

Company Name CNOOC
Industry Extractives
Overall Score (*) 4.2 out of 100

Theme Score	Out of	For Theme
1.2	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
2.5	20	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations
0.5	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 2019 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	<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: General HRs commitment: The Chairman's statement on the CSR Report states 'We stepped up our efforts in sustainable development, adhering to the Ten Principles of the UN Global Compact in the areas of human rights, labour, environment and anti-corruption.' The Company also states 'The Board of Directors (the "Board") of SNOOC Limited actively supports the Company's commitment to CSR and gives close attention to CSR Progress. This includeshuman rights issues related to sustainable development.' The Company also states 'CNOOC Limited respects the basic human rights which all employees are entitled to in accordance with the laws in each jurisdiction.' [Environmental, Social & Governance Report 2018, 11/04/2019: cnooc.com] Met: UNGC principles 1 & 2: 'The Company is a member of the UNGC. The Company states that it 'adheres to the Ten Principles of the UN Global Compact in the areas of human rights, labour, environment and anti-corruption. [Environmental, Social & Governance Report 2018, 11/04/2019: cnooc.com] Not met: UDHR Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: UNGC principles 3-6: Being a member of the UN Global Compact, the Company will fully comply with the 10 principles advocated by the Global Compact and fulfil our responsibility in the areas of human rights, labor rights, environmental protection and anti-corruption. [Environmental, Social & Governance Report 2018, 11/04/2019: cnoccltd.com] Not met: Explicitly list All four ILO apply to EX BPs Score 2 <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core Not met: Respect H&S of workers Not met: H&S applies to EX BPs
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Based on UN Instruments Not met: Voluntary Principles (VPs) participant Not met: Uses only ICoCA members Not met: Respecting indigenous rights Not met: ILO 169 Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) Not met: Expects BPs to respect these rights Score 2 <ul style="list-style-type: none"> Not met: FPIC commitment Not met: Voluntary Guidelines on Tenure Rights Not met: IFC performance standards Not met: Zero tolerance for land grabs Not met: Respecting the right to water Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to stakeholder engagement: The Company states 'we will work together with stakeholders and make social responsibility an engine that drives the Company and society forward together.' The Company also states 'To fully communicate with stakeholders to understand their expectations and demands is the foundation of our social responsibility and sustainable development. We have been always communicating with stakeholders on multiple social responsibility issues through an open, transparent and multichannel mechanism.' However, the Company does not disclose a public document stating its commitment to engage with its potentially and actually affected stakeholders [Environmental, Social & Governance Report 2018, 11/04/2019: cnoccltd.com] Not met: Regular stakeholder engagement Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to remedy Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: CEO or Board approves policy: The Company disclosed in its response to Business and human rights resources centre action platform that 'Audit Committee of the Company' has oversight of human rights issues. However it has not published any documents stating that its human rights policy is approved at board level or by CEO. [BHRR Action Platform: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company states that the board ' actively supports the Company's commitment to CSR and gives close attention to CSR progress. This includes strategy and risks, performance, internal operations, occupational health and safety, environment, and human rights issues related to sustainable development and CSR, as well as the methods and results of compliance in operations and sales.' [Environmental, Social & Governance Report 2018, 11/04/2019: cnoocLtd.com] Score 2 <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The Company's chairman's statement includes a commitment to human rights. [Environmental, Social & Governance Report 2018, 11/04/2019: cnoocLtd.com]
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: The Company Board actively supports the Company's commitment to CSR and gives close attention to CSR progress. This includes strategy and risks....health and safety, environment, and human rights issues related to sustainable development and CSR, as well as the methods and results of compliance in operations and sales.' However, the Company has not specified that the board reviews the salient human rights risks or the process it has in place to discuss these risks. [Environmental, Social & Governance Report 2018, 11/04/2019: cnoocLtd.com] Score 2 <ul style="list-style-type: none"> • 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"> • Met: Commits to ILO core conventions • Not met: Senior responsibility for HR 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 risks is integrated as 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"> • Met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations Score 2 <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy to EX contractors and joint ventures • Not met: Including to EX BPs (removed)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	to business relationships		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: Scores at least 1 on A.1.2 Not met: Trains all workers on HR policy commitments Not met: Trains relevant EX managers including security personnel Score 2 <ul style="list-style-type: none"> Not met: Score of 2 on A.1.2 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 <ul style="list-style-type: none"> Not met: Scores at least 1 on A.1.2 Not met: Monitoring implementation of HR policy commitments Not met: Monitoring EX BP's Score 2 <ul style="list-style-type: none"> Not met: Score of 2 on A.1.2 Not met: Describes corrective action process Not met: Example of corrective action Not met: Discloses % of EX supply chain monitored
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"> Not met: HR affects selection EXs business partners Not met: HR affects on-going EX business partner relationships Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met Not met: Working with EX 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 <ul style="list-style-type: none"> Not met: Stakeholder process or systems Not met: Frequency and triggers for engagement Not met: Engagement includes EX business partners workers Not met: Engagement includes EX business partners communities Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not met: Identifying risks in own operations: The Company discusses identifying safety risks. In 2018, the Company established the CNOOC Limited HSE Management System (CHSEMS) and states that the system 'was trialled in selected subsidiaries.' However, it is not clear whether this includes identifying risks in the Company's own operations. [Environmental, Social & Governance Report 2018, 11/04/2019: cnooc.com] Score 2 <ul style="list-style-type: none"> Not met: identifying risks in EX business partners 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 <ul style="list-style-type: none"> Not met: Salient risk assessment (and context) Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks Not met: Including amongst EX BPs Not met: Example of Actions decided

Indicator Code	Indicator name	Score (out of 2)	Explanation
	findings internally and taking appropriate action		Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • 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 • 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 business partners Score 2 • 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	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Channel accessible to all workers: The Company states 'CNOOC Limited and its subsidiaries have set up full-time and part-time organizations and positions to handle complaints and grievances. Anyone can make reports, allegations and grievances about violations and breaches of regulations to management, compliance monitoring personnel, legal advisers, internal audit department or other relevant departments of the subsidiaries by letter, in person, telephone, or email, etc.' However, it is not clear whether this grievance mechanism covers human rights risks. [Environmental, Social & Governance Report 2018, 11/04/2019: cnooc.com] Score 2 • 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 BPs workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Grievance mechanism for community Score 2 • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs 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 • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Response timescales • Not met: How complainants will be informed

Indicator Code	Indicator name	Score (out of 2)	Explanation
	publicly available and explained		Score 2 • Not met: Escalation to senior/independent level
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 • Not met: Public statement prohibiting retaliation: The Company states in its Code of Ethics for Directors and Senior Officers 'A director or Senior Officer will not be penalized for making a good-faith report of violations of this Code of Ethics or other illegal or unethical conduct, nor will we permit retaliation of any kind against anyone who makes a good-faith report'. However, this does not cover broader workers and other stakeholders. [Code of Ethics for Directors and Senior Officers, August 2018: cnoccltd.com] • Not met: Practical measures to prevent retaliation Score 2 • Not met: Has not retaliated in practice • Not met: Expects EX BPs 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 • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 • 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 • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 • 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 • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined Score 2 • 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 • Not met: Member of EITI • Not met: Reports of taxes and revenues beyond legal minimums: The Company discloses its tax payments (including income tax, value-added tax, mineral fee, resource tax and etc.). However, the Company does not go into further details on tax payments. [Environmental, Social & Governance Report 2018, 11/04/2019: cnoccltd.com] Score 2 • 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 • 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 • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The Company discloses recordable incidents and the rate of recordable incidents for employees and employees and direct contractors for the past three years. According to OSHA statistical methods, all indicators (except for total work hours) are calculated on the basis of 200,000 man-hours. [Environmental, Social & Governance Report 2018, 11/04/2019: cnoccltd.com] • Met: Lost days or near miss disclosures: The Company discloses the cases of lost work days and the rate of lost work days for the past three years. According to OSHA statistical methods, all indicators (except for total work hours) are calculated on the basis of 200,000 man-hours. [Environmental, Social & Governance Report 2018, 11/04/2019: cnoccltd.com] • Met: Fatalities disclosures: The Company reports that they had one direct contractor casualty in 2017 on the basis of 200,000 man hours. The Company reports the casualty rates for the past three years. [Environmental, Social & Governance Report 2018, 11/04/2019: cnoccltd.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
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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Action to prevent water and sanitation risks: The Company reports on water saving and fresh water consumption. In addition, the Company states that "freshwater conservation was achieved through measures such as seawater desalination; the Company consumed less freshwater per unit of production by optimizing the production process; employees' awareness of water resources crisis and water conservation was enhanced by active water conservation promotion." [Environmental, Social & Governance Report 2018, 11/04/2019: cnoccltd.com] 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"> • Headline: Lawsuit filed over 2011 oil spill in China in addition to fines imposed on CNOOC and Conoco Phillips • Area: Environmental damage • Story: In 2011, 3,000 barrels of oil polluted 6,200 square km of water in the Bohai Bay area. The well was owned by ConocoPhillips and CNOOC. In April 2012, a Chinese court ordered CNOOC and ConocoPhillips to pay CAD 269,000 to 21 fishermen who claimed that economic interests and their livelihoods and economic activity have been severely damaged after the oil spill. However, the claimants of the case states that they have not been compensated by the companies yet. ConocoPhillips and CNOOC already have paid about CAD 270 million to the State Oceanic Administration, which governs maritime issues in China. In addition, the two companies also agreed with China's Ministry of Agriculture to pay CAD 160 million to settle claims related to the spill. Furthermore, under a damage compensation agreement, CNOOC paid CAD 70.84 million for environmental protection efforts in Bohai Bay. In July 2015, a lawsuit was filed by a Chinese NGO (China Biodiversity Conservation and Green Development Foundation) against ConocoPhillips and CNOOC requesting the companies to conduct further clean-up in the area. The plaintiff in the trial which has been heard in 2016, demands that the two companies "immediately repair the damage in the Bohai Bay ecosystem" • Sources: [Reuters, 26/7/2015: reuters.com][China Daily, 27/7/2015: chinadaily.com.cn][Oilprice.com, 28/7/2015: oilprice.com][Global Time, 28/12/2016: globaltimes.cn]
E(1).1	The Company has responded publicly to the allegation	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: Public response available: CHRB could not find the evidence of the Company's response in public regarding this case other than through the court cases. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The Company states that "Adhering to the idea of a "Green, Low carbon, Clean, and Circular Economy", CNOOC Limited has stepped up its efforts to build an "Energy-saving and Environment-friendly" enterprise". However, there is no clear commitment. [Environmental, Social & Governance Report 2017, 19/04/2018: cnooltd.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(1).3	The Company has taken 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"> • Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders. • Not met: Provides remedies to affected stakeholders: The Company has paid compensation to some stakeholders, not all of them: ConocoPhillips and CNOOC already have paid about CAD 270 million to the State Oceanic Administration, which governs maritime issues in China. In addition, the two companies also agreed with China's Ministry of Agriculture to pay CAD 160 million to settle claims related to the spill. Furthermore, under a damage compensation agreement, CNOOC paid CAD 70.84 million for environmental protection efforts in Bohai Bay. In April 2012, a Chinese court ordered CNOOC to pay CAD 269,000 to 21 fishermen who claimed that economic interests and their livelihoods and economic activity have been severely damaged after the oil spill. However, the claimants of the case states that they have not been compensated by the companies yet. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. • Not met: Remedies are satisfactory to the victims: See above. • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company improving the system or engaging with stakeholders followed by the case.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.53 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, CNOOC made data public that met one or more elements of the methodology in 5 cases, leading to a disclosure score of 0.53 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Not met: Company reports on GRI: The Company has an ESG Reporting Guideline index. However, it is not clearly reported under the GRI reporting standards. [Environmental, Social & Governance Report 2018, 11/04/2019: cnooc.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	CNOOC 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 2019 Key Findings report and technical annex 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.