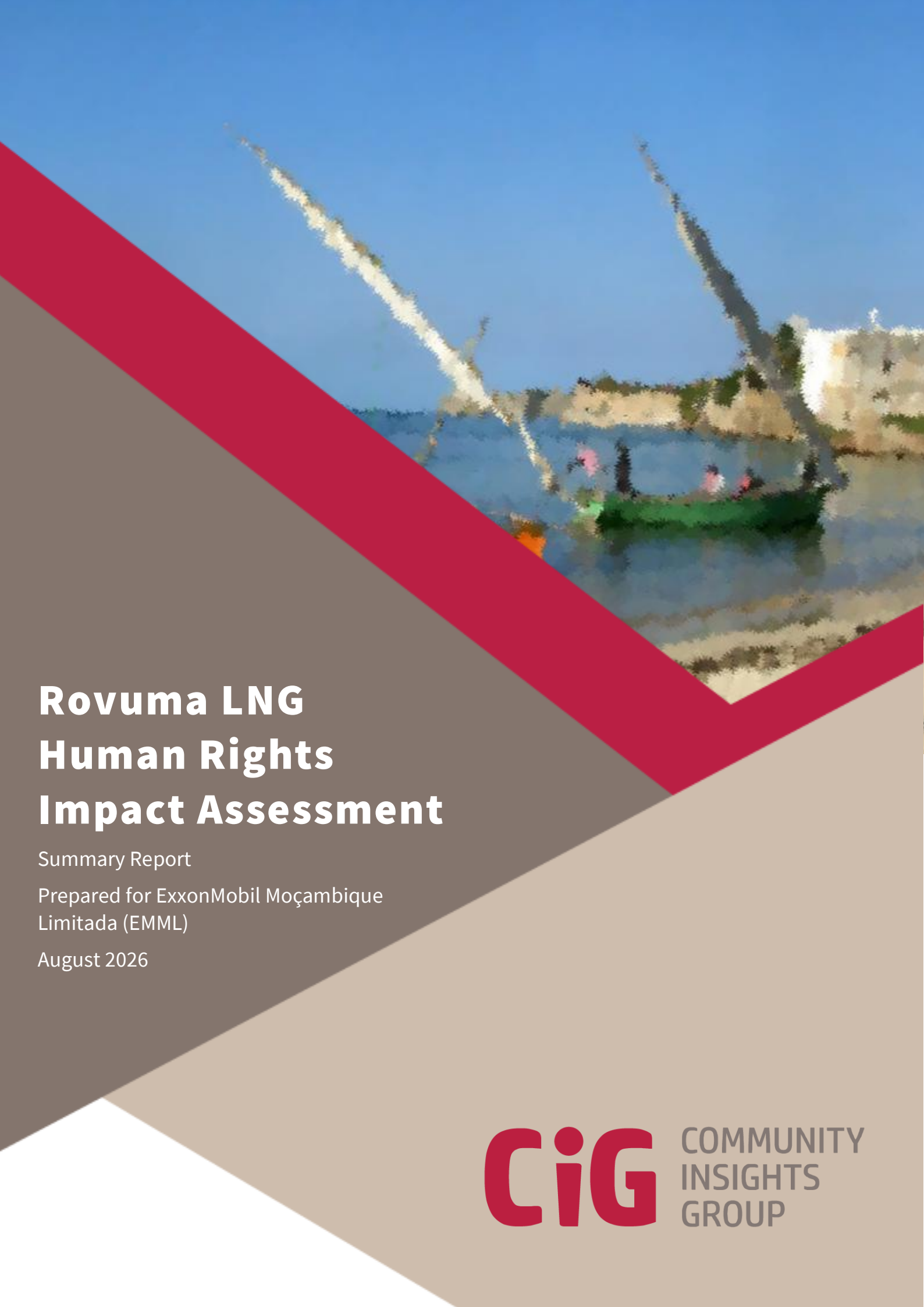




Rovuma LNG Human Rights Impact Assessment

Summary Report

Prepared for ExxonMobil Moçambique
Limitada (EMML)

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CiG COMMUNITY
INSIGHTS
GROUP

INTRODUCTION

ExxonMobil Moçambique, Limitada (EMML), on behalf of Mozambique Rovuma Venture S.p.A. (MRV), commissioned Community Insights Group (CiG) to undertake a Human Rights Impact Assessment (HRIA) of the Rovuma LNG Project (the Project) in Cabo Delgado Province, Mozambique. The Project is intended to develop natural gas produced from the Area 4 reservoirs in the offshore Rovuma Basin. The Project is to be constructed near the Mozambique LNG Area 1 Project (Mozambique LNG), operated by TotalEnergies EP Mozambique Area 1, Lda). The HRIA forms part of the Project's broader human rights due diligence process and is designed to identify salient human rights impacts, inform mitigation planning, and support alignment with the UN Guiding Principles on Business and Human Rights (UNGPs) and the Equator Principles IV (EP4). Further information about EMML can be found at its recently published Our Human Rights Approach¹ in English and Portuguese.

The Project's decision to undertake the HRIA at an early stage in the project lifecycle is both timely and strategically important. Conducting the assessment during the pre-FID phase provides an opportunity to identify potential impacts before construction activities scale up, to strengthen mitigation planning, and further embed human rights considerations into management systems.

The HRIA considers actual and potential human rights impacts² associated with the Project, taking into account the broader operating environment, interactions with the conflict-affected context and relevant business relationships. The assessment covers Project activities within its area of influence, including interactions with affected communities, workers, security arrangements, and contractors. Global supply chain activities are outside the scope of this assessment.

At the time of the assessment, construction and operations had not yet commenced, and many of the systems intended to support full mobilization were still under development or in early stages of integration. Accordingly, the findings consider observed conditions during the pre-Early Works phase, the broader contextual risks relevant to the Project setting, and potential or emerging impact pathways as construction mobilization progresses. Conditions observed at this stage are indicative of the Project's human rights risk profile, while recognizing that impact pathways may be materialized differently over time as Project activities scale up and management controls are fully implemented.

This document is a summary of findings and provides an overview of the salient human rights impacts identified and prioritized through the HRIA. The document is not intended as a substitute for the full HRIA report containing the detailed findings of the assessment.

¹ Link: EMML [Our Approach to Human Rights](#) (first published Dec 2025)

² For the purposes of this assessment, "impact" encompasses both actual and potential adverse human rights impacts, unless otherwise stated.

METHODOLOGY

The HRIA has been undertaken through a phased methodology aligned with the UNGPs, EP4 and international guidance for conducting HRIAs, combining scoping, stakeholder engagement, impact identification and assessment, and the development of recommendations.

Scoping was used to identify potentially salient human rights impacts, affected stakeholders, and relevant business relationships, and to define the priority themes for assessment. Stakeholder engagement was undertaken over two site visits and included interviews and discussions with approximately four hundred individuals including community members, workers, project personnel, Mozambique LNG and contractor representatives, private and public security actors, local authorities, civil society organizations, and implementing partners.

The assessment was informed by project documentation and management system review, contextual analysis, and applicable industry practice standards and national legal requirements. Given the Project's conflict-affected setting, the HRIA applied a Heightened Human Rights Due Diligence (H-HRDD) aligned methodology consistent with the UNGPs and UN guidance³. A conflict analysis, supported by specialist input during scoping, identified relevant conflict dynamics, potentially affected groups, and potential impact pathways. Conflict sensitivity informed stakeholder engagement and was integrated into the assessment of each potential impact, including the identification of impact pathways.

Salient human rights impact areas are identified primarily on the basis of potential impacts, taking into account scale, scope, and remediability, with likelihood considered as a secondary factor. The HRIA distinguishes between impacts the Project may cause, contribute to, or be directly linked to through business relationships, and applies this framework to develop recommendations for proportionate prevention, mitigation, management, leverage, and, where applicable, remediation responses.

OVERVIEW OF FINDINGS

At the time of the assessment, the Project had not yet entered the construction and operational phases. Early works and EPC contracts were not yet in place, and the Project's footprint on the ground remained limited. The assessment team observed that the Project has already established several foundational elements relevant to Human Rights Due Diligence (HRDD), including environmental, social and workforce management systems, risk assessment processes, and contractual and governance structures. These are well-resourced, have clear responsibilities assigned across functional teams and include monitoring systems with performance indicators, audit requirements, and oversight mechanisms. These systems offer a strong foundation for further developing a more context-responsive HRDD approach.

Based on the completed impact identification and assessment, a set of salient human rights impacts has been identified to support the risk-based prioritization for ongoing HRDD as the Project progresses towards FID and construction mobilization. For the purposes of this summary, closely

³ [UNDP, Heightened Human Rights Due Diligence for Business in Conflict-Affected Contexts. \(2022\)](#)

related salient impact areas have been consolidated under broader thematic headings. The summary focuses on these prioritized areas and presents the principal findings and priority recommendations from the full HRIA report.

Consistent with the UNGPs, the HRIA focused on identifying and assessing potentially salient adverse human rights impacts associated with the Project. However, the Project also has the potential to contribute positively to human rights outcomes through local employment, local content development, community investment, skills development, stakeholder engagement, and access to remedy. While these positive contributions do not offset adverse impacts, they are relevant to understanding the Project's broader contribution to long-term development and improved outcomes for Project-affected people and communities.



VULNERABILITY IN A CONFLICT-AFFECTED SETTING

The local context shapes the human rights risk environment in which the Project operates. Cabo Delgado Province has been affected by an armed insurgency since 2017, rooted in historic patterns of political exclusion, socio-economic marginalization, limited state presence, and contested local political economy dynamics⁴ that predate LNG development in the Afungi Peninsula.

Although Rovuma LNG is not considered a cause of the Cabo Delgado conflict, and there is no indication that the Project is contributing to the insecurity, the conflict significantly shapes the human rights baseline against which Project-related impacts must be understood. Ongoing insecurity⁵, population displacement⁶, the presence of multiple security actors, fragile community–public security relations⁷ and conflict-induced trauma heighten the vulnerability of stakeholders to potential Project-related impacts, increasing the complexity of developing and implementing timely and effective prevention, mitigation, and access to remedy measures across Project activities and business relationships, including security arrangements and contractor/supply chain management.

The HRIA identified specific areas where conflict-related conditions may influence the context in which Project-related potential human rights impacts are experienced by stakeholders. These areas included agricultural and marine-based livelihoods, community health and safety, project induced in-migration (PIIM), women's rights, access to information and grievance management,

⁴ Rufin, *Report on the socioeconomic, humanitarian and human rights situation in the Palma Afungi-Mocímboa area*, 2023.

https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-05/Mozambique_LNG_report.pdf and Observatório do Meio Rural (OMR), *Multidisciplinary Approach to Causes and Conflicts in Cabo Delgado*, 2023. <https://omrmz.org/wp-content/uploads/2025/01/OR-152-ENG-1.pdf>

⁵ Armed Conflict Location & Event Data Project (ACLED). *Mozambique Conflict Monitor*.

<https://acleddata.com/monitor/mozambique-conflict-monitor-cabo-ligado>

⁶ United Nations Office for the Coordination of Humanitarian Affairs (UN OCHA), *Mozambique Humanitarian Situation Overview, 2025–2026*. <https://www.unocha.org/mozambique>

⁷ ACLED, *Mozambique Conflict Monitor, Actor Profiles*. <https://acleddata.com/cabo-ligado-actor-profiles>

equity in socioeconomic benefits, working conditions linked to EPC mobilization and contractor workforce management, and security arrangements.

Recommendations

Going forward, the Project should continue to integrate a conflict-sensitive approach, together with a heightened vulnerability lens, throughout the Project's ongoing HRDD and impact management processes across Project functions and business relationships. This should include periodically updating the conflict context review to consider evolving conflict causes, triggers and trends and assess how these may affect priority impact areas, particularly in relation to women, youth, Internally Displaced Persons, returnees, and other vulnerable groups.

Periodic reviews should also be considered following significant changes in the operating context, including changes in conflict geography or intensity, displacement or return movements, presence of public security actors in the Afungi footprint, EPC mobilization, and security-related incidents. Where changed, heightened or emerging risks are identified, the Project should consider whether updates to relevant HRDD actions are warranted and assess whether existing management plans, stakeholder engagement approaches, grievance channels, contractor requirements, security arrangements, and coordination mechanisms remain adequate.

The Project should also engage with Mozambique LNG, where appropriate, regarding relevant conflict analysis, emerging risk information, grievance trends, security-related concerns, and other early-warning information, to support conflict-sensitive management and access to remedy across the shared Afungi footprint.



PROJECT AND MOZAMBIQUE LNG COORDINATION ON SHARED IMPACTS

As the Project and Mozambique LNG activities progress concurrently within a shared geographic and stakeholder context, communities may experience impacts that are difficult to attribute to a single operator. Resettlement and livelihood restoration activities are governed by the Resettlement Joint Operating Agreement (RJOA), under which Mozambique LNG is designated as the Resettlement Operator with exclusive operational responsibility for planning and implementation.

At this stage, the two projects have established coordination mechanisms through legal agreements, standing committees, and working-level arrangements, covering community engagement and grievance management processes, local recruitment processes, and the management of potential shared impacts such as community health and safety, PIIM, resettlement and security arrangements.

As activities scale and operational complexity increases, the effectiveness of these arrangements will depend on their consistent application in practice. In community engagement and grievance management, where coordination is still evolving in the Project's current pre-Early Works phase, there is a potential for fragmented oversight, duplicated engagement, consultation fatigue, mixed expectations, or inconsistent communication, which may create confusion regarding responsibilities, affect meaningful participation and timely access to remedy, and reduce community confidence.

Coordination is also relevant to shared potential human rights impacts related to resettlement and livelihood restoration, local employment, and equitable distribution of socioeconomic benefits, women's rights in communities, community health and safety, PIIM and security arrangements. In particular, overlapping activities and the potential use of common contractors may create cumulative community health and safety risks, while concurrent Project activities may increase PIIM-related pressures on housing, services, land, livelihoods and social cohesion.

Recommendations

Going forward, the Project should progressively strengthen HRDD coordination with Mozambique LNG, building on existing formal and working-level arrangements and beginning with sharing of relevant HRIA findings and follow-up actions, subject to appropriate information-sharing arrangements. Coordination should focus on priority shared impacts, with the aim of clarifying operational roles, information-sharing expectations, monitoring arrangements and escalation pathways, while maintaining clear accountability for each operator's own responsibilities.

Particular attention should be given to shared community health and safety and PIIM-related risks, where overlapping Project activities have the greatest potential to create cumulative impacts, as Project activities scale up. For community health and safety, coordination should support coordinated management of cumulative risks, incident response and potential pressure on local services. For PIIM, coordination should support aligned hotspot monitoring, timely information-sharing and the coordinated use of leverage with the Government of Mozambique (GoM), EPC contractors and other relevant external stakeholders to help prevent and mitigate foreseeable impacts and encourage adaptive management as pressures emerge.



LIVELIHOOD INSECURITY

In a predominantly subsistence economy, households rely heavily on land-based livelihoods that have been affected by Project-related economic displacement, contributing to heightened food insecurity and weakened household resilience. As a result, livelihood insecurity is identified as one of the most salient human rights impact areas in the HRIA.

With respect to agricultural livelihoods, as the designated Resettlement Operator, Mozambique LNG has made significant progress in advancing agricultural livelihood restoration, including providing replacement land to physically displaced households, adopting an alternative approach in response to widespread encroachment that affected the original Replacement Agricultural Land (RAL) model, and continuing agricultural support activities. Affected households nevertheless described impacts including reduced access to productive land, delays in restoring cultivation, continued food and income insecurity, and uncertainty regarding longer-term livelihood recovery. These impacts, based on community feedback gathered during HRIA fieldwork and findings from the interim audit of the Resettlement Plan prepared for Mozambique LNG, have been compounded by insecurity and the suspension of livelihood restoration and compensation programs during the *force majeure* period, with disproportionate effects on women and older persons.

With respect to marine-based livelihoods, access to nearshore fishing areas is restricted by marine safety exclusion zones established to protect infrastructure, reduce navigational risks, and prevent accidental harm to community fishers. Mozambique LNG has also led the implementation of livelihood restoration and compensation measures under the Fisheries Livelihood Restoration Program (FLRP). However, livelihood impacts have been compounded by the suspension of FLRP activities during *force majeure*, as reflected in community feedback and interim audit observations, alongside ongoing fishers' concerns regarding marine public security arrangements.

The Project has formal governance, oversight and coordination arrangements relevant to livelihood-related impacts through the RJOA, under which Mozambique LNG leads implementation of the Resettlement Plan, including the Agricultural Livelihood Restoration Program (ALRP), Revised RAL Strategy, the FLRP and the Diversified Livelihoods Restoration Program (DLRP), which were developed to address land-based and marine-based livelihood impacts in line with IFC Performance Standard 5. The Project exercises oversight, approval, review and audit rights under the RJOA, supported by broader community-facing management systems and stakeholder engagement and grievance management arrangements.

Recommendations

As the Project progresses, a key area of focus will be effective use of the Project's governance, oversight, and leverage under the RJOA to support improvements in livelihood restoration outcomes, escalate unresolved issues and facilitate coordinated follow-up with Mozambique LNG. This should include seeking alignment on monitoring approaches, with greater emphasis on household-level livelihood restoration outcomes, differentiated outcomes for households facing heightened vulnerability, regular review of priority indicators, and ongoing communication of monitoring results to affected stakeholders.

For agricultural livelihoods, priority should be given to unresolved issues relating to the revised RAL Strategy, compensation payments, DUAT issuance and access to replacement land, including outstanding host-community compensation concerns. Oversight should improve visibility of whether affected households, particularly women and older persons, are restoring access to productive land, food security and income.

For marine livelihoods, the Project should use its available leverage to strengthen communication and monitoring of access restrictions, eligibility and compensation arrangements, and seek visibility regarding whether additional impacts on fishers, intertidal collectors and divers—including those associated with underwater-noise restrictions—are identified, communicated, mitigated and compensated before the relevant activities begin.



PUBLIC SECURITY ARRANGEMENTS

Public security arrangements are a salient human rights impact area considering the Project's conflict-affected operating context, where public security deployments by the Government associated with the protection of the Project may influence how affected communities experience safety, freedom of movement, livelihoods, and access to remedy.

Public security forces deployed by the Government are responsible for protecting the Project DUAT, as well as providing maritime security, and operate solely under the command and control of the GoM, without direction from or reporting to the Project. The Government also has a broader government security presence in Cabo Delgado, where public security forces are deployed for regional security and stabilization objectives unrelated to the Project.

The governing agreement for the deployment of the public security forces is the Protocol on Restoration of Stability in Cabo Delgado, wherein the GoM recognizes its legal duty to provide a suitable environment for the proper performance of the Project. The Protocol does not extend to directing, managing, or overseeing the public security forces operations or enforcement actions, which remain the exclusive responsibility of the GoM. The Protocol requires compliance with the Voluntary Principles on Security and Human Rights (VPSHR) and includes mandatory VPSHR-aligned human rights training.

The HRIA noted that some stakeholders reported improved relations with public security forces in recent periods, alongside broader perceptions of improved security conditions compared with the peak of the conflict in 2021. At the same time, stakeholders raised some concerns regarding interactions with public security personnel, particularly offshore in relation to the enforcement of marine safety exclusion zones. Fishers described apprehension regarding patrols and the possibility of negative interactions, with implications for accessing fishing areas and livelihoods. Some concerns were also raised in relation to onshore interactions near access routes and checkpoints. While these accounts were not raised as formal grievances to the Project and were not independently verified as part of the HRIA, they indicate that perceptions of public security remain mixed and continue to be shaped by the wider conflict context, as well as evolving awareness, accessibility and confidence in available grievance channels at this early stage of implementation of the Project's Community Grievance Management Procedure.

Overall, the HRIA indicates a strong degree of alignment with the VPSHR at both system and policy levels across public security arrangements.

Recommendations

Going forward, the Project should continue to support effective use of the Project's available leverage to reinforce human rights expectations, support VPSHR-aligned training for public security personnel deployed by the Government in connection with the Project, raise concerns proactively, seek follow-up where appropriate on identified issues, and document the exercise of such leverage.

Public security-related human rights risks associated with the Project and its security arrangements should be reviewed periodically through coordinated input from the Project's security and socioeconomic teams, engaging Mozambique LNG where appropriate. For marine security arrangements, the Project should use its available leverage through existing governance and coordination mechanisms, including with Mozambique LNG, to support effective communication with affected fishing communities on the purpose, scope and practical implications of marine access restrictions, relevant expectations regarding public security conduct, and accessible and confidential channels for raising concerns.



WORKING CONDITIONS

The Project has established a structured management framework to support sound working conditions and worker-management relations. This framework is set out in the Industrial Relations Management System (IRMS), which is implemented through a number of plans and procedures, including, for example, the Requirements for Camps and Accommodations Management Plan and the Employment and Worker Relations Management Plan (EWRP), which are aligned with Mozambican law and IFC Performance Standard 2. These instruments set out Project-wide requirements for recruitment, employment practices, worker welfare, and contractor management, supported by dedicated implementation capacity and planned resourcing as workforce mobilization progresses.

Many potential workforce impacts identified by the HRIA are forward-looking and linked to the anticipated scale and complexity of construction activities, largely carried out by contractors. Given the early phase of mobilization and the limited duration and scope of worker experience to date, these impacts are best understood as potentially emerging as the Project progresses toward FID and construction mobilization.

In a remote, camp-based environment, workforce arrangements observed during early mobilization may signal potential risks that could become more pronounced as Project activities scale up and evolve. Extended rotation schedules and long working hours may contribute to fatigue and psychosocial strain among camp-based workers. Current arrangements are within applicable legal requirements and consistent with industry standards. The timely and effective implementation of phase-appropriate safeguards under the OSH framework and IRMS during the Engineering, Procurement and Construction (EPC) mobilization will be important to support reasonable limits on working hours, adequate rest and leisure, and protection of physical and mental health.

Locally recruited workers are expected to be initially engaged primarily in unskilled and semi-skilled roles and, while contracts are project-based, the prevalence of short-term contractual arrangements, combined with short demobilization notice periods in line with Mozambican labor law, and limited advance visibility of renewal, may contribute to employment and income uncertainty. In a context of limited alternative employment and restricted livelihood options, these conditions may present early indications of potential worker vulnerability, while also reflecting the early stage of the project, where workforce numbers remain limited, progression opportunities are not yet established, and confidential reporting mechanisms are not yet consistently in place across contractors but are expected to strengthen as activities scale and the IRMS is fully implemented. In recognition of this, the IRMS identifies workforce changes and demobilization as high-risk periods, underscoring the importance of fair and transparent treatment of affected workers and, where feasible, measures to assist them in preparing for potential income disruption.

Recommendations

As workforce numbers increase during subsequent Project phases, potential impacts related to working conditions will require strengthened oversight of EPC contractor workforce management processes governing rotational arrangements, working hours, and rest periods; monitoring of cumulative fatigue, worker wellbeing and safety performance; and accessible

mental health and psychosocial support and referral services, taking into account the remote camp-based environment and the conflict-affected operating context.

The Project should reinforce existing expectations to freedom of association and collective bargaining through contractor engagement, communication, and monitoring during EPC mobilization, including contractor expectations regarding non-retaliation and non-interference, and maintaining confidential grievance channels.

The Project, in coordination with Mozambique LNG, should continue to provide clear and consistent communication with local communities on recruitment criteria, selection processes, employment conditions, and progression pathways, while periodically reviewing contractor workforce practices and outcomes to identify potential patterns of unequal access or occupational clustering. It should also maintain risk-based due diligence for child and forced labor, particularly within lower-tier and off-site supply chains as EPC contractor and local supplier networks expand.



WOMEN'S RIGHTS AND GENDER EQUALITY

Women's rights and gender equality are a cross-cutting theme influencing outcomes across multiple salient human rights impacts. The Project has in place relevant gender-related measures across a number of systems and functions, including workforce management, camp management, community engagement, grievance arrangements, health and safety, and security. These provide an important foundation for addressing gender-related potential risks affecting workers and communities. However, they are not consolidated through a coordinated Project-wide strategy, which may limit consistency in how gender-related impacts are identified, addressed and monitored as the Project progresses.

In the workforce, current employment patterns reflect early mobilization in a construction context where female participation is historically limited. At this stage, women—particularly local women—are concentrated in unskilled roles. While this may partly reflect early contractor recruitment sequencing and local skills availability, it also suggests potential constraints in workforce arrangements that may contribute to unequal outcomes, limiting women's access to employment opportunities, role diversity, and progression. While no GBVH incidents were reported to the assessment team, camp-based (resident) women highlighted several contextual and structural factors that may increase vulnerability within a predominantly male, camp-based working environment. These include women's minority representation within the workforce, hierarchical power dynamics in the workplace and limited separation between work and living spaces under extended rotation schedules in camp-based environments. Risks were also perceived to be heightened for local women commuting daily from neighbouring communities, who may face increased exposure to GBVH-related risks due to prevailing gender norms, broader social and economic pressures, and barriers to accessing government protection and reporting services.

In communities surrounding the Project area, women and girls may face heightened GBVH risks linked to social and economic changes associated with Project-related activities (including employment and PIIM) that may alter household dynamics and reduce social cohesion. These potential impacts arise within a broader context characterized by prevailing gender norms,

structural inequality, conflict-related pressures, and barriers to accessing government protection, reporting services, and effective remedy. Within this context, women and girls may also face broader equality-related risks within the community, including constraints on mobility, participation, access to information, and equitable access to livelihoods and Project-related benefits.

Recommendations

As the Project progresses, it should advance a more integrated and systematic approach to gender, consolidating gender considerations across relevant systems, plans and processes, with clear accountability and regular monitoring of gender-related risks and outcomes in relation to workers and communities, and coordination with Mozambique LNG, where appropriate, to support consistent approaches in areas of overlap.

As workforce numbers increase during subsequent Project phases, the Project should strengthen oversight of EPC contractors' implementation of gender-related workforce requirements, particularly in relation to women's recruitment and participation in the workforce, workplace GBVH prevention and response measures, and contractor implementation of accessible and confidential channels for handling sensitive grievances.

In communities, the Project should build on existing measures to strengthen support for women's safe and meaningful participation in engagement and decision-making, including targeted engagement approaches, accessible and confidential reporting channels for handling sensitive grievances, and awareness of available referral pathways to appropriate support services.



ACCESS TO REMEDY

During the pre-Early Works phase, workforce grievance arrangements remain at an early stage of implementation and continue to evolve as part of the IRMS. Contractors are required to establish worker grievance mechanisms, including safeguards against retaliation. Workers are generally aware that grievance mechanisms exist, and that concerns may be raised through supervisors, Workers' Committees, Human Resources, or contractor industrial relations personnel. However, baseline awareness may not consistently translate into confidence in use. Across worker groups engaged during HRIA fieldwork, awareness of a clearly identifiable anonymous and confidential reporting channel appeared limited. This may act as a potential barrier to reporting, particularly for sensitive grievances involving supervisors, harassment, or dignity-related concerns. These observations reflect initial worker experiences during early mobilization and are expected to improve as grievance processes, oversight arrangements, and communication practices become more consistently embedded across the workforce.

At the community level, the Project's Community Grievance Management Procedure (CGMP) is also in the early stages of implementation, within a context of pre-existing vulnerabilities and low levels of trust in formal processes. Mozambique LNG has also established a CGMP and maintains a larger on-the-ground presence; as a result, at this stage, community perceptions are primarily shaped by experience with Mozambique LNG.

Whilst the Project's CGMP provides multiple reporting channels, fieldwork indicated variability in community awareness of the CGMP. Community members expressed concerns regarding perceived neutrality, confidentiality, and potential bias in channelling grievances through community leaders or relying on community facilitators, with a preference for being able to raise concerns directly with the Project. Confusion was also reported regarding the respective roles and responsibilities of the Project and Mozambique LNG in receiving and addressing grievances. Efforts to further clarify roles and responsibilities and strengthen coordination are ongoing as implementation of the CGMP progresses. While elements of the CGMP are in place, certain planned measures have not yet been fully implemented at this stage, including the recruitment of female CLOs, deployment of community facilitators, and targeted awareness-raising campaigns for community members.

Recommendations

Going forward, priority should be given to strengthening both workforce and community grievance arrangements so that they are accessible, trusted, and effective in practice. For workers, this should include the ongoing verification of contractor mechanisms, including confidential and anonymous reporting options and safeguards against retaliation, as well as clearly establishing the role of the Project grievance mechanism where contractor grievance management processes may be ineffective or unsuitable. For communities, full implementation of the CGMP should include clear communication on available channels, direct and confidential access to the Project, improved accessibility for vulnerable groups, and appropriate procedures for sensitive and security-related grievances. The Project should engage with Mozambique LNG, where appropriate, to support alignment on lodging channels, referral, tracking and closure processes across the shared operating footprint.

HRIA FOLLOW-UP AND ONGOING HRDD

The HRIA has been completed, and the Project has reviewed and considered its findings and recommendations. The recommendations provide high-level strategic direction and identify priority areas for action, with more detailed measures being developed through an iterative, cross-functional implementation-planning process that will continue as part of the Project's ongoing human rights due diligence. This process will help determine specific implementation measures, functional responsibilities, timelines, performance indicators and tracking arrangements.

At the time this Summary was prepared, initial actions were already underway. The Project appointed a Human Rights Lead to coordinate implementation of the HRIA recommendations and support ongoing human rights due diligence; initiated engagement with Mozambique LNG on the HRIA findings and opportunities for strengthened coordination; and initiated a women's rights and gender workstream to build on existing efforts and advance implementation of relevant HRIA recommendations.

The Project has also begun planning the communication of the HRIA findings and follow-up actions to affected stakeholders. This will support communication of relevant findings and follow-up actions through accessible and appropriate formats and ongoing updates on how issues raised through the HRIA are being addressed.

As implementation planning progresses, recommendations will continue to be integrated, as appropriate, through existing Project systems and processes, including the ESMP framework and associated management plans, the IRMS, contractor oversight and assurance processes, stakeholder engagement and grievance arrangements, security governance mechanisms, and coordination structures with Mozambique LNG, or taken forward through specific human rights measures where appropriate.

The Project recognizes human rights due diligence as an ongoing and iterative process involving continued engagement, monitoring and access to remedy as Project activities evolve. Priority human rights impacts and implementation progress will be monitored and reviewed periodically, including at key Project milestones such as FID, EPC mobilization, and the construction and operational phases. Actions will be reviewed and adapted in response to monitoring outcomes, stakeholder feedback, grievance trends, and changes in Project activities, business relationships and the operating context. Workforce and community grievance mechanisms will continue to be implemented and reviewed to support access to remedy.

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