

**Company Name** OMV  
**Industry** Extractive  
**Overall Score (\*)** 30.7 out of 100

Theme Score	Out of	For Theme
2.4	10	A. Governance and Policies
4.8	25	B. Embedding Respect and Human Rights Due Diligence
4.6	15	C. Remedies and Grievance Mechanisms
7.5	20	D. Performance: Company Human Rights Practices
6.1	20	E. Performance: Responses to Serious Allegations
5.2	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 Occidental Petroleum and Anadarko Petroleum merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Occidental Petroleum.

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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 1 &amp; 2: The Company 'has signed the UN Global Compact'. [Human Rights Policy Statement: <a href="http://omv.com">omv.com</a>]</li> <li>Met: UDHR: The Company states that 'OMV respects, fulfils and supports the realization of human rights as contained in the Universal Declaration of Human Rights'.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: UNGPs: The Company 'is fully committed to the UN Guiding Principles on Business and Human Rights.' [Human Rights Policy Statement: <a href="http://omv.com">omv.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company is an active participant of the UNGC. [UNGC - Status, 09/2019: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> <li>Not met: Explicitly list All four ILO apply to EX BPs: The Company's business partners are held to the same standards as the Company. The Code of Conduct cover all ILO Core. Its 'partners, contractors and all other persons acting in the name of the Group must in the course of their daily work observe all applicable laws and regulations and comply with these principles.' With respect freedom of association and collective bargaining, the Code says: 'We respect the freedom of association and collective employee representation. We make every effort to work</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>constructively with employee representatives to achieve mutually satisfactory solutions. This includes collaboration with representatives elected by our employees under local legislation. [...] As a global enterprise, we operate in host countries with the most varied socioeconomic and sociocultural systems and are bound by relevant national regulations. We respect freedom of association and effective recognition of the right to collective bargaining, and we consult on a regular basis with employee representatives.' However, CHRB could not find alternative measures to support the rights to freedom of association and collective bargaining when they are restricted by law. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: As previously stated, all four ILO fundamental rights are listed and adhered to. With respect freedom of association and collective bargaining, the Code says: 'We respect the freedom of association and collective employee representation. We make every effort to work constructively with employee representatives to achieve mutually satisfactory solutions. This includes collaboration with representatives elected by our employees under local legislation. [...] As a global enterprise, we operate in host countries with the most varied socioeconomic and sociocultural systems and are bound by relevant national regulations. We respect freedom of association and effective recognition of the right to collective bargaining, and we consult on a regular basis with employee representatives.' However, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'we're bound by relevant national regulations'. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company has 'the highest standards for health, safety, security and the protection of the environment,' and aims to continually improve its performance in these respects. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: As mentioned, the Code of Conduct applies not only to the Company, but also its business partners. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a>]</li> </ul>
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments</li> <li>• Not met: Voluntary Principles (VPs) participant: The Company 'enforces in the operating countries compliance to the VPSHR (Voluntary Principles on Security and Human Rights).' However, no evidence found of the Company being a participant to the VP the VPSHR [Health, Safety, Security and Environment]</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights: The Company maps its 'concrete responsibilities in the fields of [...] local communities and indigenous peoples' rights' via the Human Rights Matrix. However, no evidence found of a statement of commitment to respect these people's rights. The C [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</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: No evidence found in publicly available sources. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment: The Human Rights Matrix covers the responsibilities of 'local communities and indigenous peoples, including free, prior and informed consultation,' but not free, prior and informed consent. [Human Rights]</li> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC performance standards: No public statement of commitment found.</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Met: Respecting the right to water: The Company has defined its official Water Strategy 2021, which includes upholding 'the human right for water in relation to [its] business activities.' [Water Management: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: Expects BPs to commit to all these rights: No public evidence expecting business partners to commit found.</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 'is committed to genuine stakeholder engagement, convinced that mutual respect, transparent behavior and open dialogue are the best foundations for a good relationship with the different stakeholders'. These include, 'among others, employees and their</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>representations, business partners, customers, government authorities, media, society and NGOs'. The Company devotes a specific section about relations with local communities. [Code of Conduct, April 2018: <a href="#">omv.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: The Company states the following: 'Stakeholder engagement and human rights issues are the basic building blocks of trust and we are constantly striving to maintain good relationships with our neighbours. We have an active partnership with the communities around our business operations. Together, we aim to build capacity in order to support local development'. However, this does not necessarily mean the Company engages its stakeholders to develop or monitor these human rights issues, for which explicit evidence was not found. [Code of Conduct, April 2018: <a href="#">omv.com</a>]</li> <li>• Not met: Regular stakeholder design engagement: The Company preforms Environmental and Social Impact Assessments which includes stakeholder engagement, however, it is unclear if affected stakeholders actively participate in approach design or monitoring. The Company also discloses a figure with different stakeholder groups and type of engagement, but no details found on active affected stakeholder involvement in design/monitoring of the human rights approach. [Sustainability report 2018, 04/2019: <a href="#">omv.com</a>]</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: The Company has a grievance mechanism. However, no public statement of commitment to remedy any adverse impact that it has caused or contributed to could be found in public sources. [Sustainability report 2018, 04/2019: <a href="#">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): No public commitment not to threaten, intimidate or attack human rights defenders could be found.</li> </ul> <p>Score 2</p> <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	0.5	<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: CEO or Board approves policy: The Human Rights Policy Statement 'has been approved by the Executive Board and is our guiding principle for dealing with human rights issues in all aspects of our daily business life.' [Human Rights]</li> <li>• Not met: Board level responsibility for HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO: Rainer Seele, CEO, made a speech about the Company's sustainability strategy, which includes elements of health and safety and business principles and social responsibility. In regards to health and safety: 'We are on the right path here. You can see that we are investing very heavily in this area. We have also launched a new initiative. An initiative that we are combining with a new HSSE Strategy, that is an implementation project in our Group, it is a topic that we discuss regularly with our supervisory body.' Regarding human rights in general: 'How can we ensure within the company that we comply with our basic principles and rules, that we play no part in corruption, that we respect and value human rights in all our operations? How can we ensure this? Quite simply, through training, that is training measures and informational measures, and we send all our managers and employees to take part in all these training processes, regardless of whether the topic is anti-trust law or the Code of Conduct. And the first thing anyone gets when they start working at OMV is a small booklet covering the principles of conduct and business at OMV. I also assume that everyone has not just read this, but that everyone puts these business principles into practice.' However, no clear discussion setting out the Company's approach to human rights or discussing its business importance could be found. [Presentation of the OMV Sustainability Strategy 2025, 29/11/2018: <a href="#">omv.com</a>]</li> </ul>
A.2.2	Board discussions	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: Board/Committee review of salient HRs</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion: 'In 2018, the Executive Board and senior management developed the Sustainability Strategy and targets during several workshops and meetings. The Executive Board and Supervisory Board approved the Company's Sustainability Report.' However, in order to award this indicator, evidence is needed of specific issues discussed at Supervisory Board level. Approval of the sustainability reports does not show how specific human rights-related issues were discussed at Supervisory Board Committee-level meetings. No further details found in publicly available sources. [Sustainability report 2018, 04/2019: <a href="#">omv.com</a>]</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: No information found regarding incentives for a member of the Supervisory Board. Evidence found refers to executive positions (CEO not a supervisory 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: Although the Company discloses some details about the performance criteria, as indicated above, this indicators looks for evidence in relation to Supervisory Board.</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	0.5	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: The Company discloses a chart with some group functions that include human rights-related topics, including corporate affairs, HSSE, Human Resources and Procurement. However, no details found on specific human rights centralised responsibility at senior management level. [Sustainability report 2018, 04/2019: <a href="#">omv.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Company indicates that 'The Sustainability &amp; reporting department is part of the Corporate Affairs and Has a Group-wide coordination function. It is responsible for steering, providing advice on, and reporting on sustainability-related topics to internal and external stakeholders. Sustainability &amp; reporting steers and coordinates the development and the implementation of the sustainability strategy'. This strategy includes human rights elements. [Sustainability report 2018, 04/2019: <a href="#">omv.com</a>]</li> <li>• Not met: Day-to-day responsibility for EX BRs: No evidence found in publicly available sources.</li> </ul>
B.1.2	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Senior manager incentives for human rights: 'The Executive Board remuneration consists of fixed and variable remuneration elements. The variable remuneration – the Long Term Incentive Plan (LTIP) and the annual bonus – includes performance criteria related to the Company's sustainability performance. [...] The LTIP includes a Health, Safety, Security, or Environmental (HSSE) malus that may be applied to the overall target achievement.' [Sustainability report 2018, 04/2019: <a href="#">omv.com</a>]</li> <li>• Not met: At least one key EX HR risk, beyond employee H&amp;S: No evidence of this including HSSE for extractive business partners could be found.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public: The Company uses a sustainability multiplier to calculate annual bonuses. It is described as the following: 'Value between 0.8 and 1.2 determined at discretion of the OMV Supervisory Board based on a predefined set of criteria applicable to the overall target achievement'. However, no description of what these criteria are could be found. [2018 Annual Report: <a href="#">omv.com</a>]</li> </ul>
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: In the risk management section of the annual report, the Company indicates the following: 'The key Group risks are governed centrally to ensure the ability to meet the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>planning objectives through the essence of corporate directives, including those relating to health, safety, security, environment, legal matters, compliance, human resources and corporate social responsibility, with special emphasis on human rights and market price risks'. [Annual Report 2017: <a href="http://omv.com">omv.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment: No specific evidence of the Committee assessing the adequacy of the risk management system in managing human rights could be found. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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 ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: The Company indicates that 'an internal campaign informed all our employees about the relevance of human rights to our activities and invited them to complete an e-learning training course'. Also, policy is available in different languages. [Sustainability Report: <a href="http://omv.com">omv.com</a> &amp; Human rights (with Petrom), 5/8/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder: Only evidence found refers to policy being available in different languages. No details found on affected stakeholder policy communication. [Human rights (with Petrom), 5/8/2019 &amp; Sustainability, 5/8/2019: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Commits to all 4 ILO core conventions for suppliers</li> <li>• Met: Communicating policy to EX contractors and joint ventures: The Company states the following: 'Our suppliers must comply with both legal requirements and our HSE standards. To ensure the suppliers' support of OMV principles and to mitigate the risk of forced labor, slavery and human trafficking, OMV's supply chain partners have to sign OMV's Code of Conduct.' The Code of Conduct applies to the Company's 'partners, contractors and all other persons acting in the name of the Group.' [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a> &amp; Supply Chain]</li> <li>• Met: Including to EX BPs (removed)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Code of Conduct is a binding document (as indicated above, it has to be signed), however, in case a supplier does not adhere to the Company's principles, the Company 'reserves the right to terminate the relationships with suppliers, if issues of non-compliance with applicable policies are discovered, or non-compliance is not addressed in a timely manner.' [Supply Chain]</li> <li>• Met: Including on EX BPs: The Code of Conduct serves as a legally binding document for anyone who has a professional relationship with the Company, including Extractive Business Partners. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a>]</li> </ul>
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The Company offers 'an interactive e-learning program to all employees, which guides them through norms and situations with regards to human rights.' However, it indicates that, in 2017, 'a total of 423 employees participated in human rights training sessions (2016: 104) which constitutes 2% of OMV personnel. The Company provided information to CHRB, however, it has not been found in public sources. [Human Rights]</li> <li>• Met: Trains relevant EX managers including security personnel: The Company states the following: 'All OMV Group employees who are especially exposed to human rights topics shall be trained in human rights until 2025. The target group is defined by an intersection of specific functions (e.g. Security, Procurement, Human Resources, Community Relations &amp; Development) and countries with elevated human rights risk (based on an annual risk assessment).' [Human Rights]</li> </ul> <p>Score 2</p> <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	<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: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Not met: Monitoring EX BP's: The Company indicates that 'Tools like 360° feedback, supplier evaluations, and audits assess and monitor supplier compliance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>with the principles outlined in OMV's Code of Conduct. [...] Additionally, we updated the supplier relationship management system and introduced improvements in accordance with best practice in sustainability. As a result, we expanded the ESG (Environment, Social, and Governance) assessment of our suppliers. Our assessment of ESG management and performance covers human rights, occupational health and safety, social responsibility, business ethics, compliance, and environmental performance.' However it is not clear whether these compliance monitoring activities also covered extractive business partners. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: Evidence described only related to grievance mechanism. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of EX supply chain monitored: 'In 2018, we took a step forward in our supplier performance management road map and defined our targets: performing more than ten audits per year on sustainability topics by 2020 and more than 20 per year by 2025. By the end of 2018, nine supplier audits covering the entire range of sustainability issues were conducted.' However, it is unclear what percentage of the extractive business partners is monitored. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul>
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects selection EXs business partners: 'Sustainability risks for all new suppliers, including HSSE, community relations, and reputation, are identified at an early stage in accordance with the "Corporate HSSE Recommendation on Pre-qualification for Contractors." Corporate and legal HSSE requirements are provided to potential suppliers at the tender stage. We assess the HSSE qualifications of potential suppliers and rank them in the OMV Risk Matrix. For suppliers who present a potential risk to OMV's supply chain sustainability management, we conduct a more in-depth investigation of compliance with OMV's Contractor HSSE Management Standards.' However, no information regarding how human rights performance is taken into account beyond Health, Safety, Security and Environment could be found, nor is it clear if this include extractive business partners or only suppliers. The Company also provided evidence from sources that have not been found in public domain. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: HR affects on-going EX business partner relationships: The Company 'reserves the right to terminate the relationships with suppliers, if issues of non-compliance with applicable policies are discovered, or non-compliance is not addressed in a timely manner.' However, it is unclear whether or not this only applies to suppliers, or to all [extractive] Business Partners. [Supply Chain]</li> </ul> <p>Score 2</p> <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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems: In the context of community relations, the management process 'begins with Social Impact Assessments in order to make sure that the views of the local communities are incorporated and addressed throughout the project life cycle. In the SIAs, we include baseline study, community needs assessments, stakeholders analysis and the social risks associated. Based on the outcome community relations and development strategy and community grievance mechanisms are developed and implemented'. The Company reports on its last year activity concerning the community grievance management and development projects. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a> &amp; Sustainability Report: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: Frequency and triggers for engagement: Although the Company discloses in the sustainability report triggers reasons to engage with the different stakeholder groups and key topics, no evidence found in relation to frequency. [Sustainability Report: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: Engagement includes EX business partners workers</li> <li>• Not met: Engagement includes EX business partners communities</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>



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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The Company describes the following: 'The Human Rights Due Diligence Process includes assessing the human rights risk associated with our current and future business activities and taking risk management actions. This ongoing process makes use of external resources and expertise and includes external stakeholders, in particular impacted groups. The OMV's human rights tools are: Risk Ranking, Country Entry Check, Pre-Entry Risk Assessment, Human Rights Impact Assessment, Risk Register, Self-Assessment, On-Site Audit, Supplier Audit and Grievance Management.' [Human Rights Policy Statement: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: identifying risks in EX business partners: 'In 2018, prior to OMV's decision to do business in Malaysia, we commissioned a Human Rights Country Entry Check by an external human rights expert. This check provided an analysis of ongoing human rights issues and the resulting potential legal, reputational, and operational risks associated with our planned engagement in the country. We identified concerns related to labor rights, land issues, and indigenous peoples' rights, and assessed the potential for their mitigation. We plan to cooperate closely with our business partners and other stakeholders in Malaysia in order to ensure compliance with our human rights commitment locally.' [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: The Company's 'current activities and the host countries, where we already operate, are regularly subject to risk assessments.' [Human Rights]</li> <li>• Met: In consultation with stakeholders: As stated above, the process by which the Company identifies risks include impacted groups. [Human Rights Policy Statement: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: In consultation with HR experts: As stated above, the process makes use of external resources and expertise. [Human Rights Policy Statement: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: Triggered by new circumstances: These tools and techniques are implemented before the Company starts or acquires business in a new country, meaning they are triggered by new country operations. [Human Rights]</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR): The Company explains they 'increasingly rely on integrated environmental and social impact assessments as the basis for managing environmental risks.' However, the Company only seems to be focusing on environmental aspects and not human rights aspects. [Environmental Risk Management]</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context): The Company discloses that it performs human rights assessments, but it does not include what it considers to be a salient risk and how it considers relevant factors such as economic, geographical, social or others. The Company has provided information to CHRB in relation to this B.2.2 indicator. However, most part of those evidences were not found in public sources. [Human Rights]</li> <li>• Not met: Public disclosure of salient risks: The Company states the following in relation to a risk assessment for the country of Malaysia: 'We identified concerns related to labor rights, land issues, and indigenous peoples' rights, and assessed the potential for their mitigation.' No details found, however, of results of assessment, indicating which risks are salient. Additionally, relating to a risk assessment in Romania, the following was disclosed: 'Based on the expert's recommendations, OMV Petrom developed an action plan covering the areas of safety, security, the grievance mechanism, supply chain management, working conditions, and equality and non-discrimination.' However, it is unclear if these are all the risks found to be salient for the Company, as they seem focused in one operation. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company provided some sources to CHRB that are not public.</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided: The Company states the following in relation to assessment in Romania: 'Based on the expert's recommendations, OMV Petrom developed an action plan covering the areas of safety, security, the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		grievance mechanism, supply chain management, working conditions, and equality and non-discrimination.' However, an example of specific actions taken regarding one or more of these could not be found. Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective: No public information found relating to the effectiveness of addressing human rights impacts. • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Comms plan re identifying risks: See indicator B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks: See indicator B.2.3 • Not met: Comms plan re reviewing action plans: See indicator B.2.4 • Not met: Including EX business partners Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company states that employees can speak up and report violations of the Code of Business Ethics to the Compliance Department. They 'can do so by contacting the web-based Ethics Helpline or by emailing the Compliance Department.' [Sustainability Report: <a href="http://omv.com">omv.com</a> ] Score 2 • Met: Number grievances filed, addressed or resolved: In 2018, the Company received 1,058 grievances, one of which was related to human rights and was resolved. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a> ] • Met: Channel is available in all appropriate languages: The Whistleblowing Platform is available in 10 different languages. [Compliance, 6/8/2019] • Met: Opens own system to EX BPs workers: The Company's "Integrity Platform" provides an anonymous whistleblowing mechanism for 'external stakeholders, such as suppliers, in relation to the issues of non-compliance with the legal regulations, the Code of Business Ethics, or other internal guidelines of the OMV Group.' [2018 Annual Report: <a href="http://omv.com">omv.com</a> ]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Company states that 'as part of OMV's stakeholder dialog, the company has implemented a community grievance mechanism at all operating sites. With a new grievance mechanism system in place, OMV has a consistent approach in receiving, registering and solving the grievances and aims to be fully aligned with the requirements of the GRI and IPIECA'. In addition, as explained in indicator C.1, the Company's "'Integrity Platform" provides an anonymous whistleblowing mechanism for OMV employees and external stakeholders'. [Community Relations and Development & 2018 Annual Report: <a href="http://omv.com">omv.com</a> ] Score 2 • Met: Describes accessibility and local languages: The Whistleblowing Platform is available in 10 languages and online. [Compliance, 6/8/2019] • Not met: Expects EX BPs to have community grievance systems • Met: EX BPs communities use global system: As indicated above, the Company's "'Integrity Platform" provides an anonymous whistleblowing mechanism for OMV employees and external stakeholders'.
C.3	Users are involved in the design and performance of	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages users to create or assess system: No public information found regarding assessments being used in design of the grievance mechanism. • Not met: Description of how they do this



Indicator Code	Indicator name	Score (out of 2)	Explanation
	the channel(s)/mechanism(s)		Score 2 <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: EX BPs consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Response timescales: The Integrity Platform will respond within ten days to the initial report. [Integrity platform faq, 6/8/2019: <a href="http://omv-group.integrityplatform.org">omv-group.integrityplatform.org</a>]</li> <li>• Not met: How complainants will be informed</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Integrity Platform states in its FAQ 'Reports do not have any negative consequences for the reporter as long as the report is made in good faith'. System is open to employees and external stakeholders. [Integrity platform faq, 6/8/2019: <a href="http://omv-group.integrityplatform.org">omv-group.integrityplatform.org</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Integrity Platform allows for anonymous reporting: 'You can make a report or ask a question either anonymously or you can choose to disclose your identity. To guarantee your anonymity, data is encrypted and transmitted via the secure and independent server of our external service provider EQS. Neither your IP-address, time stamps nor any other metadata is being protocolled or saved. Thus no information is available which can connect your computer with EQS.' [Integrity platform faq, 6/8/2019: <a href="http://omv-group.integrityplatform.org">omv-group.integrityplatform.org</a>]</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism: 'Aiming to be fully aligned with the requirements of GRI and IPIECA, OMV has further set a target to assess the Community Grievance Mechanisms (CGMs) at all of its sites against the UN Effectiveness Criteria for Non-Judicial Grievance Mechanisms by 2025. The UN Effectiveness Criteria require the grievance mechanism to be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue. En route to this target, one pilot project was successfully implemented in Romania in 2018. The recommendations identified as a result of the audit will be analyzed and implemented at OMV Petrom to enhance the effectiveness of the CGM.' However, no further details could be found relating to the effectiveness of the mechanism. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</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 Company states the following: 'For 97.0% (2017: 97.0%) of our employees, minimum wages or salaries are fixed by law or agreed through collective bargaining agreements.' However, it is not clear whether this is a living wage. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes how living wage determined</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Pays living wages</li> <li>• Not met: Reviews livings wages definition with unions</li> </ul>
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	2	<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: Member of EITI: The Company is a member of the Extractive Industry Transparency Initiative. [Sustainability Report: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Reports taxes and revenue by country: The Company discloses payments made to governments. The criteria are based on the following: 'Where OMV makes a payment directly to the government, these payments will be reported in full, irrespective of whether this is made in the sole capacity of OMV or in OMV's capacity as the operator of a joint operation. In cases where OMV is a member of a joint operation for which the operator is a state-owned entity (i.e. a government), payments made to that state-owned entity will be disclosed where it is possible to identify the reportable payment from other cost recovery items. For host government production entitlements, the terms of the agreement have to be considered; for the purpose of reporting in this report, OMV will disclose host government entitlements in their entirety where it is the operator.' Payments to governments has a specific section of the annual report including taxes, royalties and fees by country including government and projects. [2018 Annual Report: <a href="http://omv.com">omv.com</a>]</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Although the Company has high union representation, which as proxy for non-retaliation in practice, no evidence found in relation to commitment to not interfering with the right of workers to form or join trade unions and bargain collectively. The Company has provided additional evidence to CHRB. However, this document or its content has not been found in publicly available sources. Also, as indicated in A.1.2, it is not clear whether the Company provides alternative measures in locations where the exercise of these rights is restricted under law. [Code of Conduct, April 2018: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining: The Company discloses that 86.7% of its employees are represented by local trade unions or works councils. [Sustainability Report: <a href="http://omv.com">omv.com</a> &amp; Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <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	<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: Injury Rate disclosures: The Company discloses in its annual report various health and safety indicators. The Lost-Time Injury Rate for both the Company and its contractors in 2018 was 0.30 mn hours worked, and the Total Recordable Injury Rate was 0.78 mn hours worked. [2018 Annual Report: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: Fatalities disclosures: The Company lost 'one OMV employee and two contractor employees in 2018 in an explosion followed by a fire during a routine workover operation at a well in Komsomolskoye, Kazakhstan.' [2018 Annual Report: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company has a vision of "ZERO harm - NO losses". The targets include zero work-related fatalities, stabilizing Lost-Time Injury Rate at below 0.30 per 1 million working hours, and keeping its leading position for Process Safety Event Rate. [2018 Annual Report: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: Met targets or explains why not: The Company met the LTIR goal and explains the fatalities occurred. [2018 Annual Report: <a href="http://omv.com">omv.com</a>]</li> </ul>
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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: Process to identify indigenous rights holders</li> <li>• Met: How engages with communities in assessment: The Company conducts Environmental and Social Impact Assessments, 'which include free and prior informed consultation and consent of local stakeholders. The purpose of a SIA is to ensure that consideration for indigenous and human rights, as well as the views of the local communities, are incorporated and addressed throughout all phases of the project life cycle'. These assessments include 'a baseline study, community needs assessments, a stakeholder analysis, and a study of associated social risks.' [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to FPIC (or ICMM)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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 has provided evidence to CHRB. However, this document or its content has not been found in publicly available sources.</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</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)	0.5	<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: How implements security (inc VPs or ICOC): The Company indicates that 'where relevant, third-party security contractors are formally inducted in OMV Human Rights Standards and awareness of the Voluntary principles on Security and Human Rights'. Some of its own employees who are responsible for the implementation of human rights in the Security department are trained on human rights, however, it is unclear how this relates to the Voluntary Principles or the ICOC, and whether this is widely implemented in its security personnel (human rights training covers different departments, including this, as part of a company target). [Sustainability Report: <a href="http://omv.com">omv.com</a> &amp; Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> <li>• Met: Example of respecting HRs in security: The Company states that 'A human rights clause is included in the contracts with private security providers. With all the public security forces in high-risk countries, OMV has secured a Memorandum of Understanding also referring to human rights. OMV follows the International Association of Oil and Gas Producers (IOGP) guidelines on the principles of discharging Duty of Care in insecure environments and on the use of force and firearms.' [Sustainability Report: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: Ensures Business Partners follow security approach: As indicated above, the Company states that a human rights clause is included in the contracts with private security providers. Not clear however, how it goes in relation to joint ventures. [Sustainability Report: <a href="http://omv.com">omv.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Assesses and involves communities: The Company indicates that 'Effective community engagement is a powerful security mitigation measure in regions experiencing conflict or instability. In high-risk countries, OMV's local security and community engagement strategies are tightly integrated, promoting effective policies, mutual respect, and transparency with all local stakeholders. They, in turn, directly contribute to OMV's stable and secure operating environment. This cooperation encourages a precautionary approach in early detection and resolution of local grievances.' [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> <li>• Not met: Working with local community</li> </ul>
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"> <li>• Not met: Action to prevent water and sanitation risks: The Company indicates that it used the 'IPIECA Global Water Tool' for oil and gas to identify operations in water scarcity or stress hotspots. Together with the 'Water Risk Filter' it increases 'understanding of current and potential future water constraints'. 'Both results were used to identify water-related risks of priority sites and develop appropriate relevant water management plans. In OMV Tunisia, for instance, priority sites are either sites located in water-stressed areas or that have a very high consumption of freshwater'. The Company discloses that near its operations in Libya, together with other companies and entities, the Company has provided equipment for water access, constructed water tanks, drilled wells, and provided water pumps. However, no evidence found of specific action plans to manage specific right to water risks (the example mentioned seems assistance to local communities in a wider programme covering water and sanitation among other topics). [Sustainability Report: <a href="http://omv.com">omv.com</a> &amp; Improving Social Services in Libya, 6/8/2019]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: 'Minimizing environmental impacts by way of water and soil pollution prevention, reduction of emissions, efficient use of energy and natural resources, and avoiding biodiversity disruption is an integral part of the OMV HSE Policy.[...] The OMV Group Environmental Management Standard requires that all relevant OMV businesses and activities (including investment, acquisitions, and divestment) implement an Environmental Management System (EMS) consistent with ISO 14001 and adhering to the minimum requirements listed. [...] By 2020, OMV aims to achieve 100% compliance by all operational sites with the OMV Group Environmental Management Standard as well as the requirements of ISO 14001 and ISO 50001.' However, no specific target related to water stewardship found, including considerations of water use by local communities and other users in the vicinity. [Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</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		No allegations meeting the CHRB severity threshold were found, and so the score of 24.52 out of 80 points scored in themes A-D & F has been applied to produce a score of 6.13 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	2.42 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, OMV made data public that met one or more elements of the methodology in 23 cases, leading to a disclosure score of 2.42 out of 4 points.
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 sustainability report 'has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option, and in line with the Austrian Nachhaltigkeits- und Diversitätsverbesserungsgesetz and guided by Oil and Gas Sector Disclosures presented following the launch of GRI G4 Guidelines.' The report includes references on every page to relevant GRI indicators. [Sustainability Report: <a href="http://omv.com">omv.com</a> &amp; Sustainability report 2018, 04/2019: <a href="http://omv.com">omv.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0.8 out of 4	<p>OMV 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> <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> <p>Demonstrating a forward focus</p> <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

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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.