Worker grievance mechanisms
Guidance document for the oil and gas industry

LABOUR RIGHTS SERIES
Guidance 3

Social responsibility

Advancing environmental and social performance across oil and gas

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Acknowledgements

Special thanks go to the practitioners from the IPIECA membership, and to the various external stakeholders, all of whom generously contributed their time, experiences and expertise to the preparation of this guidance.
Worker grievance mechanisms

Guidance document for the oil and gas industry
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**Glossary of terms**  
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Worker grievance mechanisms

This guidance document is one component of a series of practical guidance and tools which constitute part of IPIECA’s Company and Supply Chain Labour Rights Project.

Company and supply chain labour rights issues are complex and multifaceted, covering, for example, forced labour and human trafficking, freedom of movement, worker grievance mechanisms, supplier and subcontractor management, working hours and pay, health and safety and welfare principles, etc. There is strong interest from external stakeholders such as governments, non-governmental organizations (NGOs), the media and investors, in knowing more about what companies are doing in this area, as well as an evolving regulatory context.

The Company and Supply Chain Labour Rights Project is part of IPIECA’s broader Business and Human Rights Project and focuses on the contracted workforce that the oil and gas industry relies on to develop and conduct large-scale operations. It addresses the potential human rights impacts and issues that may occur through business relationships, particularly in the industry supply chain. The project aims to:

- enable the industry to more effectively identify, prevent and mitigate labour rights risks and impacts within projects, operations and supply chains;
- inform stakeholders of the industry’s collective commitment and efforts to respect labour rights; and
- support the industry in anticipating emerging trends and challenges.

The initial focus has been on the construction of large projects in sensitive geographies with vulnerable workforces, in particular with respect to the rights of the site-based workforce, i.e. those employed by contractors and their subcontractors.

This phase of the project includes publication of the following complementary guidance and tools:

- **Responsible recruitment and employment:** a guidance document covering considerations on responsible recruitment and employment in the oil and gas industry. The document outlines key labour rights issues to be addressed during a project life cycle, and identifies risks, emerging good practice and considerations for effective management.

- **Labour rights assessment:** guidance on the design and implementation of an on-site labour rights assessment, outlining approaches for conducting an on-site audit and assessment of contractors following contract commencement. The document also provides examples from oil and gas companies and other industries.

- **Worker grievance mechanisms** (this document): guidance on developing and implementing effective worker grievance mechanisms across oil and gas workplaces and project sites. The document provides examples of good practices from IPIECA members and other industries, that have enabled workers to speak up and have their concerns acknowledged and addressed.

- **Key steps for carrying out an on-site labour rights assessment:** a quick reference tool based on the comprehensive Labour rights assessment guidance document and Labour rights assessment toolkit.

- **Labour rights assessment toolkit:** a detailed set of tools for comprehensive on-site labour rights assessments (Microsoft™ Excel® spreadsheet format).

Introduction

This guidance provides readers with support in developing and implementing effective worker grievance mechanisms across their workplaces and project sites.

This guidance is aimed at practitioners who play a role in managing worker grievances at oil and gas project sites. Users of the guidance may include project directors, human resource (HR) managers, employee/industrial relations staff, administrative staff, health, safety, security and environment (HSSE) managers and other professionals with responsibility for labour issues who are employed by oil and gas companies or their contractors.

This guidance provides the reader with an overview of the key principles of managing worker grievances. It also provides recommendations on how to design and implement an effective mechanism for dealing with grievances raised by directly-employed workers and third-party workers.
Understanding worker grievances

This section sets out the context for the more detailed guidance that follows. It explains the need for effective worker grievance mechanisms, and provides details of common challenges that companies face when dealing with worker grievances.
Understanding worker grievances

WHAT IS A GRIEVANCE?
For the purposes of this guidance, a grievance can broadly refer to an allegation, issue, or problem that a person has raised in relation to his/her treatment or experience at work. This can cover a broad range of concerns, ranging from a complaint about canteen food and work schedules, to more serious issues such as harassment and workplace discrimination.

Depending on the specific context, grievances may also be referred to as complaints, feedback or concerns. Companies should think about the most appropriate term, and choose the one that is best suited to their circumstances, and which will be understood and accepted by employees and managers.

WHAT IS A WORKER GRIEVANCE MECHANISM?
A worker grievance mechanism (WGM) is a procedure through which a grievance can be raised, assessed, investigated and responded to. It is also a framework through which workers can gain access to remedy for adverse impacts or damage they have suffered as a result of business activities. However, for a grievance mechanism to be effective in managing worker grievances, it must meet the effectiveness criteria summarized in Box 1. For a more detailed breakdown of effectiveness criteria see Appendix 1.

IS A WORKER GRIEVANCE MECHANISM THE SAME AS A COMMUNITY GRIEVANCE MECHANISM?
The principles of an effective community grievance mechanism (CGM) and that of an effective WGM are the same, and indeed, in some contexts a CGM can be effective in picking up on workplace issues and giving workers a mechanism through which they can address issues on a worksite.

However, a CGM is not typically designed in such a way as to pick up on issues on a worksite, for example, where there are a large number of subcontractor workers or migrant workers who are not from the community. Furthermore, a CGM will not normally provide the levels of worker engagement or integration with HR systems that are required to effectively manage worker grievances. There will, nevertheless, be some degree of fluidity between a CGM and a WGM because an issue may sometimes fall between a workplace and community issue, and may change over time.

Further reading
IPIECA’s manual, Community grievance mechanisms in the oil and gas industry, gives more detailed information on CGM design and implementation.

Box 1 Worker grievance mechanism effectiveness criteria
For a WGM to be effective, it should be:
- legitimate;
- accessible;
- predictable;
- equitable;
- transparent;
- rights-compatible;
- a source of continuous learning; and
- based on engagement and dialogue with existing stakeholders.
WHY A COMPANY SHOULD HAVE A GOOD GRIEVANCE MECHANISM

Engaging with workers and communities and responding to their concerns is essential for the successful operation of any business. Figure 1 summarizes the benefits of an effective grievance mechanism.

GRIEVANCE MECHANISM STANDARDS

Key sources of information for guidance on grievance mechanism standards include the following:

- **The United Nations Guiding Principles on Business and Human Rights (UNGPs)**
  The UNGPs set out expectations of how a business should receive and handle a grievance to remediate any actual harm. The principles set out under the UNGPs for an effective grievance mechanism are widely recognized as being international good practice.

- **Investor/lender standards**
  Where oil and gas projects receive project financing or are financed through export credit guarantees, companies may be required to comply with the requirements of IFC Performance Standard 2 (IFC PS2) which covers labour and working conditions, and includes provisions on worker grievance mechanisms. IFC PS2 criteria are aligned with the UNGPs.

- **National legislation**
  It is rare that national legislation will require an employer to establish a WGM. However, there may sometimes be ways in which national law encourages the establishment of WGMs, for example by requiring employers to set out in employment contracts how employees can lodge grievances.

Further reading

Verité has developed useful guidance for companies wishing to establish effective worker grievance mechanisms for vulnerable workforces.
OVERCOMING COMMON CHALLENGES

Table 1 sets out some of the common challenges companies face in relation to handling worker grievances, along with some considerations to help overcome them.

Another key challenge for companies to consider is how to approach the handling of anonymous complaints from workers. For more information on this topic see page 21.

<table>
<thead>
<tr>
<th>OVERCOMING BARRIERS TO ACCESS</th>
<th>ENSURING THAT THIRD-PARTY WGMS ARE EFFECTIVE</th>
<th>BUILDING TRUST WITH WORKERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Allow workers to raise grievances in their own language.</td>
<td>● Review third-party capacities and systems to implement an effective WGM.</td>
<td>● Regularly communicate to workers the availability of the mechanism and how to use it.</td>
</tr>
<tr>
<td>● Reflect other socio-cultural concerns related to vulnerable workers (this could include, but is not limited to, female workers, migrants, illiterate workers, young workers, etc.).</td>
<td>● Include specific clauses in contracts with third parties addressing specific gaps identified in their systems and practices.</td>
<td>● Have a regular presence on a worksite that all workers (including third-parties) know they can approach to raise concerns (similar to the role of a Community Liaison Officer in a community).</td>
</tr>
<tr>
<td>● Allow workers to raise concerns anonymously (although note that this restricts ability to respond directly).</td>
<td>● Require that third-party WGMs are implemented in line with the effectiveness criteria (see Box 1 on page 6 and Appendix 1 on pages 28–29).</td>
<td>● Place posters across the project site (and other areas frequented by workers) which include WGM point-of-contact details. Include information on performance of the mechanism.</td>
</tr>
<tr>
<td>● Reinforce the policy of confidentiality and non-retribution, along with ability to raise anonymous grievances, during inductions to the site and other trainings.</td>
<td>● Require third parties to report on grievances raised, and outcomes, at regular intervals. Reserve the right to monitor the third party’s WGM and outcomes.</td>
<td>● Provide timely feedback to workers about grievances raised and the responses of the company.</td>
</tr>
<tr>
<td>● Reduce physical barriers to accessing the mechanism by locating in places that workers feel comfortable visiting or by receiving grievances by phone, message, etc.</td>
<td>● Where there are clear gaps, build capacities of third-party management staff involved in grievance handling.</td>
<td>● Consider engaging a trusted third party to receive complaints and manage communications with workers.</td>
</tr>
</tbody>
</table>

Further reading

The Compliance Advisory Ombudsmen has developed a number of tools to help enhance existing grievance mechanisms and create new mechanisms in line with international best practice.
Entry points to worker grievance mechanisms

This section looks at the various means by which a worker grievance may be raised.
The most conventional, company-controlled routes for workers to raise grievances on a worksite are direct contact with HR management or written notes in complaints boxes. However, various other means are available to provide workers with the ability to raise concerns, as set out below.

**TRADE UNIONS AND LABOUR FORUMS**

**Site level agreements**

Where a trade union is present at the workplace and there is a collective bargaining or labour agreement between the company and the union, grievance procedures will often be referenced in collective agreements. When functioning properly, this can be an effective means of providing a grievance process and remedy to workers. Site-level collective agreements can establish a means for individual workers to raise an employment-related grievance, potentially through the trade union or with trade union assistance.

Where such agreements and mechanisms are in place there may be less need for a company to supplement this with an additional internal procedure, as long as the mechanism provided through the collective agreement:

- accommodates individual grievances;
- is accessible for all workers on the site, regardless of trade union membership; and
- is accessible to vulnerable workers, and others such as agency workers, contractors, etc.

If this is not the case, supplementary grievance routes are recommended.

However, in many jurisdictions there may be restrictions on trade union rights or low levels of trade union membership. In such cases, alternative means of raising grievances will be necessary. One option in these circumstances can be for companies to engage with labour forums or worker committees. These can provide a company with a useful, non-adversarial means of consulting with the wider workforce on issues related to the workplace, and allow individuals to raise particular concerns.

**Global framework agreements**

Some companies have also chosen to enter into Global Framework Agreements (GFAs) with Global Union Federations. These GFAs will usually contain provisions for the joint investigation and resolution of complaints and disputes related to the agreement, and for regular dialogue on labour issues between the company and the union. Two examples of GFAs signed by oil and gas companies include those that Eni and Total have signed with the Global Union Federation IndustriALL.

**COMPANY HOTLINES**

Worker hotlines are a common entry point for workers to raise grievances in the oil and gas sector. Most companies will have specific telephone numbers and/or email addresses that complainants can use to raise any concerns related to their working conditions. These will often be operated at a global level rather than by a specific project site’s management, but they can also be developed for the needs of a specific project, or in a specific geography where companies may have multiple projects.

Some companies also choose to use an independent third party to operate hotlines and to act as an intermediary between the complainant and the company. If this route is chosen, providers need to be selected on the basis of a range of issues, including their experience, ability to deal with sensitive issues, their systems for protecting confidential information, and their response times.

**‘WORKER VOICE’ APPS**

An alternative, additional resource for the receipt of worker complaints may be available online through technology-based applications and other digital channels. In a world where most workers have access to the internet through mobile phones and computers—and where companies have large supply chains and operations across the world—it makes sense to try to harness the technology to give a larger number of workers an additional entry point to raise workplace concerns.
Many companies are beginning to think about how they can use technology-driven platforms to better understand worker sentiment across their business activities. Such an approach can provide companies with improved opportunities for identifying andremedying negative impacts on workers.

To meet this growing demand, an increasing number of applications and platforms are becoming available for companies to use. However, their use is still relatively nascent, and companies are still exploring how best to implement them and harness their potential as tools for running an effective grievance mechanism. In response to a number of identified issues and a growing number of service providers, a set of common guidelines known as the WEST Principles have been developed to help technology provide a meaningful and positive impact on workers’ lives. These guidelines consist of eight principles that companies should consider when thinking about which applications could be useful; these principles are broadly aligned with the effectiveness criteria for WGMs as set out in the UNGPs.

One example of an application to enable worker reporting is the ‘Worker Connect’ mobile app, which offers foreign migrant construction workers employed in Gulf countries a means of raising anonymous complaints about how they were recruited and are employed and housed. The app supports multiple languages and provides the company with a communications tool that can be used to respond directly to complainants, as well as to the wider workforce about broader issues and developments.

If companies are using, or thinking about using, such applications, it is important to evaluate whether they adhere to the WEST Principles and meet the effectiveness criteria set out in Appendix 1 on pages 28–29.

It is also important to note that, although these technology-based mechanisms are aimed at enhancing the ‘worker voice’, they should not be seen as equivalent to, or replacements for either:

a) the role of legitimate trade unions that represent the interests of their members; or

b) a manager or other on-site liaison that is responsible for acting as a point of contact.

EXTERNAL REPORTS AND ALLEGATIONS

Some WGMs allow for grievances to be raised through an external party and to be received by a person other than a worker or their representative. This could, for example, include allegations made in the press or in reports from NGOs. Additionally, in countries with a large number of migrant workers, allegations or information about poor treatment may be brought to a company by a labour attaché in the diplomatic representative body of a country where migrant workers are employed.

When a WGM includes these avenues for raising grievances, it is important that the grievances are assessed, investigated and responded to in the same manner that they would have been if they had been raised directly by the affected workers.

For example, Wilmar International—a leading global agribusiness group—have a Grievance Unit that is tasked with managing grievances raised directly by workers, but also those raised by third parties. The Unit is tasked with monitoring media for news related to Wilmar and its suppliers to identify potential grievances which will then be investigated in the same manner as other grievances.

Further reading

ACCESS has created a database of different company grievance mechanisms. This includes both WGMs and CGMs in the extractives sector and gives an overview of their scope and how they work.
Section 3

Review and planning

This section sets out the activities that companies should consider when designing an effective worker grievance mechanism.
Table 2 on page 15 sets out the activities that companies should consider when designing an effective WGM. Note that while these activities are presented sequentially, they include overlapping activities.

While this provides a broad overview of the steps to take when planning and designing a WGM, many of the activities are similar to those required when developing a CGM. For more a more detailed overview of these activities, refer to the IPIECA manual, *Community grievance mechanisms in the oil and gas industry*. 
### Table 2 Considerations when designing an effective worker grievance mechanism

<table>
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<tr>
<th>RISK ASSESSMENT</th>
<th>EXAMINE EXISTING PROCEDURES</th>
<th>DETERMINING RESPONSIBILITIES</th>
<th>BUILDING CAPACITY</th>
<th>PROVIDE ADEQUATE OVERSIGHT</th>
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<tr>
<td>Assess the landscape of potential risks and gaps in existing remedy framework:</td>
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<tr>
<td>- Review existing human rights risk assessments.</td>
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<tr>
<td>- Review the landscape of external complaints mechanisms (e.g. national courts, inspectors, etc.).</td>
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<tr>
<td>- Engage internally (e.g. explain why the WGM is important and demonstrate its value).</td>
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<td>- Engage externally (e.g. to confirm that the WGM is suitable for workers and to build trust and gain legitimacy among workers).</td>
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<td>Find out whether there are any channels already in place for workers to raise grievances, for example:</td>
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<td>- Informal discussions with supervisors</td>
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<td>- Trade union processes</td>
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<td>- Community grievance mechanism</td>
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<td>- On-site complaints boxes</td>
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<td>- Formal letters to HR</td>
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<td>- Ethics hotlines</td>
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<td>- Mobile apps</td>
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<td>- Audits</td>
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<td>- Submissions via a third party</td>
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<td>- Online complaints forms</td>
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<tr>
<td>- Face-to-face meetings with staff</td>
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<td>- On-site company offices.</td>
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<tr>
<td>Staff should know their roles in handling a grievance, along with who to escalate issues to:</td>
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<tr>
<td>- Confirm the roles of headquarters and project staff in managing grievances.</td>
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<tr>
<td>- Establish clear roles and responsibilities between companies and third parties, with confirmation in agreements.</td>
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<tr>
<td>- Nominate individual(s) at site level who will be responsible for dealing with grievances.</td>
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<tr>
<td>- Ensure that the nominated responsible individuals are trusted by workers and managers.</td>
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<tr>
<td>- Understand how the different channels for raising grievances relate to each other.</td>
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<td>- Establish clear guidelines to determine when a grievance should be escalated to headquarters.</td>
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<tr>
<td>Train a suitable number of individuals at project level on grievance procedures and how to manage grievances consistently:</td>
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<tr>
<td>- This could focus on specific grievance officers (similar to community liaison officers, but also supervisors and HR staff).</td>
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<tr>
<td>- Contractors and subcontractors should also implement training, or receive training from their employer, on how to use the WGM that is applicable to them.</td>
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<tr>
<td>- It is also important to build awareness of the WGM among the workers, and to provide them with training on how to use it.</td>
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<tr>
<td>Oversight of the WGM is vital to ensure that it is operating effectively:</td>
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<tr>
<td>- Companies should hold regular project meetings to discuss grievances raised and responses undertaken.</td>
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<tr>
<td>- The requirement for oversight of the WGM should be included in contracts with third parties.</td>
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<tr>
<td>- An individual or group should be responsible for overseeing complaints, and for dealing with particularly sensitive complaints.</td>
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*SOMO* has set up a useful resource setting out the landscape of different grievance mechanisms used to address human right violations.  
See Section 2 for further information on WGM entry points.
Handling a worker grievance

This section offers step-by-step guidance on managing worker grievances. Details of how to handle anonymous complaints are also included.
Handling a worker grievance

OVERVIEW OF THE GRIEVANCE MECHANISM PROCEDURE

Figure 2 gives an overview of the different channels through which grievances may be raised, along with the overarching steps that may be needed to resolve the grievance.

More details on the considerations that need to be given to each of these steps are provided under Handling a grievance, below.

HANDLING A GRIEVANCE

Figure 3 on page 18 sets out the considerations that companies may take into account at the different stages of handling a grievance. While acknowledging that companies will have different processes for handling worker grievances, Figure 3 sets out the key activities that should be considered for any grievance to be handled effectively. Some of these considerations may be different in cases where a grievance is raised anonymously (see page 21 for further information). Key to designing and operating a system is that the worker should be able to choose which approach he or she feels happiest with.
## Section 4

### Handling a worker grievance

#### Figure 3 The different stages of handling a grievance

<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Informal discussion</td>
<td>If workers have a grievance or complaint regarding their work, they should, wherever possible, raise their concern with a supervisor or manager as it may be possible to find a solution informally. This makes it more likely that disputes can be resolved quickly, closer to the source of the problem, making it less likely that the issue escalates into an intractable problem. The issue and response should still be logged and tracked from the perspectives of checking outcomes and monitoring.</td>
</tr>
<tr>
<td>Formal complaint</td>
<td>If discussions with supervisors/managers fail to resolve the issue, it is still possible to pursue an informal approach without triggering a formal procedure. For example, a further option would be for the HR manager to facilitate an informal meeting or discussion about the grievance. Any such options taken should be logged.</td>
</tr>
<tr>
<td>Assessment of complaint</td>
<td>Where a worker has a grievance against his/her supervisor or manager who is also the nominated contact for reporting grievances under the mechanism, it would not be appropriate for the worker to raise the complaint with that person. In such a case, the worker should raise the grievance through another entry point. See the examples in Section 2.</td>
</tr>
<tr>
<td>Company investigation</td>
<td>If the matter is serious and/or the worker wishes to raise the matter formally, the worker should set out the facts of the grievance in writing to the nominated manager under the mechanism. If there is a trade union at the workplace, the worker may wish to ask a union representative for advice and support.</td>
</tr>
<tr>
<td>Final meeting</td>
<td>If the grievance is substantiated, a designated manager will invite the worker to a meeting, within a determined period after receiving the complaint, to discuss the worker’s grievance.</td>
</tr>
<tr>
<td>Final meeting</td>
<td>Ideally, raising a formal grievance should be a last resort. If a company is implementing good HR management practices where there are clear avenues of communication between management and workers, it should be able to handle most issues in an informal manner. However, informal arrangements and procedures should not be made a pre-requisite for commencing more formal complaints. For example, it may be that the complainant has a complaint about the behaviour of his/her own supervisor or manager, in which case it would not be appropriate for the complainant to raise the matter informally with that person.</td>
</tr>
</tbody>
</table>

Ideally, raising a formal grievance should be a last resort. If a company is implementing good HR management practices where there are clear avenues of communication between management and workers, it should be able to handle most issues in an informal manner. However, informal arrangements and procedures should not be made a pre-requisite for commencing more formal complaints. For example, it may be that the complainant has a complaint about the behaviour of his/her own supervisor or manager, in which case it would not be appropriate for the complainant to raise the matter informally with that person.

Where a worker has a grievance against his/her supervisor or manager who is also the nominated contact for reporting grievances under the mechanism, it would not be appropriate for the worker to raise the complaint with that person. In such a case, the worker should raise the grievance through another entry point. See the examples in Section 2.

If the matter is serious and/or the worker wishes to raise the matter formally, the worker should set out the facts of the grievance in writing to the nominated manager under the mechanism. If there is a trade union at the workplace, the worker may wish to ask a union representative for advice and support.

Once a grievance has been raised, the company should provide an acknowledgement to the complainant that it is in receipt of the details. An early assessment of the complaint should identify the key issues that have been raised, together with any root causes, and should determine the outcome that the worker is looking for from the process. Any additional information should be gathered to allow a full assessment.

As part of this process, managers will need to determine the appropriate next steps. A key consideration will be whether or not the grievance raised falls within the scope of the mechanism. If it does not, the management may choose not to proceed further with the investigation as there may be other more appropriate means of handling the complaint, for example if a case of forced labour is alleged, it is usually better to refer the complaint to relevant authorities or experts.

The appropriate form of investigation will depend on the type of grievance and the seriousness of the allegation. In general terms, managers handling grievances should try to understand the key issues and interview the individuals involved in a complaint, e.g. those managing the workers, or those responsible for the activity or service that is raised in the grievance.

Where there are allegations of harassment or discrimination, or other particularly sensitive issues, the manager involved should handle these issues with care and sensitivity; this may require special training and protocols. It may be that an independent investigation is required, requiring external expert input.

The worker should have the right to be accompanied by a colleague or trade union representative at the meeting upon request. After the meeting the grievance manager will give the worker a decision in writing, within a determined period.
Section 4
Handling a worker grievance

Box 2  Communication and appeals

Companies should always acknowledge receipt of a grievance at the outset, and should aim to provide workers with regular updates on the progress of their grievance. This information should be sufficiently clear to allow the worker to understand the reasons behind all decisions taken at each stage. When a final decision is made, companies should also set out what a worker can do if they disagree with the decision and wish to appeal.

If the worker is particularly unhappy with the decision in relation to his or her grievance and wishes to appeal, he or she should notify the grievance manager. The worker should be invited to an appeal meeting within a defined period of time, and the appeal will be heard by a more senior manager. Some companies establish an appeals committee, which operates independently from company management, to fulfill the functions of hearing an appeal, deciding on the outcomes, undertaking mediation and finding a resolution. Every effort should be made to secure a resolution that is in the best interests of the worker(s) and the company. After the appeal meeting, the senior manager/committee will give the worker a decision in writing.

Box 3  Understanding the root causes of an issue

If a company wants to address an issue and prevent future complaints about the same issue, it is critical that the root causes of the issue are understood. Simply taking the complaint at face value may not actually lead to a resolution of the underlying factors that are causing the problem. For individual complaints—or where there are particular trends in types of complaint—time should be taken to analyse the complaint and the situation in which it has been raised.

Further reading

The International Code of Conduct Association (ICoCA) has developed a manual that companies can use to help them develop an effective grievance mechanism. This also includes guidance on how to operate the mechanism, along with details of the different activities that should be carried out at different stages of the grievance process.
HANDLING ANONYMOUS COMPLAINTS

Companies should provide a means by which all workers are able to raise anonymous complaints. This gives the most vulnerable workers confidence that they will not be retaliated against for raising concerns, and can be fundamental to shifting power dynamics in the workplace.

However, the normal practice a company takes when investigating a complaint—i.e. meeting with the affected worker and responding to them directly—may not be possible when anonymous grievances are raised. This can make it harder for a company to verify whether the complaint is genuine, but more importantly it is also difficult to ensure that the outcomes are satisfactory for the affected worker.

It is important to maintain anonymity, unless disclosure is required by law. Efforts should be made to protect the source from retaliation, in collaboration with national authorities or experts (where authority involvement could lead to retaliation or retribution against the worker).

It may be appropriate for anonymous complaints to be handled by independent third parties, which allows for the complainant’s confidentiality to be maintained.

Alternatively, where a worker is willing to disclose his/her identity to individuals within the company that are not closely associated or affiliated with the accused parties—for example a committee at headquarters—the company can engage directly with the worker during investigations without disclosing anyone’s identity to those being accused.

Box 4 Responses to receiving an anonymous grievance

Where a worker wishes to remain completely anonymous, and no independent third party is acting on behalf of the affected worker, the company is able to do much less to investigate the specific issue (especially if there is a lack of information) and respond to the complainant directly. Nonetheless, there are some useful approaches that can be taken that can enable a company to investigate, demonstrate that they are acting, and potentially prevent further harm while maintaining the anonymity of the worker.

Examples of actions that the company can take:

- Launching a broad campaign about appropriate workplace behaviours, providing some focus on the issue that was raised and on the area from which the complaint was generated.
- If there are a number of reports against the same person or workplace practice, the company can instigate its own independent investigation or audit observing all general labour issues in addition to the one that has been raised.
- HR management might initiate a 360 review in an area where no formal complaints have yet erupted, but in which anonymous reports suggest grievances are being harboured.
- A small number of similar complaints from the same area might justify timetabling some targeted training.
- Surveys might be used to further test concerns where a flow of reports suggest abiding issues of concern.

It is also possible that those responsible for perpetrating the issues begin to stop the practice once it is known that workers have access to an anonymous complaints mechanism.

Further reading

The Australian Human Rights Commission has developed useful guidance on handling anonymous complaints, applying learnings from cases of workplace sexual harassment.
Section 5

Complaints from workers employed by third parties

This section considers how companies should treat grievances raised by third-party workers.
Complaints from workers employed by third parties

Third-party workers would usually be expected to raise their grievances with their employer, rather than the company that has a commercial relationship with their employer.

While this is a valid expectation, there are risks associated with it. For example, business activities which have less visibility are often the ones where labour rights risks tend to be greatest. This may, in part, be due to insufficiently-developed management practices on behalf of a contractor or supplier.

**EVALUATING THE EFFECTIVENESS OF CONTRACTOR WORKER GRIEVANCE MECHANISMS**

Many third parties, especially contractors operating at an oil and gas site, are likely to have some form of grievance mechanism in place. However, it is possible that they do not have one, or that they have one which is not effective in addressing worker complaints. Therefore, when engaging with a contractor, either at the beginning of a commercial relationship or as part of the ongoing monitoring of their practices, it is important to determine whether or not they have a grievance procedure in place, and if they do, whether it is an effective mechanism for addressing worker complaints.

To achieve this, practitioners can request specific information from the contractor, or speak with their management and workers during monitoring, to help build a clear picture of whether a mechanism is, or is likely to be, effective.

As a part of this process, practitioners should ask themselves the following questions, and where the answer is ‘No’, they should look to work with their contractors to build capacities to handle grievances effectively.

<table>
<thead>
<tr>
<th>Box 5 Questions for practitioners</th>
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<tbody>
<tr>
<td>● Are written materials available which explain the grievance mechanism, and are they available in languages understood by the workers?</td>
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<tr>
<td>● Are workers aware of the process for raising grievances?</td>
</tr>
<tr>
<td>● Are workers able to raise grievances anonymously?</td>
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<tr>
<td>● Are designated members of the management team responsible for the mechanism?</td>
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<tr>
<td>● Are complaints and corresponding resolutions logged?</td>
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<tr>
<td>● Are grievances acknowledged by the contractor, and are updates provided to the workers within proposed deadlines?</td>
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<tr>
<td>● Are a high percentage of grievances resolved through mutually-agreed outcomes?</td>
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<tr>
<td>● Has there been a decline in similar types of grievance over time?</td>
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<tr>
<td>● Has the contractor demonstrated improved compliance with labour standards over time?</td>
</tr>
<tr>
<td>● Has there been a reduction in absenteeism/staff turnover, or an increase in productivity?</td>
</tr>
<tr>
<td>● Has there been a decline in the number of industrial disputes?</td>
</tr>
<tr>
<td>● Can the contractor explain the application of their grievance mechanism?</td>
</tr>
</tbody>
</table>

See Appendix 2 for examples of what to do when trying to assess the effectiveness of a contractor’s grievance mechanism.
Box 6 Key performance indicators
Key performance indicators (KPIs) can be used to evaluate the effectiveness of a WGM. KPIs could include:
- the number of grievances raised, broken down by employee type and concern;
- the percentage of grievances closed within an agreed time frame; and
- the number of grievances repeated.

Box 7 Managing a complaint from a third-party worker
When a complaint about a contractor or subcontractor is received, the company should review the complaint internally, without the contractor’s involvement in accordance with the steps set out in Section 4. The purpose of this assessment is to determine whether the complaint is within the scope of the WGM, and to assess the seriousness of the issue being raised.
- If a grievance does not fall within the scope of the WGM, this should be communicated back to the complainant, along with an explanation of why the complaint is out of scope. It may be that the grievance is referred back to the contractor who is then asked to report back on actions and outcomes.
- Where a grievance falls within the scope of the WGM, but the issue is not deemed to be of serious concern with regard to the affected workers, efforts should be made to resolve the issue and provide liaison between the contractor and individual if necessary.
- Where a grievance is assessed and deemed to be a high risk in terms of the seriousness of the allegations or potential impact, the receiver should refer the case to the personnel within the company that handle higher-risk grievances.
- In cases where the complaint is not referred back to the contractor, the company should assist the person handling the complaint to ensure that it is managed and resolved in a timely manner.

In all instances, the process and decisions taken should be documented so that these can be shared with relevant stakeholders if necessary.

See Appendix 3 for a model grievance policy and process that companies can use to support their contractors.
Appendices

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Appendix 3: Template site-level grievance policy and procedure for contractors 31
# Appendix 1: Worker grievance mechanism effectiveness criteria

<table>
<thead>
<tr>
<th>EFFECTIVENESS CRITERIA</th>
<th>GUIDANCE</th>
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</table>
| **Legitimate**         | A worker grievance mechanism should be perceived to be legitimate by those who may need to use it. It should be a clear, transparent and equitable process that is designed and implemented in accordance with the effectiveness principles, and which should encourage trust. 

The extent to which a WGM is perceived to be legitimate can be assessed only by direct engagement with the workers themselves, unless such employees are represented by a union or other employee representative. |
| **Accessible**         | As a general rule, the procedures for using a WGM should be kept as simple as possible, avoiding unnecessary administrative stages. 

All workers should be informed about the grievance mechanism at the time they are hired. Details about how the mechanism operates should be easily available (e.g. included in employee handbooks or on bulletin boards in the workplace). All communications regarding grievance procedures should be available in the main language(s) spoken by the workforce. Any other issues that may impede a particular worker group’s access to the WGM should be considered. These could include gender, disability, literacy levels, etc. Worker understanding of the process should be measured via surveys or interviews. 

Typically, there should be more than one point of contact or reporting channel for the grievance mechanism. This is particularly important where there are geographically separate sites; in this situation, there should be a contact person or point at each site, or a grievance hotline. 

A WGM should also be made available to third-party workers (see Receiving third-party grievances on page 25). |
| **Predictable**        | Management should provide a clear and known procedure for using the WGM, together with an indicative time frame for each stage; for example, a maximum time between a grievance being raised and the arrangement of a meeting to investigate it. 

Procedures should allow for time to investigate grievances fully, but should also aim for swift resolutions. It is important to verify that applicable legislation and collective agreements do not establish specific timescales. 

Managers should be trained and given guidance so that grievances are handled in a consistent, systematic and impartial manner. |
### EFFECTIVENESS CRITERIA

<table>
<thead>
<tr>
<th>EFFECTIVENESS CRITERIA</th>
<th>GUIDANCE</th>
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<tbody>
<tr>
<td>Equitable</td>
<td>Workers and management should have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair and informed terms. &lt;br&gt;Where there are language barriers, it may be necessary to provide written materials in different languages and to engage interpreters. Additionally, support may need to be provided to ensure that all workers understand how the WGM is used, in non-technical language through advice, training, etc. &lt;br&gt;If there are low levels of literacy among workers, provision should be made to enable those workers to lodge complaints verbally in their native language(s), or assistance should be provided to lodge written complaints.</td>
</tr>
<tr>
<td>Transparent</td>
<td>Every complaint should be treated seriously, and dealt with consistently and in an impartial, confidential and transparent manner. This builds the credibility of the mechanism among workers and ensures that it will be used. &lt;br&gt;A procedure should be in place to enable workers to monitor the status of complaints, as well as the implementation of outcomes. &lt;br&gt;The outcomes or findings of any investigation should be explained clearly to all parties. Note that this will be difficult in situations where grievances have been raised anonymously. See Handling anonymous complaints on page 21 for guidance.</td>
</tr>
<tr>
<td>Rights-compatible</td>
<td>Outcomes and remedies should be in line with internationally-recognized human rights legislation and national law. &lt;br&gt;No aspect of the mechanism should prevent workers from enforcing their legal rights. Workers should be protected against retaliation for having raised complaints.</td>
</tr>
<tr>
<td>A source of continuous learning</td>
<td>It is important that the HR or other relevant department conducts regular reviews of all complaints and actions taken, to evaluate the effectiveness of the grievance procedure and resolutions. The results of these reviews should be reported to senior management. Monitoring can also reveal whether initial grievances are being responded to in accordance with stated timelines. Note that it is often not appropriate to set timelines for grievance resolutions as they may require more time than initially anticipated to reach the appropriate outcome. &lt;br&gt;The types of grievances that are being lodged should also be monitored by employers (e.g. to determine whether the same issues are recurring on a regular basis) to enhance ongoing human rights due diligence and worker engagement strategies.</td>
</tr>
<tr>
<td>Based on engagement and dialogue with stakeholders</td>
<td>Engaging with workers on the design and performance of a grievance mechanism can help to confirm that it meets their needs, that they will use it in practice, and that there is a shared interest in its success.</td>
</tr>
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Appendix 2: Reviewing worker grievance mechanisms

Table A2 Reviewing worker grievance mechanisms

<table>
<thead>
<tr>
<th>INFORMATION SOURCE</th>
<th>WHAT TO REVIEW</th>
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</table>
| Documentation review | - Check that written information is provided to each worker explaining the mechanism.  
- Check whether there are any written notices or posters in areas commonly used by workers (e.g. canteen, break room) which outline the process for raising grievances in appropriate languages.  
- Review worker files and/or grievance logs to confirm that grievances are being systematically acknowledged and recorded, and that workers are informed of the proposed course of action in a clear and timely manner. Records should also be kept of worker responses, and/or appeals in cases where workers are unsatisfied with the proposed solution.  
- Review the grievance log to check the types of grievances raised. If the number of similar grievances has decreased, this may indicate that the company is enhancing performance in this area.  
- Check HR reports and records to gather information about absenteeism or staff turnover and assess whether there have been any positive changes that could indicate increased worker satisfaction.  
- Review periodic aggregated information about grievances. |
| Management interviews | - Ask management to explain the procedure they have in place to raise grievances, and understand how they report outcomes to their customers/project leads.  
- Confirm that there are clear reporting lines and responsibility among management personnel for handling grievances.  
- Gather information about the process for resolving grievances. Resolutions should preferably be reached through dialogue rather than investigation.  
- Ask the management team whether they have a process in place for recording and tracking grievances, and how they monitor their progress in addressing specific and/or recurring issues.  
- Enquire about past industrial disputes or issues in the workplace, and ask management whether they think there have been any notable changes since the grievance mechanism was established. |
| Worker interviews | - Check that workers are aware of the process for raising grievances and are able to identify who is responsible for handling them. If the mechanism’s existence and scope has been appropriately and regularly communicated to workers, the majority of workers should be able to describe it.  
- Assess workers’ perception of the grievance mechanism by asking them for examples of issues they may have raised and how they were resolved. Workers’ use of the mechanism indicates that they trust it as a credible avenue for addressing grievances.  
- Verify that workers are aware of, and are satisfied with, the time frames within which grievances are addressed. The process should be predictable and transparent.  
- Enquire about any notable changes in the workplace that have taken place since the grievance mechanism was established, or about particular issues that have been raised through the mechanism. |
Appendix 3: Template site-level grievance policy and procedure for contractors

The text below can be included within existing contractor HR policies:

- [Contractor] is committed to a transparent process for workers to express concerns and file grievances, including anonymous complaints.
- [Contractor] will ensure that there will be no retaliation or discrimination against those who express grievances, and that grievances will be treated with confidentiality.
- [Contractor’s] management will treat grievances seriously and take prompt and appropriate action.
- [Contractor’s] grievance mechanism does not replace other channels as defined by law or collective agreements.

The process below can be included within the policy:

**Informal discussion**

- Managers and workers are encouraged to use informal methods of resolving disagreements or disputes. If workers have a reasonable grievance or complaint regarding the workplace or the way they have been treated at work they should, where possible, start by discussing it with their manager. It may be possible to agree a solution informally between worker and manager.
- Every effort will be made by both management and workers to resolve complaints, grievances and disputes at the earliest possible opportunity and with the minimum opportunity for tension or conflict.

**Formal grievance**

- If the worker wishes to raise the matter formally, he/she should set out the grievance, preferably in writing, to his/her supervisor/manager. The worker’s statement should be factual in nature and avoid language that is insulting or abusive.
- Where the grievance is against the worker’s direct supervisor and the worker feels unable to approach that person, the worker should address the grievance to the Designated Manager at [the Contractor]. This is [insert name of manager].
- If there is a trade union at the workplace, the worker may wish to ask a union representative for advice and support.
- If a worker does not wish to identify themselves, they may submit a written anonymous complaint to the Designated Manager (see below) detailing the nature of the problem.

continued ...
Appendix 3
Template site-level grievance policy and procedure for contractors

Investigation and response

- [The Contractor] will appoint a Designated Manager who will investigate the worker's grievance. This is [insert name of the manager].
- The Designated Manager will call the worker to a meeting within 10 days after receiving the complaint to discuss the worker's grievance.
- The worker has the right to be accompanied by a colleague or trade union representative at this meeting if the worker makes such a request.
- After the meeting, the Designated Manager will give the worker a decision in writing within five days.

Appeal

- If the worker takes exception to the decision on a grievance and wishes to appeal, he/she should notify the Designated Manager. The worker will be invited to an appeal meeting within a defined time period, and the appeal will be heard by a more senior manager.
- The worker has the right to be accompanied by a colleague or trade union representative at this meeting if the worker makes such a request. Every effort should be made to secure a resolution in the best interests of the worker(s) and the company. After the meeting the senior manager/ombudsman will give the worker a decision in writing.
- This decision is final within the terms of the company's internal grievance mechanism. However, this does not prevent the worker from pursuing the matter through other legal processes.

Record keeping

- [The Contractor] will keep a record of grievances lodged and outcomes, and report these on a regular basis to [the Company].
Glossary of terms
Glossary of terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complainant</td>
<td>An individual, or group, that has submitted a grievance. Complainants may include individuals who allege harms against themselves, or who allege harms against others as a result of business activities.</td>
</tr>
<tr>
<td>Contractor</td>
<td>An individual or company that has entered into a contract with an oil and gas company to provide a service.</td>
</tr>
<tr>
<td>Grievance</td>
<td>Used interchangeably with complaints. Refers to an allegation, issue or problem that a person has related to their treatment or experience at work. This can cover a broad range of concerns, ranging from a complaint about the quality of food provided in the canteen, to serious and potentially illegal actions such as harassment and workplace discrimination. Can also be referred to as feedback or concerns.</td>
</tr>
<tr>
<td>Designated manager</td>
<td>Staff member(s) assigned with the responsibility of receiving grievances and handling the grievance process.</td>
</tr>
<tr>
<td>Direct employee</td>
<td>A worker directly contracted by an oil and gas company to carry out work.</td>
</tr>
<tr>
<td>Supply chain</td>
<td>Refers to the chain of suppliers providing materials, components, goods or products for use in the activities of companies. This includes suppliers of raw materials and suppliers of specific pieces or components for assembly/production.</td>
</tr>
<tr>
<td>Third-party worker</td>
<td>A worker performing work for a contractor, labour agent, supplier or other business partner that is providing a service or goods to an oil and gas company.</td>
</tr>
<tr>
<td>Remediation</td>
<td>The process of providing remedy for adverse impacts on workers’ rights. This may take a range of forms including apologies, ceasing the activity causing the alleged adverse impact, compensation, rehabilitation, punitive sanctions, as well as the prevention of future harms.</td>
</tr>
<tr>
<td>Worker grievance mechanism</td>
<td>A procedure through which a grievance can be raised by a worker, assessed, investigated and responded to. It is also a framework through which workers can gain access to remedy for any adverse impacts or damage they have suffered as a result of business activities.</td>
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</table>
IPIECA is the global oil and gas industry association for advancing environmental and social performance. It develops, shares and promotes good practice and knowledge through industry collaboration. IPIECA convenes a large portion of the global oil and gas industry across the value chain and is the industry’s principal channel of communication with the United Nations.

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