

Sustainability  
Plan  
2015

Trinidad & Tobago



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## Disclaimer

The 2015 Sustainability Plan for Trinidad & Tobago includes a set of actions designed by the Company and aimed at contributing to sustainable development. Repsol undertakes to fully implement those actions specified in the Sustainability Plan that are required by law, reserving the right to modify, postpone or cancel the rest of the voluntary actions, which does not imply the assumption of any liability whatsoever by Repsol.

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# Corporate Responsibility

## Vision and preparation of this Plan

Sustainable development is a responsibility shared by political, social and economic actors that requires decisive action.

At Repsol we understand Corporate Responsibility to be the contribution made by large companies to sustainable development. We consider that the essence of Corporate Responsibility is the incorporation of environmental and social aspects into the decision-making processes of organizations.

We contribute to development by supplying energy that is essential for the realization of people's fundamental rights.

Additionally, we aspire to contribute to this sustainable development through our vision of Corporate Responsibility, the responsibility we voluntarily assume. This goes beyond the legal requirements regarding the impact that our activities may have on society and the environment. We thus respond to our stakeholders' expectations regarding our activities by implementing practices that maximize positive impacts and prevent, mitigate, repair or offset negative ones.

We have identified the expectations that our stakeholders have on issues related to governance, respect for Human Rights, labor practices, environmental impacts and the legitimacy of our operating and value chain practices; and concerning issues that affect the consumers and users of our products and services, as well as the positive and negative impacts that could be generated in local communities.

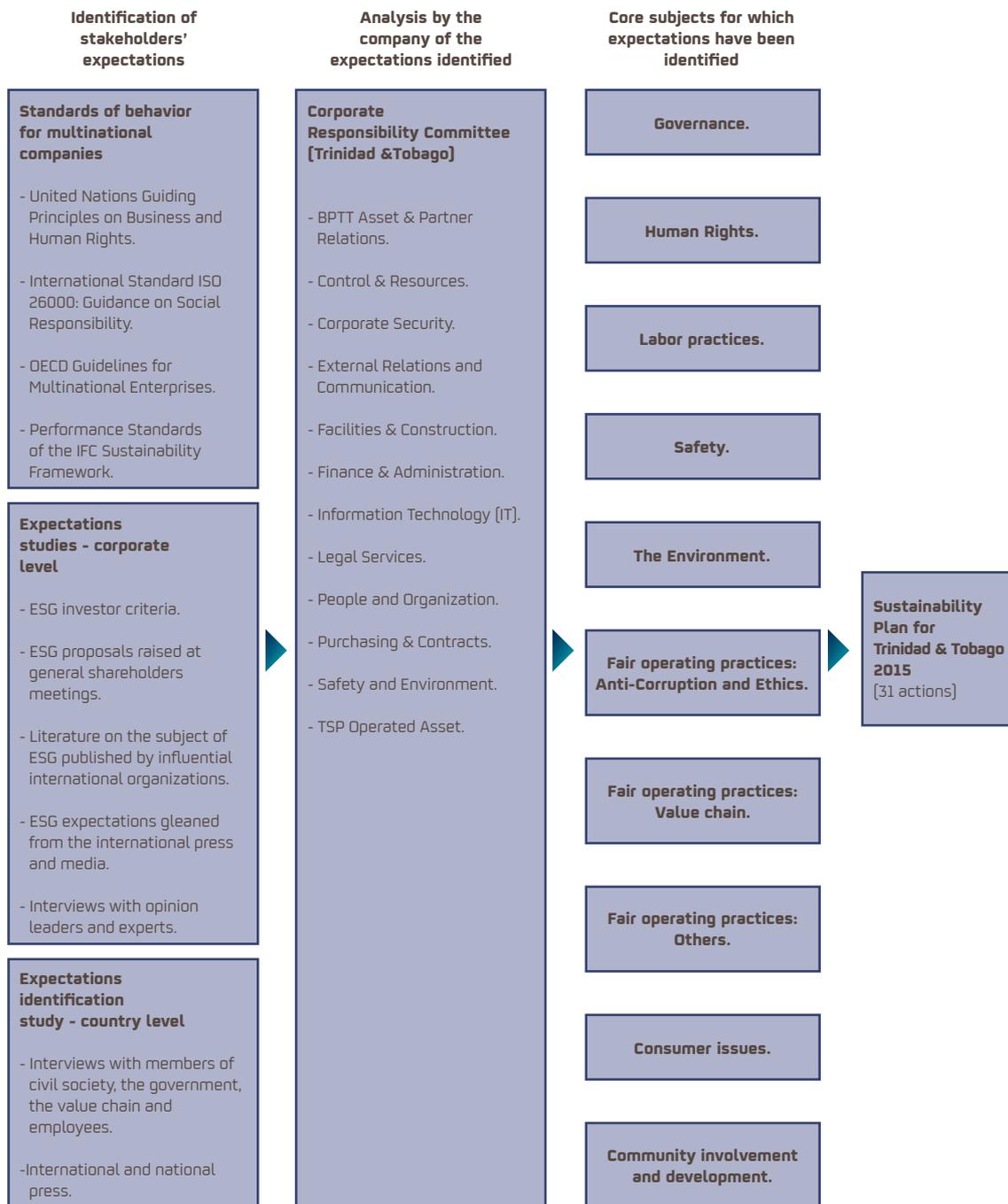
The identification of these expectations at a global level has been carried out through an analysis of four international standards that currently make up the broadest international consensus on acceptable behavior for a multinational company:

In addition, we have developed an *expectations study*, or relevant issues study, for the company's corporate-level stakeholders, both at corporate and country-level. The studies focus on aspects concerning the way the company is managed and also on environmental, social and governance [ESG].

After an analysis and consolidation process, the results were studied by the Corporate Responsibility Committee of Trinidad & Tobago, presided by the Director of the Repsol Business Unit in Trinidad & Tobago, which is made up of executive-level representatives of the different business and corporate units in the country.

This exercise has enabled us to formally and systematically introduce the expectations of Repsol's stakeholders in the Company's decision-making processes, which is essential to Corporate Responsibility.

-INTRODUCTION OF STAKEHOLDERS' EXPECTATIONS INTO THE COMPANY'S DECISION-MAKING PROCESSES-



The result of this analysis is the current Sustainability Plan 2015, which is a public document, the degree of compliance of which will be assessed annually and reported to the company through an annual follow-up report.

This Plan consists of 31 specific short-term actions (2015) with its corresponding implementation indicators, grouped in eight of the ten programs described in the above table, inspired in the core areas of corporate responsibility described in the ISO 26000 International Standard: Guidance on Social Responsibility. These are the areas in which companies have the greatest ability to generate ethical, environmental and social impact.

With respect to the programs, the largest number of actions has been concentrated in the Labor practices, Human Rights, Community involvement and development, and Fair Operating practices: Value chain programs:

**-DISTRIBUTION OF THE ACTIONS OF THE TRINIDAD & TOBAGO SUSTAINABILITY PLAN BY ACTION PROGRAMS-**

<b>Program</b>	<b>Number of actions</b>
Governance	1
Human Rights	6
Labor practices	7
Safety	3
The Environment	3
Fair operating practices: Anti-Corruption and Ethics	3
Fair operating practices: Value chain	4
Community involvement and development	4

The 2015 Sustainability Plan for Repsol Trinidad & Tobago is not the Repsol Group's only contribution to sustainable development, but is complemented with the actions considered in the Corporate Sustainability Plan and those confined to certain countries or operating sites included in our respective sustainability plans.

93,5% of the actions included in this Plan are linked to the variable remuneration system applied to Repsol's employees, which constitutes the Company's unequivocal commitment to the effective maximization of its contribution to sustainable development.

# Stakeholders' expectations and the corresponding actions of the Plan

## Program 1

### Governance

Organizational governance is the system the company uses to make and implement decisions to achieve its objectives. It is therefore a decisive factor when it comes to integrating Corporate Responsibility principles into all of its activities and transmitting them to its value chain.

It addresses issues related to the highest governing body of the Company; the efficient use of financial, human and natural resources; transparency and accountability; the legal and internal compliance rules of the company, all with the maximum involvement and commitment of the leaders of the organization.

In order to fulfill its stakeholders' Governance-related expectations, the Repsol Group has specific management systems in place, which can be consulted on its corporate website: **repsol.com**

Furthermore, the company has added one action to this Sustainability Plan with which it aims to reinforce its response to the main expectations, as indicated below.

-ACTION INCLUDED IN THE GOVERNANCE PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT THEY RESPOND TO-

## GOVERNANCE PROGRAM

**Expectation:**

Improve performance on the management of the company, especially against compromising situations (such as spills or accidents).

**Expectation:**

Encourage communication by senior management posts related to sustainability.

**Action included in the program:**

1. Present in a meeting to all the different departments in the Trinidad & Tobago Business Unit, a Corporate Responsibility overview and its legal implications.

Specific information on the action included in the Governance program of the current Plan is included in the table below.

<b>ACTION</b>	<b>Present in a meeting to all the different departments in the Trinidad &amp; Tobago Business Unit (TTBU), a Corporate Responsibility overview and its legal implications.</b>
<b>DESCRIPTION</b>	The Corporate Responsibility overview that Legal Services will present to all the TTBU during 2015, will be an excellent opportunity to provide to our Managers the legal implications that this corporate commitment represents, as part of our daily job.
<b>INDICATOR</b>	Number of contacted persons.

## Program 2

# Human Rights

States and companies play different roles in the common effort in favor of Human Rights. While States have the duty to protect Human Rights against those who infringe them, companies have the responsibility to respect Human Rights throughout their operations. This means acting with due diligence to avoid interfering with the degree to which people enjoy these rights and addressing any potential adverse impacts if these occur.

The program envisions a host of actions geared towards internal training, internal and external awareness and regulatory compliance on the subject of human rights, ensuring due diligence is taken at all times and directing efforts to avoid any impact on human rights, respecting the rights of indigenous people and any other vulnerable group, addressing claims and complaints and repairing any possible impact.

In order to fulfill the expectations of its stakeholders in relation to human rights, the Repsol Group has specific management systems in place, which can be consulted on the Company's website [repsol.com](http://repsol.com)

Said systems are reinforced by six actions included in this Sustainability Plan for Repsol Trinidad & Tobago, which are aimed at fulfilling the expectations of the Company's stakeholders in relation to human rights.

### -ACTIONS INCLUDED IN THE HUMAN RIGHTS PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT THEY RESPOND TO-

## HUMAN RIGHTS PROGRAM

**Expectation:**

Verifying that the company's security arrangements respect human rights and are consistent with international law and with the rules in place to ensure compliance with the law.

**Expectation:**

Providing local communities with pluralistic, appropriate and transparent grievance mechanisms, allowing them to raise their complaints and the company to gather comments on its potential impact on human rights.

**Expectation:**

Sharing our human rights policy with suppliers, contractors and partners.

**Expectation:**

Providing suitable training for security personnel (employees, contractors and subcontractors) so as to ensure they honour rules relating to human rights.

**Expectation:**

Alignment of the Voluntary Principles on Security and Human Rights and the Guiding Principles on Business and Human Rights. Companies do not report on key information that shows whether these systems actually work or not; on what issues the company has had or is having to deal with, and how they are addressing them.

- Actions included in the program:**
1. Create and implement a plan for Trinidad & Tobago Business Unit on the "Voluntary Principles on Security and Human Rights" initiative.
  2. Develop and implement an effective grievance mechanism in Trinidad & Tobago Business Unit operations.
  3. Impart awareness on Human rights issues for private security contractors.
  4. Include Ethical and Human Rights topics/issues in the annual meetings with contractors and suppliers.
  5. Promote online Human Rights training to all Repsol employees in the Trinidad & Tobago Business Unit (TTBU). Reinforce key messages of the Human Rights course via Internal Communication.
  6. Strengthen the existing communication channels related to the Code of Ethic and Conduct among Trinidad & Tobago Business Unit (TTBU) employees.

Specific information on each of the actions included in the Human Rights program of the current Plan is included in the tables below, arranged alphabetically by issue:

## Business Relations

<b>ACTION</b>	<b>Include Ethical and Human Rights topics/issues in the annual meetings with contractors and suppliers.</b>
DESCRIPTION	<p>We will create an avenue for discussions on Ethics and Human Rights topics with Contractors and Suppliers during meetings in order to become more aware of any existing or possible situations. This would allow Repsol to take any necessary preventative or corrective measures if necessary.</p>
INDICATOR	<p>Number of people / number of contractors invited to the annual meeting.</p>

## Culture and Management

ACTION	<b>Promote online Human Rights training to all Repsol employees in the Trinidad &amp; Tobago Business Unit (TTBU). Reinforce key messages of the Human Rights course via Internal Communication.</b>
DESCRIPTION	We will promote and emphasis via internal communication, visual notice board in lunch area and through meetings with the Line Managers the importance of online Human Rights training to all Repsol Employees in the TTBU.
INDICATOR	<ul style="list-style-type: none"> <li>- 100% completion by TTBU employees.</li> <li>- Four messages (email or other) to all employees.</li> </ul>

## Due diligence

ACTION	<b>Develop and implement an effective grievance mechanism in Trinidad &amp; Tobago Business Unit operations.</b>
DESCRIPTION	We will develop and implement a procedure that codifies the design and implementation of the grievance mechanism for TSP operating asset, and set out a detailed procedure to follow when dealing with grievances. Such procedure will follow the United Nation's Guiding Principles on Business and Human Rights, to systemize, record and respond to all the grievances that derive from persons affected by our operations.
INDICATOR	<ul style="list-style-type: none"> <li>- Develop the procedure to manage grievances.</li> <li>- Implement training to persons involve in the system.</li> </ul>

<b>ACTION</b>	<b>Strengthen the existing communication channels related to the Code of Ethic and Conduct among Trinidad &amp; Tobago Business Unit (TTBU) employees.</b>
<b>DESCRIPTION</b>	We will reinforce communication channels for employees within Trinidad & Tobago Business Unit (TTBU) by using various methods of communication and capturing information/ complaints in a secure and private methods.
<b>INDICATOR</b>	<ul style="list-style-type: none"> <li>- Reinstate suggestion boxes in both Towers and Heliport / Anonymous online survey.</li> <li>- At least two email communications throughout 2015 about boxes and usage. Carried out an internal communication campaign about the channels for employees to report possible non-compliance or infringement of the norm Ethics and conduct of Repsol employees. [Aim: 100% employees].</li> <li>- Record and present grievances to BU for further action plan.</li> <li>- Communicate to PO team on the communication channels implemented in TTBU.</li> </ul>

## Security forces

<b>ACTION</b>	<b>Create and implement a plan for Trinidad &amp; Tobago Business Unit on the “Voluntary Principles on Security and Human Rights” initiative.</b>
<b>DESCRIPTION</b>	We will develop and implement a plan for increasing awareness of our private security providers about the “Voluntary Principles of Security and Human Rights”.
<b>INDICATOR</b>	<ul style="list-style-type: none"> <li>- Create plan for increasing awareness levels of Private Security Contractors, hired by Repsol, in Trinidad and Tobago about the Voluntary Principles on Security and Human Rights.</li> <li>- Prepare information on “Voluntary Principles on Security and Human Rights” to share with the Security Contractors.</li> <li>- The Security Contractors have included a module on the “Voluntary Principles on Security and Human Rights” in their Security Officer training.</li> </ul>

ACTION	<b>Impart awareness on Human rights issues for private security contractors.</b>
DESCRIPTION	We will reinforce the importance security officer compliance with the UN principles and Repsol's policies on human rights in carrying out their duties.
INDICATOR	Number of security companies contacted.

## Program 3

### Labor practices

The term labor practices encompass all policies and practices related to the work performed within, by or on behalf of the company, such as the working hours, remuneration, the recruitment and promotion of workers; disciplinary and grievance procedures; the transfer and relocation of workers; the termination of employment, training and skills development, and health, safety and industrial hygiene.

Labor practices also include representation and participation in collective bargaining, social dialog and tripartite consultations to address social issues related to employment.

In order to fulfill the expectations of its stakeholders in relation to labor practices, the Repsol Group has specific management systems in place, which can be consulted on the corporate website **repsol.com**

Said systems are reinforced by the seven individual actions that Repsol Trinidad & Tobago has included in the context of this Plan. These are aimed at responding to the principal expectations of the company's stakeholders, as indicated below.

#### -ACTIONS INCLUDED IN THE LABOR PRACTICES PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT CONTRIBUTE TO RESPONDING TO THEM-

LABOR PRACTICES PROGRAM	
<p><b>Expectation:</b> Regarding racial discrimination, we expect companies to be transparent and open in their policies. Their contracts and processes should be clear and open. We want companies to avoid favoritism.</p>	<p><b>Expectation:</b> Having suitable resources in place to ensure the well-being and health of employees.</p>
<p><b>Expectation:</b> Fostering employment opportunities for people with disabilities.</p>	<p><b>Expectation:</b> Repsol must lead by example; it is the only way to stand on the image of racial discrimination.</p>
<p><b>Expectation:</b> Strengthen the internal communication system on the subject of human resources.</p>	<p><b>Expectation:</b> Ensure the companies working for you follow the rules in terms of working conditions.</p>
<p><b>Actions included in the program:</b></p> <ol style="list-style-type: none"> <li>1. Analyze the feasibility of a differently-abled program within our Trinidad &amp; Tobago Business Unit (TTBU).</li> <li>2. Communicate the status of the Climate Action Plan for the Trinidad &amp; Tobago Business Unit (TTBU) employees through BU meetings, department meetings and internal communication.</li> <li>3. Communicate through internal channels the People &amp; Organization (P&amp;O) Policies to all employees within the Trinidad &amp; Tobago Business Unit (TTBU) for 2015.</li> <li>4. Impart awareness of the Labour Risk Policy to contract holders of the Trinidad &amp; Tobago Business Unit (TTBU).</li> <li>5. Promote employee health &amp; raise awareness of health lifestyle choices.</li> <li>6. Provide training (technical, human resources and generic) to employees within the Trinidad &amp; Tobago Business Unit (TTBU) that is relevant to the employee &amp; Company needs.</li> <li>7. Streamline the process/procedure for Unionised employees when being selected to act in positions offshore at a higher level.</li> </ol>	

Specific information on each of the actions included in the Labor Practices Program of the current Plan is included in the tables below, arranged alphabetically by issue:

## Culture, Development and Management

<b>ACTION</b>	<b>Communicate through internal channels the People Organization (PO) Policies to all employees within the Trinidad &amp; Tobago Business Unit (TTBU) for 2015.</b>
<b>DESCRIPTION</b>	We will reinforce communication about People Organization (PO) Policies through our internal emails and digital noticeboards within the lunch room. We will review for example: recruitment selection, development, various allowances, work place attire.
<b>INDICATOR</b>	At least three email communications throughout 2015.
<b>ACTION</b>	<b>Impart awareness of the Labour Risk Policy to contract holders of the Trinidad &amp; Tobago Business Unit (TTBU).</b>
<b>DESCRIPTION</b>	We will reinforce the importance of the contract compliance with contract holders and ensure that all contract holders complete the Labour Risk Survey.
<b>INDICATOR</b>	<ul style="list-style-type: none"> <li>- One workshop in 2015 to present Labour Risk in BU.</li> <li>- E-mails to Contract Holders to complete surveys at least once per year.</li> <li>- BU Presentation.</li> </ul>

<b>ACTION</b>	<b>Provide training (technical, human resources and generic) to employees within the Trinidad &amp; Tobago Business Unit (TTBU) that is relevant to the employee Company needs.</b>
<b>DESCRIPTION</b>	We will promote to the Trinidad & Tobago Business Unit (TTBU), via internal communications, various online training available. We will continue to review training needs based on request received.
<b>INDICATOR</b>	Present quarterly to BU hours of training completed.

### Health employees

<b>ACTION</b>	<b>Promote employee health raise awareness of health lifestyle choices.</b>
<b>DESCRIPTION</b>	We will promote healthy choices for employees via emails, directing employees to healthy eating, exercising, medical awareness and checks.
<b>INDICATOR</b>	Send at least eight health communications throughout 2015.

## Promotion of Diversity and Balance

<b>ACTION</b>	<b>Analyze the feasibility of a differently-abled program within our Trinidad &amp; Tobago Business Unit (TTBU).</b>
<b>DESCRIPTION</b>	We will review the resources required and potential positions that can be adapt to the program. We will also review the program established in other Business Units in order to develop a plan locally.
<b>INDICATOR</b>	Present results to all employees at Townhall or via email communication.
<b>ACTION</b>	<b>Communicate the status of the Climate Action Plan for the Trinidad &amp; Tobago Business Unit (TTBU) employees through BU meetings, department meetings and internal communication.</b>
<b>DESCRIPTION</b>	We will communicate the status of the climate action projects within the action plan and show work progress to TTBU employees through internal communication.
<b>INDICATOR</b>	Completion of at least 80% of climate action plan in TTBU.
<b>ACTION</b>	<b>Streamline the process/procedure for Unionised employees when being selected to act in positions offshore at a higher level.</b>
<b>DESCRIPTION</b>	We will clearly define the steps involved in the process and implement guidelines to assist in the selection method of employees for acting positions offshore. We will communicate the process to offshore employees via oral and written communication so there is a higher level of transparency of the process.
<b>INDICATOR</b>	<ul style="list-style-type: none"> <li>- Number of Union employees Acting per year.</li> <li>- Communication Campaign - Crew AB.</li> </ul>

## Program 4

### Safety

Safety is a critical concern in industrial operations, meaning prevention, control and maintenance are of huge importance to the business, as is the need to champion a specific culture and conduct aimed towards safety.

The program seeks to prevent and mitigate safety risks and to ensure that emergencies are controlled and managed accordingly; that incidents are reported and investigated and lessons duly learned; and that applicable law and safety management systems are properly adhered to.

It also envisages a safety-oriented culture and conduct promoted through leadership, training, communication and awareness; incorporating safety-related concerns into our commercial relationships, such as due diligence, rating processes for partners, audits and controls, safety training, and communication and awareness campaigns aimed at our commercial partners.

In order to fulfill the expectations of its stakeholders in relation to safety, the Repsol Group has specific management systems in place, which can be consulted on the corporate website [repsol.com](http://repsol.com)

Said systems are reinforced by the three individual actions that Repsol Trinidad & Tobago has included in the context of this Plan. These are aimed at responding to the principal expectations of the company's stakeholders, as indicated below.

#### -ACTIONS INCLUDED IN THE SAFETY PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT CONTRIBUTE TO RESPONDING TO THEM-

### SAFETY PROGRAM

**Expectation:**

Companies should have programs to show how they manage their systems. Every company must ensure that they have the best equipment, staff and so on in their operations.

**Expectation:**

I would suggest providing employees with training and education in respect to the environment and safety practices and procedures.

**Expectation:**

In addition, it would be convenient to receive assistance with videos, training about safety and education.

**Actions included in the program:**

1. Implement the Safe Systems of Work e-learning tool and transition to an electronic Permit to Work System.
2. Train employee and contractor staff in the Target Zero Accidents Training Course which aims to improve upon HSE Culture within the organization.
3. Carry out a quantitative risk assessment for all crew change transportation options to our offshore TSP asset.

Specific information on each of the actions included in the Safety Program of the current Plan is included in the tables below arranged alphabetically by issue:

## Culture and Management

ACTION	<b>Train employee and contractor staff in the Target Zero Accidents Training Course which aims to improve upon HSE Culture within the organization.</b>
DESCRIPTION	Target Zero Accidents is a course which guides persons through a series of exercises with a goal of changing their outlook of Safety Culture in the workplace at home. The content and structure of the course creates an environment which encourages persons to take responsibility and internalize their own safety through introspection and the creation of a personal action plan. Throughout the course it is reiterated that safety should include work and home activities. Through this program it is expected that the overall Safety Culture of the organization is improved.
INDICATOR	Results of HSE section Climate Survey.

## Risks Management

ACTION	<b>Implement the Safe Systems of Work e-learning tool and transition to an electronic Permit to Work System.</b>
DESCRIPTION	Safe systems of work is the mechanism by which hazards and risks are identified and managed at Repsol's facilities. This is accomplished through the utilization of the permit to work system which formally documents the hazards and control measures to be implemented for maintaining a safe work environment. The safe systems of work e-learning tool is to improve the accessibility of the training for personnel involved in activities at the offshore locations increasing efficiency with regards to time and cost. The electronic permit to work system will be a paperless initiative that seeks to improve the efficiency of executing the relevant permit to work documents in keeping with Repsol's values of transparency and responsibility.
INDICATOR	Number of non-conformances generated in weekly audits.

ACTION	<b>Carry out a quantitative risk assessment for all crew change transportation options to our offshore TSP asset.</b>
DESCRIPTION	We will conduct a quantitative project risk assessment of the crew change options transportations for our TSP offshore operations, and present results for informed decision making.
INDICATOR	<ul style="list-style-type: none"> <li>- The final quantitative risk assessment report. Complete the report in 2015.</li> <li>- The implementation of controls for the selected crew change option.</li> <li>- Select the option that the risk is as low as reasonably practicable.</li> </ul>

## Program 5

# The Environment

Today Society faces a significant number of environmental challenges that vary from global problems like climate change or the depletion of natural resources, to other local problems that, nevertheless, can have an important impact on the environment where they occur. These include air or water pollution, the generation of waste or the destruction of ecosystems and biodiversity.

The activity of companies invariably contributes to some of these impacts. And these issues have special relevance in sectors such as oil and gas that are characterized by the performance of extractive or industrial activities in large installations. Therefore, it is necessary that companies identify options that enable them to prevent these impacts, minimize them when unavoidable and correct them.

These options include preventing and mitigating environmental risks and impacts through suitable control mechanisms, proper emergency management, operational efficiency, suitable management of water resources and waste, efficient use of materials, regulatory compliance and environmental management systems.

The program also addresses climate change, environmental and biodiversity protection, and the need to champion an environment-oriented culture and conduct through leadership, training, environmental communication and awareness, ensuring due diligence in our commercial relationships, including partner rating processes, audits and controls, training on the subject of environmental protection, and environmental communication and awareness campaigns, among others.

In order to respond to stakeholders' expectations on the Environment, the Repsol group has specific management systems which can be consulted on the corporate website [repsol.com](http://repsol.com)

Additionally, Repsol Trinidad & Tobago has included three actions in the Plan to respond to some these expectations.

-ACTIONS INCLUDED IN THE ENVIRONMENT PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT THEY RESPOND TO-

## ENVIRONMENTAL PROGRAM

<p><b>Expectation:</b> All companies are required to ensure that the environment is not being polluted due to their activity. There are about four different laws that all companies must be in compliance with and respect.</p>	<p><b>Expectation:</b> Water pollution is a critical aspect. Companies should focus on oil spills prevention and response. Consider all changes in regulation regarding this topic and establish proper prevention and mitigation plans.</p>
<p><b>Expectation:</b> Whatever could be done to preserve ecosystems and biodiversity should be done by the government and companies. We would like companies to make us feel safe in environmental terms.</p>	
<p><b>Actions included in the program:</b></p> <ol style="list-style-type: none"> <li>1. Assess the positive and negative impacts of offshore operations on the environment through marine environmental monitoring.</li> <li>2. Communicate to Partners (JOV &amp; Operator) Repsol's initiatives on water pollution reduction.</li> <li>3. Identify two potential projects within our Trinidad and Tobago Business Unit (T&amp;TBU) that could result in reduction of CO2 emissions.</li> </ol>	

Specific information on each of the actions included in the Environment program of the current Plan is included in the tables below, arranged alphabetically by issue:

### Biodiversity

<b>ACTION</b>	<b>Assess the positive and negative impacts of offshore operations on the environment through marine environmental monitoring.</b>
<b>DESCRIPTION</b>	We will conduct, at least once a year, periodic marine environmental monitoring, in order to assess the positive and negative impacts of the offshore operations. This includes water quality, sediment quality, quality and quantity of benthic fauna [organisms that live in the sediment of the sea floor] and phytoplankton. Through these activities Repsol meets its internal and legal requirements for environmental management.
<b>INDICATOR</b>	Results of the report.

## Climate Change

<b>ACTION</b>	<b>Identify two potential projects within our Trinidad &amp; Tobago Business Unit (TTBU) that could result in reduction of CO2 emissions.</b>
<b>DESCRIPTION</b>	We will identify two potential projects to reduce CO2 emissions in the Trinidad & Tobago Business Unit (TTBU).
<b>INDICATOR</b>	<ul style="list-style-type: none"><li>- The number of accepted CO2 reduction projects</li><li>- Quantification of reduction of CO2 emissions</li></ul>

## Environmental risks and impact Management

<b>ACTION</b>	<b>Communicate to Partners (JOV Operator) Repsol's initiatives on water pollution reduction.</b>
<b>DESCRIPTION</b>	We will share with our Partners, Repsol's initiatives and actions on the water pollution reduction.
<b>INDICATOR</b>	<ul style="list-style-type: none"><li>- Number of Partners.</li><li>- Actions taken.</li></ul>

## Program 6

# Fair operating practices: Anti – Corruption and Ethics

Fair operating practices refer to the way in which organizations deal with others such as business partners, suppliers, contractors, customers, competitors, associations to which they belong, and government agencies and departments.

When ensuring that these relations are carried out in a fair manner, companies have to adapt their practices to criteria such as the prevention of corruption, implementing the necessary policies and practices. They must ensure that their leaders show commitment, motivation and proper supervision when implementing anti-corruption policies, training their employees on how to eradicate bribery and corruption, and offering incentives for any progress made in this regard, encouraging employees, partners and suppliers to report infringements of the company's policies, notifying the authorities of any criminal offences committed and attempting to ensure that the company's partners adopt similar practices.

In order to respond to the company's stakeholders' expectations on this subject, the Repsol group has specific management systems in place which are available at the corporate website **repsol.com**

Additionally, as part of the Sustainability Plan for Repsol Trinidad & Tobago, the Company has included another three actions in this subject to respond to some of the expectations mentioned, as indicated below.

### -ACTIONS INCLUDED IN THE FAIR OPERATING PRACTICES: ANTI – CORRUPTION AND ETHICS PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT CONTRIBUTE TO RESPONDING TO THEM-

## FAIR OPERATING PRACTICES PROGRAM: ANTI-CORRUPTION AND ETHICS

**Expectation:**

Get involved in the processes to enhance transparency. Conduct surveys and audits. Pick up areas where there is a lack of transparency.

**Expectation:**

Make sure corruption does not take place inside your organizations and make sure all the people you are working with are not corrupted either. Have some sort of processes to determine whether a contractor could be rated as corrupt or not, and avoid working with the corrupt ones.

**Expectation:**

We must also be vigilant with contractors and providers and make them meet our transparency standards and respect and comply with our policies. Maintain constant conversations with them.

**Expectation:**

Ethics are of huge importance, especially when it comes to procurement.

**Actions included in the program:**

1. Contribute proactively to Extractive Industries Transparency Initiative (EITI) and Trinidad & Tobago EITI working group.
2. Impart awareness of Repsol's Ethic & Conduct Code and Human Rights policy to contractors (suppliers).
3. Include the new Corporate Responsibility clause in Human Rights and Anti-Corruption within all Trinidad & Tobago contracts.

Specific information on each of the actions included in the Fair Operating Practices: Anti – Corruption and Ethics program of this plan is included in the tables below arranged alphabetically by issue:

## Business Relations

<p><b>ACTION</b></p>	<p><b>Contribute proactively to Extractive Industries Transparency Initiative (EITI) and Trinidad &amp; Tobago EITI working group.</b></p>
<p><b>DESCRIPTION</b></p>	<p>The Extractive Industry Transparency Initiative (EITI) reporting template must be complete with the following information:</p> <ol style="list-style-type: none"> <li>1. Tax Payments to BIR</li> <li>2. Tax Payments to Ministry of Energy</li> <li>3. Production Data</li> <li>4. Social Expenditure and Infrastructure Payments</li> </ol> <p>We undertake to provide this information in keeping with the deadlines agreed with the EITI working group</p>
<p><b>INDICATOR</b></p>	<p>Provided hours / Reports submitted to EITI Completion of the EITI template with the following information:</p> <ol style="list-style-type: none"> <li>1. Tax Payments to BIR</li> <li>2. Tax Payments to Ministry of Energy</li> <li>3. Production Data</li> <li>4. Social Expenditure and Infrastructure Payments</li> </ol>
<p><b>ACTION</b></p>	<p><b>Include the new Corporate Responsibility Clause in Human Rights and Anti-Corruption within all TT Contracts.</b></p>
<p><b>DESCRIPTION</b></p>	<p>Legal Services will work with Purchasing Contracts in order to put in place this corporate standard before the end of 2015.</p>
<p><b>INDICATOR</b></p>	<p>Number of Contracts modified.</p>

## Culture and Management

<b>ACTION</b>	<b>Impart awareness of Repsol's Ethic Conduct Code and Human Rights policy to contractors (suppliers).</b>
<b>DESCRIPTION</b>	We will disseminate "Suppliers Ethics and Conduct Code" [Norm 00-00464NO] and Corporate Responsibility Clause In Human Rights Policy to all suppliers. This will be provided in the RFQ/Tender phase and incorporated into the Contracts or Terms and Conditions of Procurement which suppliers must agree to accepting before being engaged in Services/supply of materials.
<b>INDICATOR</b>	Number of people contacted / hours of contacted/ etc.

## Program 7

### Fair operating practices: Value chain

Fair operating practices refer to how companies conduct their business with other parties, including partners, suppliers, contractors, clients, competitors, associations to which they belong, and government agencies and departments. They are essentially a measure of how ethical a company is in its business with other companies.

The company must attempt to ensure that these relationships are fair, integrating ethical, social and environmental concerns into its purchasing, distribution and recruitment policies; properly monitoring companies with which it has dealings, providing possible support to small and medium-sized enterprises to reach socially responsible objectives, and having proper procurement practices, fair prices, suitable delivery timeframes and stable contracts.

In order to respond to the company's stakeholders' expectations on this subject, the Repsol group has specific management systems in place which are available at the corporate website [repsol.com](http://repsol.com)

Additionally, as part of the Sustainability Plan for Repsol Trinidad & Tobago, the Company has included another four actions in this subject to respond to some of the expectations mentioned, as indicated below.

**-ACTIONS INCLUDED IN THE FAIR OPERATING PRACTICES: VALUE CHAIN PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT CONTRIBUTE TO RESPONDING TO THEM-**

### FAIR OPERATING PRACTICES PROGRAM: VALUE CHAIN

**Expectation:**

Actively participate in increasing the awareness of organizations with which relates regarding CSR principles and issues.

**Expectation:**

Promoting ethical attitudes and transparency among the company's suppliers and contractors.

**Expectation:**

We expect multinational companies to explain, individually or as group, more regularly to local companies what the various opportunities are to work with them and what they will be needing in the near and long-term future.

**Actions included in the program:**

1. Communicate to Partners (JOV & Operator) Repsol's commitments and policies on Code of Conduct and Ethics and Human Rights.
2. Conduct monthly video conference meetings with TSP Asset to improve the communication process and address any issues or concerns employees may have and give and receive feedback.
3. Contribute to an increase in health, safety, environmental awareness by our onshore contractors.
4. Distribute Repsol's "Providers Conduct Code" to all existing contractors and suppliers.

Specific information on each of the actions included in the Fair Operating Practices: Value Chain program of this plan is included in the tables below, arranged alphabetically by issue:

## Partners

ACTION	<b>Communicate to Partners (JOV Operator) Repsol's commitments and policies on Code of Conduct and Ethics and Human Rights.</b>
DESCRIPTION	We will communicate to Partners the commitments and policies adopted and practiced in respect of code of conduct and ethics, and human rights.
INDICATOR	<ul style="list-style-type: none"> <li>- Number of Partners.</li> <li>- Actions taken.</li> </ul>

## Suppliers and contractors

ACTION	<b>Conduct monthly video conference meetings with TSP Asset to improve the communication process and address any issues or concerns employees may have and give and receive feedback.</b>
DESCRIPTION	We will conduct monthly video conference meetings with both Repsol employees and contractors in our three platforms, to address any issues, concerns and give and receive feedback, in an effort to improve both our communication process and have a better level of transparency. Our aim is to answer all questions or concerns at the meetings and should we need to get any additional information that may not be available at that moment, we will committ to answering by the following day.
INDICATOR	12 Video conferences per year.

ACTION	<b>Contribute to an increase in health, safety, environmental awareness by our onshore contractors.</b>
DESCRIPTION	We will set up workshops to sensitize onshore contractors to HSE policies and standards, working together all the areas involved within the BU.
INDICATOR	Assist in setting up the workshop to sensitize onshore contractors to HSE Policies.
ACTION	<b>Distribute Repsol's "Providers Conduct Code" to all existing contractors and suppliers.</b>
DESCRIPTION	We will ensure that Contractors and Suppliers are aware of and abide by Repsol's existing Code of Conduct for suppliers.
INDICATOR	Number of suppliers/contractors who receive the code.

## Program 8

# Community involvement and development

Community involvement and development stems from the identification of existing stakeholders and involvement with them in the management and minimization of the impacts that the organization's activities might generate.

Similarly, by actively involving and developing the local community the company can become an asset serving society and the community, although in this process the community frequently raises different, and sometimes opposing interests, which the company must weigh up together. Shared responsibility is needed to promote the community's well-being as a common goal. The company must liaise with the different groups representing the community to establish priorities for its social investment, with particular attention paid to vulnerable groups.

Companies can help boost local development by creating jobs, improving relations with public authorities, enhancing the capacities and opportunities of local suppliers, and rolling out cultural, healthcare, social and environmental initiatives and programs.

In order to meet the expectations of its stakeholders on the subject of community involvement and development, the Repsol group has specific management systems in place which can be consulted on the corporate website **repsol.com**

Additionally, this edition of the Sustainability Plan includes four actions in the area of Community involvement and development. These enable us to respond to the principal expectations of the company's stakeholders, as indicated below.

-ACTIONS INCLUDED IN THE COMMUNITY INVOLVEMENT AND DEVELOPMENT PROGRAM AND A SUMMARY OF THE PRINCIPAL EXPECTATIONS THAT CONTRIBUTE TO RESPONDING TO THEM-

## COMMUNITY INVOLVEMENT AND DEVELOPMENT PROGRAM

**Expectation:**

You need to make a great effort to communicate what you are doing and the real impact of your surveys. You have to answer all questions, if not those people will make a lot of noise and destroy everything. Many companies do not know what their stakeholders are. [Seismic studies].

**Expectation:**

Before a company does work in the sea, information should be given about what they are going to do and the impacts of those analyses. Those studies should be public.

**Expectation:**

Carry out sport and sponsorship initiatives that would help reducing the amount of crime and the youth's involvement in criminal activities and drugs. Collaborate with schools.

**Expectation:**

Companies should help the country overcome the social challenges we are facing, such as crime. Investing in CSR programs, in education, etc. That would reduce crime.

**Expectation:**

We need to foster agriculture, and we need machinery. Companies could help by providing the necessary machinery and equipment to farmers.

**Expectation:**

I would advise you to enhance and improve your communication with the society in general.

**Expectation:**

Companies should help the country overcome the social challenges we are facing, such as crime. Investing in CSR programs, in education, etc. That would reduce crime.

**Expectation:**

Repsol should improve their communication and dialogue with society. Let the people know what you are doing in their benefit. Put in place more CSR initiatives and make them notable and known throughout the country.

**Expectation:**

Companies should assume the responsibility to inform to the public. Inform to the agency and the media. Usually, companies only inform the Ministry of Energy when an accident occurs. This is good. However, the media do not receive any information from companies. We would expect more dialogue with companies, even if the information is not positive.

**Actions included in the program:**

1. Communicate Repsol's Corporate Responsibility Plans to all our Stakeholders.
2. Implement an after school sports programme in all primary schools in the Mayaro Guayaguayare environs.
3. Implement an agriculture production program in primary schools in the company's fenceline community using greenhouse technology.
4. Strengthen the company's commitment to quality primary education within the government schools in its fence line community.

Specific information on each of the actions included in the Community involvement and development program of this plan is included in the tables below, arranged alphabetically by issue:

## Community involvement and Dialogue

<b>ACTION</b>	<b>Communicate Repsol's Corporate Responsibility Plans to all our Stakeholders.</b>
<b>DESCRIPTION</b>	We will develop a communication plan focused on communicating Repsol's Social Investment projects. In 2015 we will focus on developing and implementing a local website to insure external access to all communication initiatives committed in the plan.
<b>INDICATOR</b>	<ul style="list-style-type: none"> <li>- Implementation of the local website.</li> <li>- Development of the communication plan.</li> </ul>

## Social Investment

<b>ACTION</b>	<b>Implement an after school sports programme in all primary schools in the Mayaro Guayaguayare environs.</b>
<b>DESCRIPTION</b>	We will implement an after school sports programme (Football Cricket) in the six government primary schools in the Mayaro/ Guayaguayare community, with the objective of providing extra curriculum activities for children in order to have them occupied and at the same time inculcating discipline, team values, among others.
<b>INDICATOR</b>	<ul style="list-style-type: none"> <li>- Implementation of after school football cricket activities in 6 primary schools.</li> <li>- Implement 2 Summer Sports Camps in the community for approximately 100 children.</li> <li>- Number of successful participants/attendees.</li> </ul>

<p>ACTION</p>	<p><b>Implement an agriculture production program in primary schools in the company's fenceline community using greenhouse technology.</b></p>
<p>DESCRIPTION</p>	<p>We will promote the participation of students at primary education level, using the greenhouse technology with the objective of creating an interest for the field of agriculture for future professional interest. At the same time setting the foundation for the future of food production/security in the country.</p>
<p>INDICATOR</p>	<ul style="list-style-type: none"> <li>- Implementation of greenhouses in 2 primary schools in the community of Mayaro Guayaguayare.</li> <li>- Increased production among greenhouse farmers. Increase the level/volume of production among all 6 greenhouse farmers before the end of 2015.</li> </ul>
<p>ACTION</p>	<p><b>Strengthen the company's commitment to quality primary education within the government schools in its fence line community.</b></p>
<p>DESCRIPTION</p>	<p>We will fortify the company's social investment initiative in the primary schools within our fence line community, to insure quality education for all students, helping them achieve higher academic performance.</p>
<p>INDICATOR</p>	<p>Number of students in intervention schools scoring above average in Secondary Entrance Assessment [SEA].</p>

# Process of updating the Plan

This Sustainability Plan is a dynamic document.

Each year we will give an account of the extent to which the actions that make up this Plan have been carried out by publishing a monitoring report.

Moreover, given that the expectations of our stakeholders and the issues that concern them are changeable and subject to the evolution of events during the course of the year, this Plan will be updated annually with new actions or the reformulation of existing ones to adapt them to the new situation.

The successive updates of the plan will leave behind them a trail of completed actions that, collectively, are a contribution of our company to sustainable development.

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