



Tanggung Development



TANGGUH DEVELOPMENT

TANGGUH PROJECT SECURITY PROCEDURE

MANAGING ALLEGATIONS OF ABUSE OR RELATED INCIDENTS IN THE PROVISION OF SECURITY

TANGGUH AREA OF OPERATION

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1.0 INTRODUCTION

1.1. PURPOSE

This document describes the procedure BP will follow, as operator of the Tangguh LNG Project, for situations that may involve a human rights violation associated with the provision of Project security in Tangguh Area of Operations. Adherence to this procedure will:

- a) Demonstrate BP and the Tangguh Project's continuing commitment to respect, promote and protect human rights.
- b) Provide BP and Tangguh Project management with guidance in responding to human rights challenges
- c) Provide BP and Tangguh Project management with a process to clearly document alleged or actual cases of human rights violation.
- d) Provide a process to mitigate human rights-related legal and reputation risks to BP and the Tangguh Project.

Within the Tangguh Project's area of operations, BP will take appropriate measures within its control to ensure its people and assets are protected in a manner that respects, protects and promotes human rights. The response process outlined in this procedure builds on BP's Code of Conduct.

There may be situations in which it is not clear whether a violation of human rights has occurred. Consistent with BP's Code of Conduct, all BP and Tangguh Project staff are obliged to raise all allegations, incidents or concerns that they may have regarding possible human rights violations to Tangguh security and line management, so that the responsible people within management can make a judgment on the specific allegation, incident or concern and put into place the procedure set out in this document.

1.2. SCOPE AND PRINCIPLES

This procedure addresses situations that may involve a human rights violation associated with the provision of Project security in Tangguh Area of Operations.

Area of Operations:

Tangguh's area of Operations includes all Tangguh Project property, facilities, vehicles, boats, aircraft, offices, and associated offices and activity. Any specific location where the Tangguh Project is physically conducting business activity on a permanent or temporary basis is within the area of Operations. This also includes the physical locations where Tangguh Security has the primary responsibility for maintaining security and providing protection for Tangguh Project employees, contractors, invited visitors and their equipment or operations, as well as situations where Tangguh management determines that there may be a direct Project impact.

Below are BP's general guidelines in the event of a human rights allegation associated with the Tangguh Project:

BP will carry out an internal inquiry in all cases where an allegation, incident or concern regarding a possible human rights violation within Tangguh's Area of Operations is brought to the attention of the Tangguh Project or BP.

BP and the Tangguh Project will keep records and documentation of all human rights – related allegations.

In all cases, there will be a clear chain of command for managing the incident internally.

BP and Tangguh Project management will exchange information internally as quickly and efficiently as possible relating to the allegation, incident or concern.

1.3. EXCEPTIONS

This procedure does not attempt to provide guidelines covering allegations, concerns or incidents outside the Tangguh Area of Operations.

2.0 TERMS, DEFINITIONS AND ABBREVIATIONS

2.1. ABBREVIATIONS

AMDAL	Environmental and Social Impact Assessment
BP Group	BP corporate
BPMIGAS	Government of Indonesia upstream oil & gas regulatory body
BU	BP Indonesia Business Unit
BUL	BP Indonesia Business Unit Leader
C&EA	BP Indonesia Communications and External Affairs Department
GOI	Government of Indonesia
HSSE	Health, Safety, Security and Environment
ISP	Tanggung Integrated Social Program
KOMNASHAM	Indonesia Human Rights Commission
LNG	Liquefied Natural Gas
NGO	Non-governmental organization
PSC	Production sharing contract
PUL	Tanggung Performance Unit Leader
SPA	Single Point of Accountability
TFM	Tanggung Field Manager
UN	United Nations
VP	Vice President

2.2. TERMS AND DEFINITIONS

Integrated Social Program (ISP)

The Tangguh Project seeks to catalyze sustainable and responsible economic growth by implementing an Integrated Social Program, which integrates environmental, social and economic concerns into the Project's development. The ISP comprises a total of 14 programs targeting Papua, the Bird's Head, Kabupaten Teluk Bintuni and direct community assistance to the Directly Affected Villages and resettlement-affected villages. These programs have been developed to respond to the identified project impacts, the social and economic environment and indigenous peoples' issues. The ISP programs are managed by the Tangguh ISP Unit. The programs consist of: Integrated Community Based Security, Local and district governance, Mitigation of in-migration and induced impacts, Civil society strengthening, Papuan business empowerment, Revenue management, Workforce and industrial affairs, Vocational training, Health, Education, Resettlement, Community Action Plans/Directly Affected Villages, Women's empowerment, micro-finance/micro-enterprise, resettlement, and Bay forum.

3.0 REFERENCES

3.1. CODES AND STANDARDS

Field Guidelines for Joint Security Measures Within the Work Area of the Tangguh LNG Project

(full text and summary available on www.bp.com see Tangguh, Field Guidelines)

UN Basic Principles on the Use of Force and Treatment of Offenders
(attachment to the Field Guidelines)

UN Code of Conduct for Law Enforcement Officials (available on www.un.org)

US/UK Voluntary Principles on Security and Human Rights (available on www.state.gov – see Human Rights, Fact Sheets)

3.2. PROJECT DOCUMENTS

AMDAL – Tangguh Environmental and Social Impact Assessment, October 2002
(Summary available on www.bp.com and www.adb.org; full report available as CD-ROM by contacting Tangguh Project)

BP Group Code of Conduct, “Our Commitment to Integrity”
(available on www.bp.com)

Tangguh Project Social Policy and Tangguh Integrated Social Program (see www.bp.com)

Tangguh Project Grievance Procedure (undergoing internal review)

3.3. POLICY

The Tangguh LNG Project follows BP policy and standards concerning security and human rights, which includes the Project’s stated commitment to the US/UK Voluntary Principles on Security and Human Rights (referred to in this document as the Voluntary Principles). Further, the Project commitment to the Voluntary Principles is incorporated within the Tangguh Project Environmental and Social Impact Assessment (Indonesian acronym ‘AMDAL’), and in the signed agreement between the Project and the Indonesian Police in Papua, known as the Field Guidelines for Joint Security Measures Within the Work Area of the Tangguh LNG Project (Indonesian acronym ‘Juklap’).

The Voluntary Principles state that ‘All allegations of human rights abuses by private security should be recorded. Credible allegations should be properly investigated. In those cases where allegations against private security providers are forwarded to the relevant law enforcement authorities, Companies should actively monitor the status of investigations and press for their proper resolution.’

In addition, the Voluntary Principles state: ‘Companies should record and report any credible allegations of human rights abuses by public security in their areas of operation to appropriate host government authorities. Where appropriate, Companies should urge investigation and that action be taken to prevent any recurrence. Companies should actively monitor the status of investigations and press for their proper resolution.’

4.0 ORGANISATION AND RESPONSIBILITIES

Within the scope of this procedure and BP and Tangguh Project delegation of authorities, responsibilities for implementation are noted below.

4.1. BP INDONESIA BUSINESS UNIT LEADER (BUL)

The Business Unit Leader is responsible for the following:

- Deciding terms of reference and establishes internal investigation team
- Confirming findings of an internal investigation and determining next actions
- Consulting with Tangguh Project PUL on outcomes of initial inquiries and internal investigations and next actions
- Providing written record of next actions post internal investigation report to Tangguh PUL, BP Indonesia VP Relations & Support, and Tangguh VP ISP
- Consulting with BP Indonesia VP Relations & Support on situations posing potential reputation risk as well as matters involving Government of Indonesia communications
- Communications with Government of Indonesia
- Communications with BP Group
- Monitoring progress of investigations and next actions, and ensuring sustained actions as needed

4.2. TANGGUH PERFORMANCE UNIT LEADER (PUL)

The Tangguh Project Performance Unit Leader is responsible for the following:

- Keeping the BP Indonesia BUL, Country Head and VP Relations & Support abreast of developments that involves public security or situations that could pose a potential reputation risk
- Agreeing lead for initial inquiry with Tangguh Field Manager; consults with Tangguh VP ISP for appropriate ISP interface in the initial inquiry
- Consulting with BP Indonesia VP Relations & Support and Tangguh VP ISP, then informs BP Indonesia BUL on outcomes of initial inquiry and advises on internal BP investigation if recommended
- Consulting with BP Indonesia BUL on outcomes on internal investigations and recommendations for next actions
- Providing written records on allegations, concerns or incidents and written records of Project actions to Tangguh VP ISP for inclusion in the Project grievance log
- Communications with PSC partners, lenders, communities, and others as appropriate
- Monitoring progress of Project actions and ensuring sustained Project efforts as needed
- Ensuring post incident review and regular review of adequacy of this procedure
- Ensuring implementation of simulated exercises

4.3. TANGGUH FIELD MANAGER (TFM)

The Tangguh Project Field Manager is responsible for the following:

Serving as the Single Point of Accountability for on-site response management

- Keeping Tangguh Project PUL abreast of all developments involving private or public security related to a potential human rights allegation, concern or incident in Tangguh Area of Operations
- Consulting with Tangguh Project PUL and Tangguh VP ISP on terms of reference and lead on initial inquiries
- Providing written report on finding from initial inquiry and written record of on-site actions to Tangguh Project PUL

4.4. TANGGUH VICE PRESIDENT INTEGRATED SOCIAL PROGRAM (VP ISP)

The Tangguh Project VP ISP is responsible for the following:

- Maintaining and updating the Tangguh Project grievance log
- Consulting with Tangguh Field Manager and with Tangguh PUL on initial inquiries and internal investigations for appropriate ISP interface
- Monitoring and sustaining ISP actions as needed

4.5. BP INDONESIA VICE PRESIDENT RELATIONS & SUPPORT

The BP Indonesia VP Relations and Support (Communications and External Affairs) is responsible for the following:

- Advising BP Indonesia BUL on handling of allegations, concerns and incidents that could affect BP reputation, as well as matters involving interface with Government of Indonesia
- Monitoring and sustaining actions as needed involving Relations & Support

4.6. INTERNAL INVESTIGATION TEAM LEADER

The Internal Investigation Lead is responsible for the following:

- Leading the internal investigation team
- Providing a written report on the outcome of the investigation and recommendations to BP Indonesia BUL, Tangguh PUL, BP Indonesia VP Relations & Support, and Tangguh VP ISP

5.0 RESPONSE PROCESS PROCEDURE

A clear chain of command is required to manage human rights allegations, incidents or concerns. The Tangguh Project line management must quickly co-ordinate with the BP Business Unit's Communications and External Affairs function. The Tangguh Field Manager (TFM) must be informed so that he may take appropriate and prompt action. An incident involving a possible human rights violation should be treated with the same sense of urgency and attention as a major environmental or safety incident.

Notification of a possible human rights violation may come to BP or the Project's attention via several sources, including local communities, media, employees, or non-governmental organizations (NGOs). When an allegation, incident or concern is reported, on-site personnel line management is responsible for immediate assessment and determination of whom to notify in accordance with the procedure set out in this document. If after consideration there is any uncertainty as to whether a specific allegation, incident or concern could amount to a human rights violation, on-site management should still proceed as per a confirmed human rights violation. The Tangguh Field Manager is the Single Point of Accountability (SPA) for on-site response management.

5.1. STAGE 1 INTERNAL INQUIRY

If the allegation, incident or concern falls within Tangguh's Area of Operations, then an internal inquiry will be conducted in all cases to obtain information and to attempt to gain facts and establish the credibility of an allegation and the facts. The following process must be followed:

5.1.1. Notification:

Tangguh Field Manager notifies the Tangguh Performance Unit Leader (PUL) of the allegation, incident or concern. The PUL will then notify:

- the Tangguh Vice President Integrated Social Program (ISP)
- BP Indonesia VP Relations & Support (C&EA).

If the allegation, incident or concern poses a potential reputation risk for BP Indonesia, the PUL will inform the BP Indonesia Business Unit Leader (BUL).

5.1.2. Point Person for the Inquiry:

Tangguh Field Manager selects a point person to lead the initial inquiry, as agreed with the Tangguh Project PUL; the Tangguh VP ISP will be consulted, who will ensure appropriate ISP interface and log the allegation or incident in the Tangguh Project grievance log. The point person selected for the initial inquiry will depend on the nature of the allegation or incident (e.g., if a security-related incident, the point person will typically be the Field Security Manager; if a labour issue, the point person may be the Industrial Relations Team Leader).

5.1.3. Fact-finding:

Establish the basic facts as soon as possible – who, what, where, and if possible, the why the event happened. All information gathered will be retained.

5.1.4. Reporting:

The Tangguh Field Manager reports back in writing to the Tangguh Project PUL as soon as practicable, of the basic facts, identifying any connection the Project may have with the allegation, incident or concern, and an assessment of the potential consequences. \

5.1.5. No Evidence of Human Rights Violation:

If the internal inquiry shows the allegation, incident or concern to be unfounded as agreed with the Tangguh Project PUL, the Tangguh Field Manager will record the actions for the Tangguh Project PUL. The PUL will advise the Tangguh VP ISP, who will update the Tangguh grievance log and the BU VP Relations & Support. The Tangguh Project PUL will inform the BUL.

5.1.6. Evidence of Possible Human Rights Violation:

If the allegation, incident or concern appears to be credible and warrants further action (see Table 1 Examples for further guidance) as determined by the Tangguh Project PUL, or if it is found to be an actual incident, the response process moves to Section 5.2 Stage 2 Action.

Factors to Consider in Moving to Stage 2 Actions

In deciding the following factors need to be considered:

Significant or intentional breach of Tangguh/BP policy

Any of the circumstances listed in Table 2

People are hurt and/or there is harm to assets

Impact on community and/or employees

Situation poses a legal, security and/or reputation risk

Example 1 - Not Requiring Stage 2 Action:

A person shows up at the Tangguh base camp gate demanding to be let into the premises of the camp. The person is irate and demanding to talk to the Field Manager. The on-duty Tangguh security guard informs the person that he cannot enter the premises without proper arrangement. The person starts to become more forceful and threatens the security guards verbally.

The security guard physically escorts him off the property. A community member reports the incident to the Tangguh Community Affairs worker alleging improper conduct on the part of the security guard. The Community Affairs worker reports it to the Field Manager for follow-up. It was found that the security guard followed all proper procedures and abided by workforce code of conduct.

At this point, Stage 1 Internal Inquiry has been completed and the case is closed. The Community Affairs team works with the community leaders and community forum to prevent the possibility of future misunderstandings.

Example 2 – Requires Stage 2 Action:

BP receives a report from an NGO that a protestor blocking access to the Tangguh Project Right of Way (within our area of Operations) was injured during a confrontation with public security forces. The report alleges that excessive force was used by the public security forces. BP's initial internal inquiry indicates that the claim may be credible. BP now moves to Stage 2 Action.

5.2. STAGE 2 ACTION REQUIRING INTERNAL BP INVESTIGATION

(See Flowchart in Appendix Attachment 1)

5.2.1. The Internal Investigation:

In the case of a credible allegation, concern or incident that involves BP or Tangguh Project employees or contractors, the Tangguh Project PUL will inform the VP Relations & Support (C&EA), the BUL and the BP Indonesia Country Head about the need for an internal investigation. The BUL will:

Decide the nature and terms of reference for a BP investigation

Select the lead of the investigation team

Notify BP Group representatives as appropriate.

The investigation team should include appropriate line and functional representatives, which may include Security, Legal, Audit, Integrated Social Program (ISP), HSSE and/or others as appropriate.

In the case of an incident, concern or allegation that appears to be credible as a result of Stage 1 Internal Inquiry and it involves public security; the process described in Section 5.3 must be followed

5.2.2. Notification to Government:

The BUL will notify Indonesia Government Authorities and others, as appropriate, consistent with the requirements in Section 5.3 Action Requiring Notification to Government Authorities and Section 5.4 "Notification of Other Parties" of this procedure. The PUL will notify communities, partners, lenders or others as appropriate consistent with section 5.4 of this procedure.

5.2.3. Information Gathering:

The investigation team will gather all available information. The lead of the investigation team will develop its report on the facts, findings and recommendations and send it to the BUL, PUL, VP ISP and VP Relations & Support.

5.3.4. Findings and Recommendations:

The BUL will confirm the findings and recommendations and determine next actions, advising the PUL, VP ISP and VP Relations & Support.

5.2.5. Further Reporting to the Government:

Following the findings and determination of next actions, the BUL will notify Indonesian Government Authorities and others, as appropriate, consistent with the requirements in Section 5.3 Action Requiring Notification to Government Authorities and Section 5.4 "Notification of Other Parties" of this procedure. The PUL will notify communities, partners, lenders or others as appropriate consistent with section 5.4 of this procedure.

5.2.6. Grievance Log:

The VP ISP will update the Tangguh grievance log.

5.2.7. BP Group Notifications:

The BUL will inform BP Group and others as appropriate.

5.2.8. Monitoring Progress and Sustaining Actions:

The BUL and PUL will monitor progress and sustain actions as needed.

5.3. STAGE 2 ACTION REQUIRING NOTIFICATION TO GOVERNMENT AUTHORITIES

5.3.1. Informing the BUL:

If the allegation appears to be credible and involves the public security forces (police or military) in Tangguh Area of Operations, the Tangguh Project PUL will inform the BP Indonesia BUL.

5.3.2. Notification to the Government:

The Government of Indonesia must always be the first external stakeholder to be notified in the event of a possible incident of human rights violation. The BUL will immediately notify the appropriate Indonesian government authorities, making a record in writing.

The manner and means for making this notification will be consistent with the reporting steps set in the Juklap and with the overarching guidelines set in the Voluntary Principles (see Table 2). At a minimum, notification will be:

- BPMIGAS
- The National Police
- The National Human Rights Commission – Komnasham – the body officially chartered by the Government of Indonesia to investigate human rights abuse.
- Other agencies of the Government, as appropriate.

The BP Indonesia BUL will be responsible for all communications with the Government of Indonesia.

5.3.3. Informing Other Stakeholders:

Inform stakeholders of actions taken, as appropriate. See next sections of this procedure.

5.3.4. Monitor and Sustain Actions:

Monitor progress and sustain actions as necessary to press for resolution by the governmental authorities.

Circumstances within Tangguh Area of Operations That Require Reporting to the Indonesia Governmental Authorities

- When there is a violation of Indonesia law, including criminal actions, committed within the Tangguh area of operations, a report must be filed with the Police
- When an allegation concerns the police or military
- When physical force is used by private or public security

- When a firearm is discharged by public security
- Where injury or death is caused by the use of force or firearms
- When there is inappropriate use of force or where force used is not proportional to the threat
- When there is inappropriate use of company equipment (leading to a human rights incident)
- When the rights of individuals to participate in lawful and peaceful assemblies aimed at the Tangguh Project is violated
- Where there is a credible allegation of human rights abuse or violation of international human rights law by public security in Tangguh area of operations
- Act of torture or other cruel, inhuman or degrading treatment or punishment

The Juklap requires immediate notification in writing whenever it is believed that BP or the Police have acted in breach of any of the standards set forth in the UN Principles on the Use of Force and Firearms by Law Enforcement Officials, the UN Code of Conduct for Law Enforcement Officials, or the Voluntary Principles on Security and Human Rights in the provision of security for the Tangguh Project

The Juklap requires that criminal actions or violations of law be reported to the Police. It also requires BP to notify the Police in writing whenever it is believed BP or the public security force has acted in a breach of the Juklap (which establishes the Voluntary Principles and the UN Code of Conduct for Law Enforcement Officials as Project security standards).

The UN Code of Conduct for Law Enforcement Officials requires prompt reporting to the competent authorities in every instance in which a firearm is discharged. Under the UN Code, no law enforcement official may inflict, instigate or tolerate any act of torture or other cruel, inhuman or degrading treatment or punishment, as defined by the UN Code.

The Voluntary Principles and the UN Principles on the Use of Force and Firearms address the use of force by public security, which should be used only when strictly necessary and to the extent proportional to the threat, and the right of individuals to participate in lawful and peaceful assemblies. Company equipment may not be used in an inappropriate manner. All parties to a conflict are obliged to observe applicable international humanitarian law.

Under the UN Code of Conduct for Law Enforcement Officials international human rights and humanitarian laws are referenced, which highlight that no law enforcement official may inflict, instigate or tolerate any act of torture or other cruel, inhuman or degrading treatment or punishment.

5.4. NOTIFICATION OF OTHER PARTIES

The Tangguh Project PUL is responsible for notifying the Tangguh Production Sharing Contract (PSC) partners in a timely manner in the event of an allegation, incident or concern with the potential for damage to business reputation and/or legal liability. The Tangguh Project PUL will advise the partners if an investigation team has been established and provide ongoing status reports and findings.

Lenders will similarly be notified in cases where an incident requires public disclosure or constitutes a potentially significant breach of Tangguh policy.

The Tangguh Project PUL will notify appropriate community and consultative forums.

Depending on the circumstances, the BP Indonesia BUL will notify other parties as appropriate, which may also include overseas Governments, and/or individual NGOs.

5.5. CONFIDENTIALITY

The basic intent will be to fully disclose those actions taken concerning allegations, incidents or concerns of human rights violations occurring within the Tangguh Area of Operations. In notifying external parties, BP will consider whether disclosure could be expected to result in material risk to the Tangguh Project or be in violation of local laws and contracts. BP will take appropriate measures to protect the identities of individuals raising human rights allegations, incidents or concerns. Consistent with the standards in the Voluntary Principles and the process outlined in this document, BP will make an individual determination on external disclosure of those actions.

5.6. POST INCIDENT REVIEW

The leader of the internal investigation team (Section 5.2) will organize a review of the effectiveness of the response after the investigation required under this procedure has been completed. This review will include assessment of the event and the responses undertaken. The objective of the review is to identify lessons learned that can be incorporated into future response actions.

Post-incident reviews will include the following items, as well as others specific to the incident:

- What happened?
- How did we respond?
- What went well? What could be done better?
- Were our actions consistent with BP/Tangguh policies including the Voluntary Principles and the Juklap?
- What would we do differently if the same situation occurred today?

The post-incident review will be used to improve learning on how to deal with violations and lessons learnt may be incorporated into future revision of this procedure as determined by the Tangguh Project PUL.

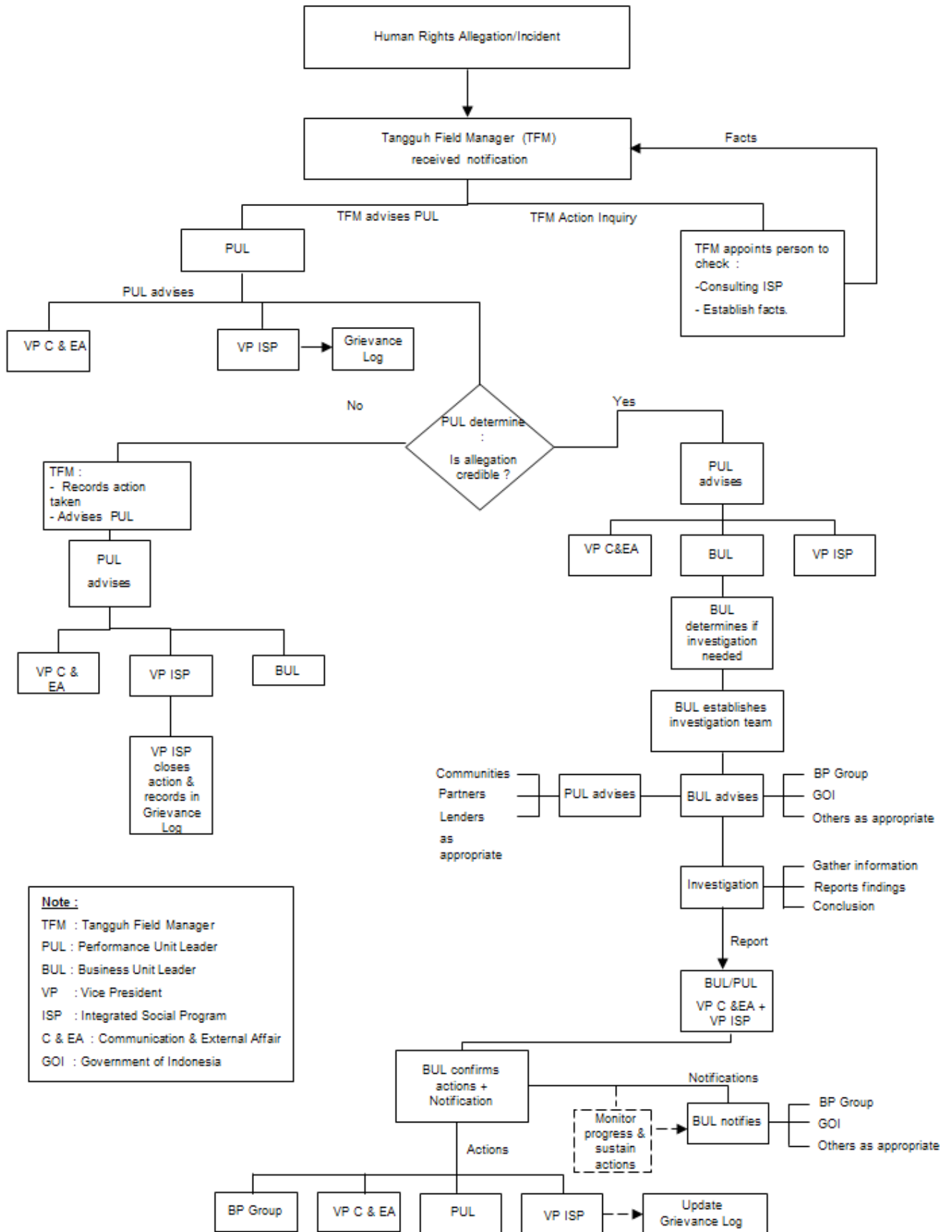
5.7. RESPONSE EXERCISE

This response process will be reviewed periodically and updated as necessary. The Tangguh Project PUL will ensure testing it through an annual simulated exercise.

ATTACHMENTS

HUMAN RIGHTS INCIDENT PROCESS INVOLVING TANGGUH EMPLOYEES AND CONTRACTORS

ATTACHMENT: HUMAN RIGHTS INCIDENT PROCESS INVOLVING TANGGUH EMPLOYEES AND CONTRACTORS



Note :
 TFM : Tangguh Field Manager
 PUL : Performance Unit Leader
 BUL : Business Unit Leader
 VP : Vice President
 ISP : Integrated Social Program
 C & EA : Communication & External Affair
 GOI : Government of Indonesia

* Situations involving public security should revert to Section 5.3 of this procedure