Corporate Human Rights Benchmark
2019 Company Scoresheet

Company Name: China Petroleum & Chemical Industry: Extractives
Overall Score (*): 4.8 out of 100

<table>
<thead>
<tr>
<th>Theme Score</th>
<th>Out of</th>
<th>For Theme</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2</td>
<td>10</td>
<td>A. Governance and Policies</td>
</tr>
<tr>
<td>0.0</td>
<td>25</td>
<td>B. Embedding Respect and Human Rights Due Diligence</td>
</tr>
<tr>
<td>0.0</td>
<td>15</td>
<td>C. Remedies and Grievance Mechanisms</td>
</tr>
<tr>
<td>0.0</td>
<td>20</td>
<td>D. Performance: Company Human Rights Practices</td>
</tr>
<tr>
<td>1.3</td>
<td>20</td>
<td>E. Performance: Responses to Serious Allegations</td>
</tr>
<tr>
<td>2.3</td>
<td>10</td>
<td>F. Transparency</td>
</tr>
</tbody>
</table>

(*) 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)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1.2</td>
<td>Commitment to respect the human rights of workers</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Company states that it &quot;strictly comply with laws and regulations relative to labor and employment” as well as safeguards employees' freedom of association, recognises bargaining rights, eliminates all kinds of compulsory labour and forbids to use child labour. The Company also has no discriminative regulations or acts upon race, colour, social class, nationality, religion, disability, sex, sexual orientation, union membership, political affiliation or age etc. regarding staff recruitment, salary, promotion, dismissal and retirement issues. [5 Care for Employees, n/q: sinopec.com]</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
</tr>
<tr>
<td>----------------</td>
<td>----------------</td>
<td>-----------------</td>
<td>-------------</td>
</tr>
<tr>
<td>A.1.3.EX</td>
<td>Commitment to respect human rights particularly relevant to the industry (EX)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • 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 • 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</td>
</tr>
<tr>
<td>A.1.4</td>
<td>Commitment to engage with stakeholders</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to stakeholder engagement: The Company made a study of the issues that concerned stakeholders, formulated corporate action targets and schemes, actively diversified channels for social responsibly communication and disclosed its corporate responsibility philosophy and fulfilment to stakeholders. However, this information does not provide insights to a commitment to engage with potentially and actually affected stakeholders to award this score. [Social Responsibility Report 2015, 2015: sinopecgroup.com] • Not met: Regular stakeholder engagement Score 2 • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement</td>
</tr>
<tr>
<td>A.1.5</td>
<td>Commitment to remedy</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to remedy Score 2 • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts</td>
</tr>
<tr>
<td>A.1.6</td>
<td>Commitment to respect the rights of human rights defenders</td>
<td>0</td>
<td>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</td>
</tr>
</tbody>
</table>

A.2 Policy Commitments (5% of Total)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.2.1</td>
<td>Commitment from the top</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: CEO or Board approves policy: The Company does not have a human rights policy.</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
</tr>
<tr>
<td>----------------</td>
<td>----------------</td>
<td>-----------------</td>
<td>-------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Met: Board level responsibility for HRs: According to the Communication on progress report, the &quot;Social Responsibility Management Committee&quot; of the Board is responsible for CSR management strategies, plans, and the annual social responsibility planning, and for making recommendations to the Board. [Communication on Progress for Sustainable Development, 24/03/2017: sinopec.com] Score 2</td>
<td></td>
</tr>
</tbody>
</table>

A.2.2 Board discussions 0 The individual elements of the assessment are met or not as follows: Score 1 Met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 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 Met: Commits to ILO core conventions Not met: Senior responsibility for HR Score 2 Not met: Day-to-day responsibility Not met: Day-to-day responsibility for EX BRs |

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)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>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 Met: Commits to ILO core conventions Not met: Senior responsibility for HR Score 2 Not met: Day-to-day responsibility</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 risks is integrated as part of enterprise risk system: Through daily communication with NGOs and rating organisations, [the Company] outlined material issues related to risk management, human rights, safety, environmental protection and greenhouse gas emissions. However the distinction between material issues and enterprise risk management is unclear and hence score has not been awarded. [Communication on Progress for Sustainable Development, 24/03/2017: sinopec.com] Score 2 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 Met: Commits to ILO core conventions Not met: Communicates its policy to all workers in own operations Score 2 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) to business relationships 0 The individual elements of the assessment are met or not as follows: Score 1 Not met: Commits to all 4 ILO core conventions for suppliers Not met: Communicating policy to EX contractors and joint ventures: The Company actively advocates that its partners, suppliers and contractors should be in compliance with relevant [respect and safeguard] to all human rights recognised by the international community. However, the Company fails to describe how this information is passed on to its business relationships. [5 Care for Employees, n/q: sinopec.com] Not met: Including to EX BPs (removed) |
<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
|                |                | Score 2         | 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         | Not met: Scores at least 1 on A.1.2  
|                |                |                 | Not met: Trains all workers on HR policy commitments  
|                |                | Score 2         | Not met: Trains relevant EX managers including security personnel  
|                |                |                 | 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         | Not met: Scores at least 1 on A.1.2  
|                |                |                 | Not met: Monitoring implementation of HR policy commitments  
|                |                | Score 2         | Not met: Monitoring EX BP's  
|                |                |                 | 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         | Not met: HR affects selection EXs business partners  
|                |                |                 | Not met: HR affects on-going EX business partner relationships  
|                |                | Score 2         | 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         | Not met: Stakeholder process or systems  
|                |                |                 | Not met: Frequency and triggers for engagement  
|                |                | Score 2         | Not met: Engagement includes EX business partners workers  
|                |                |                 | Not met: Engagement includes EX business partners communities  
|                |                |                 | Not met: Analysis of stakeholder views and company’s actions on them |

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

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| 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  
|                |                | Score 2         | Not met: In consultation with HR experts  
|                |                |                 | Not met: Triggered by new circumstances  
|                |                | Score 2         | 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: Including amongst EX BPs  
|                |                | Score 2         | Not met: Example of Actions decided  
<p>|                |                |                 | Not met: Both requirements under score 1 met              |</p>
<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.2.4</td>
<td>Tracking:Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</td>
<td>0</td>
<td>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</td>
</tr>
<tr>
<td>B.2.5</td>
<td>Communicating: Accounting for how human rights impacts are addressed</td>
<td>0</td>
<td>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</td>
</tr>
<tr>
<td>C. Remedies and Grievance Mechanisms (15% of Total)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.1</td>
<td>Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Channel accessible to all workers 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</td>
</tr>
<tr>
<td>C.2</td>
<td>Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities</td>
<td>0</td>
<td>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</td>
</tr>
<tr>
<td>C.3</td>
<td>Users are involved in the design and performance of the channel(s)/mechanism(s)</td>
<td>0</td>
<td>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</td>
</tr>
<tr>
<td>C.4</td>
<td>Procedures related to the mechanism(s)/channel(s) are publicly available and explained</td>
<td>0</td>
<td>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 Score 2 • Not met: Escalation to senior/independent level</td>
</tr>
<tr>
<td>C.5</td>
<td>Commitment to non-retaliation over complaints or concerns made</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Public statement prohibiting retaliation • Not met: Practical measures to prevent retaliation Score 2 • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation</td>
</tr>
<tr>
<td>C.6</td>
<td>Company involvement with State-</td>
<td>0</td>
<td>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</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
</tr>
<tr>
<td>----------------</td>
<td>--------------------------------------------------------------------------------</td>
<td>------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
|                | based judicial and non-judicial grievance mechanisms                            | Score 2          | • Not met: Will work with state based or non judicial mechanisms  
• Not met: Example of issue resolved (if applicable)                                                                                                    |
| C.7            | Remediying 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)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| 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: Company is not a member of the Extractive Industry Transparency Initiative (EITI). [EITI Members Registry, 23/02/2016: eiti.org]  
• Not met: Reports of taxes and revenues beyond legal minimums  
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 |
| D.3.4          | Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs) | 0                | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Injury Rate disclosures: The Company discloses the number of newly diagnosed cases of occupational diseases (21). However, the Company does not disclose an injury rate. [Sustainability Report 2017, 23/04/2018: sinopecgroup.com]  
• Not met: Lost days or near miss disclosures  
• Met: Fatalities disclosures: Number of fatalities in 2017 was 3. [Sustainability Report 2017, 23/04/2018: sinopecgroup.com]  
Score 2  
• 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  
• Not met: Process to identify indigenous rights holders  
• Not met: How engages with communities in assessment  
Score 2  
• Not met: Commits to FPIC (or ICMM)  
• Not met: Gives recent example FPIC or dropping deal |
### E. Performance: Responses to Serious Allegations (20% of Total)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| E(1).0 | Serious allegation No 1 | 0 | • Headline: Potential impact of drilling for oil in the pristine Amazon rainforest  
• Area: Land rights  
• Story: Environmental and indigenous rights campaigners have raised concerns over the potential impact of drilling for oil in the Amazon after the Ecuadorian government sold the rights to explore two oil blocks covering an area of 500,000 acres of pristine Amazon rainforest to China National Petroleum and China Petroleum and Chemical.  

Campaign groups fear the deal could destroy the ecosystem and threaten unique, endangered cultures, including two isolated indigenous tribes. The blocks border Yasuni National Park, a 3,800-square-mile area of jungle that is home to two indigenous tribes, the nomadic Tagaeri and the Taromenane, who have no contact with the outside world. The blocks also overlap with the traditional home of the Sápara, an indigenous group with only 300 members, according to Amazon Watch.  

Amazon Watch reports that Manari Ushigua, president of the Sápara Nation of Ecuador, warns against oil extraction destroying his community's rainforest, mountains and contaminating its water supplies, all of which are key resources for the community's survival. Ushigua said his community had not been consulted about the deals. In accordance with Article 57 of the country's Constitution and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), to which Ecuador became a signatory in 2007, the government is required to organize a free, prior and informed consultation to obtain the consent of the communities before any drilling activity is contemplated.  
• Sources: [Amazon Watch - 3 February 2016- Oil Extraction Threatens To Expand Further into Ecuadorean Rainforest under New 20-Year Contract][Business and Human rights - 2 February 2016- Ecuador: Sápara indigenous say Andes Petroleum oil contracts threaten their livelihoods, culture, territory -] |
| 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  
• Not met: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation.  
Score 2  
• Not met: Response goes into detail |
| E(1).2 | The Company has appropriate policies in place | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Company policies address the general issues raised  
• Not met: Policies apply to the type of business relationships involved  
Score 2  
• Not met: Policies address the specific rights in question: As far as CHRB was able to ascertain, the Company does not have any policy publicly available on land rights. |
<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| E(1).3        | The Company has taken appropriate action           | 0                | The individual elements of the assessment are met or not as follows:  
• 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 reviewed management systems to prevent recurrence  
Score 2  
• Not met: Remedies are satisfactory to the victims  
• Not met: Has improved systems and engaged affected stakeholders |

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

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>F.1</td>
<td>Company willingness to publish information</td>
<td>0.32 out of 4</td>
<td>Out of a total of 38 indicators assessed under sections A-D of the benchmark, China Petroleum &amp; Chemical made data public that met one or more elements of the methodology in 3 cases, leading to a disclosure score of 0.32 out of 4 points.</td>
</tr>
</tbody>
</table>
| F.2           | Recognised Reporting Initiatives                   | 2 out of 2     | The individual elements of the assessment are met or not as follows:  
• Not met: Company reports on SASB  
• Not met: Company reports on UNGPRF |
| F.3           | Key, High Quality Disclosures                      | 0 out of 4     | China Petroleum & Chemical 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  
• 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  
• 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 : Remediing adverse impacts and incorporating lessons learned  
Demonstrating a forward focus  
• 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.