

**Company Name** Coal India  
**Industry** Extractives  
**Overall Score (\*)** 27.4 out of 100

Theme Score	Out of	For Theme
1.1	10	A. Governance and Policies
7.4	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
5.6	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
4.1	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"> <li>• Not met: General HRs commitment: The Company's Sustainability Report 2016-2017 states that a Human Rights Policy "aligned with the Universal Declaration of Human Rights and international frameworks" is in place. This policy is noted as presented to the Board, but is not yet available on the company website. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: The Company noted in the Sustainability Report that it is "committed to the principles of the United Nations Global Compact on Human Rights." [CIL's Policy for Corporate Social Responsibility, 2019: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: UDHR: The Company's Sustainability Report 2016-2017 states that a Human Rights Policy "aligned with the Universal Declaration of Human Rights and international frameworks" is in place. This policy is noted as presented to the Board, but is not yet available on the company website. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: International Bill of Rights: The Company does not refer to the International Bill of Rights in its disclosed documents, but notes generally that the international frameworks have been referenced. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: OECD</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>• Not met: ILO Core [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Met: UNGC principles 3-6: The Company states in the Sustainability Report that the company is "committed to the principles of the United Nations Global Compact on Human Rights." [CIL's Policy for Corporate Social Responsibility, 2019: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Explicitly list All four ILO apply to EX BPs: It is noted in the Sustainability Report that all suppliers and contractors are required to abide by various labour statutes, citing the Payment of Wage Act, Minimum Wages Act, Equal Remuneration Act, Industrial Dispute Act, Employees State Insurance Act, Child Labour Act and Contact Labour Act. However, there is no reference to the ILO Core. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: The Company has a stated commitment in its Corporate Social Responsibility Policy and in its Sustainability Report to the UN Global Compact Principles. No evidence found, however, in relation to a specific commitment to each ILO core area. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Respect H&amp;S of workers: It is noted in the Sustainability Report that CIL's Safety Policy is overseen by an Internal Safety Organisation across all operations. However, there is no evidence of clear commitment to H&amp;S. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: H&amp;S applies to EX BPs: It is noted in the Sustainability Report that all suppliers and contractors are required to abide by various labour statutes, citing the Payment of Wage Act, Minimum Wages Act, Equal Remuneration Act, Industrial Dispute Act, Employees State Insurance Act, Child Labour Act and Contact Labour Act. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</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 Sustainability Report references security of operations varying throughout the Sustainability Report, but does not publicly state a commitment to security of operations based on UN Instruments. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Voluntary Principles (VPs) participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights: The Sustainability Report notes initiatives regarding indigenous peoples in relation to health, education and the environment. It also discloses the total number of violations involving rights of indigenous peoples, however there is no policy or statement regarding the rights of indigenous peoples, nor reference to the ILO Convention or UN Declaration regarding the rights of indigenous peoples. [Sustainability Report 2016-2017, 2017: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: ILO 169</li> <li>• Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)</li> <li>• Not met: Expects BPs to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment</li> <li>• Not met: Voluntary Guidelines on Tenure Rights</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 commit to all these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states its responsibility to "develop and retain amicable relationships with all our stakeholders" and that "the expectations and the concerns of stakeholders and the extent to which the relevant issues are addressed, play a vital role in influencing the sustainable growth of an organisation". The Company notes frameworks regarding stakeholder engagement in the Sustainability Report, including its adherence to a structured stakeholder engagement process that includes "Land losers" and local villagers. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Regular stakeholder engagement: The company discloses the mode of engagement and frequency across various stakeholders in its Sustainability Report. Key concerns and timings of engagements are disclosed across some, but not all, stakeholders. This demonstrates multi-site engagements taking place. Employee engagement timings are noted. "Land losers" are engaged with "when required" and local villagers are reportedly engaged with through ongoing Corporate Social</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Responsibility activities, however no evidence or case studies of these kinds of engagements occurring within the last two years. Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <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>
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"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects EX BPs to reflect company HRD commitments</li> </ul>

### 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 <ul style="list-style-type: none"> <li>• Not met: CEO or Board approves policy: The Sustainability Report has been signed by the Chairman of the Board. [Annual Report 2017 - 2018, 2019: <a href="http://coalindia.in">coalindia.in</a> &amp; Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Board level responsibility for HRs</li> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
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"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion: The company is noted by the ILO as a partner for the HIV and AIDS programmes in India in all locations since 2008. The programme, called VCT@WORK, provides HIV testing among employees and migrant workers from neighbouring states. This is disclosed by the ILO, not Coal India.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
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"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key EX RH risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## 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"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR: No evidence of Senior Responsibility for Human Rights management. The Company notes that its Corporate Social Responsibility Policy is overseen by the Corporate Social Responsibility/Sustainable Development Committee. However, this policy does not specify any human rights. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: No evidence of day-to-day responsibility disclosed in either Sustainability Report or Annual Report.</li> <li>• Not met: Day-to-day responsibility for EX BRs: No evidence of extractives business partners day-to-day responsibility on human rights issues. A range of labour-related acts that business partners must comply with are provided in the Sustainability Report, but this does not specify human rights.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key EX HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
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"> <li>• Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communicates its policy to all workers in own operations: The Company states that awareness on human rights is included in the Company's training programmes - however, it is not clear whether this is communicated to all workers. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience: The Sustainability Report discusses human rights in a section noted for "Customers, Vendors, Investors, Government, Society". Employees in the company's own operations are not specified and no other Code of Conduct specifies human rights. [Sustainability Report 2016-2017, 2017: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy to EX contractors and joint ventures</li> <li>• Not met: Including to EX BPs (removed)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on EX BPs</li> </ul>
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"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments</li> <li>• Not met: Trains relevant EX managers including security personnel</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: The Sustainability Report index discloses data on the number of operations that have had human rights reviews and supplier human rights assessments. However there is no disclosure of how this monitoring of human rights implementation takes place in any publicly available documents. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Monitoring EX BP's</li> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of EX 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 EXs business partners: The Sustainability Report index includes "Percentage of total number of significant investment agreements and contracts that include human rights clauses or that have undergone human rights screening". It is also noted that suppliers are expected to comply with a range of labour laws, including child labour laws. However there is no discussion or explanation of how human rights impacts selection of extractives business partners.</li> </ul> <ul style="list-style-type: none"> <li>• Not met: HR affects on-going EX business partner relationships</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with EX business partners to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems: The Sustainability Report discloses a comprehensive process for identifying and engaging with a range of stakeholders, including Government, Employees, Land losers, Local villagers and community, customers, suppliers, NGOs and Media. This covers workers in the supply chain. Key concerns and materiality tests are also disclosed. Frequency of engagement and sites are disclosed across some but not all areas. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Met: Frequency and triggers for engagement: As above</li> <li>• Met: Engagement includes EX business partners workers: As above</li> <li>• Not met: Engagement includes EX business partners communities</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Analysis of stakeholder views and company's actions on them: The Sustainability Report provides discussion of a range of key concerns emerging from stakeholder engagement. In doing so the company indicates that it acknowledges input from the stakeholder engagement. A set of human rights risks were discussed, including wages and impacts of mining activities on the community. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</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</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)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company conducts a materiality matrix with input from stakeholder concerns. The Company states that this matrix acts as a guidance for the top management while integrating the sustainability management within the business strategy. The key concerns identified, including Health &amp; Safety, Rehabilitation and Resettlement Compensation, and Anti-Corruption, are discussed in detail in the Sustainability Report. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Met: Public disclosure of salient risks: The key concerns identified, including Health &amp; Safety, Rehabilitation and Resettlement Compensation, and Anti-Corruption, are discussed in detail in the Sustainability Report. The Sustainability Report discloses that stakeholder engagement with Land Losers yielded a key concern regarding Rehabilitation and Resettlement Compensation. A diagram showing the process and results of assessment is provided in the Sustainability Report. The key concerns identified, including Health &amp; Safety, Rehabilitation and Resettlement are discussed in detail in the Sustainability Report. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: As above. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul>
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 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Sustainability Report index provides data on how many suppliers are assessed on human rights, but this is not explained or discussed further in company disclosures.</li> <li>• Not met: Including amongst EX BPs: The Sustainability Report section on Human Rights states that suppliers are required to comply with a series of labour laws - including child labour laws. The index of the report provides data on the number of suppliers screened for impacts on society, however this does not specify human rights issues. There is no explanation given for what the process of screening is, what human rights issues are integrated and how findings are acted on.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>Not met: Example of Actions decided [Caring for miners: Coal India Limited promotes VCT@WORK in India, 29/05/2018: <a href="http://ilo.org">ilo.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met: The Sustainability Report section on Human Rights states that suppliers are required to comply with a series of labour laws - including child labour laws. The index of the report provides data on the number of suppliers screened for impacts on society, however this does not specify human rights issues. There is no explanation or examples given for what the process of screening is, what human rights issues are integrated and how findings are acted on.</li> </ul>
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 <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> Score 2 <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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Comms plan re identifying risks</li> <li>Met: Comms plan re assessing risks: The Company has communicated in its sustainability report how it identifies the Company's key human rights issues and the disclosure of these issues (see B.2.2) [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</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 business partners</li> </ul> Score 2 <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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The company notes in it's Annual Report that it has " a robust online stakeholder grievance management system to deal with the grievances of the stakeholders i.e. employees, consumers, customers and other stakeholders. Under the policy, all grievances are being addressed within the scheduled timeline and the stakeholders are informed accordingly. In the year 2016-17, Coal India has received a total of 3884 grievances in online portal, out of which, 3287 grievances have been disposed." Aside from this, the Sustainability Report specifies a stakeholder engagement framework that includes NGOs and Land Losers and provides a forum for key concerns, including human rights concerns, to be expressed. [Annual Report 2017 - 2018, 2019: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Number grievances filed, addressed or resolved: The Sustainability Report provides data on: Negative impacts for labour practices in the supply chain, number of grievances about labour practices filed, confirmed incidents of corruption, and data on health and safety incidents. The Company also states that during the year 2016-17 they did not report any cases of human rights violations.</li> <li>Met: Channel is available in all appropriate languages: The stakeholder engagement framework is the only mechanism specified by which affected parties can participate in discussions with the company. While specific groups are included, there is no mention of channels being open to those affected by extractives business partners human rights impacts.</li> <li>Met: Expect EX BPs to have equivalent grievance system</li> <li>Met: Opens own system to EX BPs workers: The company describes a detailed Online Grievance Management System in its Sustainability Report. Separately it notes in it's Annual Report that it has " a robust online stakeholder grievance management system to deal with the grievances of the stakeholders i.e. employees, consumers, customers and other stakeholders. Under the policy, all grievances are being addressed within the scheduled timeline and the stakeholders are informed accordingly."</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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"> <li>• Met: Grievance mechanism for community: The stakeholder engagement framework includes meetings with community and NGOs. The Company also notes that it has " a robust online stakeholder grievance management system to deal with the grievances of the stakeholders i.e. employees, consumers, customers and other stakeholders. The Company also links to the Government of India's Centralized Public Grievance Redress and Monitoring System as a means for filing a public grievance. The Company also provides a public address to post a grievance. The Company states that in order to check the status of their grievance they should indicate a mobile number or mail address. [Annual Report 2017 - 2018, 2019: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The stakeholder engagement framework specifies that "a system of communication for obtaining feedback and assessing opinions/ideas/suggestions" is provided. Interpretation into local languages is not specifically mentioned.</li> <li>• Not met: Expects EX BPs to have community grievance systems</li> <li>• Not met: EX BPs communities use global system: The Sustainability Report description of the Online Grievance Management system or Stakeholder Engagement Framework does not specify that these channels are open to extractives business partners stakeholders.</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system: The description of the Stakeholder Engagement process describes how material issues identified from stakeholder groups are linked with relevant GRI aspects, plotted with regards to relevance, and then inform mitigation plans. However, it is not clear whether the stakeholder engagement process effects the creation or assessment of the company's grievance mechanism.</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <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 consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company notes in its Annual Report that it has an grievance system in place, and all grievances are being addressed within the scheduled timeline and the stakeholders are informed accordingly. However, the company has not specified what the scheduled timeline is. [Annual Report 2017 - 2018, 2019: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <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	<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: Public statement prohibiting retaliation</li> <li>• Not met: Practical measures to prevent retaliation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects EX BPs to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms: However, the Company does link to the Centralised Public Grievance Redress and Monitoring System on their website which is managed by the Government of India. [Coal India Limited Grievance Mechanism System, 29/05/2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	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"> <li>• Met: Describes how remedy has been provided: The Sustainability Report provides details on how stakeholder engagement identified land resettlement as a salient human rights risk, and how this risk was mitigated by the Company through subsequent programs. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Says how it would remedy key sector risks: The description of the Stakeholder Engagement process describes how material issues identified from stakeholder groups are linked with relevant GRI aspects, plotted with regards to relevance, and then inform mitigation plans. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</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 or achieved: The Sustainability Report specifies a range of labour laws that suppliers are expected to adhere to, and that it adheres to. This includes the Payment of Wage Act, the Minimum Wages Act, and the Equal Remuneration Act. However there is no discussion of a living wage, and how this is determined or what timeframe is targeted. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes how living wage determined</li> <li>• Not met: Pays living wages</li> <li>• Not met: Reviews living wages definition with unions</li> </ul>
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Member of EITI</li> <li>• Not met: Reports of taxes and revenues beyond legal minimums</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Reports taxes and revenue by country</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: It is noted in the Sustainability Report that "CIL fully recognizes the rights of employees to freely associate and join trade unions, and we have embedded this principle in our Management Standards". However the company does not state non-retaliation or commit to non-interference explicitly. [Sustainability Report 2016-2017, 2017: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Met: Discloses % covered by collective bargaining: It is noted in the Sustainability Report that 94.32% of employees are covered by a collective bargaining agreement. [Sustainability Report 2016-2017, 2017: <a href="http://coalindia.in">coalindia.in</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)	2	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: The Company discloses the number and the rate of serious accidents and serious injuries. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Lost days or near miss disclosures [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Met: Fatalities disclosures: The Company reports a fatality and serious injury rate per million tons of Coal production are 0.053 and 0.199 respectively for the reporting period. The Company also reports on the number of fatal accidents, and fatalities that occurred in the calendar year in 2017. The Company reports there were 34 cases of fatal incidents with 37 fatalities in 2017. The Company also details the causes of these deaths. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company has a 'Zero Harm Potential' target. The Company also has a safety management plan. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Met targets or explains why not: The Company discloses very detailed data regarding areas in which incidents occurred, type of incident and what caused the incident within the Sustainability Report. The Company also reports on its achievements in safety for the year 2017-18 and discloses the number of mine, safety training statistics and etc. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul>
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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: Process to identify indigenous rights holders: A "Tribal Sub Plan" is identified under the company's corporate social responsibility strategies. However, the Company does not discuss the process of identifying indigenous land rights holders in specific areas of extractives operations. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: How engages with communities in assessment: The stakeholder engagement framework specifies Land Losers, local villagers and community groups as specific groups for engagement. Tribal or indigenous peoples are not specified outside of this. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> <p>Score 2</p> <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	<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: Approach to identification of land tenure rights holders: The Company discuss compensation for resettlement, however, does not specify how land owners are identified. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Describes approach to doing so if no recent deals</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works: The Company indicates that "Subsidiaries of CIL is providing liberal and attractive benefits to the project affected persons/families which includes adequate compensation, direct employment, suitable rehab site with necessary infrastructure facilities etc". However no evidence found on how the Company provides compensations, including valuation methods and involving legitimate tenure rights holders in the process. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</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	<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: How implements security (inc VPs or ICOC): The company specifies anti-corruption training for security staff, but no human rights training outside of this is discussed.</li> <li>• Not met: Example of respecting HRs in security</li> <li>• Not met: Ensures Business Partners follow security approach</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Assesses and involves communities</li> <li>• Not met: Working with local community</li> </ul>
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Action to prevent water and sanitation risks: The Company highlights how the access to clean water and sanitation is necessary for human beings. The Company specifies water conservation and mine water management plans, including data and specific projects in place with regards to water. The Company also details information regarding an initiative related to sanitation, including setting up hand pumps and drinking machine to provide safe water to local villages. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Water targets considering local factors: The Company specifies a range of initiatives and projects undertaken specifically to suit the water use and practices of the surrounding villagers, including the needs of agricultural workers and recognising key water sources for villages. [Sustainability Report 2017-2018, 2018: <a href="http://coalindia.in">coalindia.in</a>]</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		<ul style="list-style-type: none"> <li>• Headline: Forced eviction allegations at Kusmunda mine, India</li> <li>• Area: Land rights</li> <li>• Story: The Company is alleged to have breached the rights to consultation and consent around land acquisition, in relation to expansion of mines and acquisition of additional land. The allegations are made in a 2016 Amnesty International (AI) report entitled 'When land is lost, do we eat coal? Coal mining and violations of Adivasi rights in India. The AI report alleges that land acquisition by three of the company's subsidiaries breached international laws relating to the rights of indigenous peoples and also India's national laws on Scheduled Tribes. The three mines involved are: Kusmunda in Chhattisgarh, operated by SouthEastern Coalfields (SECL); Tetariakhar in Jharkhand, operated by Central Coalfields (CCL); Basundhara-West in Sundargarh, Odisha, operated by Mahanadi Coalfields (MCL). AI alleges that the processes of land acquisition breached international law relating to the rights of indigenous peoples and other rights, such as rights to livelihood and prohibition on discrimination, as well as India's national laws on Scheduled Tribes. In Adivasi regions the Panchayat (Extension to Scheduled Areas) Act (1996) (PESA Act) requires consultation of gram sabhas (village assemblies), and the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act (2006) requires their consent regarding forest land.</li> <li>• Sources: [Amnesty International, June 2016 -: <a href="http://amnesty.org.in">amnesty.org.in</a>][The Guardian, 13/07/2016 -: <a href="http://theguardian.com">theguardian.com</a>]</li> </ul>
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"> <li>• Not met: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
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"> <li>• Not met: Company policies address the general issues raised</li> <li>• Not met: Policies apply to the type of business relationships involved</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: No policies concerning respect for land rights or on consultation have been found for the Company or its three subsidiaries. No details about systems such as due diligence in these types of cases have been found.</li> </ul>
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"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence: No details about compensation, resettlement or rehabilitation have been found in relation to these allegations, although all three subsidiaries have a 'grievance mechanism' page on their websites which give details for how a stakeholder can raise a concern.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: 23 workers killed in mine collapse in India</li> <li>• Area: Health and safety</li> <li>• Story: On December 29, 2016 at least 18 mine workers were killed after a collapse at the Lalmatia open-cast coal mine. As many as 23 people were buried under rubble in the collapse at the mine, located about 390km from the Jharkhand state capital Ranchi. The mine is operated by Eastern Coalfields Ltd (ECL), a subsidiary of Coal India Ltd.</li> </ul> <p>Families of the victims accused Coal India of overlooking safety rules after it ignored two warnings prior to the collapse. The Indian government has called for a nationwide safety survey for the country's coal mines after the accident. [Coal India has a poor safety record, with 135 accidents reported in 2016, killing 37 people and injuring 141, the company said in a report.]</p> <p>On September 12, 2018, the press reported that Coal India planned to close 53 of its 174 underground coal mines by the end of 2018 due to safety concerns at the mines operated by the Company and its subsidiaries. According to The Hindu, a total of 65 workers died in in the first six months of 2016, with 18 people killed at</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the Lalmatia coal mine, owned by Coal India subsidiary Eastern Coalfields. A further 122 people were reported to have suffered serious accidents during this period. Stated by the press, the safety concerns have cast doubts over the ability of the Indian Government to deliver safe mining operations license. It was also reported that the unprofitable, very small and not financially viable coal mines may close as well</p> <p>• Sources: [Channel News Asia - 03/01/2017 -: <a href="http://channelnewsasia.com">channelnewsasia.com</a>][The Hindu Business Line - 12/09/2018: <a href="http://thehindubusinessline.com">thehindubusinessline.com</a>][The Economic Times - 31/12/2016: <a href="http://economictimes.indiatimes.com">economictimes.indiatimes.com</a>]</p>
E(2).1	The Company has responded publicly to the allegation	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"> <li>• Met: Public response available: Through the press, the Company only said that fog had slowed rescue operations as authorities tried to clear the collapsed mine waste.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(2).2	The Company has appropriate policies in place	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: Company policies address the general issues raised</li> <li>• Met: Policies apply to the type of business relationships involved</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: In its document 'Mine Safety at a Glance' the company discloses the number of fatalities, rate of fatalities and injury rates for each year since 1975. [Mine Safety at a Glance, 13/03/2019: <a href="http://coalindia.in">coalindia.in</a>]</li> </ul>
E(2).3	The Company has taken appropriate action	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>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Met: Has reviewed management systems to prevent recurrence: According to press reports, Coal India planned to close 53 of its 174 underground coal mines by the end of 2018 due to safety concerns at the mines operated by the Company and its subsidiaries. Stated by the press, the safety concerns have cast doubts over the ability of the Indian Government to deliver safe mining operations license. It was also reported that the unprofitable, very small and not financially viable coal mines may close as well.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.26 out of 4	<p>Out of a total of 38 indicators assessed under sections A-D of the benchmark, Coal India made data public that met one or more elements of the methodology in 12 cases, leading to a disclosure score of 1.26 out of 4 points.</p>
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company states that their Sustainability Report was prepared in accordance with the latest G4 guidelines of the GRI. The Company also maps their report to the GRI index. [Sustainability Report 2016-2017, 2017: <a href="http://coalindia.in">coalindia.in</a>]</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0.8 out of 4	<p>Coal India met 2 of the 10 thresholds listed below and therefore gets 0.8 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <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>• 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> <p>Discussing challenges openly</p>

Indicator Code	Indicator name	Score	Explanation
			<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>• 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 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.

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