

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** PTT  
**Industry** Extractives  
**Overall Score (\*)** 17.5 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
3.0	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
5.0	20	D. Performance: Company Human Rights Practices
3.5	20	E. Performance: Responses to Serious Allegations
3.0	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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: PTT states that it adheres to human rights principles as prescribed by law, and to international standards such as the United Nations Universal Declaration of Human Rights (UNUDHR), the UN Framework and Guiding Principles on Business and Human Rights (Ruggie Framework), and principles of the United Nations Global Compact (UNGC). PTT is a UNGC signatory. In its Sustainability Management Policy it states that it 'encourages practices within PTT Group that respect human rights, cultures, and individual rights granted by the law, covering all stakeholder groups within PTT Group's operational boundary, and in accordance with the following international principles: United Nations Global Compact (UNGC) Principles on Human Rights, United Nations Universal Declaration of Human Rights (UNDHR), United Nations Framework and Guiding Principles on Business and Human Rights (Ruggie Framework: Protect, Respect, Remedy).'</li> </ul> <p>[Sustainability: People webpage, June 2018: <a href="http://pttplc.com">pttplc.com</a> &amp; PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: UNGPs: as above</li> <li>Met: OECD: PTT states that it has a human resource management policy in place that respects human rights, labor rights and fair treatment in accordance with... the UN "Protect, Respect and Remedy" Framework for Business and Human Rights, the International Labor Organization (ILO), and the OECD Guidelines for Multinational Enterprises. [Sustainability: People webpage, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	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"> <li>• Met: ILO Core: The Company's Sustainability Management Policy states that its human rights scope covers the basic rights and freedoms granted to all individuals. This scope of issues under PTT and PTT subsidiaries responsibilities include: working conditions, freedom of association and collective bargaining, forced and compulsory labour, child labour, safe and healthy working conditions, and discrimination. [PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: All four ILO apply to EX BPs: The scope of the Sustainability Management Policy does not cover business partners. The Company's Supplier Sustainable Code of Conduct expects suppliers to adhere to minimum human rights standards, but the scope does not include collective bargaining. [PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a> &amp; PTT Supplier Sustainable Code of Conduct, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: All four ILO Core</li> <li>• Not met: Respect H&amp;S of workers</li> <li>• Not met: H&amp;S applies to Ex BPs</li> </ul>
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"> <li>• Not met: Based on UN Instruments: The Company states that it is 'currently not a participant of the Voluntary Principles on Security and Human Rights, however it PTT operates by endorsing accordingly to the Principles which align to PTT Group Security Management Standard.' It has not made the Group Security Management Standard available and does not provide any additional details. [Sustainability: People webpage, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: VPs participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights: The Company states that indigenous people are one of the stakeholder groups it focuses on to create a sustainable positive impact in its host communities and to respect all human rights where they operate. However, it does not include an explicit commitment to respect the rights of indigenous people. [PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: ILO 169</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment</li> <li>• Not met: Vol Guidelines on Tenure</li> <li>• Not met: IFC performance standards</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expects BPs to respect all these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	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"> <li>• Not met: Commits to stakeholder engagement: The Company commits to engagement with its 6 main stakeholder groups - Country, Community and Society, Shareholders, Customers, Partners, and Employees. The Company states that it 'is committed to engaging with stakeholders through a fair, efficient, and systematic approach, to identify important stakeholders, integrate their expectations into company strategy, and consistently monitor and communicate with relevant stakeholders'. 'It is vital for PTT to engage with these diverse groups to not only be able to understand and prioritize its own material issues, but also effectively respond to the sustainability challenges and opportunities that may affect each stakeholder group.' However, it does not commit to engaging with potentially and actually affected stakeholders on its human rights issues. [Corporate Sustainability Report 2017, December 2017 &amp; PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
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"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs: The Company's Sustainability Management Policy outlines the steps taken in the identification, management and review of human rights issues, stating that 'The sustainability management function must identify and prioritize improvement opportunities, and work towards short- and long-term improvements, and present findings to: Management and the Board of Directors for opinions, recommendations, and any additional improvements opportunities.' However, it does not describe the process it has in place to discuss and address human rights issues at Board level or how the Board or a Board committee regularly reviews the Company's salient human rights issue. [PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a> ] Score 2 • Not met: Examples or trends re HR discussion • 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 • Not met: Incentives for at least one board member • Not met: At least one key EX RH risk, beyond employee H&S Score 2 • 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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Senior responsibility fo HR (inc ILO): The Company's website states that "PTT assigned Corporate Management Function and Sustainability Function, chaired by senior executive vice president on corporate management and sustainability, to manage and develop human rights management system. PTT Group Sustainability Management Project oversees the performance, ensuring it is in alignment with PTT Group human rights management system." Company's policies cover all ILO core areas. [Sustainability: People webpage, June 2018: <a href="http://pttplc.com">pttplc.com</a> & PTT Human Rights Risk Assessment, June 2018: <a href="http://pttplc.com">pttplc.com</a> ] Score 2 • 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 • Not met: Senior manager incentives for human rights • Not met: At least one key EX HR risk, beyond employee H&S Score 2 • 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 • Not met: HR part of enterprise risk system: The Company states that it ' PTT's 2017 annual human rights risk assessment covered the Group's activities and operations in 82 locations globally. The assessment revealed that 23 of PTT Group's operational areas (or 28% of total operations) have a possibility to be at risk of human rights violations and are at a level which requires continuous monitoring.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>These plausible risks are: unsafe working conditions, occupational health and safety, forced labor, violations of community rights in operational areas, and the rights of minorities and vulnerable groups. To mitigate these risks, PTT Group has developed the necessary control measures and action plans for 100% of its high-risk areas, thus ensuring that any risks have been thoroughly inspected, monitored, and managed within controllable limits.' However it is not clear whether the Company integrates attention to human rights risks into its broader enterprise risk management system. [Corporate Sustainability Report 2017, December 2017]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> <li>• Not met: Communicates its policy to all workers in own operations: The Company states 'PTT's employees receive regular training and knowledge-sharing on human rights issues. Since 2014, the company has held the PTT Group Sustainability Management training course, which covers content on human rights and business, risks and opportunities, and best practices on human rights management. A total of 24 of the Sustainability Management classes have been held for 79% of all employees in the organization. Over the past year PTT has, in addition, organized a technical seminar on 'Business and Human Rights' for PTT Group management and employees to understand the importance of respecting human rights in business, and of collaborating with other businesses, the public sector and civil society to push for the successful implementation of human rights principles.' The Company does not state that all employees were communicated, whether it communicates these principles to all stakeholders, or makes it accessible to all audiences. [Corporate Sustainability Report 2017, December 2017] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul> </li></ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> <li>• Not met: Steps to communicate policy commitments to BRs: The Company states in PTT Supplier Sustainable Code of Conduct that 'PTT's suppliers are obligated, in all of their activities, to operate in full compliance with the laws and regulations of the countries in which they operates while upholding the PTT policies concerning compliance with all applicable laws, Business Ethics, Human Rights, Health and Safety and Environment as indicated in each subsection of this code'. The Company states in this code of conduct that it expects its suppliers and contractors to maintain a strong commitment to Freedom of Labour, Freedom of Association, Prevention of Child Labour, and Non-Discrimination. However, the Company does not refer to collective bargaining in the supplier code of conduct. [PTT Supplier Sustainable Code of Conduct, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Including to EX BPs</li> </ul>
B.1.5	Training on Human Rights	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"> <li>• Not met: Trains all workers on HR policy commitments: The Company states in its Sustainability report that 'since 2014, the company has held the PTT Group Sustainability Management training course, which covers content on human rights and business, risks and opportunities, and best practices on human rights management. A total of 24 of the Sustainability Management classes have been held for 79% of all employees in the organization. Over the past year PTT has, in addition, organized a technical seminar on 'Business and Human Rights' for PTT Group management and employees to understand the importance of respecting human rights in business, and of collaborating with other businesses, the public sector and civil society to push for the successful implementation of human rights principles.' It does not disclose any documents in which it states that it trains all relevant managers and workers on the HRs commitment(s). [Corporate Sustainability Report 2017, December 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Trains relevant managers including security personnel</li> </ul>
B.1.6	Monitoring and corrective actions	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"> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Not met: Monitoring EX BP's</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR affects selection extractives business partners</li> <li>• Not met: HR affects on-going business partner relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with business partners to improve performance</li> </ul>
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 <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The Company has stakeholder engagement processes in place, and has identified key stakeholder groups, however, it has not disclosed any public documents with description of its systems and/or processes to identify affected stakeholders in relation to human rights issues. [Corporate Sustainability Report 2017, December 2017]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: workers in SP engaged</li> <li>• Not met: communities in the SC engaged</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## 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 <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: The Company states ' PTT's 2017 annual human rights risk assessment covered the Group's activities and operations in 82 locations globally. The assessment revealed that 23 of PTT Group's operational areas (or 28% of total operations) have a possibility to be at risk of human rights violations and are at a level which requires continuous monitoring. These plausible risks are: unsafe working conditions, occupational health and safety, forced labor, violations of community rights in operational areas, and the rights of minorities and vulnerable groups. To mitigate these risks, PTT Group has developed the necessary control measures and action plans for 100% of its high-risk areas, thus ensuring that any risks have been thoroughly inspected, monitored, and managed within controllable limits.' However, it does not describe the process for identifying risks, and it is not clear whether human rights assessments include extractive business partners of its systems and/or processes to identify affected stakeholders. [Corporate Sustainability Report 2017, December 2017]</li> <li>• Not met: identifying risks in EX business partners</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company assesses human rights impact levels according to its 'Risk Rating Scale: Impact' which include minor, moderate, major, and critical levels. It also assesses likelihood of human rights risk according to its 'Risk Rating Scale: Likelihood'. Based on the assessment, identified risk issues include employment practices within PTT Group's supply chain, environmental management and stakeholder engagement around PTT's Group operations. The percentage of operational sites with high risks is 31% of the total operational sites in PTT Group, accounted for 20 sites from 65 sites. Of all the high risk areas, the percentage of sites with mitigation plans in place in 2016 is approximately 50%. However the Company does not explain the process for identifying salient risks, which human rights aspects are considered and whether it considers the impacts on stakeholders. [PTT Human Rights Risk Assessment, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company states that it ' PTT's 2017 annual human rights risk assessment covered the Group's activities and operations in 82 locations globally. The assessment revealed that 23 of PTT Group's operational areas (or 28% of total operations) have a possibility to be at risk of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>human rights violations and are at a level which requires continuous monitoring. These plausible risks are: unsafe working conditions, occupational health and safety, forced labor, violations of community rights in operational areas, and the rights of minorities and vulnerable groups. To mitigate these risks, PTT Group has developed the necessary control measures and action plans for 100% of its high-risk areas, thus ensuring that any risks have been thoroughly inspected, monitored, and managed within controllable limits.' [Corporate Sustainability Report 2017, December 2017]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Example of Actions decided</li> <li>• Not met: Including amongst EX BRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including EX BRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### 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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: PTT has set up channels to respond to and manage human rights-related grievances from all its stakeholders – inside and outside of the organization. Internal channels for employees include the labor unions and the labor relations grievance system, whereas external channels for non-employees and the public are the customer relations center, the Office of the President and the company secretariat, and the investor relations department [Corporate Sustainability Report 2017, December 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company states 'In 2017, there were no grievances related to human rights violations, or actions in violation of human rights laws. ' [Corporate Sustainability Report 2017, December 2017]</li> <li>• Not met: Channel is available in all appropriate languages: It is not clear whether the channels are communicated and available in all languages, nor whether the Company expects business partners to have their own grievance channels.</li> <li>• Not met: Expect EX BPs to have equivalent grievance system</li> <li>• Not met: Opens own system to EX BP workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or	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"> <li>• Not met: Grievance mechanism for community: PTT has set up channels to respond to and manage human rights-related grievances from all its stakeholders – inside and outside of the organization. External channels for non-employees and the public are the customer relations centre, the Office of the President and the</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
	concerns from external individuals and communities		company secretariat, and the investor relations department. It is not clear the extent to which this is accessible to all external individuals and communities who may be adversely impacted by the Company, or how these mechanisms are made available to local community. [Corporate Sustainability Report 2017, December 2017] Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects EX BP to have community grievance systems</li> <li>• Not met: EX BP communities use global system</li> </ul>
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"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: EX BPs in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Response timescales: The Company states in its CSR report that 'PTT also realizes the importance of protecting all who have come forward with grievances, and has therefore mandated that grievances must be resolved within a specified timeframe. For employee grievances, this means no more than 30 days. Externally-filed grievances, on the other hand, must be investigated, resolved, and reported back to the issue owner (either on its successful resolution or, should the process take longer, its status) within 7 working days.' [Corporate Sustainability Report 2017, December 2017]</li> <li>• Not met: How complainants will be informed: The Company states on its website that 'a Grievance Resolution Committee is established to deal with incidents on a case-by-case basis, with a representative from the HR department serving as one of the committee's members. Employees are able to file formal complaints to the human resources department of each business unit; directly to the employee relations division of the human resource department by internet or phone; through a Joint Consultant Committee (JCC) representative; or the State Enterprise Employees Union of PTT Public Company Limited'. PTT also states that employees who report a grievance can track its status via the employee relations grievance system. However, the Company does not provide this information in relation to external stakeholders and communities.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
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"> <li>• Not met: Public statement prohibiting retaliation</li> <li>• Not met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects EX BRs to prohibit retaliation</li> </ul>
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"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
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"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## 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"> <li>• Not met: Living wage target timeframe</li> <li>• Not met: Describes how living wage determined</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Pays living wages</li> <li>• Not met: Reviews livings wages definition with unions</li> </ul>
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Member of EITI</li> <li>• Met: Reports of taxes beyond legal minimums: PTT discloses revenues, taxes and royalties by countries for the year 2017 in the separate document 'Consolidated Revenue Transparency 2017' [Consolidated Revenue Transparency 2017, December 2017: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Reports taxes and revenue by country: As above. [Consolidated Revenue Transparency 2017, December 2017: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Steps taken re non EITI countries</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>
D.3.3	Freedom of association and collective bargaining (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"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation</li> <li>• Met: Discloses % covered by collective bargaining: According to PTT's website, 2,935 employees are members of PTT labor union, or 65.42% of total employees. [Performance, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
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"> <li>• Met: Injury Rate disclosures: Lost time injury frequency rate (per 200,000 hours worked) = 0.02 (2017) [Corporate Sustainability Report 2017, December 2017]</li> <li>• Met: Lost days or near miss disclosures: Lost day rate (per 200,000 hours worked) = 0.05 (2017) [Corporate Sustainability Report 2017, December 2017]</li> <li>• Met: Fatalities disclosures: Fatalities = 0 (2017) [Corporate Sustainability Report 2017, December 2017]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance</li> <li>• Not met: Met targets or explains why not</li> </ul>
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"> <li>• Not met: Process to identify indigenous rights holders</li> <li>• Not met: How engages with communities in assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to FPIC (or ICMM)</li> <li>• Not met: Gives recent example FPIC or dropping deal</li> </ul>
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"> <li>• Not met: Approach to identification of land tenure rights holders</li> <li>• Not met: Describes approach to doing so if no recent deals</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works</li> <li>• Not met: Steps to meet IFC PS 5 in state deals</li> <li>• Not met: Describes approach if no recent deals</li> </ul>
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"> <li>• Not met: How implements security (inc VPs or ICOC)</li> <li>• Not met: Example of respecting HRs in security</li> <li>• Not met: Ensures Business Partners follow security approach</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Assesses and involves communities</li> <li>• Not met: Working with local community</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not met: Action to prevent water and sanitation risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors</li> <li>• Not met: Reports progress in meeting targets and shows trends in progress made</li> </ul>

### 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		No allegations meeting the CHRB severity thresholds were found, and so the score of 13.98 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.49 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.95 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, PTT made data public that met one or more elements of the methodology in 9 cases, leading to a disclosure score of 0.95 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"> <li>• Met: Company reports on GRI: The Company reports against the GRI indicators, and includes a table on their website with reference to the relevant pages in the Sustainability report. [PTT GRI Reporting table, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	PTT 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"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)</li> <li>• Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)</li> </ul>

#### 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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd,

unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

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.