

To: Mr. Jesse Douglas, CEO  
Wolverine Energy and Infrastructure

9 December 2018, Brussels

**Regarding Wolverine Energy and Infrastructure's future license in occupied Western Sahara**

We are privileged to write to you. We are approaching you as we have seen your company mentioned in the documents submitted by PetroMaroc to SEDAR. The files suggest that Wolverine is to acquire PetroMaroc. Our association last week wrote a story about that possible acquisition on our website <https://www.wsrw.org/a105x4344>

Given our previous experience with PetroMaroc's approach to the conflict in Western Sahara, we take it for granted that the company has not presented to you correctly the legal aspects relating to the Zag license. The license is mostly located in occupied Western Sahara, not in Morocco, as PetroMaroc has consistently suggested. The falsely reported location of the license obfuscates the fact that the agreement is invalid, signed with the wrong government, as Morocco has no rights to issue such licences on the occupied land.

We hope your company has studied the ethical and legal risks involved in acquiring interests in a Moroccan license on occupied land. Such license is directly in violation of the rights of the people of Western Sahara, and thus their human rights.

We kindly ask you to reply to our association with a response to the following questions:

- 1) Has PetroMaroc stated to Wolverine that the Zag license is mostly located on land under foreign military occupation, pending a UN-sponsored decolonization process, and not in Morocco?
- 2) How has Wolverine assessed the legality of an oil license issued by Morocco outside of the internationally recognized borders of Morocco?
- 3) How does Wolverine consider the risk for legal steps against the interest holders of such license by the UN-recognized representatives of the people of the territory?

We also expect you to have noticed that San Leon Energy, the operator of the Zag block, was reported to the National Contact Point of the OECD Guidelines in Ireland by the association GLAN. The organization documented how such contract on the Zag license is in violation of the human rights paragraphs of the OECD Guidelines for Multinational Enterprises.

A copy of this mail has been sent to  
PetroMaroc  
National Contact Point of the OECD Guidelines for Multinational Companies in Canada

Sincerely

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