



Communications Protocol

Pertaining to the Grant Agreement between NRT and Tullow Kenya on Supporting Community Conservancies in Turkana and West Pokot

1. Objectives of this Communications Protocol

Tullow Oil has entered into a five year \$12 million grant agreement with the Northern Rangeland Trust (NRT) that will support communities in Turkana and West Pokot Counties to establish and operate six community conservancies. With the support of Tullow, NRT will open an NRT North Rift Office in Lokichar and work with communities in the core area of Tullow operations (associated with the potential Phase 1 development and the A1 access route) to establish and operate community conservancies.

This document sets out a Communications Protocol between NRT and TKBV, with the following objectives:

- To set out how each party will manage, review or approve any singular or joint communications in relation to the Grant Agreement;
- To establish guidelines on the use of communication media, including key messages, communications opportunities and potential threats; and
- To build mutual understanding between NRT and TKBV on community conservancies and how to project their philosophy and approach.

2. NRT and TKBV's Communications Objectives

The communications objectives of both NRT and TKBV in relation to the Grant Agreement are:

- (i) To build broad-based support for the community conservancy initiative in the North Rift, and in this way enhance the success of the conservancies.
- (ii) To promote recognition of Tullow and Africa Oil support to community conservancies in Turkana and West Pokot as part of their commitment to positive social and environmental development from the oil industry

- (iii) To manage any reputational risk to Tullow Kenya and Africa Oil: while Tullow Kenya will not be involved in the operation of NRT North Rift or the community conservancies, any negative perception of the conservancies could negatively affect Tullow Kenya's social license to operate, putting its operations at risk.
- (iv) To manage any reputational risk to NRT: NRT must not appear to be a 'Tullow' project and should be positioned as neutral in line with its operating philosophy, so as to maintain trust with communities, government and other stakeholders.

3. Key Messages

A set of FAQs is answered in Annex 1, covering a broad range of potential questions relating to NRT and TKBV. However, in all communications, the key messages to convey relate to:

A. Community Conservancies – these are autonomous, democratically elected community institutions governing agreed areas of community land for purposes of bringing peace, enhancing lives and conserving natural resources. Their objectives are:

- To promote community representation and good governance
- To promote community stability and peace
- To reverse environmental degradation through rangeland rehabilitation and wildlife conservation
- To improve livestock productivity through planned grazing and rangeland management
- To promote integrated socio-economic development within the conservancy
- To provide a platform for diversified and enhanced livelihood opportunities
- To promote equitable distribution of conservancy-derived economic benefits

B. Northern Rangelands Trust – this is the umbrella organisation developed for the specific purpose of supporting the community conservancies in northern Kenya. NRT's objectives are:

- To support and nurture the development of resilient community conservancies in northern Kenya
- To oversee and facilitate building of conservancy institutions and governance standards
- To resolve conflicts and disputes within and between conservancy communities through neutral mediation
- To build capacity for conservancy operations and programmes including peace and security, livelihoods and other economic developments, conservation and land management
- To raise funds for conservancy operations and programmes
- To broker support agreements with investors, county governments, other partners
- To generate political and financial support for the conservancy movement and monitor its impacts

C. Tullow Kenya BV – in partnership with Africa Oil, Tullow is the operator in three exploration blocks in Turkana. Tullow's objectives in relation to conservancies are:

- To develop and maintain a safe, secure, peaceful and stable working environment for oil operations with informed and positive support from local communities
- To promote improved communications, awareness and knowledge and understanding between pastoral communities and the nascent oil and gas industry and thereby promote a social license to operate

- To develop effective means through which the direct and indirect environmental and social impacts of the nascent oil and gas industry can be managed
- To develop an effective means through which the nascent oil and gas industry can benefit pastoral communities within the area of oil operations
- To provide opportunities for community institutions to compete for business within the nascent oil and gas industry and thereby develop independent means of finance
- To provide direct support to conservancies through a grant agreement with NRT

4. Communication Channels

Tullow and NRT will communicate key messages through individual or joint engagements with stakeholders, involving a number of communication channels:

- FAQs - a series of frequently asked questions, that will address the likely questions and concerns of stakeholders, has been developed (Annex 1) and will be routinely updated.
- Briefing sheets and background documents
- Direct communication channels including emails and E-shots
- Public Barazas - Targeted community meetings, meetings with local leaders and County Government representatives
- Radio(especially community radio stations) - Community radio interviews with representatives from NRT and favourable leaders and influencers within the community
- Print media
 - o The official public launch date for the community conservancies programme
 - o Targeted articles in the national and international press
 - o Articles and interviews in County based newspapers e.g. Turkana Times and the Turkana Guardian
- Leverage significant dates/occasions such as the World Environmental Day to showcase best practice in community collaboration focusing on environmental conservation initiatives.

This list is not exhaustive and can be further developed as opportunities arise and are identified.

5. Potential Stakeholders/Audiences

- a) County Government incl. MCAs, MPs, County Executive
- b) National government
- c) Government Agencies e.g. Kenya Wildlife Service, Kenya Forest Service etc
- d) Local communities
- e) Special interest groups
- f) Turkana/National media
- g) Wider Kenyan public

6. Branding

The following branding principles will be applied:

- Only NRT and Conservancy branding and logos will be used in the operations of community conservancies, consistent with the proven NRT standards and approach
- The Tullow brand and logo will be used, to promote the joint objectives of conservancies, NRT and Tullow as set out above, in the following circumstances:
 - o When acknowledging Tullow/Africa Oil financial support to NRT and community conservancies in websites, reports, brochures, presentations, press releases, fact sheets etc

- o When marking Conservancy infrastructure or community benefit projects funded by Tullow/Africa Oil, or when acknowledging such in public meetings and AGMs

Tullow has developed a set of Brand Guidelines which need to be adhered to in instances where the Tullow logo will be used, including any instance of co-branding, as indicated above.

7. Internal communications within NRT and conservancies

Most community sensitization about conservancies, their structure, operations, benefits, role of the community, community participation etc will follow NRT norms and is achieved through carefully facilitated meetings and building networks of support. As such, there is limited scope for Tullow approval of such communications, which will follow the Key Messages and Branding guidance given above.

8. Approvals and Review Process for External or Written Communication Material

The following guidelines will be followed, for review, vetting and approval of written or external communications material and activities.

- Announcements- NRT will notify Tullow, and Tullow will notify NRT, regarding any planned announcements/press releases relating to the Grant Agreement, and provide adequate opportunity for each party's review and feedback prior to issuance of the same.
- Advertising- NRT will keep Tullow informed, and Tullow will keep NRT informed, on publicity plans including events, advertisements etc relating to the Grant Agreement, and where co-branding is required, will do so only following prior consultation with each party.
- Social media - NRT will notify Tullow, and Tullow will notify NRT, in advance of any intended posting by either party on social media that makes mention of the other party in a way that might introduce reputational risk. Otherwise either party is free to communicate about the Grant Agreement if it promotes the objectives and spirit of this Communications Protocol.
- Image Rights- the relevant party should obtain consent prior to producing any communications materials bearing images of people from the local community. This consent needs to be obtained from the person(s) appearing in the photo.
- External presentations and any information placed in the public domain – this needs to follow the guidelines in this Communications Protocol, and the parameters set out below, and should be checked prior to the event, by the designated representatives from NRT and Tullow to ensure no sensitive information is shared:
 - o Presentations by NRT must acknowledge Tullow/Africa Oil, and must not adversely mention Tullow/Africa Oil in any way that presents reputational risk
 - o Presentations by Tullow/Africa Oil can acknowledge support to NRT, and must not claim ownership or direction of NRT's core business and approach

9. Guidelines on Engagement with Media

- i. It is worthwhile to note that journalists regularly attend conferences and other industry events and their presence is not always advertised or made clear. Any external engagements should be viewed as opportunities for potential interaction with a journalist or reporter from a particular publication.
- ii. Any NRT or Tullow employee approached or contacted by a journalist should refer any questions to the designated NRT or Tullow spokesperson or where applicable, the Tullow or NRT Communications team.

- iii. In any interaction with the media, NRT or Tullow should not comment 'off the record' even if a journalist offers the chance to provide information without attribution. There are numerous instances where journalists have ignored these 'gentlemen agreements' and shared sensitive information.
- iv. In instances where an NRT or Tullow employee has spoken to a journalist, either on purpose or inadvertently, and is concerned that the resulting coverage may be unfavourable or represent the employee, his or her views and / or Tullow or NRT in an inaccurate or unfavourable light, please contact the designated Tullow or NRT representative and ensure this information is shared as soon as possible to mitigate against possible negative publicity.
- v. On social media, NRT will need to liaise with the Tullow Communications function, and vice versa, on any information related to the community conservancies that is likely to be affect/impact upon the reputation or operations of Tullow or NRT. This includes when writing status updates, Twitter posts, Facebook comments etc. Please be aware that journalists use and monitor social media sites for potential stories.

ANNEX I: FREQUENTLY ASKED QUESTIONS

1. What is a Community Conservancy

Community conservation is a movement that is changing the landscape of northern Kenya, empowering communities by building community institutions to govern the land, promoting land management, developing programmes of security and peace-making, rangeland management, livelihood development and economic growth.

A community conservancy is a community-based organisation created for the management of community land for the benefit of household livelihoods (improved governance and representation, reduced conflict, improved pasture management, improved livestock production, integrated development, enterprise development/alternative livelihoods) and the conservation and protection of natural resources (most often rangelands and wildlife).

2. Why are Tullow and Africa Oil supporting community conservancies?

Tullow is committed to ensuring that the oil and gas sector brings real and long lasting benefits to host communities in areas where it operates. Tullow's support for the establishment and operation of conservancies in the South Lokichar Basin and along the A1 highway – as seen through the signing of a 5 year grant agreement - represents a relatively early (as seen from the oil and gas life cycle) social investment in the pastoral communities that reside within the potential project's area of influence. While Tullow believes that community conservancies offer unique means through which the multiple challenges faced by pastoral societies in Northern Kenya can be addressed, it is also true that within the context of a nascent oil and gas industry, the establishment and operation of conservancies provides opportunities for both the management of change and the capturing of opportunities brought about by the growth of the oil and gas industry. Specifically, such benefits may include:

- Development and maintenance of a safe, secure, peaceful and stable working environment for oil operations with informed and positive support from local communities
- Promotion of improved communications, awareness and knowledge and understanding between pastoral communities and the nascent oil and gas industry and thereby promote a social license to operate
- Development of effective means through which the direct and indirect environmental and social impacts of the nascent oil and gas industry can be managed
- Development of effective means through which the nascent oil and gas industry can benefit pastoral communities within the area of oil operations
- Provision of opportunities for community institutions to compete for business within the nascent oil and gas industry and thereby develop independent means of finance

3. Who is NRT and what is their role?

The Northern Rangelands Trust is an umbrella organisation that supports community conservation in northern Kenya. There are now 27 community conservancies facilitated by NRT, working to secure peace in a historically volatile region; manage the land and natural resources in one of the most diverse and arid areas in East Africa; build resilience, and; ultimately transform the livelihoods of marginalised communities.

To develop resilient community conservancies that transform lives, secure peace, and conserve natural resources.

NRT Core Values

- Respect for traditional pastoral and other community values
- Coexistence of livestock, people and wildlife
- Community-led decision making
- Meaningful livelihoods through wildlife conservation
- Competent governance and financial accountability
- Equitable distribution of benefits
- Environmental, social and economic sustainability in all our work
- Apolitical, without allegiance to any political party, creed, or race
- Credible, measurable results

4. Why did Tullow choose NRT for this partnership?

Communities in Turkana and West Pokot visited NRT with Tullow's support, and saw for themselves the value of developing conservancies to bring peace, manage the land well, and build institutions for maintaining security, livelihood programmes and conservation. With approval from NRT's Council of Elders, NRT negotiated a grant agreement with Tullow to support the development of conservancies in Tullow's area of operation. Tullow recognised NRT's extensive experience in establishing conservancies elsewhere in northern Kenya, particularly amongst pastoral communities. Over the last 20 years, NRT has supported the development of 27 community conservancies in northern Kenya, that now cover over 30,000 square kilometres of primarily semi-arid land. NRT's focus on these pastoral areas, most of which share the same geographical as well as social-economic challenges with Turkana/Pokot counties, was also deemed important in Tullow's decision to support NRT and community conservancies in Turkana and West Pokot.

5. Is NRT a Tullow Contractor?

No, NRT is an independent umbrella organisation representing a movement of community conservancies in northern Kenya. Tullow Kenya and NRT have signed a grant agreement, through which Tullow and Africa Oil have committed to providing NRT and the newly established community conservancies with support for a 5 year period. The terms of this agreement provide for NRT to facilitate the establishment and operation of conservancies in accordance with NRT practices. See FAQ 4

6. What is Tullow funding actually for?

Tullow's \$12 million grant agreement will help the Turkana and West Pokot communities establish and operate six (6) community conservancies in the region. The funding will cover many aspects involved in establishing and operating a community conservancy, including:

- Salaries for conservancy management teams and conservancy rangers
- The purchase, maintenance and fuelling of conservancy vehicles
- The facilitation of training workshops, peace meetings, etc.
- The purchase of the IT and communications equipment needed to effectively run a conservancy, as well as the purchase of operations equipment and uniforms for conservancy rangers

7. Were the communities of Turkana and West Pokot consulted in this process? How?

Communities were involved and consulted as follows;

- NRT fact-finding teams comprised of the Council of Elders (NRT's highest governing body) & senior management. Several trips were conducted to Turkana and West Pokot counties to meet the local

leaders, county and national government officials at the county level. This provided good forums for interactions and consultations

- Communities and local leaders as well as government representatives from both counties were invited to visit NRT HQs and community conservancies to learn and understand the concept of a community conservancy
- Several meetings involving target conservancy areas were carried out to discuss area-specific issues regarding the establishment of conservancies.

8. Was the County/National government as well as other government agencies e.g the National Land Commission (NLC) involved prior to establishing the conservancies?

- County government leadership (governors, MPs, MCAs) and representatives of national government at county level were involved and consulted in view of the fact that trust lands fall under the mandate of county governments.
- The National Land Commission was not directly involved at the initial stages but plans are in place to involve them in the process.

9. How do community conservancies operate?

The Basis of Community Conservancy Model includes:

- A self-defined community
- Living in an agreed and defined area;
- Registering and developing a community institution to govern the area as a conservancy, in order to;
- Achieve the combined objectives of securing peace, improving lives, and conserving natural resources.

Each conservancy has an elected board comprising members drawn from constituency within the defined community conservancy. Locally elected boards govern each of the six new community conservancies in Turkana and West Pokot. Local government and other stakeholders can be included as observers (ex officio members). The Board assumes responsibilities for operations and development activities within the conservancy, prioritising various interventions including peace and security, rangeland management, alternative livelihoods, integrated development, etc.

10. How will the boundaries for the conservancies be established?

Generally the boundaries of a conservancy align with existing administrative boundaries at the ward/location level. In this way a conservancy territory may cut across sub-county boundaries. Although community conservancy boundaries are defined, the conservancy holds no claim to land ownership, i.e., the conservancy only serves a land and resource management function.

11. How will community conservancies promote reduced conflict/peace

The cause of conflict and insecurity is a key driver of the approach to promoting peace and stability. Initially NRT and the conservancies implement a number of baseline studies to better understand the underlying causes for conflict and insecurity. Thereafter NRT and the conservancies work together to promote peace through various means including:

- regular peace meetings between community leaders, respected elders and young warriors
- the employment of conservancy rangers who assume responsibility for raising awareness within their communities regarding peace building initiatives, working together with neighbouring

conservancies and wildlife conservation while simultaneously monitoring people and livestock movements within their conservancies.

12. The Conservancies are located in community owned land, what tenure agreements are in place?

The Conservancy will exist on trust land and there is no planned conversion of this land into any other tenure. Registration of conservancy land is not a claim, nor a basis for ownership.

13. How will the community benefit from conservancies?

The communities resident within community conservancies may benefit from conservancy operations in many ways as described by the objectives of community conservancies:

- To promote community representation and good governance
- To promote community stability and peace
- To reverse environmental degradation through rangeland rehabilitation and wildlife conservation
- To improve livestock productivity through planned grazing and rangeland management
- To promote integrated socio-economic development within the conservancy
- To provide a platform for diversified and enhanced livelihood opportunities
- To promote equitable distribution of conservancy-derived economic benefits

Operation of the conservancies will promote improved governance through the conservancy board. The day-to-day operations will provide employment opportunities. The conservancies will, with the support of NRT, launch rangeland management programs as well as planned grazing initiatives that will help promote improved sustainable natural resource use in the area together with improved livestock productivity. Additionally, better land use is expected to minimise resource-based conflict that arises from competition for good grazing - a key source of insecurity in the area. The project is also expected to promote and develop alternative livelihood activities including competing for opportunities (i.e., local procurement of goods and services) from the nascent oil and gas industry.

14. How many jobs will be created?

- The project aims to directly provide about 180 jobs, i.e., approximately 30 jobs per conservancy
- In the future opportunities to create community owned companies may be associated with increased employment opportunities as well as revenue generation for the communities

15. In what ways will Tullow be accountable to the communities?

Successful establishment and operation of community conservancies will provide both a voice and representation for pastoral communities. As such conservancies may function as effective counterparts to Tullow through which coordination and collaboration can occur across a range of common issues including engagement, community based security, access to land, local content, social investment, etc may occur. While conservancies may function as effective representatives of pastoral communities it also remains that Tullow will continue to engage with all stakeholders within the area of influence with the aim of establishing and maintaining good relations.

In what ways will the conservancies be accountable to the communities?

- Community conservancies are established and operate on behalf of the community. To this end, the conservancy management and operation is primarily accountable to the community.

Accountability mechanisms include:

- Communities will remain accountable through their democratically elected conservancy boards. The board officials (chair, vice and treasurer) will ensure that the team is accountable.
- To provide checks and balances, the ex-officials (MPs, MCAs, chiefs, KWS etc) will attend conservancy boards whenever necessary

16. What measures are in place for when the 5 year agreement ends?

At this time Tullow and NRT have signed a 5 year grant agreement. It is not yet possible to look beyond the 5 year timeframe as much will depend on the schedule for the development of discovered oil resources. During the initial 5 years it is anticipated that opportunities for revenue generation in the conservancies may derive from multiple sources including the potential: (i) to develop community companies to compete for oil and gas related business opportunities in the extended value chain associated with the oil industry; (ii) to work with the County Government in implementation of various community-level CIDP interventions; (iii) to derive donor support to implement programs; (iv) to develop enterprises e.g., livestock to market programs, that serve as alternative sources of income. A key objective for Tullow is to promote the creation of multiple funding and/or revenue streams that ensure that conservancies are not solely dependent on only the one income source.

17. How does Tullow deal with peace and security?

The GoK holds primary responsibility for the protection of our operations, providing security for the local communities, and for the preservation of human rights. Within this context, as a responsible operator and signatory to the Voluntary Principles on Security and Human Rights (VPSHR), Tullow Kenya is committed to ensuring that: our presence should have a positive effect on our surroundings; our security operations do not negatively impact the local society, and; that Tullow does not exacerbate existing conflicts. As such Tullow's approach to peace and security is based upon collaboration with relevant stakeholders.

Part of this approach is captured in our continued engagement with industry associations such as the Kenya Oil and Gas Association (KOGA), County and National Policing structures and civil society actors such as the Kenya National Human Rights Commission (KNCHR) and the Institute on Human Rights in Business.

Further Tullow is a signatory to the Voluntary Principle on Security and Human Rights (VPSHR or VP's) an international multi-stakeholder initiative designed to ensure that security operations around extractive industry operations are designed in a framework which is respectful of human rights and 'do no harm' to the society with whom we work.

18. What is the difference between NRT and the community conservancies?

The Northern Rangelands Trust is an umbrella organisation that was established to support community conservancies. A community conservancy is an autonomous institution, operated by the indigenous communities that live there. NRT supports these conservancies in a number of ways:

- It raises funds for the conservancies
- It provides them with advice on how to manage their affairs.

- It supports a wide range of training and helps broker agreements between conservancies and investors.
- It also monitors performance, providing donors with a degree of oversight and quality assurance.