

Company Name Novolipetsk Steel
Industry Extractive
Overall Score (*) 6.8 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
0.8	15	C. Remedies and Grievance Mechanisms
2.5	20	D. Performance: Company Human Rights Practices
1.4	20	E. Performance: Responses to Serious Allegations
0.9	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 that Newmont Mining and Goldcorp merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Newmont Mining.

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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: General HRs commitment Not met: UNGC principles 1 & 2 Not met: UDHR Not met: International Bill of Rights Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: ILO Core: The Company's Human Rights Policy sets out the following principles: 'support for freedom of association and collective bargaining, rights to liberty and security of person, prohibition of forced labour and child labour, prohibition of discrimination, ensuring occupational safety and health, providing safe working conditions, respect for the right to a minimum wage'. [Human Rights Policy, 29/12/2018: nlmk.com] Met: Explicitly list All four ILO apply to EX BPs: The Company's Human Rights Policy sets out the following principles: 'support for freedom of association and collective bargaining, rights to liberty and security of person, prohibition of forced labour and child labour, prohibition of discrimination, ensuring occupational safety

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and health, providing safe working conditions, respect for the right to a minimum wage'. In addition, the Company states that the policy requirements are binding on all stakeholders. [Human Rights Policy, 29/12/2018: nlmk.com] Score 2 <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy sets out the following principles: 'support for freedom of association and collective bargaining, rights to liberty and security of person, prohibition of forced labour and child labour, prohibition of discrimination, ensuring occupational safety and health, providing safe working conditions, respect for the right to a minimum wage'. [Human Rights Policy, 29/12/2018: nlmk.com] • Met: Respect H&S of workers: The Company's Human Rights Policy includes ensuring occupational safety and health for its employees. [Human Rights Policy, 29/12/2018: nlmk.com] • Not met: H&S applies to EX BPs
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0	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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company states that it actively engage its stakeholders through various formats of interaction, such as general shareholders' meetings, regular trainings, and personnel engagement monitoring. The Company states that maintaining transparent, trust-based stakeholder engagement over the long term is the foundation on which NLMK Group's sustainable development is built. The Company conduct regular trainings in safety techniques and implement programmes to improve working conditions, conduct dialogues with representatives of local communities to inform them about the Company activities in the regions where the Company operates, organizes thematic conferences and events etc. [Annual Report 2018, 2018: nlmk.com] 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"> • Met: CEO or Board approves policy: The Company's Human Rights Policy is approved by the President (Chairman of the Management Board). [Human Rights Policy, 29/12/2018: nlmk.com] • Not met: Board level responsibility for HRs

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs • 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 • Not met: Incentives for at least one board member • Not met: At least one key EX RH risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Policy, 29/12/2018: nlmk.com] • Not met: Senior responsibility for HR Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key EX HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR risks is integrated as part of enterprise risk system 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: See indicator A.1.2 [Human Rights Policy, 29/12/2018: nlmk.com] • Not met: Communicates its policy to all workers in own operations: The Company states in its Human Rights Policy that it shares its Human Rights Policy with stakeholders, including employees, subcontractors, and business partners. It also states in its Corporate Ethics Code that it informs its employees about the principles and standards set out in this Code, the measures it takes and the results achieved, as well as about its online corporate training courses, by posting this Code on the Company's official website, publishing information in the corporate media, spreading awareness-raising materials, or through other disclosure channels. However, it is not clear how the communication is approach and whether it includes translation into other languages where necessary. [Human Rights Policy, 29/12/2018: nlmk.com & Corporate Ethics Code, 21/12/2018: nlmk.com] Score 2 • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 [Human Rights Policy, 29/12/2018: nlmk.com] • Not met: Communication of policy commitments to stakeholder [Human Rights Policy, 29/12/2018: nlmk.com] • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy to EX contractors and joint ventures • Not met: Including to EX BPs (removed) Score 2 • Not met: How HR commitments made binding/contractual: The Company states that its Human Rights policy requirements are binding on all stakeholders.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			However, details of process on binding is not available. [Human Rights Policy, 29/12/2018: nlmk.com] <ul style="list-style-type: none"> 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"> Met: Scores at least 1 on A.1.2 [Human Rights Policy, 29/12/2018: nlmk.com] Not met: Trains all workers on HR policy commitments: The Company states that it informs its employees about the principles and standards set out in the Code, the measures it takes and the results achieved, as well as about its online corporate training courses, by posting this Code on the Company's official website, publishing information in the corporate media, spreading awareness-raising materials, or through other disclosure channels. The Code includes respecting human right issues. However, it is not clear whether the training covers all employees. [Human Rights Policy, 29/12/2018: nlmk.com & Corporate Ethics Code, 21/12/2018: nlmk.com] Not met: Trains relevant EX managers including security personnel Score 2 <ul style="list-style-type: none"> Met: Score of 2 on A.1.2 [Human Rights Policy, 29/12/2018: nlmk.com] 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"> Met: Scores at least 1 on A.1.2 [Human Rights Policy, 29/12/2018: nlmk.com] Not met: Monitoring implementation of HR policy commitments Not met: Monitoring EX BP's Score 2 <ul style="list-style-type: none"> 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 Not met: identifying risks in EX business partners Score 2 <ul style="list-style-type: none"> 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> Not met: Action Plans to mitigate risks Not met: Including amongst EX BPs Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Comms plan re identifying risks Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company states that any employee of the Company, any counterparty and any stakeholder that has questions about the application of, or compliance with this Code, or possesses information that an employee or counterparty of NLMK Group has violated the principles and requirements of this Code, can write to ethics@nlmk.com or use any of the channels of communication specified on its official website. [Corporate Ethics Code, 21/12/2018: nlmk.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages Not met: Expect EX BPs to have equivalent grievance system Not met: Opens own system to EX 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 <ul style="list-style-type: none"> Not met: Grievance mechanism for community Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not met: Engages users to create or assess system Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> Not met: Engages with users on system performance Not met: Provides user engagement example on performance Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Response timescales

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews living wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Member of EITI • Not met: Reports of taxes and revenues beyond legal minimums Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation [Human Rights Policy, 29/12/2018: nlmk.com] • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: In 2018, 287 injuries were reported t NLMK Group companies, of which 89 resulted in disability and injury to employees and contractors, including fatal and severe injuries. [Our Team Report 2018, 2018: nlmk.com] • Met: Lost days or near miss disclosures: The Company reports that Lost Time Injury Frequency Rate per 1,000,000 person hours worked was 0.77 [Our Team Report 2018, 2018: nlmk.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Fatalities disclosures: The Company reports that 'deeply regrets three fatal accidents that occurred at its sites in Lipetsk and Noviye Sergi in 2018'. [Our Team Report 2018, 2018: nlmk.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company has various targets on occupational health and safety KPIs, including 'zero fatal accidents involving employees and contractors and achieve by the end of 2022 a total Lost Time Injury Frequency Rate (LTIFR) among employees and contractors of not higher than 0.5' [Our Team Report 2018, 2018: nlmk.com] • Met: Met targets or explains why not: The Company states that during the reporting period, the LTIFR dropped to 0.77, a 31% reduction on the figure for 2017. The Group also keeps records of all work-related injuries and determines the TRIFR, which is calculated every month for each subsidiary, with data on contractors included. In 2018, the TRIFR fell to 2.14 for Group employees and 2.51 for contractors, which indicates a decline in the total number of injuries across all Group companies. The Group identified Plans for 2019 and the medium term. Going forward we will continue to implement programmes and measures to improve safety, reduce injuries, and develop a culture of safety among the Group's employees and contractors. Zero fatal accidents will be NLMK's key goal in upcoming periods. <p>We will continue to carry out planned activities to minimize and eliminate the top-three risk categories identified during the current reporting period. The Group will continue to hold training programmes for NLMK employees and contractors through its Corporate University. The Group also plans to establish an internal audit institute for assessing the effectiveness of the OHS system at its companies, and intends to develop a regulation governing LOTO (log-out tag-out) systems to ensure control over hazardous energy sources at NLMK companies.</p> <p>2018 performance and eliminated the systemic causes of work-related injuries that occurred. [Our Team Report 2018, 2018: nlmk.com]</p>
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"> • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment <p>Score 2</p> <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	<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: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <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	<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: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	<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: Action to prevent water and sanitation risks [Environmental Report 2017, 31/12/2017: nlmk.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors [Environmental Report 2017, 31/12/2017: nlmk.com] • Not met: Reports progress in meeting targets and shows trends in progress made [Environmental Report 2017, 31/12/2017: nlmk.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 5.46 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.37 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.53 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Novolipetsk Steel 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 reports on GRI but only on its Sustainability indicators and does not cover human rights. It is not enough to be award. [Environmental Report 2017, 31/12/2017: nlmk.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0.4 out of 4	Novolipetsk Steel met 1 of the 10 thresholds listed below and therefore gets 0.4 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) • 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.

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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.