

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Oil & Natural Gas Corporation
Industry Extractives
Overall Score (*) 6.9 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
1.3	20	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations
2.6	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company is committed to conducting its business operations and strategies with the ten universally accepted principles in the area of Human rights, Child Labour, Anti-corruption and Environment. The Company also embraces and supports these ten principles, particularly that on Human rights: "Business should support and respect the protection of internationally proclaimed human rights. [Annual Report 2016-17, 2017: ongcindia.com] Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: ILO Core: The Company is committed conducting its business operations and strategies with the ten universally accepted principles in the area of Human rights Child Labour, Anti-corruption and environment. However the Company fails to publish a policy with commitment to respect and support forced labour, rights to collective bargaining and freedom of association. [Annual Report 2016-17, 2017: ongcindia.com] • Not met: UNGC principles 3-6 • Not met: All four ILO apply to EX BPs

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: All four ILO Core • Not met: Respect H&S of workers: The Company pursues its business activities in a safe and sustainable manner. All work practices, procedures and production endeavours comply with the highest Health, Safety and Environment standards as per the Industry norms, Government and relevant statutory bodies. All the products of the Company conform strictly to the respective product-making-procedures, laws, statutes and standards governing their production. However, there is no explicit reference to respecting the health and safety of workers to award this score. [Annual Report 2016-17, 2017: ongcindia.com] • Not met: H&S applies to Ex BPs
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Based on UN Instruments • Not met: VPs participant • Not met: Uses only ICoCA members • Not met: Respecting indigenous rights • Not met: ILO 169 • Not met: UNDRIP • Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Vol Guidelines on Tenure • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to respect all these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company conducts regular engagements both formal (solely for the purpose of sustainability reporting) and informal (business as usual process). These engagements enable ONGC group to develop mutually beneficial relationship with stakeholders. The Company also outlines in its Sustainability report the specific stakeholders groups it engages with and the mode of engagement. [Sustainability Report FY 2015, 2015: ongcindia.com] • Not met: Regular stakeholder engagement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: All policies are approved either by the Board or by designated competent authorities as authorised by Board. [Annual Report 2016-17, 2017: ongcindia.com] • Not met: Board level responsibility for HRs: All policies are approved either by the Board or by designated competent authorities as authorised by Board. It then goes on to say that each policy incorporates safeguards to ensure that its functioning is overseen by a Competent Authority/Commitment. There is no further information to clarify who is responsible of human rights within the Company. [Annual Report 2016-17, 2017: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key EX RH risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior responsibility fo HR (inc ILO) Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key EX HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR part of enterprise risk system Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Communicates its policy to all workers in own operations Score 2 <ul style="list-style-type: none"> Not met: Communication of policy commitments to stakeholder: The Company's policies and operational frameworks are available on the Company's website as well as its intranet. The Company goes on to describe engagement routes for various stakeholders such as customers, employees, contract workers and communities around areas of operation. The Company engages with the communities in and around areas of operation through CSR projects. The Company CSR Projects website details a number of these projects. [Annual Report 2016-17, 2017: ongcindia.com & CSR Projects, 29/05/2018: ongcindia.com] Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Steps to communicate policy commitments to BRs Not met: Including to EX BPs Score 2 <ul style="list-style-type: none"> Not met: How HR commitments made binding/contractual Not met: Including on EX BPs
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Trains all workers on HR policy commitments: Serval specialized and advanced training programmes are conducted across the Company. One of which includes human rights related training as part of its induction program. Training on human rights is related to aspects like preventing physical/verbal abuse, disrespectful treatment etc. Human rights training is given to all security personnel on a periodic basis. However, it is not clear whether training cover all ILO core areas. [Sustainability Report Financial Year 2016, 2016: ongcindia.com] Not met: Trains relevant managers including security personnel: The Company states that security personnel receive human rights training. There is information to suggest that managers receive this training also. However, it is not clear whether

Indicator Code	Indicator name	Score (out of 2)	Explanation
			training cover all ILO core areas. [Sustainability Report Financial Year 2016, 2016: ongcindia.com] Score 2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring EX BP's Score 2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR affects selection extractives business partners • Not met: HR affects on-going business partner relationships Score 2 • Not met: Both requirement under score 1 met • Not met: Working with business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Stakeholder process or systems: The Company's Sustainability report states that 'understanding the stakeholders expectations is an essential part of the groups sustainability approach through regular engagements'. Although the Company acknowledges the community around operations as a stakeholder there is no information which describes how the Company determines affected and potentially affect stakeholders as there's could occur at larger geographical scales. [Sustainability Report Financial Year 2016, 2016: ongcindia.com] • Not met: Frequency and triggers for engagement • Not met: workers in SP engaged • Not met: communities in the SC engaged Score 2 • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifying risks in own operations • Not met: identifying risks in EX business partners Score 2 • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including amongst EX BRs Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective

Indicator Code	Indicator name	Score (out of 2)	Explanation
	evaluating the effectiveness of actions to respond to human rights risks and impacts		<ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX BRs Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company has a four-tier Grievance Management system in place to address employee grievances related to policy/policies. The channel of grievance is 'Reporting Authority of Individual, Sectional in charge, Key Executive, Appeals Committee.' The Company also has a 'public grievance portal': 'Through this portal, we are committed to empower each stakeholder viz. Citizen/vendor/employee/former-employee to register grievances relating to any operational wing of ONGC'. [Annual Report 2016-17, 2017: ongcindia.com & Public Grievance Portal: grievance.ongc.co.in] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BP workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company 2016 Sustainability Report states that "for external stakeholders, the Company has a well laid down grievance redressal system in place with adequate provisions to escalate the matters up the hierarchy up to the Board." [Annual Report 2016-17, 2017: ongcindia.com & Public Grievance Portal: grievance.ongc.co.in] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects EX BP to have community grievance systems • Not met: EX BP communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: The Company describes grievance channels for employees and external stakeholders to escalate matters/issues. Although the Company has introduced an E-Grievance handling mechanism for quick redressal of grievances of various stakeholders there is no further information relating to grievance response timescales. [Annual Report 2016-17, 2017: ongcindia.com] • Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company states that external stakeholders grievance matters can be escalated to the Board. However, there is no information on how internal (employee and worker) grievances can be escalated and to higher levels. [Annual Report 2016-17, 2017: ongcindia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation • Not met: Practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BRs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe: The Company ensures compliance with various labour protection Acts such as Payment of Wages Act 1936 and Minimum Wages Act 1948. However, there is no mention of a target timeframe to pay all workers the living wage. • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews living wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Member of EITI: The Company is not a member of Extractive Industry Transparency Initiative (EITI). [EITI Members Registry, 2018: eiti.org] Score 2 <ul style="list-style-type: none"> • Not met: Reports of taxes beyond legal minimums • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: Recordable Incidents in FY16 were 483 for ONGC and 44 for ONGC (Videsh). [Sustainability Report Financial Year 2016, 2016: ongcindia.com] • Met: Lost days or near miss disclosures: Lost days in FY16 were 818 for ONGC and 214 for ONGC (Videsh). [Sustainability Report Financial Year 2016, 2016: ongcindia.com] • Met: Fatalities disclosures: The number of fatalities was 9 for ONGC and 2 for ONGC (Videsh). [Sustainability Report Financial Year 2016, 2016: ongcindia.com] Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment Score 2 <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach Score 2 <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks Score 2 <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Land rights • Headline: Allegation that the Shwe Gas pipeline project has been the cause of land grabs • Sources: EarthRights International, 31/12/2015 - burmapartnership.org and earthrights.org Shwe Gas Movement, 30/09/2013 - burmacampaign.org.uk International Business Times, 21/10/2013 • Allegation: Human rights groups and local communities in Burma (Myanmar) have alleged that the Shwe Gas pipeline project has been the cause of human rights abuses, land grabs and large-scale pollution. The 2,500km pipeline runs from western Burma to China and the project is operated by a consortium comprising state-owned China Natural Petroleum Corporation (CNPC) with 50.9%, Myanmar Oil and Gas Enterprise (MOGE) holds 7.37%, Daewoo 25.04%, Korean Gas Corporation 4.17%, GAIL 4.17% and ONGC 8.35%. Shwe Gas Movement (SGM) and EarthRights International (ERI) alleged that fishermen and farmers lost their land because of environmental destruction and land confiscation.
E(1).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation. Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has improved systems and engaged affected stakeholders: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.63 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Oil & Natural Gas Corporation made data public that met one or more elements of the methodology in 6 cases, leading to a disclosure score of 0.63 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company Sustainability Report FY16 was prepared in accordance with core GRI G4. [Sustainability Report Financial Year 2016, 2016: ongcindia.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Oil & Natural Gas Corporation met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.