) Mapping priority human rights issues	A macro-level approach, transversal to all of the company's E&P and Refining units in the country.	Identify and assess the "priority issues" of human rights for E&P and Refining operations, including the categories of rightsholders potentially affected, considering the engagement of relevant stakeholders.	● ● General risk matrix identifying the "priority themes" for E&P and Refining operations ● ● Identification of the main categories of rightsholders potentially affected	Once priority themes have been identified, the overall risk matrix should be updated whenever local risk mapping indicates new risks to human rights or when operations undergo changes that may lead to the identification of new risks. **Recommended frequency for review/update:** every 2 to 3 years, taking advantage of existing cycles that have synergy with this process.
2) Local risk mapping	Unit/location/project in accordance with the agreement.	Develop a human rights risk matrix for the unit/locality/project, identifying the rightsholders potentially most affected and treatment measures for each risk. If necessary, establish a prioritization plan for the units/localities/projects, based on relevant human rights criteria, to carry out local risk mapping.	● Prioritization plan for units/locations/projects for the progressive implementation of local risk mapping ● Local risk matrix, identifying the rightsholders potentially affected in each unit/location/project	**Recommended frequency for review/update:** annually or when changes occur in the socioeconomic context and human rights protection that may lead to the identification of new risks.
Stage: Integration & Monitoring (Section 2.2)				
3) Diagnosis of corporate risk management capacity	Corporate policies, processes, standards, and resources for E&P and Refining that interface with the HRDD (e.g., risk and impact management, community relations, external communication, whistleblowing	Assess whether the policies, processes, and control measures adopted by the company to address priority issues (i) are effective and (ii) are in accordance with best practices for HRDD.	● ● Diagnosis identifying gaps in risk management and impacts on human rights, and respective areas for improvement. ● ● Action plan to address the identified management gaps.	The capacity to manage risks and impacts on human rights should be reassessed whenever: ● A new policy, process, or standard is developed. ● Changes occur in the assumptions that underpinned the diagnosis of management capacity (regulatory changes, reduction of resources, etc.).

mechanisms)			The company should establish feedback mechanisms for the continuous improvement of its management capacity based on lessons learned and monitoring of the effectiveness indicators of the HRDD. **Recommended frequency for review/update: every 2 to 3 years,** following the update of the Priority Themes Mapping.
4) Diagnosis of local risk management capacity	Measures to prevent and mitigate the risks identified in the Local Risk Matrix for each unit/location/proje ct.	Assess whether the control measures adopted by the unit to address the identified risks (i) are effective and (ii) are in accordance with best practices for HRDD.	● <u>Diagnosis identifying gaps in risk management</u> and impacts on human rights, and respective areas for improvement. ● <u>Action plan</u> to address the identified management gaps.	The diagnosis should be carried out annually, during the review of the Local Risk Matrix.

<table>
<tr><td colspan="4" align="center">💬

Step: Communication (Section 2.3)</td></tr>
<tr>
<td>**5) Follow the UNGP Reporting Framework**</td>
<td>A broad external communication process for stakeholders regarding the HRDD Development) in Petrobras' E&P and Refining operations.</td>
<td>To guide the preparation of formal reports on the HRDD</td>
<td>● ● <u>Diagnosis based on the UNGP</u> Reporting Framework service checklist</td>
<td>**Recommended frequency for review/update:** at each reporting cycle.</td>
</tr>
</table>

5) Follow the UNGP Reporting Framework	A broad external communication process for stakeholders regarding the HRDD Development) in Petrobras' E&P and Refining operations.	To guide the preparation of formal reports on the HRDD	● ● <u>Diagnosis based on the UNGP</u> Reporting Framework service checklist	**Recommended frequency for review/update:** at each reporting cycle.

<table>
<tr><td colspan="4" align="center">🔊

Complaints and Complaint Mechanisms (Sections 2.4 and 2.5)</td></tr>
</table>

6) Evaluate the effectiveness of complaint mechanisms.	Policies, processes, and resources related to managing the company's complaint mechanisms (Ombudsman, Whistleblower Channel, etc.)	To assess whether Petrobras' complaint mechanisms are effective according to the GPs.	● ● <u>Diagnosis based on the checklist for meeting</u> the effectiveness criteria of the GPs.	**Recommended frequency for review/update: every 2 to 3 years.**

In-depth assessments (integrating multiple stages of the HRDD)

7) **Prior Human Rights Impact Assessment (HRIA)**	Unit/location/project	To assess on-site the existence of risks to human rights, establishing a baseline of the degree of respect for human rights. The on-site assessment should be carried out through field visits, including engagement with rightsholders.	● Impact assessment that allows: (i) establishing a baseline of the status of respect for human rights and the socioeconomic context in the locality, (ii) identifying and assessing risks and impacts on human rights, (iii) identifying management gaps, (iv) developing an action plan to: (a) address management gaps, prevent and mitigate impacts;	Before critical moments in the business lifecycle, such as project implementation/new operations, expansion of operations, asset acquisition, decommissioning, etc., it is recommended to seek synergies with internal processes, for example, establishing that Environmental Impact Assessments (EIAs) should be carried out in parallel with or in addition to environmental licensing impact studies[16]. HRIAs carried out in advanced stages of the business lifecycle should simultaneously consider both the impacts that have occurred and the risks present in the next phase of the business.
8) **Subsequent Human Rights Impact Assessment (HRIA)**	Unit/location/project	To assess on-site the occurrence and severity of impacts on human rights, in order to define, if necessary, appropriate remedial measures. The on-site assessment should be carried out through field visits, including engagement with rightsholders.	● Impact assessment that allows: (i) Identifying and evaluating impacts and affected rightsholders; (ii) Identifying management gaps; (iv) Developing an action plan to: (a) address management gaps, prevent and mitigate impacts; (b) repair existing impacts	When risk assessments or other sources (e.g., whistleblowing mechanisms, audits, etc.) indicate the occurrence of impact(s) on human rights and there is a need to further evaluate them.

1.6. Geographical delimitation of local mappings and diagnoses

Since the primary objective of conducting risk mapping and management capacity assessments at the "local" level is to enable effective risk management (i.e., preventing and mitigating negative impacts on people), the geographical scope of local mapping and assessments must be appropriate to this objective. In this sense, one can address an asset in isolation (for example, a refinery) or address different assets (for example, offshore exploration platforms located in a basin, which constitute an operational unit), provided that the joint approach to the assets does not compromise the identification and assessment of risks and

---

[16] See guidelines from IPIECA regarding the benefits and drawbacks of conducting an integrated assessment, along with a step-by-step guide on how to do it.

impacts on human rights associated with all those assets and the rightsholders who may be affected, nor the analysis of the existing risk and impact management capacity of each asset.

2.1. Identification and assessment of risks and impacts on human rights

2.1.1. Guidelines for the risk and impact identification and assessment phase

The initial step in human rights due diligence is to **identify and assess the nature of actual and potential adverse impacts** (in this Manual, potential impacts are referred to as "**risks**") on human rights with which the company may be involved. During this process, it is especially important that companies ensure the meaningful participation of potentially affected rightsholders (where possible) and/or stakeholders[17] – which can be done through different methodologies and tools and at different scales.

Risks vs. Impacts on Human Rights

The GPS establish that companies must conduct HRDD regarding existing and potential impacts. In this Manual, the term "**risks**" is used to refer to potential impacts, while "**impacts**" is used to refer to existing impacts – those that have occurred or are occurring.

The process of **identifying and assessing risks and impacts** should follow these guidelines:

Guidelines for identifying and assessing risks and impacts on human rights.

- It must encompass the **broad range of human rights** recognized in international and national instruments, starting from the starting from the minimum set of rights refered to in the GPs.

- It must be based on the **severity of the negative impact on** people, according to the technical criteria of scale, scope and degree of repairability (see definitions in Annex 3).

- You must consider **all the risks and impacts** that the company may cause, contribute to, or be directly involved in through its operations and value chain.

---

[17] Guiding Principles n. 15, 17 e 18.

- It should give particular consideration to the risks and impacts on the human rights of people belonging to groups or populations exposed to a **higher risk of vulnerability** or marginalization.

- It should include "**meaningful consultations**" (see definition below) with potentially impacted individuals and groups and other relevant stakeholders, whenever possible, depending on the size of the company, its nature and its context of activity or operation.

- ● It should be guided by internal or external **human rights experts**.

- You should consider **appropriate sources of information** that allow you to understand the perspective of rightsholders.

- It should be carried out **continuously** and when the company's business and operations are undergoing **changes** and **key moments**, such as asset acquisition, development of new plans or projects, opening of new units, acquisition of areas for expansion, closure or reduction of operations and decommissioning of structures, among others.

2.1.2. Risk and impact identification and assessment at Petrobras: how to implement it and where to start?

To guide the HRDD of Petrobras' E&P and Refining operations, the company must begin this stage comprehensively, conducting a mapping exercise to identify priority human rights issues across all E&P and Refining units.

Next, in order to ensure that HRDD is initiated and integrated into the processes of each E&P and Refining unit, local risk mappings must be carried out, as described in Chart 2 below.

Table 2 - Summary of tools/processes for implementing HRDD at Petrobras - Risk and Impact Identification and Assessment stage (a description of each is presented in Annex 3)

Tools	Scope	Objective	Results	Frequency
Step: Identification and assessment of risks and impacts (Section 2.1)				
1) Priority human rights issues mapping	A macro-level approach, transversal to all of the company's E&P and Refining units in the country.	Identify and assess the "priority issues" of human rights for E&P and Refining operations, including the categories of rightsholders potentially affected, considering the engagement of relevant stakeholders.	• Risk matrix (general) identifying the "priority issues" for E&P and Refining operations • Identification of the main categories of rightsholders potentially affected.	Once the priority issues have been identified, the overall risk matrix should be updated whenever local risk mappings indicate new risks to human rights or operations undergo changes that may lead to the identification of new risks. **Recommended periodicity for review/update:** 2 to 3 years, taking advantage of existing cycles that have synergy with this process
2) Local risk mapping	Unit/locality/project agreement.	Develop a human rights risk matrix for the unit/locality/project, identifying the rightsholders potentially most affected and treatment measures for each risk. If necessary, establish a plan for prioritizing units/locations/projects, based on relevant human rights criteria, to carry out local risk mapping.	• Prioritization plan for units/locations/projects to progressively carry out local risk mapping • Local risk matrix, identifying potentially affected rightsholders in each unit/locality/project	**Recommended periodicity for review/update:** annually or when there are changes in the socioeconomic context and the protection of human rights that may lead to the identification of new risks.

"Priority issues" of human rights can refer both to individual human rights (e.g. freedom of expression, freedom of association, right to non-discrimination, right to water), and to categories of human rights related to groups of potentially affected individuals or to operational contexts that have implications for a set of rights (e.g. security, rights of indigenous peoples, rights related to land).

The identification of priority themes is extremely relevant for HRDD, because it allows the company to understand macro themes of cross-cutting relevance, and identify where to concentrate efforts and resources. The identification of **priority issues** will be an important reference to guide the work of risk mapping at the local level and also of communication on HRDD (see section 2.3 below).

To identify **priority issues**, all negative impacts on human rights should be considered and evaluated according to the following criteria:

- **Severity**: risk assessment in terms of:
    - scale: the seriousness of the risk to human rights;
    - scope: the number of individuals who are or may be affected;
    - degree of irreparability: the difficulty involved in repairing the impact, when it occurs, restoring the holder of the right to the situation prior to its occurrence;
- **Probability**: impacts that are likely to occur in the future;

After identifying the Priority Issues, it is important that the company carries out **(local) human rights risk mapping** for each E&P and Refining unit, location or project. If it is not possible to carry out the mapping in all units simultaneously, it is recommended to establish a **plan for prioritizing** the units/locations/projects, based on relevant human rights criteria, according to the availability of existing resources and schedules.

Two sets of information can be considered as a starting point in the processes of identification and assessment of risks and impacts to be implemented at Petrobras: (i) The human rights **priority issues** that are common to companies in the oil and gas sector in Brazil; (ii) The **categories of rightsholders** most commonly affected by activities related to the sector in the country. In the process of mapping local risks, it is important that the company considers the risks/issues and specific rightsholders for the units/operations in question, according to the respective contexts and nature of the activities.

**Priority human rights issues
of companies in the Oil & Gas sector in Brazil[18]**

- Decent work/working conditions, in particular:
    - Freedom of association
    - Discrimination and harassment
    - Occupational health and safety, including mental health
- Land acquisition and land conflicts
- Health and safety of local communities and environmental protection
- Access to water
- Property security/Use of force
- Information, participation and consultation of local communities, including indigenous peoples and traditional communities
- Impacts on children
- Impacts on women and girls
- Impacts on indigenous peoples and traditional communities

---

[18] The list is not exhaustive and was prepared based on several sources, including publications by IPIECA.

● Retaliation and action by human rights advocates

**Key human rightsholders
potentially affected by companies in the Oil & Gas sector[19]**

● Direct and outsourced employees, especially:
  ○ Young apprentices[20] or other school-age workers
  ○ Migrant workers
  ○ Minority workers in the company (women, LGBTQIA+, elderly, Black people, people with disabilities, among others)
  ○ Low-skilled workers
  ○ Offshore workers
● Indigenous peoples and traditional communities, especially riverside communities;
● Local communities
● Women and children
● Human rights advocates
● Commercial and artisanal fishermen
● People working in the coastal tourism sector

In **identifying potentially affected rightsholders**, it is important to consider the different contexts in which Petrobras' activities are carried out and the different holders that may be affected throughout the different phases of the life cycle of E&P and Refining operations:

1. The location of resources can determine the number and type of communities affected, as well as the nature of the impacts and their likelihood. For example, in offshore exploration and extraction, fishing communities may be the most affected communities, but communities living close to the coast, commercial fishermen, and the coastal tourism sector may also suffer adverse impacts.

➔ It is also important to consider the methods of handling and transporting employees in the operations, which can vary depending on the extraction location – onshore oil and gas extraction typically involves land-based pipelines, while offshore extraction will involve subsea pipelines and ships. Furthermore, industries utilize shipping methods and port facilities that may be part of their area of impact, even when they are far from the extraction points.

Annex 5 presents **examples of E&P and Refining activities that may negatively impact human rights**.

---

[19] IPIECA, "Human rights due diligence guidance" (2021).
[20] Within Brazilian context.

2.1.3. Engagement and meaningful participation of stakeholders and rightsholders.

According to Guiding Principle No. 18, in the process of identifying and assessing risks and impacts, companies should "include meaningful consultations with potentially impacted individuals and groups and other relevant stakeholders depending on the size of the company, its nature and context of activity or operation". The objective of this engagement is to obtain the perspective of those potentially impacted regarding the identified risks and impacts and the respective preventive and mitigating measures.

Figure 6 - Stakeholders for meaningful engagement

Stakeholder engagement represents **an essential part of implementing human rights due diligence**. It is also recognized as an effective activity to identify and avoid potential impacts, as stakeholders can contribute with important information and knowledge to help identify risks and impacts that they may suffer or that may affect their surroundings.

In situations where it is not possible to consult rightsholders directly, companies should consider reasonable alternatives, such as consulting trusted and independent experts, human rights advocates, and other civil society entities, such as organizations that work on relevant issues or that represent the interests of rightsholders (e.g., trade unions, NGOs).

On the other hand, inadequate or incomplete engagement can frustrate expectations, generate misunderstandings, and even intensify tensions. **Therefore, it is recommended that the engagement of rightsholders, especially in contexts of vulnerability and pre-existing tension, be carried out in an advisory manner or directly carried out by experts trained in engagement for the specific purposes of HRDD, through established methodologies such as HRIAs.**

Stakeholder engagement in tools for HRDD
In order to carry out the **Priority Issues Mapping**, considering the extent of its scope (all E&P and Refining units), it is recommended to engage **stakeholders** who can contribute to a better understanding of the perspective of potentially affected rightsholders, who act more broadly in the national territory, such as civil society organizations, unions and specialists.
In **the Local Risk Mappings**, it is recommended that the perspective of human rightsholders be obtained through research of secondary data, analysis of complaints and claims received through the Community Relations and the Ombudsman's Office, in addition to consultations that have been carried out in the HRIAs, surveys (e.g., on the work environment, diversity and inclusion, etc.) and other diagnoses and studies carried out by the company.
In **prior or subsequent Human Rights Impact Assessments (HRIAs),** it is recommended to prioritize meaningful engagement with rightsholders where possible.

What is "meaningful" engagement or participation[21]?

Meaningful stakeholder engagement is characterized by **two-way communication** and depends on the **good faith** of all participants. It is also a **responsive** and **continuous** process that, in many cases, involves engaging with stakeholders **before** making decisions.

➔ **Two-way engagement** means that both the company and stakeholders can freely express their opinions, share their perspectives, and listen to other points of view to reach a mutual understanding. It also means that relevant stakeholders have the opportunity to help develop and carry out their own engagement activities.

➔ **Good faith:** both the company and stakeholders are expected to act in good faith in engagement activities. This means that the company engages with the genuine intention of understanding how the relevant interests of stakeholders are affected by its activities. It also means that the company is prepared to deal with any negative impacts it causes or contributes to, and that stakeholders genuinely represent their interests, intentions, and concerns.

➔ **Responsive engagement** means that the company seeks to base its decisions on the perspectives of the people who may be affected by those decisions. It is important to engage stakeholders and rightsholders before making any decision that may impact them. This initiative involves the timely provision of all necessary information to stakeholders and rightsholders so that they can make an informed decision about how the company's decisions may affect them. Furthermore, it is necessary to monitor the implementation of agreed commitments to ensure that negative impacts are addressed, including the use of remedies when the company has caused or contributed to the impact(s).

➔ **Continuous engagement** means that stakeholder engagement activities continue throughout the entire lifecycle of an operation or activity; in other words, engagement activity is not a one-off event.

Furthermore, it's important to remember that:

● Engagement activities should always be developed according to the needs and context of the stakeholders you want to engage. For the participation of **vulnerable groups** to be truly meaningful, there needs to be specific approaches to enable their participation.

---

[21] Translated directly from the OECD Due Diligence *Guidance* for Meaningful Stakeholder Engagement in the Extractive Sector.

● In any situation, engagement must respect the human rights of those involved and not put them at risk. The company must also ensure that there will be no retaliation against those who participate.

Stakeholder engagement activities should be proportionate to the risks and impacts the company may cause or contribute to. For example, where operations involve the resettlement of communities, broader information sharing, consultations, and negotiations may be necessary compared to a situation where impacts are more limited, such as in cases of changes to transportation routes.

Mandatory engagement

In some cases, engaging or consulting with stakeholders is a company obligation and must be fulfilled in accordance with applicable law.

● The right of workers to form or join a union and the right to collective bargaining are internationally recognized human rights. For this reason, it is important that, when engaging workers, the engagement of their representatives or unions should also be promoted.
● Communities located in the area of influence of projects and developments have the right to be informed about the scope and characteristics of the projects to be implemented, through public hearings, during the environmental licensing process.
● Indigenous peoples and traditional communities should be consulted regarding legislative or administrative measures likely to directly affect them, with the aim of reaching an agreement and obtaining consent regarding the proposed measures, in accordance with ILO Convention No. 169.

Although Brazilian environmental licensing may require public hearings and/or informational meetings (depending on the subject of the licensing and the agency involved), as a rule, there is no clear requirement that these processes be bidirectional and responsive. Informative meetings and public hearings are relevant to the human rights and rights distribution process, but it is important to foresee, in addition to them, moments where more meaningful engagement can be achieved with potentially affected rightsholders, as described in this Manual.

2.1.5. Free, prior and informed consultation

When projects and activities may affect the lives of indigenous peoples and their lands and resources, minimum human rights standards stipulate that States must conduct free, prior and informed consultations "with the aim of reaching an agreement and obtaining the consent" of the communities involved (ILO Convention 169). More recent non-binding instruments, such as the United Nations Declaration on the Rights of Indigenous Peoples and the VGGT, establish that in such situations, States must obtain the free, prior and informed consent of indigenous communities (UNDRIP, art. 19). Indigenous peoples cannot be forcibly displaced from their lands. Exceptionally, they may be resettled in accordance with the law and compensated, but only if their free, prior and informed consent is obtained (ILO Convention 169).

Brazilian history, since colonization, is marked by structural violence against indigenous and traditional peoples and communities, who continue to fight for the effective recognition of their rights. Brazilian law has advanced in recognizing the protection conferred by ILO Convention No. 169 to indigenous peoples and,

more recently, in cases involving quilombolas (communities founded by formerly enslaved people who escaped during Brazil's period of slavery) (in line with the most recent jurisprudence of the Inter-American Human Rights System), but civil society continues to seek the same recognition for peoples and communities called "traditional," such as coconut breakers, people of the Gerais (traditional communities that live in the Gerais, a vast region of the Cerrado savanna in northern Minas Gerais, Brazil), rubber tappers, among others. In any case, traditional communities are protected by specific national legislation, which emphasizes the essential relationship between protecting the ways of life of traditional communities and their dependence on the territory and natural resources existing therein.

Although the primary duty to protect and implement the right to free, prior, and informed consultation belongs to States, the Brazilian State's capacity for intercultural dialogue with indigenous peoples, traditional communities, and *quilombola* communities is still under construction. However, the weak state action in this regard does not exempt companies from respecting recognized human rights. Therefore, it is important that companies in sectors where activities and operations may affect the rights of indigenous and traditional communities understand and develop procedures for conducting free, prior, and informed consultations (FPIC) in accordance with international standards. Conducting FPIC requires a specific consultation methodology, which must be voluntary, in good faith, and community-led, with the community being informed, in appropriate language and in a timely manner, of all issues necessary to understand the extent of any measure that may affect it.

2.1.4. Periodicity and life cycle of businesses

The HRDD must consider the risks and human rights impacts that the company may cause/contribute to throughout **the entire business life cycle** – from the first studies to assess the implementation of an E&P and refining project/structure to the closure of the operation and decommissioning of structures, including impacts that may occur after decommissioning (e.g., a soil contamination liability).

Given that HRDD has **a preventive and mitigating character, and considering the life cycle of an operation/project, the sooner the company maps human rights risks and engages stakeholders, the sooner the company will be equipped with important information to prevent (or mitigate) risks and impacts, and the more effective its due diligence process will be.**

> **Possible consequences of starting HRDD too late:**
>
> ● Stakeholder perspectives may not be adequately understood, and the relationship with them may be compromised throughout the business lifecycle.
> ● As a result, some negative impacts may not be avoided or adequately addressed, potentially affecting even the perception of the business's positive impacts.

Therefore, project and operational schedules should be planned in a way that allows the company to conduct risk and impact mapping and engage stakeholders as soon as it begins operating in the territory in question. Below are some tools that can be used in the initial stages:

- **Local human rights risks mapping** to be carried out in the oil/natural gas exploration phase in the E&P business or in the planning phase of Refining operations and other operations/projects, identifying the rightsholders potentially affected in this phase.
- **Human rights impact assessments (HRIA)** in parallel with the impact studies required by environmental licensing, and/or prior to critical changes in operations (expansion, reduction, closure, decommissioning, etc.).

> **Exploratory activities:**
>
> According to the OECD Due Diligence Guide for Meaningful Stakeholder Engagement in the Extractive Sector, when companies undertake exploratory activities (either directly or through third parties), they must follow the GP guidelines for HRDD (or require their representatives to follow them), regardless of the exploration results and whether the project is deemed viable or not. The way a company approaches and initiates operations in a given region is crucial for establishing a positive environment for stakeholder engagement throughout the project.

2.1.5. Human Rights Impact Assessment (HRIA)

The HRIA is a robust study conducted by human rights experts, which includes field research, combining on-site visits, interviews, stakeholder engagement, and encompasses the development of a baseline on the status of respect for human rights in the locality in question.

The HRIA must follow tested methodologies developed based on the guidelines of the GPs and, above all, must include consultations and engagement with stakeholders and, when possible, rightsholders. It can be employed with different scopes and at various points in the life cycle of a project/operation, depending on the company's needs and objectives throughout the HRDD process (see Annex 3).

Table 3 - Summary of tools/processes for implementing HRDD at Petrobras - Risk and Impact Identification and Assessment stage (a description of each is presented in Annex 3)

Tool	Scope	Objective	Results	Frequency
In-depth assessments, which combine the steps of the HRDD.				
7) Prior Human Rights Impact Assessment (HRIA)	Unit/location/project	Assess *in loco* the existence of risks to human rights, establishing a *baseline* of the degree of respect for human rights. On-site *evaluation* should be carried out through field visits, including engagement with rightsholders	1. Impact assessment that allows: (i) to draw a baseline of the status of respect for human rights and the socioeconomic context in the locality, (ii) identify and assess human rights risks and impacts (ii) Identify management gaps (iv) develop an action plan to: (a) remedy management gaps, prevent and mitigate impacts;	Before critical moments in the business life cycle, such as: implementation of projects/new operations, expansion of operations, acquisition of assets, decommissioning, etc. It is recommended to seek synergies with internal processes, for example by establishing that HRIAs must be carried out in parallel or in addition to environmental licensing impact studies[22]. EHRIs carried out in advanced stages of the business life cycle must simultaneously contemplate both the impacts that have occurred and the risks present in the next phase of the business.
8) Subsequent Human Rights Impact Assessment (HRIA)	Unit/location/project	To assess on-site the occurrence and severity of impacts on human rights, in order to define, if necessary, appropriate remedial measures. On-site assessments should be conducted through field visits, including engagement with rightsholders.	1. Impact assessment that allows: (i) Identify and evaluate impacts and impacted rightsholders; (ii) Identify management gaps (iv) develop an action plan to: (a) remedy management gaps, prevent and mitigate impacts; (b) remedy existing impacts	When risk mappings or other sources (e.g. whistleblowing mechanisms, audits, etc.) indicate the occurrence of human rights impact(s) and there is a need for further assessment of them.

The **HRIA carried out at the project, unit or site level,** is an extremely useful tool to ensure the effectiveness of a company's HRDD process, since:

---

[22] See IPIECA's clarifications on synergies and differences between environmental impact studies and EHRIs.

- It helps the company identify the nature of its involvement with the mapped risks and adverse impacts - whether it caused (or may cause) the adverse impact; whether it contributed (or could contribute) to the adverse impact; whether the adverse impact is (or would be) directly related to its operations, products or services - in order to adopt the appropriate response to the (possible) harm;
- It facilitates dialogue between the company, rightsholders, and other stakeholders;
- It strengthens the company's knowledge management process regarding human rights, through the documentation of identified risks and impacts and the actions taken to address them[23].
- It can result in building partnerships between the company and stakeholders on how to address human rights risks and impacts, including through the development of joint actions to address cumulative risks and impacts or legacy issues;

It is recommended that HRIAs be carried out at the following points in the business lifecycle:

During key moments involving significant changes in operations, such as the implementation of a new project, expansion, reduction and closure of operations, decommissioning of structures, etc.

When risk mapping or other sources indicate that the company may be causing or contributing to a negative impact on a particular location/unit/project, and there is a need to conduct an in-depth study to verify the occurrence and assess the severity of the negative impacts.

Synergy between HRIAs and Environmental Impact Assessments (EIAs)

Although they have distinct objectives, environmental impact studies (EIAs) required within the scope of Brazilian environmental licensing and human rights impact assessments (HRIAs) can present synergies, especially regarding studies of the socioeconomic environment. The data and information collected about the socioeconomic reality within the scope of an EIA can contribute to analyses of negative impacts on human rights. On the other hand, there are important differences between the two, among the main ones being:
- Human Rights Impact Assessments (HRIAs) focus on evaluating the impacts on a wide range of protected human rights, which can broaden the scope of topics commonly addressed in Environmental Impact Studies (EIAs) (addressing, for example, issues of security and conflict, corruption, access to justice, land disputes, gender perspectives and discrimination, as well as giving special attention to vulnerable groups).
- Since the focus of the HRIA is on negative impacts on human rights, the assessment should be more in-depth.
- The HRIA encompasses risks and impacts related to project workers as well as those associated with the project's value chain, which are not always considered in EIAs.

---

[23] Legacy issues relate to the risks and impacts caused by company(ies) or state entities that operated in the region prior to the company's arrival and that continue to negatively affect
s. For example, poorly managed community resettlements prior to the company acquiring the area where it now operates.

> ● The HRIA requires meaningful engagement and participation with potentially affected rightsholders throughout the assessment process.
>
> Other important differences and ways to carry out the two types of studies in a complementary way are presented in several manuals, such as the Guide *Integrating human rights into environmental, social and health impact assessments* by IPIECA.[24]

2.1.6. Existing processes for identifying and assessing risks and impacts at Petrobras that may contribute to the HRDD

Petrobras has developed and adopted internal policies and processes that, although not fully aligned with the guidelines of the GPs, can already contribute to the processes of **identification and assessment of risks and impacts on human rights**, among the main ones:

- Social Responsibility Policy
- Managing Social Risks and Community Relations;
- Managing Social Risks of Investments, Operations, Decommissioning, Hibernations and Divestments;
- Social Responsibility Report Template;
- Catalog of social risks (event) by social responsibility issue;
- Social Risk Matrix;
- Framework for Assessing Social Impact – Model Agreed Upon at the Meeting of July 8, 2022;
- Social Risk Scale;
- Diagnosis and Analysis of Community Relationships;
- Manage Local Social Responsibility Plans and Community Relations;
- Levels of Community Engagement;

- Guidelines for the Removal and Resettlement of Communities;
- Community Committee Evaluation Questionnaire;
- Assessment of Socioeconomic Impacts;
- HSE Policy;
- Protective Intelligence and Corporate Security Policy (ISC);
- Managing Corporate Security Risks;
- Enterprise Risk Management Policy;
- Enterprise Risk Management;
- Corporate Risk Appetite Statement;
- Business Risk Base;
- Tool for Managing Business Risks;
- Perform Qualitative Risk Analysis;

It is recommended, however, to strengthen the HRDD in these processes or through the elaboration of specific processes, paying attention to the gaps and recommendations presented in the Technical Note, attached to this Manual.

---

[24] IPIECA, "*Integrating human rights into environmental, social and health impact assessments".* (2013)

2.2. Integration of results and monitoring of the effectiveness of responses

2.2.1. Guidelines for integration and monitoring

According to Guiding Principles 19 and 20, once the risks related to their activities have been identified, companies must integrate the conclusions of their assessments into internal functions and processes, taking appropriate measures to address them, which may involve preventive and/or mitigating measures.

Below are the guidelines that must be observed in the process of **integrating the results of human rights impact assessments and monitoring the responses adopted**:

Guidelines for integrating and monitoring the results of human rights impact assessments.
Define prevention and mitigation measures **based on the results of the human rights risk and impact assessment** and, if necessary, prioritize them according to the degree of **severity** of the risks and impacts identified **for people**.
Define attributions for the implementation and supervision of measures to prevent and mitigate human rights risks and impacts at the **appropriate levels and functions** within the company, including the **involvement and supervision of senior management in the most severe issues**.
Internal processes for decision-making and resource allocation must be able to ensure the implementation of effective measures to prevent and mitigate the identified human rights risks and impacts.
Monitor the effectiveness of the measures adopted according to *feedback* from internal and external sources, including **potentially affected stakeholders and rightsholders**.

Therefore, if the company has identified an impact that it may have caused or contributed to, it must take timely and appropriate measures to remedy it, as discussed in Section 3 below.

The process of **integrating** results aims to determine:

- The area of the company responsible for implementing measures to prevent or mitigate the impact.
- How to ensure the effectiveness of the measures taken

● Ways to continuously improve internal processes, based on lessons learned in the due diligence process.

It is also worth highlighting that the measures defined should be aimed at preventing and mitigating negative impacts on people, not just on the business, and should be developed by experts who understand the process of preventing and mitigating impacts on human rights. This is a process that should be carried out whenever a risk is identified.

> **Impact prevention measures:** actions aimed at preventing negative impacts from occurring, for example measures that reduce the likelihood of a negative impact occurring.
> **Impact mitigation measures:** actions that reduce the extent of the impact if it occurs.
> The focus of HRDD is on preventing negative impacts.

Once preventive and mitigating measures (often called risk "controls") have been adopted, companies should **monitor** the implementation and effectiveness of these measures. To this end, companies must make use of a series of internal (e.g. audit reports, data from complaint mechanisms, compliance indicators) and external sources of information, especially **the perspective of potentially impacted rightsholders** (which can be done through secondary data, such as publications by civil society organizations, reporting, etc.), but also through **meaningful stakeholder engagement (which should follow the guidelines presented in section 2.1).**

The frequency with which a company tracks the progress of responses depends on the nature and severity of the negative impact, actual or potential, that the company is monitoring. For example, for more severe impacts, there is a greater urgency in determining whether the negative impacts are being effectively addressed. In many cases, activities to track implementation and the respective results can be integrated into existing internal monitoring and communication processes.

In short, monitoring should allow companies to assess whether the processes and measures implemented are enabling the company to effectively prevent and/or mitigate the negative impacts of its activities, and what can be done to make them more effective. Monitoring is also essential for the company to be able to communicate with stakeholders about what is being done to fulfill its responsibility to respect human rights.

> **Examples of indicators for monitoring HRDD**[25]
>
> Establishing appropriate qualitative and quantitative indicators can be useful for monitoring. For example, relevant indicators might include:
>
> ● Percentage of impacted rightsholders who feel that the negative impacts were adequately addressed.

---

[25] Indicators that bring the perspective of the affected parties, such as the first two examples, are extremely relevant to HRDD since the objective of HRDD is to prevent, mitigate and repair the impacts on people. There are different methodologies that can be employed to obtain the perspective of those affected, for example structured consultations and surveys, which must be appropriate to the context and reality of the affected parties.

- Percentage of impacted stakeholders who feel that the channels for submitting complaints are accessible, equitable, and effective.
- Percentage/number of agreed control measures that were implemented according to the planned schedules.
- Rate of recurring problems related to the identified negative impact(s).

2.2.2. Integrating results and monitoring responses at Petrobras: where to begin?

Petrobras has adopted procedures for integrating and monitoring risks that interface with human rights (social risks by SR, human rights risks by ISC - Corporate Security Intelligence, occupational health and safety risks by HSE).[26] Based on the guidelines of the GPs and other reference parameters, it is recommended that Petrobras carry out a **Diagnosis of the capacity to manage human rights risks at corporate level**, in order to assess whether the policies, processes and control measures adopted by the company to manage the priority topics (i) are effective and (ii) are in accordance with the best practices for HRDD. Once the diagnosis is made, an action plan must be defined to remedy gaps and, in a structured and prioritized manner, strengthen HRDD. If there are many actions to be implemented, they should be prioritized according to the severity of the potential impact they aim to prevent/mitigate.

The **Diagnosis of Corporate Management Capacity** aims to identify whether:

- The company has assigned responsibilities at the appropriate levels internally to prevent or mitigate risks and impacts on human rights, including the **involvement and oversight of senior management on priority issues.**
- Internal processes for decision-making and resource allocation are capable of ensuring the implementation of effective measures to prevent and mitigate identified risks and impacts on human rights.
- The company monitors the effectiveness of the measures adopted based on feedback from internal and external sources, including the **perspective of stakeholders and rightsholders potentially affected.**
- It established feedback mechanisms for continuous improvement based on the results of the HRDD.

When carrying out the **Diagnosis of (corporate) management capacity,** the company must also seek to understand which activities and areas of the company were involved in the generation of negative impacts on human rights. If the evidence is clear enough, the company can link this type of analysis to employee **performance incentives** – whether financial incentives, promotions, or other rewards – which can play an important role in helping to incorporate respect for human rights into the company's practices.

Table 4 - Summary of tools/processes for implementing HRDD at Petrobras - integration and monitoring phase (a description of each is presented in Annex 3

---

[26] For example, in the Social Risk Management and Relationship Process, *"social risks must be addressed through the preparation of a response plan with a description of the actions, deadlines and those responsible, and the product of this stage must be registered in the social risk matrix"* and the Petrobras Business Risk Management Guideline defines that *"Units of the general structure should plan for monitoring as an integral part of risk management."*

36

Tools	Scope	Objective	Results	Frequency
Stage: Integration & Monitoring (Section 2.2)				
3) Diagnosis of corporate risk management capacity	Corporate E&P and Refining policies, processes, standards and resources that interface with HRDD (e.g. risk and impact management, community relations, external communication, whistleblowing mechanisms)	Assess whether the policies, processes and control measures adopted by the company to address priority issues (i) are effective and (ii) are in line with best practices for HRDD.	● Diagnosis identifying gaps in risk management and impacts on human rights, and respective areas for improvement. ● Action plan to address identified management gaps	The capacity to manage risks and impacts on human rights should be reassessed whenever: ● A new policy, process, or standard has been developed. ● Changes occur in the assumptions that underpinned the management capacity diagnosis (regulatory changes, resource reduction, etc.) The company must establish feedback mechanisms for the continuous improvement of its management capacity based on lessons learned and the monitoring of the effectiveness indicators of the HRDD. **Recommended periodicity for review/update:** 2 to 3 years, following the update of the Mapping of Priority Themes
4) Diagnosis of local risk management capacity	Measures to prevent and mitigate the risks identified in the Local Risk Matrix of each unit/locality/project	Assess whether the control measures adopted by the unit to address the identified risks (i) are effective and (ii) are in line with best practices for HRDD.	● Diagnosis identifying gaps in risk management and impacts on human rights, and respective areas for improvement. ● Action plan to address identified management gaps.	The diagnosis should be carried out annually, during the review of the Local Risk Matrix.

In addition to diagnosing corporate-level management capacity, it is important that each local risk mapping be accompanied by a diagnosis of the (local) management capacity of the risks identified in the local mapping, which has the same objective as the diagnosis carried out at the corporate level.

2.2.3. Existing processes for integrating and monitoring risks and impacts at Petrobras that can contribute to HRDD

Petrobras has developed and adopted internal policies and processes (listed in item 2.1.6 above) that, while not entirely aligned with the guidelines of the Guiding Principles, can already contribute to the integration

and monitoring of human rights risks and impacts. However, it is recommended to strengthen the HRDD within these processes or through the development of specific processes, paying attention to the gaps and recommendations presented in the Technical Note attached to this Manual.

2.3. Communication on risk and impact management

2.3.1. Guidelines for communication

Companies like Petrobras, whose nature of operations presents severe risks to human rights, should formally report how they address these risks to a wide range of stakeholders[27]. Beyond formal reports, such as annual sustainability reports or specific human rights reports, companies should have processes in place that allow them to communicate about their due diligence process to impacted or potentially impacted rightsholders in a timely, culturally appropriate, and accessible manner, especially when information is requested by rightsholders or stakeholders.

Guidelines for communication regarding the management of risks and impacts on human rights.
● Communicate externally the risks and impacts on human rights that have been identified, as well as the measures taken to address them. When there are risks of serious impacts on human rights, communication actions should include formal reports containing themes and indicators on the identification of such impacts and measures adopted to address them.

● Communications should:
   ○ Provide sufficient information to allow for an assessment of the adequacy of the response given to the negative impacts on human rights.
   ○ Be accessible to the intended stakeholders
   ○ Have a format and frequency that reflect the impacts on human rights.

● Communication efforts should not expose the affected rightsholders or company employees to risks.

The information communicated must be physically accessible and understandable. It should be shared at the time, in the format, language, and location that best ensures its visibility and understanding by the target audience. The following questions may be helpful in identifying the appropriate way to inform stakeholders:

- Who is the target audience?
- How can the public access the information?
- What accessibility barriers might exist for certain marginalized or vulnerable groups?
- What are the characteristics of the target audience (language, education level, location, technical knowledge)?

---

[27] Guiding Principle n. 21.

- What do stakeholders and rightsholders consider important or useful in terms of content and methods of information sharing?

In answering these questions, the company must establish distinct communication methods for audiences with distinct needs. For example, if local communities do not have frequent internet access, it is important that communication takes these factors into account.

The most common forms of communication, depending on the target audience, are:

- Formal public reports, such as company annual reports, sustainability or corporate social responsibility reports, specific reports on human rights management;
- **Publication of the results or executive summary of the completed HRIAs;**
- Direct engagement with rightsholders who are impacted or potentially impacted to communicate the results of the HRIA or the progress of managing specific issues, which can be done in meetings, forums, hearings, depending on the situation and timing.

Larger companies that have excelled in the implementation of HRDD have adopted separate reports to present information on human rights management in the company, whether on HRDD in general or on specific topics or studies carried out[28].

The type of information, the frequency, and the way it is disseminated will vary according to the impacts. For example:

If a company can impact the quality of water used by a metropolitan area, it is important that it publish information, including data on how it manages water resources, in a way that is accessible to water resource managers and the local population.

- If a company has detected a challenge related to inclusion or identified widespread discriminatory practices among employees in a particular unit, and has conducted an in-depth assessment of the issue, it should communicate the assessment process and its results to its employees. This can be done through informational meetings, publication in internal communication channels, workshops, etc.
- If a company's expansion of operations could impact a particular indigenous group, it is important to communicate about managing these risks directly (if possible), engaging leaders and members of potentially affected communities, in accordance with applicable regulations and in a manner they deem culturally appropriate.
- Communicating the results of managing less severe socio-environmental impacts related to day-to-day operations (such as noise and particulate emissions, changes in traffic, lighting, etc.) can be addressed in periodic meetings established to discuss these topics, such as Community Forums, social dialogues, etc.

Depending on the case, communication processes may occur concurrently or lead to a process of engagement and participation of rightsholders and other stakeholders. For example, when communicating

---

[28] Unilever, "Human Rights Progress Report" (2021); Unilever, "Labour Rights in Unilever's Supply Chain: from compliance towards good practice" (2013); Nestlé, "Nestlé's human rights framework and roadmap" (2021); Nestlé, "Tackling Child Labor" (2019); Nestlé, "Nestlé Commitment on Labour Rights in Agricultural Supply Chains" (2015); Rio Tinto, "Report into workplace culture at Rio Tinto" (2022).

about the results of managing socio-environmental impacts (noise, particulate emissions, etc.) in community forums or meetings with local leaders, rightsholders can bring suggestions and their own perspectives (see section 2.1.3 on guidelines for conducting engagement).

The best way to assess the adequacy and sufficiency of the information published on how the company is managing negative impacts is through engagement and feedback from the target audience.

UN Guiding Principles Reporting Framework[29]

The Reporting Framework presents a guide with questions and indications that help companies begin the formal external communication process about their HRDD in a broad way to various stakeholders, regardless of their size or the stage of implementation of their GPs Assuming that HRDD is a process of continuous improvement, the focus of the Reporting Framework is to guide companies in their communication, including how they have progressed in implementing GPs. The following principles guide the use of the UN Guiding Principles Reporting Framework:

- To place the communicated information within the context of business activities;
- Meet the minimum level of information that must be communicated, according to the Reporting Framework;
- To demonstrate continuous improvement;
- Focus on respect for human rights;
- To address the most severe impacts on human rights;
- Provide examples of how management occurs in the different geographical areas where it operates;
- Explain any omission of important information.

2.3.2. Existing communication processes that can contribute to HRDD

Petrobras has developed and adopted internal policies and processes (such as the process for preparing the sustainability report and the processes for Social Relations, Community Forums, and HSE Dialogues) that, while not entirely aligned with best practices on HRDD communication, already contribute to communicating HRDD to stakeholders. However, it is recommended to strengthen HRDD in the aforementioned processes or through the development of specific processes, paying attention to the gaps and recommendations presented in the Technical Note attached to this Manual.

3. IMPACT REPAIR AND COMPLAINT MECHANISMS

3.1. Guidelines on repairing

According to Guiding Principle No. 22, companies must "take remedial measures when they find that they have caused or contributed to negative impacts on human rights." A company will not be fulfilling its

---

[29] The Reporting Framework is the primary reference for reporting on human rights due diligence following Guiding Principles (GPs) and was developed through the Human Rights Reporting and Assurance Frameworks Initiative (RAFI). RAFI was co-facilitated by Shift and Mazars through an open, global, and consultative process involving representatives from over 200 companies, investor groups, civil society organizations, governments, lawyers, and other specialized organizations from all regions of the world. Consultations took place in Addis Ababa, Bangkok, Jakarta, London, Manila, Medellín, New York, and Yangon.

responsibility to respect human rights if it has identified that it has caused or contributed to a negative impact but has failed to provide any remediation.

In the comments on the GPs, it is highlighted that one way to ensure that the remediation process takes place is through a reliable complaint mechanism at the operational level, which allows for the systematic handling of different types of complaints and denunciations (see more below), but companies must also remediate impacts that have been identified through other means, such as social and/or human rights impact assessments, media investigations, etc.

3.1.1. Fair and proportionate compensation for the damage

Reparation must be fair and proportionate to the severity of the harm suffered and should never replace criminal liability. Determining what constitutes just reparation depends on the circumstances of each case, but in all cases, reparation must be consistent with internationally recognized human rights and not violate the rights of third parties. Other characteristics of just reparation include:

- The reparation should aim to return the affected party to the same situation it was in before the negative impact(s) occurred;
- The affected parties may require different reparations. For example, women may suffer harm differently than men, therefore requiring different reparations;
- Financial compensation is not always a sufficient reparative measure. For example, although financial resources can be offered in the acquisition of an area used by traditional communities, these communities may relate to that area through values that go beyond the idea of material goods or a unit of production.

Examples of remedial measures, depending on the damage caused:

- Providing explanations and information
- Changes to operational practices and plans.
- Implementation of disciplinary measures
- Restriction or reduction of activities that cause impact.
- Job restoration
- Compensation for lost assets
- Acknowledgment of the error and formal apology.
- Correction of inaccuracies in company statements.
- Cost of legal assistance
- Provision of medical or psychological assistance
- Development of environmental restoration and/or livelihood programs
- Financial and non-financial compensation
- Payment of fair compensation
- Commitment to no repetition

Finally, if an alleged impact has been brought to the company's attention and, after a thorough assessment, the company does not acknowledge its involvement and/or the occurrence of the impact, it should not prevent or hinder the rightsholders' access to the judiciary or other legitimate means of redress (e.g., negotiation with the union, mediation by the OECD National Contact Point, etc.).

> **Step-by-step repair instructions:**
>
> 1) Assess the need to conduct an in-depth study (e.g., an HRIA) to verify the occurrence of the impact, the company's connection to the impact, and its severity.
> 2) Consult with stakeholders and rightsholders or their representatives to understand their perspective.
> 3) Seek out human rights experts, both internal and/or external, as needed.
> 4) If stakeholders or rightsholders who are impacted disagree with the company's assessment of their involvement with any risk or negative impact, the company must cooperate in good faith with dispute resolution mechanisms (e.g., the judiciary) to help resolve the disagreements and provide redress (if applicable).

The following are objective examples of scenarios involving negative impacts and reparations proportionate to the damage, to illustrate the type of approach that should be pursued, with due analysis and technical guidance regarding the protection of human rights:

> Scenario 1
> A company is building an oil pipeline on the traditional lands of an indigenous community, displacing them to a location that does not hold the same cultural significance for its members.
>
> Possible remediation measures:
> - *Consider locations closer to their traditional lands for relocation;*
> - Ensure that the resettlement site has means of transportation to the traditional lands;
> - To ensure that communities continue to have access to traditional lands to perform their rituals.

> Scenario 2
> Workers suffered an accident resulting from a safety failure while performing their duties. As a consequence, they can no longer work, and their family income and social interaction have been compromised.
>
> Possible remediation measures:
> - To promote the rehabilitation of workers;
> - Reassign them to new activities and/or roles within the company;
> - To help them develop other skills and competencies so that they can perform other activities;
> - Provide a compensation package that includes lost profits.

3.2. Guidelines on complaint mechanisms

Grievances are inevitable in any project or operation that presents significant inherent risks, even when the highest standard of management is adopted. Therefore, the most responsible attitude of companies is to

adopt operational-level grievance mechanisms that are effective in receiving and resolving complaints that arise.

According to the GPs, in order to be able to quickly respond to and directly repair the damage caused, companies must establish or participate in effective operational-level grievance mechanisms, which are available to individuals and groups who may suffer adverse impacts, without threat of retaliation[30].

Guidelines for implementing complaint mechanisms
● To have a mechanism in place to receive, process, and resolve internal and external complaints/reports related to its operations and supply chain, and to repair damages (where applicable).
● ●The mechanism must be designed and implemented according to effectiveness criteria (it must be accessible, transparent, predictable, equitable, based on dialogue, legitimate, and compatible with human rights), ensuring that the people for whom it is intended know about it, trust it, and are able to use it.
● Adopting relevant measures to improve the mechanism and prevent future complaints and violations, making it a source of continuous learning.
● Do not use these mechanisms to weaken the role of legitimate unions in labor disputes, nor to prevent access to judicial or other non-judicial complaint mechanisms.

3.2.1. Objectives and infrastructure for complaints

Operational-level complaint mechanisms should primarily perform two functions related to companies' responsibility to respect human rights:

1) To contribute to the identification of negative human rights impacts as part of a company's human rights due diligence. By analyzing trends and patterns in complaints, companies can also identify systemic problems and adjust their practices accordingly.
2) To make it possible for complaints, as soon as they are identified, to be addressed and for adverse impacts to be repaired proactively by the company, thus preventing damages and complaints from escalating.

Mechanisms for "complaints" vs. "reporting" vs. "relationship channels"
The GPs refer to the implementation of "grievance mechanisms," commonly translated as "whistleblowing" or "complaint" mechanisms. Since many companies define "whistleblowing" only as the most serious cases of violations of their corporate policies, this Manual also uses the term "complaints" because the mechanisms must also be able to address complaints and concerns from rightsholders. Often, concerns, if left unaddressed, can escalate and lead to situations such as conflicts, which can impact human rights; therefore, it is important to address them early on.

---

[30] UNGP, "Guiding Principles 29 and 31".

> Whistleblowing mechanisms are distinct from the structures commonly called "relationship channels"—channels established so that local communities, customers, and partners can resolve doubts and obtain information about the company's activities, products, and services. However, a whistleblowing mechanism can have more than one function and also receive questions and queries, provided it has an adequate and effective procedure for handling complaints, grievances, and reports related to negative impacts on human rights.

Typically, companies have more than one structure or channel for receiving complaints and reports from different audiences, making it possible to speak of an "ecosystem" or "infrastructure" for receiving complaints/reports. Considering the idea of an "ecosystem" for redress, it is important that complaint mechanisms have:

- Different access points, that is, various ways for stakeholders to indicate problems or concerns;
- Different paths to resolution, depending on the type of process that is most appropriate for the problem; and
- A joint monitoring point, where indicators can be tracked and trends identified for all complaints and reports received, so that the company can learn from the impacts that occurred, feed into the HRDD and evaluate the effectiveness of the reparation ecosystem as a whole.

In the oil and gas sector, it is especially important that, in addition to processes for handling complaints from their employees and outsourced collaborators, companies also have effective complaint mechanisms for residents of the localities within their area of influence, due to the inherent risks that the activities of this sector represent for them.

Examples of different structures for handling complaints and reports by public.	
Employees	**Communities**
- Ethics hotline and/or whistleblowing hotline - Human resources complaint processes - Channels for dialogue and negotiation with unions. - National Contact Points[31] - Legal Proceedings	- Ethics hotline or whistleblowing hotline - Complaint mechanism for communities - Relationship with communities (social dialogue, community forums, etc.) - National Contact Points[32] - Legal Proceedings

---

[31] INational Contact Points are agencies established by governments with a dual mandate: to promote the OECD Guidelines for Multinational Enterprises, including due diligence guidance, and to handle cases as a non-judicial complaint mechanism.

[32] National Contact Points are agencies established by governments that have a dual mandate: to promote the OECD Guidelines for Multinational Enterprises, including guidance related to due diligence, and to handle cases as a non-judicial complaint mechanism.

4.3. How to ensure effective mechanisms for target audiences?

According to the GPs[33], in order to be effective for the audiences for which they are intended, grievance mechanisms must meet the criteria described below. See Appendix 3 for a **Checklist of guidelines** that can help Petrobras verify that the company's grievance infrastructure is aligned with the effectiveness criteria.

Criterion	Description of the GPs
Legitimacy	To build trust among the individuals and groups concerned for whom they are intended, and to be responsible for the proper handling of complaints processes.
Accessibility	To be known by all interested individuals and groups for whom they are intended, and to offer support processes to those who may have difficulty accessing them.
Predictability	Having a defined and known procedure, with an indicative timeframe for each step, and clarity about the processes and possible results, as well as the means to monitor its implementation.
Equitable	To ensure that victims have access to sources of information, advice, and specialized knowledge necessary to initiate a reporting process on an equal footing, with full information and respect;
Transparency	Keeping the parties involved in a complaints process informed about its progress and providing sufficient information about the mechanism's performance aims to foster confidence in its effectiveness.
Compatibility with human rights	To ensure that the outcomes and reparations are in accordance with internationally recognized human rights;
Source of continuous learning	To identify relevant experiences in order to improve the mechanism and prevent new complaints and violations in the future;
Based on dialogue and engagement with stakeholders.	Consult with interested individuals and groups, for whom these mechanisms are intended, about their design and performance, paying particular attention to dialogue as a means of addressing and resolving complaints.

It is important to clarify that being "**based on dialogue and engagement**" means that the mechanism must not only adopt dialogue as a means to address complaints, but must also be improved according to the users' perspective. In this way, the company should seek to obtain the perspective of local communities and workers about the mechanism, which can be done in several ways:

- User satisfaction ratings for the channel upon complaint resolution;
- Surveys targeted at workers or residents of the localities within the area of influence;
- Requesting feedback during operational and social dialogues.

Companies often hold regular meetings with local communities, during which they provide updates on their operations. It can be helpful to incorporate into the agendas of these meetings a report on how complaints

---

[33] Guiding Principle n. 31.

received have been resolved. The company can also produce regular reports for communities on environmental and social monitoring, which may include information on the performance of complaint mechanisms. Informing communities about the number and types of complaints received and the forms of redress provided demonstrates that the company is seeking to resolve complaints effectively. Greater transparency can also help promote and build understanding of complaint mechanisms and increase trust in them.

On certain occasions, companies may receive complaints that at first glance may seem exaggerated, unfounded, or frivolous. Despite the cost and effort involved, it is important to receive and address these complaints, even if it is confirmed that the complaint was unfounded, because:

- Addressing all complaints in the same way ensures consistency;
- Unfounded complaints can mask a separate problem that is important and deserves attention.

The procedure for receiving, investigating, and resolving complaints can vary depending on the company and even from location to location within the same company. However, a typical complaint mechanism will have seven basic steps, starting with receiving the complaint and ending with its resolution or closure, as shown in the figure below:

Figure 7 - Stages of a typical complaint mechanism
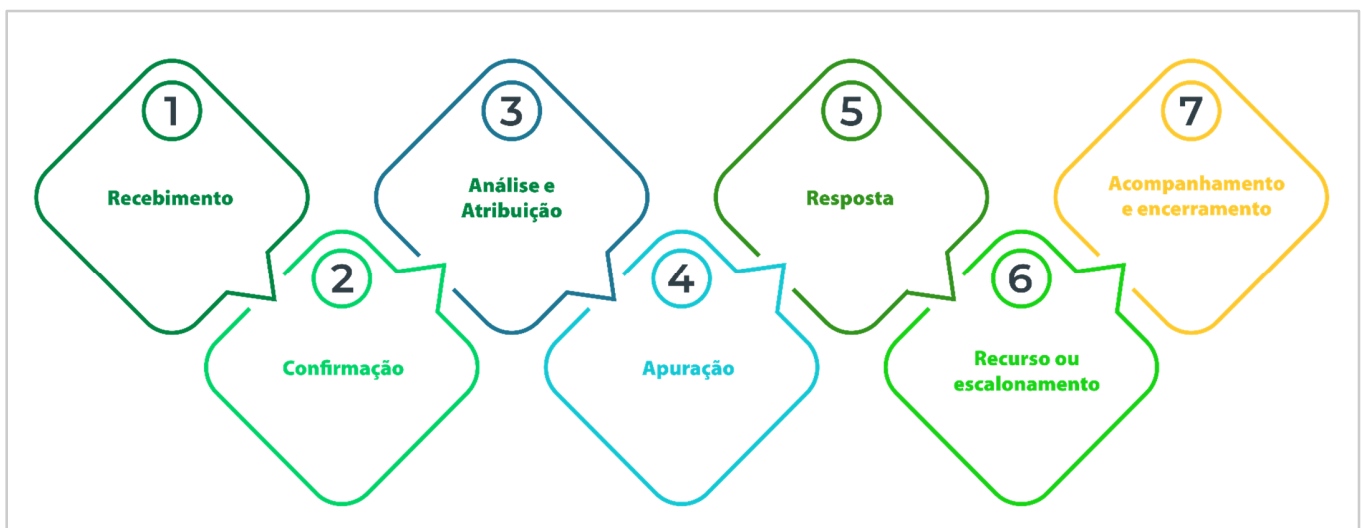
Simpler complaints can be resolved more quickly. Furthermore, for complaints that frequently recur, the company can establish a standard procedure for their resolution (in addition to seeking to understand the causes of their recurrence in order to reduce it). The investigation phase will be especially important for more complex cases where the company needs to understand its involvement with the alleged damage and its severity. In these cases, the company may employ tools such as human rights impact assessments (HRIAs) or other studies to better understand its responsibility to repair the damage.

In specific circumstances, the legitimacy and trust of local communities in the mechanism can also be increased through the inclusion of third parties seen as independent in the process. In such circumstances, a differentiated approach may be evaluated, which could consider aspects such as:

- Take the complaint to an internal review committee composed of senior management to consider whether further action is needed;
- Suggest the use of an independent mediator, agreed upon by both parties, to facilitate dialogue [34];
- Involve a third party, such as a trusted and independent expert, to assess the complaint and propose an impartial solution;
- Establish a permanent appeals committee in partnership with the community, composed of individuals who have credibility and are seen as impartial by community members.

Finally, it is important to remember that complaints can arise from the earliest stages of a project. Therefore, along with efforts to map human rights risks from the exploration or planning phase of a business, it is also important that a complaints mechanism be available and publicized as soon as the company begins its first activities (research, construction, etc.) in a given location.

3.2.2. Existing processes at Petrobras related to complaint mechanisms that may contribute to th.

Petrobras has an Ombudsman's Office[35] and a Complaints Channel[36], both open to internal and external audiences, with channels that include a toll-free number, WhatsApp, and corporate phone lines with leadership, in addition to receiving complaints through Social Relations, Community Forums[37], and meetings. The Guidelines for the Removal and Resettlement of Communities stipulate that "the opening of a local channel of communication with the affected communities must be ensured, through which they can give and receive feedback on their complaints and grievances." However, it is recommended to strengthen the Human Rights and Citizenship Department in these processes, paying attention to the gaps and recommendations presented in the Technical Note attached to this Manual.

---

[34] The procedure for hiring the mediator should be established at the time the mechanism is developed.

[35] Independent channel for engaging with stakeholders. Receives and processes complaints, claims, requests for information, requests, suggestions or compliments, conflict of interest inquiries, and demands related to the General Data Protection Law.

[36] An independent and confidential channel available to both external and internal audiences of Petrobras and its subsidiaries. Complaints regarding fraud, corruption, money laundering, conflicts of interest, harassment, discrimination, safety, environment and health, and other irregularities can be submitted to this channel.

[37] Scope: Permanent spaces for dialogue with formal and informal community leaders. Structure: Managed by the Community Relations sector. Meetings should be held periodically, and the application of the Community Committees Evaluation Questionnaire is recommended.

47

APPENDICES:

1- Technical note: TAKEN FROM THIS SUMMARY

2- Glossary of human rights due diligence

3- Description of the indicated tools

4- Full reference parameters

5- Examples of E&P and Refining activities that may negatively impact human rights.

APPENDIX 2

GLOSSARY OF TERMS RELEVANT TO HUMAN RIGHTS DUE DILIGENCE

Ability to influence: In the context of GPs, it refers to a company's ability to effect changes to the unlawful practices of a party that is causing or contributing to a negative impact on human rights.

*Rightsholders***:** individuals or social groups who hold certain human rights that must be respected by the company. The group of rightsholders can be large and diverse, including those who have no direct interaction with operations, such as residents of distant communities who are also affected by the developments.

Human rights due diligence (HRDD): An ongoing risk management process that a company needs to follow to identify, prevent, mitigate, and account for how it addresses its negative human rights impacts. The HRDD consists of four stages: assessing the actual and potential impacts on human rights; integrate and act on discoveries; monitor responses; and communicate about how impacts are addressed.

Human rights: basic international standards designed to ensure dignity and equality for all. Every human being has the right to enjoy them without discrimination.

Stakeholder engagement: an ongoing process of interaction and dialogue between a company and stakeholders, which allows the company to listen, understand, and respond to their interests and concerns, including through collaborative approaches. Engagement should be done in a meaningful way, which means it should be two-way and responsive.

Serious human rights violations: There is no uniform definition of serious human rights violations in international law. The following practices are generally included: genocide, slavery and practices analogous to slavery, summary or arbitrary executions, torture, enforced disappearances, arbitrary detention, forced removal, and systematic discrimination. Other types of human rights violations, including economic, social, and cultural rights, can also be considered serious violations if they are systematic, occur on a large scale, or are targeted at specific population groups.

Vulnerable/vulnerable individuals or groups: individuals or groups who are at a higher risk of not being able to anticipate, cope, resist and/or recover from adverse impacts, or groups that may suffer the impact disproportionately. Depending on the context, they can be the elderly, children, women, indigenous peoples, among others.

Negative impact on human rights: This occurs when an action removes or reduces an individual's ability to enjoy their human rights. Human rights impacts may have occurred or be ongoing, or they may be potential impacts, also called human rights risks.

Grievance (or whistleblowing) mechanism: the process for receiving, investigating, responding to, and closing complaints, grievances, or reports from stakeholders in a timely, fair, and consistent manner.

Mitigation: Actions taken to reduce the extent of the negative impact. Mitigating a human rights risk refers to actions taken to reduce the likelihood of a potential negative impact occurring.

Stakeholders: individuals, groups or entities that have an interest - financial, social, environmental or other - in the company's activities - which may affect or be affected by its activities, in a positive or negative way. Stakeholders whose rights may be impacted are called rightsholders. At Petrobras, a similar term is used, "**stakeholders**" to refer to groups of individuals and/or organizations with common social, political, economic, environmental or cultural issues and/or needs, who establish or may establish relationships with Petrobras and are capable of influencing – or being influenced by – the company's activities, businesses and/or reputation.

Prevention: actions taken to ensure that negative impact on human rights does not occur.

United Nations Guiding Principles on Business and Human Rights (GPs): UN guidelines that clarify the role of the State and companies in relation to the responsibility of companies to respect human rights. GPs apply to all states and all companies regardless of their size, industry, location, operational context, and structure. They must also be implemented with special attention to the rights, needs and challenges faced by individuals from groups or populations at high risk of vulnerability.

Probability: chance of occurrence of impact on human rights, taking into account the nature of the risk and the context in question.

Business relationships: relationships that a company maintains with business partners, entities in its value chain and any other entity (public or private) directly linked to its operations, products or services.

Redress: refers to both the process of providing redress for a negative impact on human rights, and the outcomes that can counteract or offset the negative impact. These outcomes can take various forms, such as apologies, restitution, rehabilitation, financial or non-financial compensation, punitive sanctions (criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

Responsibility to respect human rights: a company's responsibility to avoid violating the human rights of rightsholders and to address the negative impacts it may be involved in, as set out in the UN Guiding Principles on Business and Human Rights.

Severity: The severity of impacts is determined by their scale, scope, and degree of irreparability. "Scale" means the severity of the negative consequences for rightsholders arising from the identified risks or impacts. "Scope" means the number (absolute or relative) of rightsholders (persons) adversely affected by a risk or impact. "Irreparability" means the degree of difficulty in restoring the status of the rights holder to its original position before the risk or impact occurred.

Priority human rights issues: human rights that are at risk of suffering more severe negative impacts through a company's activities or its business relationships. They are those that stand out as those most at risk, which can vary according to the sector and the operational context in question.

APPENDIX 3

DESCRIPTIONS OF RECOMMENDED TOOLS/PROCEDURES FOR IMPLEMENTING HRDD IN E&P AND REFINING OPERATIONS

The following describes the tools indicated throughout the Manual that can contribute to the implementation of HRDD in Petrobras' E&P and Refining operations.

Development of internal capacity and support from experts.

As highlighted in section 1.5.1 of the Manual, on developing internal capacity and support from human rights experts, the implementation of the different stages and processes of the Human Rights Debt Management requires knowledge of processes and best practices in corporate risk and impact management for human rights, knowledge of the scope of protection of the human rights being protected, and mastery of specific methodologies for the meaningful participation of rightsholders. Therefore, when companies are building their internal capacity to understand human rights issues, it is important to have the support of internal and/or external human rights experts. The degree of external support may depend on the company's capabilities, its goals, and the complexity of its negative impacts on human rights.

Especially in the initial implementation phase of the tools indicated in this Manual, it is recommended that the company obtain expert support at key moments in the processes, until the company's internal capacity and processes are consolidated. Therefore, in the description of the tools below, key moments where review and validation by experts is recommended during the development of the company's internal capacity have been indicated. It should be noted, however, that in addition to contributing to a greater understanding of the subject matter, the review of diagnoses, mappings, and analyses by external experts contributes to good governance of the human rights agenda within the company by providing greater impartiality to internal processes. The review can occur through different structures, such as an advisory panel of internal and/or external experts, specialized consulting, etc.

Step: Identification and assessment of risks and impacts (Section 2.1)

1. Mapping priority human rights and local risk issues

Two tools can be used to identify and assess risks and impacts on human rights, depending on the analytical scope desired: mapping priority human rights issues, which has a macro scope and is transversal to the entire company; and mapping local risks, which is limited to specific locations.

Steps and methods

Both the **mapping of priority human rights issues** and the **mapping of local risks** must comply with the following steps, considering, when relevant, the specificities of each:

Table 1: Stages and methods for mapping priority human rights and local risk issues.

STAGES/METHODS	MAPPING	
	Priority Human Rights Issues	**LOCAL RISKS**

1. Definition of resources	● Define the necessary resources and the responsible team. The team (in-house and/or third-party) must have the following characteristics:
	  ○ Knowledge of risks and impacts on human rights related to the company's activities.
	  ○ Knowledge about the company's activities.
	  ○ The processes should include the involvement of areas that interface with the management of risks and impacts on human rights, with the participation of at least the following areas being recommended: Social Responsibility, Human Resources, Corporate Risks, Social Risks, Ombudsman, Compliance, Community Relations, HSE (Safety, Health and Environment) and ISC (Corporate Security Intelligence). The objective of this involvement is to leverage the experience and knowledge of these areas for the evaluation of priority human rights issues.	

	A team should be defined with representatives from each area who have knowledge of the different risks and impacts on human rights under the purview of each area, in a cross-cutting manner across the E&P and refining units.	Representatives from each area that has the unit/location/project under its responsibility should be involved, as well as the unit managers who can contribute to the identification and assessment of risks and impacts.
1.1. Method	● The definition of work deadlines, meetings, channels for exchanging information, etc., should be managed by the area designated as responsible for managing the process, and a specific procedure may be developed for this purpose. ● **To involve the areas and managers of the units in the process:** Conduct workshops, seminars, discussion groups, etc. It is important to prepare and guide the participation of representatives from each area/unit. ➔ For a better understanding of the process and the objective of their participation, it is essential that the areas and managers involved have received **training** on what HRDD is and its methodology for assessing risks to human rights.	
2. Parameterization: human rights	Consider the wide range of human rights protected by conventions and instruments, at a minimum expressed in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.	
2.1. Method	Analyze human rights references that apply to the **context of the company's activities**.[38] Develop a spreadsheet listing the most relevant human rights (at both macro and local levels).	

---

[38] See Annex 4 for a list of the most relevant instruments for the oil and gas sector.

3.	Identification of risks inherent to human rights and rightsholders potentially impacted.	● To identify, based on technical knowledge in human rights, the **inherent risks**, from the analysis of activities carried out at the macro/local level and the socioeconomic context at the macro/local level, anticipating possible interfaces between the risks. ● Identify the categories of **rightsholders potentially impacted** by the specified risks, paying particular attention to the categories of rightsholders that exhibit greater vulnerability.	
	3.1. Method	Desk-based research	Desk-based research (prioritize local data sources)
		Consider the following <u>**sources of information in desk-based research:**</u> ● International intergovernmental organizations (e.g., UN and OECD, ECLAC) and governmental entities (IBGE, Fiocruz, etc.); ● Specialized publications on the O&G sector; ● Specialized academic publications on the subject; ● Specialized media; ● Internal information and studies conducted by Petrobras: human rights impact assessments (HRIAs) carried out by the company, environmental impact studies (EIAs), compliance management systems, audits, social diagnoses, safety diagnoses, health and safety inspections, etc.; ● Information gathered through alert systems and complaint mechanisms. Note: Information gaps can be addressed through engagement with stakeholders, as outlined in step 6.	
4.	Severity and probability assessment	● The risks identified must be evaluated according to **severity**, ascertained based on three criteria: **scale**, **scope** and **degree of irreparability**, based on knowledge and technical approach to HRDD.	
	4.1 Method	● For each criterion, a degree of severity must be assigned: "low/medium/high" in granularity that makes it possible to differentiate the severity of the different risks, in order to **identify the most severe** (see definition and description of each criterion in **Table 2**).	
		● Since this **mapping is cross-sectional**, encompassing various units of the company, **a macro-level assessment approach** should be adopted, considering, for example, the most frequent risks present in the company's history. ● In **mapping priority human** rights issues, it is not necessary to assess the probability of risk occurrence. Here, the predominant factor in defining priority human rights issues is **severity.**	● In **mapping local risks**, one must consider the risks of impacts that have some probability of occurring in the future (both in the short and long term) in the respective unit/location/project. ● Assess the likelihood of the impact occurring on a scale such as "high/medium/low probability" or "unlikely/likely/very likely". ● Consider the existence of factors that may contribute to increasing the **likelihood of**

		human rights impacts.[39]
5. Summary of preliminary results	**Summary:** The results obtained should be synthesized in order to identify the priority themes of human rights/local risks. It is important that each risk presents a description of its severity and is correlated to the human rights and the group of rightsholders potentially affected.	
5.1. Method	- The **list of priority** human rights issues should be organized according to their **degree of severity.** - The mapped **themes** should be correlated with the **identified rightsholders** (Table 3). - It is recommended that issues of medium to high severity be considered a priority for the company's actions. - Risks that are related to each other (e.g., "risk of workplace harassment" and "risk of sexual harassment") and classified at the same severity level can be **grouped into thematic groups.**	- Use a spreadsheet that allows you to summarize the information and conclusions from each stage of the mapping process. - Develop a "**Matrix**" or "**Heat Map**" of risks to facilitate the visualization of the **most priority risks** for the unit, through the crossing of the degrees of **severity** and **probability** (see **Figure 1**).
6. Engagement with stakeholders	It is recommended that HRDD experts (internal and/or external) engage **with stakeholders,** through **appropriate methodologies,** to gain a stakeholder perspective on risk identification and assessment and to address gaps and lack of information in assessment.	
6.1. Method	**Engagement with stakeholders (macro level):** Engage with organizations that operate at the national level and that interface with the company's risks and impacts and/or represent the interests of potentially affected rightsholders, such as trade unions and civil society organizations.	**Engagement with stakeholders (local level):** See guidelines on consultations in the Manual, including recommendations on conducting consultations using established methodologies with expert support, especially in situations where there may be pre-existing tensions and socioeconomic vulnerability factors. The result of HRIAs already carried out in the unit/locality/project can be used.
7. Key moment for review and validation of the list of priority themes/local risk mapping by experts [see item 1.5.1 of the Manual]		

---

[39]Factors that may be considered: a) Inherent to the activities carried out in the unit/location/project (e.g., predominance of activities that present a high degree of danger, frequency of risk-generating activities); b) Inherent to the location (e.g., socioeconomic vulnerabilities, low oversight by competent bodies); c) Inability of the company to manage such risk (e.g., absence or ineffectiveness of procedures and resources, occurrence of many cases in the past).

8. Definition and assignment of control measures (prevention and mitigation) for the identified risks.	The mapping of priority human rights issues, being macro-level in scope, does not include the risk management stage.	• Identify the **area** and the **professional responsible** for implementing **the control measure** and, if applicable, the deadline for its implementation.
		• To establish:
		   ○ indicators for monitoring the effectiveness of the measure
		   ○ The person responsible for monitoring;
		   ○ The frequency of monitoring

Table 2: *Criteria for assessing the severity of risks and impacts*

Severity criteria[40]	Description	Suggested description to aid in evaluation[41]		
		Low	**Medium**	**High**
Scale	Assess the severity of the negative consequences for rightsholders arising from the identified risks or impacts. The presence of **vulnerable groups** increases the scale of the impact.	There are no serious physical injuries or long-term consequences (such as health or livelihoods).	There are serious physical or mental injuries and/or other long-term consequences (such as on health, livelihoods).	There are damages that represent a risk to life and/or other long-term consequences (such as on health, livelihoods).
Scope	Assess the number (absolute or relative) of rightsholders (people) negatively affected by a risk or impact.	<10% of the identified rights holder group or few rightsholders were affected.	10-50% of the identified rights holder group or the majority of rightsholders were affected.	>50% of the identified rights holder group or the entire rights holder group
Degree of irreparability	It assesses whether the rights holder's situation can be restored, so that they have the same position as before the event.	It can be fully restored.	It can be restored, but only to a limited extent.	It cannot be restored.

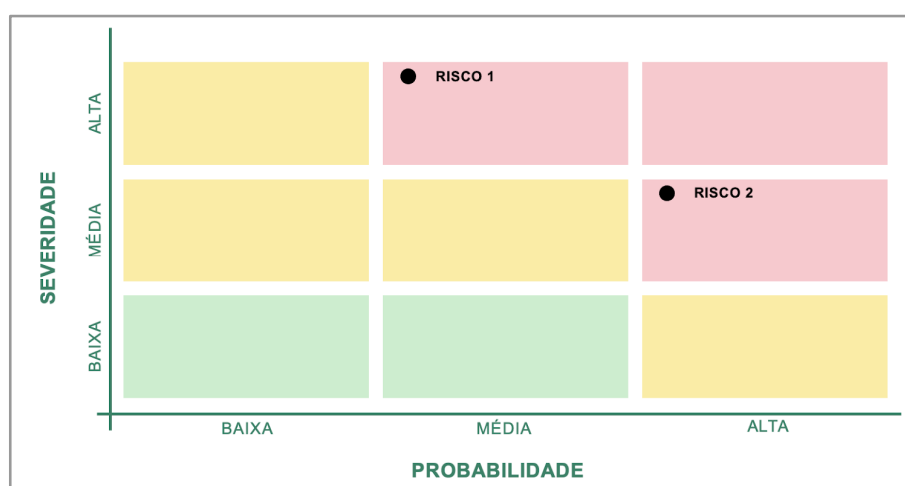[40] The terminology used for the severity criteria follows the terminology established in the GPs and other international parameters on human rights abuses, such as the OECD guide on responsible business conduct. If the company wishes to integrate the severity criteria for human rights impacts into its risk assessment processes (which may adopt different terminology), it is recommended to evaluate the best way to harmonize terms, so as not to lose sight of the objectives and effectiveness of human rights abuses. Furthermore, the use of the terminology established in the GPs allows teams to better understand the human rights benchmarks and communicate about human rights abuses using standard terminology.

[41] It is recommended that the evaluation criteria be accompanied by descriptions that help the evaluator determine the degree of severity, as suggested in the table above. Descriptions can be more detailed and may even provide specific definitions of impacts for the different groups of potentially affected rightsholders.

Table 3: Example table for priority themes of human rights and rightsholders

Priority human rights issues	Rightsholders			Degree of severity
	Category of potentially affected rightsholders	*Category of potentially affected rightsholders*	*Category of potentially affected rightsholders*	
PRIORITY THEME OF HUMAN RIGHTS 1	Select a category related to the mapped priority human rights theme.			*Classify in*
				HIGH
				MEDIUM
				LOW
PRIORITY THEME OF HUMAN RIGHTS 2		Select a category related to the mapped priority human rights theme.		*Classify in*
				HIGH
				MEDIUM
				LOW

Figure 1: Matrix/heat map model for prioritizing local risks.

1.1. Prioritization plan for mapping local risks

1) **Develop a prioritization matrix:** Use a spreadsheet **(Figure 2)** to easily identify which units/projects/locations may be exposing rightsholders to risks and impacts on human rights.

2) **Define evaluation criteria:** Consider criteria that indicate a higher probability of a more severe negative impact occurring (see examples in **Table 4**). However, other criteria relevant to the execution of the plan may be added to the evaluation, such as the availability of local managers to carry out the mapping, alignment with the unit's schedule, etc.

3) **Evaluate and compare**: Comparing units can be facilitated by assigning scores to each level of criticality, and it is recommended to assign different weights to highlight the relevance of certain criteria.

58

- In-depth studies of each unit are not necessary, as this is a preliminary assessment for prioritization purposes. Studies and diagnoses already carried out by the company can be used and supplemented with the knowledge of unit/project/location managers, when necessary.

4) **Develop a prioritization plan:** Based on the prioritization results, create a prioritization plan considering existing resources and unit timelines. The plan should establish deadlines for implementing local risk mapping.

5) Key moment for review of the prioritization plan by experts [see item 1.5.1 of the Manual]

Table 4: Examples of prioritization criteria[42]

	EXAMPLES OF PRIORITIZATION CRITERIA
Context of the communities in the areas of influence of the unit/project/ locality	- The existence of socioeconomic vulnerabilities that may contribute to impacts on human rights (based on data such as HDI, income distribution, school enrollment rate, unemployment/employment rate, etc.). - Proximity of communities to the unit/project/location of the risk-generating activity. - History of negative impacts on local communities, including indigenous peoples and traditional communities. - History of tensions, conflicts, and local protests against Petrobras.
Workforce context	- Existence of complaints and/or reports regarding impacts on workers' human rights (moral harassment, sexual harassment, discrimination, exhausting work hours, delayed wages, etc.). - High rates of workplace accidents. - The existence of tensions with unions and union leaders. - Low representation of minorities (gender, race, people with disabilities, etc.).
Characteristics of operations: risks inherent to the activities carried out or planned	- Activities that pose inherently more severe risks to human rights, both for workers and local communities. - Occurrence of a critical phase in the unit/project/location, at the time of evaluation or in the recent past (e.g., start or expansion of operation, decommissioning of structures, etc.). - The unit/project/location shows a lack of or insufficient management to address risks (e.g., lack of equipment and infrastructure maintenance, insufficient human resources, etc.).

---

[42] This list is not exhaustive. Other criteria may be considered depending on the company's operating context.

Figure 2: Prioritization matrix model for units/locations/projects

CRITÉRIOS LOCALIDADES	PROXIMIDADE	IDH	RENDA	ESCOLARIDADE	CONFLITOS	QUEIXAS	ATIVIDADES
LOCALIDADE 1							
LOCALIDADE 2							
LOCALIDADE 3							
UNIDADE 1							
UNIDADE 2							
UNIDADE 3							
PROJETO 1							
PROJETO 2							

Stage: Integration & Monitoring (Section 2.2)

2. Assessments of the capacity to manage priority human rights issues and local risks.

Assessments of the capacity to manage priority human rights and local risk issues follow the same steps, differing only in the following aspects:

- **Scope -** the assessment of the capacity to manage priority human rights issues focuses on the effectiveness of managing the risks associated with priority human rights issues, while the assessment of local risks focuses on the effectiveness of the measures implemented for the risks identified at the local level;

- **Approach -** the diagnosis of the capacity to manage priority human rights issues has a more macro and cross-cutting approach, while the diagnosis of the capacity to manage local risks is limited to measures implemented in specific localities.

Steps and methods

1) Define the necessary resources and the responsible team. The team (in-house and/or third-party) that will carry out the diagnosis must have the following characteristics:
- Knowledge of risks and impacts on human rights related to the company's activities.
- Knowledge about the company's activities.

2) Establish a set of evaluation requirements: once the priority themes of human rights**/**local risks **have been identified**, a set of requirements must be established to assess their capacity to adequately manage the priority themes of human rights/local risks identified. Based on the OECD Guiding Principles and Guidelines, it is recommended that the evaluation questions include at least those presented in **Table 5**, which must be answered for each priority human rights theme.

3) Carry out a diagnosis: A diagnosis of Petrobras' management policies, procedures, standards, and practices should be carried out, based on the methods described in **Table 5**, for each item.

➜ It is recommended that the areas responsible for the policies, procedures, standards, and practices being analyzed be involved. In general, the priority themes for companies in the oil and gas sector encompass policies, procedures,

60

and standards from the following areas: Social Responsibility, Human Resources, Business Risks, Social Risks, General Ombudsman, Compliance, Community Relations, HSE (Safety, Health and Environment), and ISC (Corporate Security Intelligence). In local diagnoses, representatives from each area that has the unit/location/project under their responsibility should be involved, as well as the unit managers who can contribute to the analysis performed.

4) Develop an action plan: once management gaps that compromise the effectiveness of implemented policies, procedures, standards, and practices have been identified, develop an action plan to address them. This includes reviewing and revising existing documents or creating new policies, procedures, and standards.

To develop the action plan, the following must be identified:
- Responsible for coordinating the implementation of the plan.
- Those responsible for implementing each action.
- Areas involved in each action
- Timeline for implementing the actions
- Prioritization of actions.
- ➔ It is important to emphasize that the prioritization of actions should be based on the severity of each priority human rights/local risk issue; that is, actions to improve the effectiveness of managing more severe issues should be prioritized.

5) Key moment for review of the prioritization plan by experts [see item 1.5.1 of the Manual].

Table 5: Stages and methods for diagnosing the capacity to manage priority human rights issues and local risks.

CRITERION	METHOD
Adherence of policies and processes to human rights standards and best practices.	
1) The company has established policies and procedures that are in accordance with international and national human rights standards.	• To assess, based on specialized knowledge, whether policies and procedures are aligned with international and national human rights standards relevant to each priority human rights issue. • Conduct benchmarking of best human rights practices in the sector to assess the company's degree of adherence to them.
Effectiveness of the measures implemented	

2) Responsibility for implementing and overseeing measures to prevent and mitigate impacts on human rights is assigned to the appropriate levels and functions within the company, including senior management oversight of the most pressing human rights issues and local risks.
3) Internal processes for decision-making and resource allocation enable the implementation of effective measures to prevent and mitigate identified risks and impacts.
 	
4) Those responsible for implementing measures to prevent and mitigate risks and impacts have been properly trained and have the necessary expertise to respond to those risks and impacts.
	• Evaluate the effectiveness of the measures implemented, based on the qualitative and quantitative indicators monitored by the company for each priority human rights/local risk issue, such as:
	  ○ Internal sources (Human Rights Impact Assessments (HRIAs), social diagnoses, audits, records and reports of complaints and/or denunciations handled, internal reports from HR, HSE, Social Responsibility, ISC, etc.).
	  ○ External sources (social and environmental indicators, publications from specialized media, civil society organizations, experts, and governmental and intergovernmental organizations, etc.).

61

	It is recommended to perform comparative analyses with previous diagnoses in order to identify trends of improvement/worsening in the effectiveness of the measures taken.

Step: Communication (Section 2.3)

3. Guidelines for carrying out broad formal communication on human rights management

For the purpose of carrying out comprehensive formal company communication with Petrobras' various stakeholders, it is recommended to follow the UNGP Reporting Framework guidelines, reproduced below. In addition, it is recommended to complete the detailed checklist established by the UNGP Reporting Framework.

Table 6: Principles and requirements of the UNGP Reporting Framework [43]

PRINCIPLES	REQUIREMENTS
Contextualize the information according to the company's activities and sector.	Readers of the disclosure should understand the company's context, so the report should present information such as ● The company's business model; ● The organizational structure; ● The governance structure; ● The strategies; and ● The structure of operations. If the company's human rights report is included in its Annual Report, Integrated Report, Sustainability Report, or similar document, the company may already provide this information.
Meeting a minimum information standard	The company must, at a minimum [44]: ● Answer questions related to respect for human rights; ● To meet the four requirements regarding the focus of communication; and ● Answering questions about the management of priority human rights issues. These minimum standards must be observed by any company that has begun to address the issue of human rights in its operations. The company must therefore work towards achieving these standards and improving the quality of its responses to all questions over time.
Demonstrate continuous improvement.	The company must disclose its progress in implementing the Guiding Principles, as well as its respective improvement strategies.
Focus on respect for human rights.	Disclosing initiatives to promote human rights does not replace the company's need to disclose the specific procedures adopted to avoid violating human rights, as well as the strategies to prevent, mitigate, and repair the risks and negative

---

[43] Free translation by XXX.

[44] The points listed refer to the questions raised in the UNGP Reporting Framework guidelines.

	impacts with which it is involved.
Addressing the most severe impacts	The focus of communication should be on the most severe risks and impacts on human rights.
Provide accurate answers.	The company must support its responses to the questionnaire with accurate information, including examples of risks and impacts on priority human rights issues and how they were/will be prevented, mitigated, or remedied.
Explaining the lack of important information.	In exceptional circumstances, it may not be possible for a company to disclose certain information necessary to comply with these principles. In such cases, the company must justify the omission of the information.

Complaints and Complaint Mechanisms (Sections 2.4 and 2.5)

4. Evaluate the effectiveness of complaint mechanisms.

As described in the Manual, the effectiveness of complaint mechanisms should be periodically evaluated based on the effectiveness criteria of the UN Guiding Principles on Business and Human Rights (GPs or Guiding Principles). **Questionnaire 1** presents a description of each criterion and questions to guide the company on the minimum requirements that should be evaluated. By answering "no" or "partially" to each criterion, the company should seek appropriate measures to address the identified gaps.

The list of questions in **Questionnaire 1** is indicative in order to guide the evaluation of the company based on the effectiveness criteria described in the Guiding Principles. However, in-depth diagnoses can be made using questions that consider specific characteristics of the mechanism's target audiences, the operational contexts to which the mechanism applies, and the mechanism's performance indicators.

Other references that can be consulted for evaluating the effectiveness of complaint mechanisms:
- *Community grievance mechanisms in the oil and gas industry* (IPIECA, 2015);
- *Handling and Resolving Local-level Concerns and Grievances: Human Rights in the Mining and Metals Sector* (ICMM, 2019);
- *Addressing Gender-Based Violence and Harassment - Emerging Good Practice for the Private Sector* (EBRD, CDC e IFC, 2020);
- *A Guide to Designing and Implementing Grievance Mechanisms for Development Projects - The Office of the Compliance Advisor/Ombudsman*, CAO (IFC, 2008);
- *Good Practice Note: Addressing Grievances from Project-Affected Communities* (IFC, 2009); e
- OECD Guidelines for Multinational Enterprises (UN, 2011).

Questionnaire 1: Criteria and questions that contribute to evaluating the effectiveness of complaint mechanisms.

EFFECTIVENESS CRITERIA	DESCRIPTION OF CRITERIA AND QUESTIONS FOR THE COMPANY
	The mechanism fosters trust among the individuals and groups it is intended for, and the company is responsible for the proper handling of the complaint processes.

Legitimacy	How does it assess the level of information and user confidence in the mechanism?
	Does the company adopt and publicize a commitment/policy of non-retaliation against those who use the complaint mechanism?
	Does the complaint mechanism guarantee the anonymity of its users?
	Does it guarantee the confidentiality of the complaint mechanism process?
	Does it guarantee the autonomy of the responsible departments to investigate complaints?
Accessibility	*The complaint mechanism is known to all individuals and groups for whom it is intended, and the company provides the necessary assistance to those who may have difficulty accessing it.*
	Does it publicize the existence of complaint mechanisms through its main communication channels (internal and external)?
	Did you implement different channels and access points to the mechanisms according to the needs and location of the target audience, taking into account issues such as language and culture?
	Does it guarantee that the channels are easy to understand and access?
	Does it adopt measures to reduce barriers that may impede access to the mechanism (for example, those related to language, illiteracy, cost of access, location, and fear of reprisals)?
	Does the presentation and visual design of the complaint mechanism contribute to its understanding, including how the target audience can access it? (language, access steps, etc.)
Predictability	*The complaint mechanism has a defined and known process, indicating deadlines, clarifying its procedures and possible outcomes, as well as the means to monitor its implementation.*
	Does the company clearly communicate the difference in scope between the various existing channels?
	Has a clear process been defined for each stage of using the complaint mechanism, from registration to the conclusion of the complaints?
	Does it explain how the registration and handling of complaints works, including the possible outcomes?
	Did you set deadlines for investigating and resolving the complaints?
	Does it keep the user informed about the case's progress and resolution timeline?
	Does it provide users with a protocol number to track their complaint?
Equity	*The processes involving the complaints mechanism ensure that victims have access to the information, advice, and specialized knowledge necessary to initiate a complaints process on an equal footing, with full information and in a respectful manner.*
	Has the company established guidelines to ensure that communication and engagement with the user is done respectfully?
	In more complex cases, does the company guide the user on how to find information and/or specialized support?
	Does it allow users to supplement their statements during the investigation, if necessary?
Transparency	*The company keeps the parties involved in a complaint process informed about its progress and provides sufficient information about the performance of the complaint mechanism, aiming to foster confidence in its effectiveness and safeguard the public interest at stake.*
	Does it keep the user informed about the case's progress and resolution timeline?
	Does it publish indicators on the performance of the complaint mechanism? (e.g., number of cases received vs. number of cases handled; classification of cases, considering user types, topics, and responses offered; progress of indicators over the years, etc.)
Compatibility with human rights	*It ensures that the results and reparations are in accordance with internationally recognized human rights.*
	Does the process of registering, investigating, and resolving complaints respect human rights?
	Does the handling of protests involve human rights experts whenever necessary?
	How do you classify complaints according to topic, priority, and urgency, in order to prioritize the most serious complaints and ensure a faster resolution process?

	The company has not established any type of restriction on users' right to use other methods of dispute resolution (for example, filing lawsuits).
Source of continuous learning	*Relevant experiences are identified with the aim of improving processes involving the use of the complaints mechanism and preventing future violations.*
	Has it established indicators and a process for monitoring the effectiveness of the mechanism?
	Does it conduct a critical analysis of the indicators, seeking to understand the cause of the complaints?
	Has an internal discussion process been established with the responsible areas on how to improve results and prevent impacts, based on the reported complaints?
	Does the system for registering and monitoring complaints received through different channels allow for the earliest possible detection of problems and prevent their recurrence?
Based on dialogue and stakeholder engagement	*There is consultation with interested individuals and groups, for whom these mechanisms are intended, regarding their design and performance, with special attention to dialogue as a means of addressing and resolving complaints.*
	Do you request user feedback on the complaint submission process and the response received?
	Does it involve stakeholders in the process of building and reviewing the mechanism?
	In complex cases where greater engagement may be necessary, has the company established opportunities for dialogue with the user?
	In more complex cases, has the company established the possibility for users to request a review of the response received or to engage in a dialogue?

In-depth assessments (Section 2.1.5)

5. Human Rights Impact Assessment (HRIA)

The HRIA can have different objectives and be employed at various points in the life cycle of a unit/project/location, depending on the company's needs and objectives throughout the human rights due diligence process, as summarized in **Table 7.**

Table 7: Examples of HRIA objectives

Examples of objectives for a Human Rights Impact Assessment (HRIA)				
When to evaluate			Scope of the evaluation	
Project/activity/operation start	During the execution of a project/activity/operation	Project/activity/operation closure	Comprehensive	Specific
Identify and assess impacts to define appropriate	To identify and assess risks and impacts, evaluate the adequacy	To identify and assess risks and impacts related to the closure of a given	To identify and assess impacts relating to all	Assess the impacts related to one or more priority human rights issues that the

65

management measures.	of implemented management measures, and establish appropriate responses to existing impacts.	project/activity/operation and evaluate the adequacy of the management measures implemented, as well as to establish appropriate responses to the existing impacts.	relevant recognized human rights.	company believes require a deeper understanding of.

Steps and methods

As described in the Manual, HRIAs should be conducted following the Guiding Principles, especially regarding the **engagement of stakeholders and rightsholders throughout the process.** The main steps adopted in established HRAs methodologies are summarized in **Table 8**.

Definition of resources and team: HRIAs should be carried out by multidisciplinary teams of experts that include professionals with technical knowledge and experience in:

- Implementation of HRIAs using established methodologies.
- Assessment and management of human rights impacts related to critical human rights issues common in the oil and gas sector (e.g., rights of indigenous peoples and traditional communities, conflict and security, land issues, access to water).
- Conducting engagements with stakeholders and rightsholders potentially affected, including specialized teams to conduct engagement and consultation with indigenous peoples and traditional communities (when necessary).

If HRIAs are carried out by internal teams, it is recommended that the process include periodic support and review by external experts in HRDD, to ensure the impartiality of the process and the technical robustness of the assessment.

Table 8: Stages and methods of HRIAs

STAGE	DESCRIPTION
Preliminary research ("scoping")	• Collection and analysis of primary and secondary data to understand the characteristics of the unit/project/location, the company's history of operations in the region, and to learn about studies already carried out. • Collection and analysis of primary and secondary data to identify the main human rights risks inherent to the socioeconomic context, the unit/project/locality analyzed, and the company's partners.
Collection and analysis of data and establishment of the socioeconomic and human rights context ("baseline")	• Collection and analysis of secondary data and survey of the legal framework, in order to establish an overview of the current protection and implementation of human rights in the local context, including the most vulnerable and/or marginalized groups.

66

PETROBRAS

Field research and on-site stakeholder engagement	● Visit to the unit/project/location to engage with potentially affected parties (and other internal and external stakeholders, such as: local communities, direct and indirect employees, local civil society organizations, municipal bodies, etc.). ● Conducting site visits within the area of influence for on-site observations, georeferencing, etc.
Assessment of the severity of the impact (cataloging, evaluation) with engagement of stakeholders and rightsholders.	● Cataloging and evaluating the impacts identified based on human rights regulations and the severity criteria established in the Guiding Principles, with special attention to the scope of each of the protected human rights. ● Engagement of stakeholders and rightsholders in order to integrate their perspective into (i) the assessment of identified risks and impacts and (ii) the development of prevention and mitigation measures to be implemented. ● Engagement should be conducted using methodologies appropriate to the local culture and aligned with human rights, and can take various forms (individual interviews, focus groups, workshops, roundtables, etc.) depending on what is most suitable for the target audience and stage of the HRIA.
Development of recommendations on prevention, mitigation and remediation of identified impacts, and an action plan for implementation and monitoring.	● Development of recommendations on how to respond to (prevent, mitigate, and repair) the identified impacts, with a corresponding action plan for implementation and monitoring. ● Establishing indicators, targets, and KPIs for the effective monitoring of the measures to be taken.
Communication	● Preparation of a publication presenting the main risks and impacts identified and recommendations adopted by the company for dissemination and engagement of stakeholders, using language and depth appropriate to the local context. ● Effective communication and expectation management when presenting HRIA results within a specific local context.

APPENDIX 4

INTERNATIONAL HUMAN RIGHTS INSTRUMENTS

Referenced instruments (as a minimum) in the GPs:

Universal Declaration of Human Rights, 1948

International Covenant on Civil and Political Rights, 1966

International Covenant on Economic, Social and Cultural Rights, 1966

Declaration on Fundamental Principles and Rights at Work, 1998, which is based on the 8 ILO conventions (CO29, C087, C098, C100, C105, C111, C138, C182)

Other relevant instruments of the International Labor Organization:

C019 – Equal Treatment (Compensation for Accidents at Work)

C026 Methods of Fixing Minimum Wages, 1928

C029 – Forced or Compulsory Labour, 1930

C81 – Labour Inspection in Industry and Commerce, 1947

C87 – Freedom of Association and Protection of the Right to Organize, 1948[45]

C89 – Night Work of Women in Industry (Revised), 1948

C595 – Protection of Wages, 1949

C197 – Migrant Workers (Revised), 1949

C598 – Right to Organise and Collective Bargaining, 1949

C100 – Equal Remuneration of Men and Women Workers for Work of Equal Value, 1951

C102 – Minimum Standards of Social Security, 1952

C103 – Maternity Support (Magazine), 1952

C104 – Abolition of Penal Sanctions on Indian Labour, 1955

C105 – Abolition of Forced Labour Convention, 1957

---

[45] Despite being part of the ILO's fundamental conventions, Brazil has not ratified the convention because it adopts compulsory union unity.

C111 Discrimination in Employment and Occupation, 1958

C119 – Machinery Guard, 1963

C131 – Setting Minimum Wages, Especially in Developing Countries, 1970

C135 Protection of Workers' Representatives, 1971

C136 – Protection Against the Risks of Benzene Poisoning, 1971

C138 – Minimum Age for Admission, 1973

C139 – Prevention and Control of Occupational Hazards Caused by Carcinogenic Substances or Agents, 1974

C145 – Continuity of Employment of Seafarers, 1976

C148 – Air Pollution, Noise and Vibrations, 1977

C154 – Promotion of Collective Bargaining, 1981

C155 – Safety and Health of Workers, 1981

C159 Vocational Rehabilitation and Employment of Disabled Persons 1983

C161 – Occupational Health Services, 1985

C169 – Indigenous and Tribal Peoples, 1989

C170 – Safety at Work with Chemicals, 1990

C171 – Night Work, 1990

C174 – On the Prevention of Major Industrial Accidents, 1993

C182 – Prohibition of the Worst Forms of Child Labour and Immediate Action for Their Elimination, 1999

Key international human rights instruments concerning potentially vulnerable or marginalized groups for the oil and gas sector:

International Convention on the Elimination of All Forms of Racial Discrimination, 1965

Convention on the Elimination of All Forms of Discrimination against Women, 1979

Convention on the Rights of the Child, 1989

International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, 1990

International Convention on the Rights of Persons with Disabilities, 2007

Regional human rights instruments:

American Convention on Human Rights (Pact of San José, Costa Rica), 1969

Additional Protocol to the American Convention on Human Rights in the Area of Economic, Social, and Cultural Rights "Protocol of San Salvador", 1999

Additional Protocol to the American Convention on Human Rights Concerning the Abolition of the Death Penalty, 1990

Inter-American Convention on the Granting of Women's Civil Rights, 1948

Inter-American Convention to Prevent and Punish Torture, 1985

Protocol to the American Convention on Human Rights on the Abolition of the Death Penalty, 1990

Inter-American Convention on the Forced Disappearance of Persons, 1994

Inter-American Convention on the Prevention, Punishment and Eradication of Violence Against Women, 1994

Inter-American Convention on the Elimination of All Forms of Discrimination Against Persons with Disabilities, 1999

Inter-American Convention against Racism, Racial Discrimination, and Related Forms of Intolerance, 2013

APPENDIX 5

EXAMPLES OF E&P AND REFINING ACTIVITIES THAT CAN NEGATIVELY IMPACT HUMAN RIGHTS

EXAMPLES OF E&P AND REFINING ACTIVITIES THAT CAN NEGATIVELY IMPACT HUMAN RIGHTS

The table below presents the most common impacts associated with E&P and refining operations in Brazil. The list of impacts is not exhaustive, and others may exist depending on the context and particularities of each operation. The list below can contribute to initiating the risk mapping process for operations, but it does not replace conducting a risk mapping according to the guidelines and methodology outlined in this Manual.

OPERAÇÃO	EXAMPLES OF SITUATIONS THAT CAN IMPACT HUMAN RIGHTS THROUGH ACTION/ACTIVITY (Non-exhaustive list)	EXAMPLES OF HUMAN RIGHTS POTENTIALLY IMPACTED
	Exploração	
EXPLOITATION	- Restricted access to fishing areas, which can lead to loss of livelihoods and food insecurity. - Reduction in income sources, such as tourism and fishing, due to environmental impacts and reduced marine biodiversity. - Impacts on the free use of natural resources by the local community. - Workplace accidents	- Right to a safe, clean and sustainable environment (UN Resolution A/RES/76/300); - Right to participate in development (Declaration on the Right to Development) and right to an adequate standard of living (Article 25, UDHR); - Right to a (dignified) life (Article 6, ICCPR); - Right to Health (Article 25 of the Universal Declaration of Human Rights); ILO Convention No. 155 concerning Occupational Health and Safety; - Right to personal security (Art. 3 UDHR; Art. 9 ICCPR); - Right to personal integrity (Article 5, ACHR);

	Acquisition of land for new operations or to expand existing operations, pipelines, etc.	
PRODUCTION REFINING	- Forced displacement of individuals and communities - Lack of consultation and participation processes, including the absence of a Local Productive Arrangement (LPA). - Overvaluation of properties in the region due to real estate speculation, leading to the displacement of tenants. - Loss of access to areas relevant for subsistence or of spiritual and cultural value to local communities, indigenous and traditional peoples. - Changes in the lifestyles of local communities, indigenous peoples, and traditional communities. - Emergence or increase of conflicts to access natural resources (land, water, food) - Food insecurity	- Right to free, prior and informed consultation (Article 10 of the UN Declaration on the Rights of Indigenous Peoples; Article 17 of ILO Convention No. 169); - Right to traditional territory (art. 14 ILO Convention No. 169); - Right of use, administration and conservation of natural resources specific to traditional lands by traditional peoples and communities and compensation for damage to traditional lands (art. 15 ILO Convention No. 169); - Right to adequate housing and food (art. 25, UDHR); - Right of access to information (Art. 19 UDHR; Art. 19 ICCPR) and to participation (UDHR art. 27.1, art. 21.1, art. 21.2) - Right to freedom of movement and residence (art. 13, UDHR); - Gender equality in land ownership, decision-making and participation (art. 14, 2, g CEDAW); gender equality in access to land (art. 14, 2, h CEDAW); - Right to a (dignified) life (Article 6, ICCPR); - Right to effective reparation (Article 8, ICCPR); - Non-discrimination and equality (art. 2, UDHR)
	Construction/installation of infrastructure	

72

PRODUÇÃO REFINO	• Overvaluation of properties due to real estate speculation, leading to the exodus of tenants and lessees, including small farmers, fishermen, and other groups who may find themselves in a situation of socioeconomic vulnerability. • Devaluation of properties in the region due to changes in the landscape and environmental impacts. • Destruction or damage to archaeological cultural heritage. • Reduced road safety due to increased travel in the region and damage to access roads caused by trucks and machinery. • Increased theft and robbery due to the arrival of a large contingent of workers from other regions, who may receive higher wages than the regional average. • Impacts on women's safety due to the increased number of male workers circulating in the region. • Increased alcohol and drug abuse among migrant workers. • Sexual exploitation and abuse of women and children. • Degrading working and living conditions, exhausting workdays, forced labor, child labor. • Workplace accidents • Noise and reduced quality of life due to construction and transportation of structures and machinery.	• Right to participate in development (Declaration on the Right to Development) and right to an adequate standard of living (Article 25, UDHR); • Right to housing (art. 25, UDHR); • Right to participate in cultural life (art. 27, UDHR) • Gender equality in land ownership, decision-making and participation (art. 14, 2, g CEDAW); • Right to a (dignified) life (Article 6, ICCPR); Right to personal security (Article 3 UDHR); • Prohibition of torture, inhuman or degrading treatment (art. 5, UDHR); • Right to free work, under just and favorable conditions (Art. 23 UDHR; Art. 7 ICESCR); • Right to protection of children against economic exploitation and child labor (Article 32, CDC); Protection against sexual exploitation of children (Article 34, CDC); • Prohibition of slavery and servitude (Art. 8 ICCPR; Art. 4 UDHR); • Right to Health (Article 25 of the Universal Declaration of Human Rights); ILO Convention No. 155 concerning Occupational Health and Safety; • Right to personal security (Art. 3 UDHR; Art. 9 ICCPR); • Right to personal integrity (Article 5, ACHR);
	Drilling activities (with or without a drilling rig), well drainage, installation and execution of operational activities on the platform.	
EXPLORATION AND PRODUCTION	• *Offshore: Restrictions on access to fishing areas* • Workplace accidents • Health damage due to explosions or fires, or due to contact with toxic substances in the event of leaks. • Onshore: Reduction in the quality and quantity of water available for consumption and reduction in access to sources of drinking water. • Restricting access to areas relevant for subsistence or of spiritual and cultural value to local communities, indigenous and traditional peoples. • Changes in the lifestyles of local communities, indigenous peoples, and traditional communities resulting from environmental impacts.	• Right to participate in development (Declaration on the Right to Development) and right to an adequate standard of living (Article 25, UDHR); • Respect for the customs and customary law of indigenous and tribal peoples (Convention No. 169); • Right to health (art. 25, UDHR, art. 12, ICESCR); • Right to adequate food (Article 25, UDHR); • Right to safe and clean drinking water (UN General Assembly Resolution 64/292) • Right to a safe, clean and sustainable environment (UN Resolution A/RES/76/300); • Right to Equality in the Enjoyment of Economic, Social and Cultural Rights (Article 3 ICESCR)
	Oil transportation (ships and pipelines)	

PRODUCTION	● Restrictions on access to fishing areas ● Impacts on health and safety and livelihoods due to explosions or fires, presence of toxic substances in case of leaks. ● Reduction in income sources, such as tourism and fishing, due to environmental impacts and reduced marine biodiversity. ● Impacts on the free use of natural resources by the local community. ● Noises ● Reduction in water quality and quantity due to leaks and poor waste management. ● Workplace accidents	● Right to a safe, clean and sustainable environment (UN Resolution A/RES/76/300); Right to safe and clean drinking water (UN General Assembly Resolution 64/292). ● Right to Health (Article 25 of the Universal Declaration of Human Rights); ILO Convention No. 155 concerning Occupational Health and Safety; ● Right to personal security (Art. 3 UDHR; Art. 9 ICCPR); ● Right to personal integrity (art. 5, ACHR);
	Refining processes	
REFINING	● Reducing air quality and air pollutant emissions (through flaring) ● Reduced quality of life and sleep due to noise and impacts from plant lighting. ● Reduction in water quality and quantity due to leaks and poor waste management. ● Workplace accidents, health and safety impacts due to explosions or fires, contact with toxic substances in cases of leaks, and the operation of heavy machinery.	● Right to a safe, clean and sustainable environment (UN Resolution A/RES/76/300); Right to safe and clean drinking water (UN General Assembly Resolution 64/292). ● Right to Health (Article 25 of the Universal Declaration of Human Rights); ILO Convention No. 155 concerning Occupational Health and Safety; ● Right to personal security (Art. 3 UDHR; Art. 9 ICCPR); ● Right to personal integrity (Article 5, ACHR);
	Surveillance and property security activities	
EXPLORATION PRODUCTION REFINING	● Abusive use of force by private security forces against lawful communities, such as home invasion. ● Abusive use of force by private security forces against their own and outsourced employees, for example, repression of peaceful demonstrations. ● Discrimination or violence against employees during personal search procedures. ● Violence against traditional peoples and communities and human rights defenders ● Increase in local conflicts as a result of the actions of security forces.	● Right to personal security (Art. 3 UDHR; Art. 9 ICCPR); ● Right to personal integrity (Article 5, ACHR); ● Non-discrimination and equality (art. 2, UDHR) ● Prohibition of torture, inhuman or degrading treatment (Article 5, UDHR); ● Right to free work, under just and favorable conditions (Article 23 UDHR; Article 7 ICESCR); ● Right to inviolability of the home (art. 12, UDHR; art. 17, ICCPR); ● Right to due process of law (art. 8 UDHR; art. 9 ICCPR)