

**Company Name** PTT  
**Industry** Extractives  
**Overall Score (\*)** 45.4 out of 100

Theme Score	Out of	For Theme
4.3	10	A. Governance and Policies
12.5	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
7.5	20	D. Performance: Company Human Rights Practices
12.5	20	E. Performance: Responses to Serious Allegations
4.4	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	<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: General HRs commitment: PTT states that it adheres to human rights principles as prescribed by law, and to international standards such as the United Nations Universal Declaration of Human Rights (UNUDHR), the UN Framework and Guiding Principles on Business and Human Rights (Ruggie Framework), and principles of the United Nations Global Compact (UNGC). PTT is a UNGC signatory. In its Sustainability Management Policy it states that it 'encourages practices within PTT Group that respect human rights, cultures, and individual rights granted by the law, covering all stakeholder groups within PTT Group's operational boundary, and in accordance with the following international principles: United Nations Global Compact (UNGC) Principles on Human Rights, United Nations Universal Declaration of Human Rights (UNDHR), United Nations Framework and Guiding Principles on Business and Human Rights (Ruggie Framework: Protect, Respect, Remedy).'</li> </ul> <p>[Sustainability: People webpage, June 2018: <a href="http://pttplc.com">pttplc.com</a> &amp; PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: UNGPs: as above</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>Met: OECD: PTT states that it has a human resource management policy in place that respects human rights, labor rights and fair treatment in accordance with... the UN "Protect, Respect and Remedy" Framework for Business and Human Rights, the International Labor Organization (ILO), and the OECD Guidelines for Multinational Enterprises. [Sustainability: People webpage, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>
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>Met: ILO Core: The Company's Sustainability Management Policy states that its human rights scope covers the basic rights and freedoms granted to all individuals. This scope of issues under PTT and PTT subsidiaries responsibilities include: working conditions, freedom of association and collective bargaining, forced and compulsory labour, child labour, safe and healthy working conditions, and discrimination. [PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>Not met: Explicitly list All four ILO apply to EX BPs: The scope of the Sustainability Management Policy does not cover business partners. The Company's Supplier Sustainable Code of Conduct expects suppliers to adhere to minimum human rights standards, but the scope does not include collective bargaining. [PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a> &amp; PTT Supplier Sustainable Code of Conduct, N/A: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Explicit commitment to All four ILO Core</li> <li>Not met: Respect H&amp;S of workers</li> <li>Not met: H&amp;S applies to EX BPs</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 Company states that it is 'currently not a participant of the Voluntary Principles on Security and Human Rights, however PTT operates by endorsing accordingly to the Principles which align to PTT Group Security Management Standard.' In addition, in its Security, Safety, Health and Environmental Policy, it states that it has a QSHE culture which: 'Protect the organization from security threats by stringent standards and measures with respect to the Universal Declaration of Human Rights.' However, it has not made the Group Security Management Standard available and does not provide any additional details. [Sustainability: People webpage, June 2018: <a href="http://pttplc.com">pttplc.com</a> &amp; Quality, Security, Health and Environment Policy, Dec 2018: <a href="http://pttplc.com">pttplc.com</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 Company states that indigenous people are one of the stakeholder groups it focuses on to create a sustainable positive impact in its host communities and to respect all human rights where they operate. However, it does not include an explicit commitment to respect the rights of indigenous people. [PPT Sustainability Management Policy, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: ILO 169</li> <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	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 stakeholder engagement: The Company indicates that 'PTT's mission toward its stakeholders encloses 6 groups, which are the country, communities and society, customers, shareholders, partners, and employees. The mission encompasses more than merely producing results and generating profit. As a national energy company, the company must maintain balance between responding to stakeholders and taking into account the benefits of the people and the nation. Therefore, engaging with diverse groups of stakeholders assists PTT in understanding and prioritizing sustainability issues related to its business operations. Furthermore, it aids in effectively responding to sustainability challenges and opportunities that may potentially affect all stakeholder groups'. However, it does not commit to engaging with potentially and actually affected stakeholders on its human rights issues. [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>Not met: Regular stakeholder engagement: The Company indicates that 'PTT conducted the Environmental Impact Assessment (EIA) and organized sessions to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			listen to concerns and opinions from surrounding communities. The hearings was a significant step to identify best approach for project implementation and adjust the gas pipeline route for effectiveness of the construction whilst gaining trust and acceptance from stakeholders. The company also set up monitoring mechanism, conducted satisfactory surveys, and followed up on complaint cases on a monthly basis'. However, it is not clear that the company regularly engages with potentially and actually affecter stakeholders. [Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ] 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: The Company indicates that 'PTT prioritizes protection and remediation procedures for all individuals affected from its operations. The company provides channels to receive complaints particularly in crisis and emergencies in all areas of operations, set the process for expedient access to remedy, both as financial remedies (compensation, financial supports), and non-financial remedies. Non-financial remedies may include establishing emergency point to receive grievances and complaints to provide initial remediation, providing advices or recommendation supports from specialist, as well as providing communication channel to listen to concerns and complaints from stakeholders'. However, no evidence found of a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. [State Enterprise Performance Evaluation Report: <a href="http://pttplc.com">pttplc.com</a>]</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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The board of directors approves the Company's compliance framework, in which the Company states that it respects human rights and complies with the principles of human rights law. In addition, as indicated below, the CEO is signatory of the CEO Guide to Human rights. [Compliance Framework, August 2017: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Board level responsibility for HRs: The Company states in its website that 'PTT's Board of Directors has assigned Corporate Governance Committee to oversee PTT Group's Sustainability Management and Policy, which covers human rights management throughout PTT Group's supply chain'. Members of the Board are part of the Corporate Governance Committee. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Speeches/letters by Board members or CEO: The CEO has signed the CEO Guide to Human Rights. [WBCSD Website - CEO Guide to Human Rights: <a href="http://wbcسد.org">wbcسد.org</a>]</li> </ul>
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: The Company indicates that 'Regarding the Group's Human Rights performance, PTT's Board of Directors has assigned Corporate Governance Committee to oversee PTT Group's Sustainability Management and Policy, which covers human rights management throughout PTT Group's supply chain. This is overseen by Organization Management and Sustainability Function, comprises Senior Executive Vice President and Executive Vice President for Sustainability Management. Furthermore, Corporate Management Department is assigned to manage performance in line with the Group's Human Rights Management System. Performance is reported to Corporate Governance Committee quarterly. This includes communicating policies to responsible functions, whose duty is to ensure effective compliance to human</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			rights management approach. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a> ] <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Incentives for at least one board member: The Company indicates that PTT Board of Directors have Total Recordable Injuries Rate (TRIR) as their performance indicator. No further details found. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: At least one key EX RH risk, beyond employee H&amp;S: Although Board of directors have performance indicator linked to health and safety, it is not clear whether it includes health and safety of local communities and workers of extractive business partners. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</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	1	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>• Met: Senior responsibility for HR: The Company's website states that 'PTT's Board of Directors has assigned Corporate Governance Committee to oversee PTT Group's Sustainability Management and Policy, which covers human rights management throughout PTT Group's supply chain. This is overseen by Organization Management and Sustainability Function, comprises Senior Executive Vice President and Executive Vice President for Sustainability Management. Furthermore, Corporate Management Department is assigned to manage performance in line with the Group's Human Rights Management System. Performance is reported to Corporate Governance Committee quarterly. This includes communicating policies to responsible functions, whose duty is to ensure effective compliance to human rights management approach'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: The Company indicates that 'regarding the Group's Human Rights performance, PTT's Board of Directors has assigned Corporate Governance Committee to oversee PTT Group's Sustainability Management and Policy, which covers human rights management throughout PTT Group's supply chain. This is overseen by Organization Management and Sustainability Function, comprises Senior Executive Vice President and Executive Vice President for Sustainability Management'. However, no details found on how day-to-day responsibility is allocated across the range of relevant functions within the Company. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Day-to-day responsibility for EX BRs</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 Company indicates that the Senior Executive Vice President for Organization Management and Sustainability, the Executive Vice President for Organization Management and Sustainability and the Vice President for Corporate Management System Department have Lost Time Accident (LTA) as their human rights performance indicators. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: At least one key EX HR risk, beyond employee H&amp;S: Although senior executives have performance indicator linked to health and safety, it is not clear whether it includes health and safety of local communities and workers of extractive business partners. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The company indicates that ' PTT Group's Human Rights risks have been included as a part of the enterprise risk management. It was allocated as risks at functional level. Today, relevant units at functional level are managing human rights risk effectively, through risk management plan and reporting to relevant Committees. This comprehensive management approach resulted in zero human rights complaints. However, in case of high impacts and severity, PTT will consider management of human rights risks at a higher level, including business unit &amp; support functional level and corporate level, respectively. PTT has conducted human rights risks assessment for PTT Group since 2015. The latest review of operational areas and risk assessment was conducted in 2018. This risk assessment addresses various operations in industry groups and operational areas. The assessment covers 117 operational areas in 29 countries where PTT operates. The process covers identification of key issues, impacts on vulnerable groups, and the likelihood of impacts at the national-level of operations. Vulnerable groups include women, indigenous people, LBGTQI, underprivileged people and children. The objective behind this risk assessment is to consolidate corporate human rights risk reports, in conjunction with project-level human right risks reports'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment: Although the Company indicates that 'this comprehensive management approach resulted in zero human rights complaints', no evidence found on whether the Company carries out assessments of the adequacy of the management system in managing human rights, being this overseen by the Audit Committee (or whether a third independent party conducted it). [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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>• 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 indicates that ' To foster understandings in business and human rights, PTT continues to raise awareness to all employees through internal journal articles, magazines and public relations emails. The content is drafted to ensure reader's ease in comprehension and cover contents about human rights principles, approaches, management systems and case studies from other businesses'. However, it is not clear that it includes local languages where necessary. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder</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	<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: See indicator A.1.2</li> <li>• Not met: Communicating policy to EX contractors and joint ventures: The Company indicates that it 'supports and encourages PTT's business partners to operate with consideration and respect to human rights, and in compliance with PTT's Human Rights Guideline. (...) Notably, PTT adopted the Supplier Sustainable Code of Conduct which covers issues on environment, labor rights, business ethics, etc. The Code of Conduct is enforced on suppliers with the contract values at over 2 million baht, and/or whose work affects safety and environment. This includes vendors who wish to register as suppliers with PTT'. However, CHRB could not find information about how the Company communicates its human rights Policies down its supply chain. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Including to EX BPs (removed): (Removed)</li> <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	0.5	<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: See indicator A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The Company indicates that 'PTT also conducted PTT Group's Sustainability Management and PTT Integrated Management System (PIMS) training courses. The content covers human rights performances in business sector, as well as best practices in business</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>operations with respects to human rights. The trainings commenced in 2014. As of now, there have been 47 classes of participants. The number of participants is equivalent to 78 % of all employees'. However, CHRB is looking for evidence that all its workers are trained on its human rights policy commitment(s). [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Trains relevant EX managers including security personnel: Also, 'for training of security officers, PTT stipulated that the security companies must provide necessary trainings to the security officers in line with the company's Term of References. Emphasis is placed on prevention of human rights violations, e.g. raising awareness that security and safety are basic human rights for all, avoiding the use of violence against others, and no use of violence against offenders'. In relation to own operations, the Company states that, in 2017 'PTT conducted an academic seminar titled 'Business and Human Rights' for executives and employees in functions relevant to human rights performances'. These include safety and security personnel. 'The seminar's content covers overview of international human rights management, the government's directions, and how human rights issues can be cascaded from the businesses to state enterprises'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2: See indicator A.1.2</li> <li>• Not met: Both requirements under score 1 met: See above</li> </ul>
B.1.6	Monitoring and corrective actions	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: See indicator A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Met: Monitoring EX BP's: In its website section 'Supply chain management', the Company indicates: 'PTT has in place supplier assessment and audit programs to manage risks, define mitigation plans, and evaluate performance based on jointly developed mitigation plans. Assessments take into consideration quality/quantity/safety in production and delivery, PTT's basic requirements, and minimum requirements in labor and environmental laws and management standards such as ISO 9001, ISO 14001, and OHSAS 18001. [...] In addition, PTT conducts supplier audits for the refinery group and Ethanol/B100 factories, covering criteria such as quality of products and services, work process and delivery, environmental health and safety at work, adherence to the PTT Supplier Sustainable Code of Conduct, transportation of products and services, and social and environmental impact from work processes.' [Supply Chain Management: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2: See indicator 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: In its website, the Company reports its performance on the management of supply chains. According to the figures it 'Conduct on-site audits on 9 hydrocarbon suppliers and 100% audits on critical indirect procurement supplier'. Although it indicates that 9 hydrocarbon suppliers were audited it is not clear the proportion of the extractive business partners that it represents. [Performance - Management of sustainable Supply Chains: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>
B.1.7	Engaging business relationships	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: HR affects selection EXs business partners: On its website section 'Supply chain management', the Company indicates: PTT has standards for selecting, assessing and auditing suppliers in a fair and transparent manner in terms of the supplier's ability to secure business operations and respond to PTT's needs. PTT uses a pre-qualification questionnaire (PQ) to evaluate each supplier's potential in various aspects including service readiness, production rate, transportation, and industrial standards. In addition, sustainability criteria for supplier selection include business integrity, social responsibility, human rights, safety, and environmental management. Qualified suppliers will be included in the PTT Approved Vendor List (AVL). Suppliers must be able to operate according to the PTT Supplier Sustainable Code of Conduct'. Supplier code/supply chain management refers to 'suppliers and contractors' [Supply Chain Management: <a href="http://pttplc.com">pttplc.com</a> &amp; PTT Supplier Sustainable Code of Conduct, N/A: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: HR affects on-going EX business partner relationships: No further information found on decisions to renew, expand or terminate business relationships related to human rights performance. [Supply Chain Management: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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	<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: Stakeholder process or systems: The Company indicates that it 'identifies stakeholder groups who are potentially affected by its operations through the company's sustainability materiality assessment process. The process assesses the needs of all stakeholder groups through various channels, including meetings, complaint mechanism, and questionnaires. The issues identified in the process will then be prioritized in accordance with its significance to the company, and to the stakeholders, to ensure the balanced management of all material issues. As shown in the list of PTT's materiality, four issues out of the top five issues are significantly related to human rights. This includes climate change, security and emergency management, corporate citizenship, and human rights management'. However, no details found on how it has engaged with affected (or potentially affected) stakeholders the last two years on these issues. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Frequency and triggers for engagement [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.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 indicates that 'in 2016, PTT has set up PTT Group Human Rights Management System to serve as a guideline for management of human rights issues related to PTT Group's business operations. It also supports PTT Group's efforts in applying the necessary human rights management processes that covers all of PTT Group's activities which may incur human rights impacts throughout the operation cycle. These activities include merger and acquisition, construction, and decommission. PTT has announced its adoption of the system, and communicated to companies within PTT Group accordingly to ensure appropriate adoption of the system'. In the Sustainable Report, the Company states that 'To ensure the efficacy of the human rights risk assessment, PTT has classified the following groups as vulnerable groups: women, ethnic minority members, foreign laborers, LGBTQI, underprivileged and handicapped individuals, and children. Moreover, PTT has established a practice where it reviews risks of human rights violations in conjunction with relevant organizations annually or as frequent as needed. Instances where such reviews are needed include significant changes in business operations, a new business development, or a divisional-/project-level change. A review may also take place if there is an occurrence of a potential violation of human rights issue'. PTT's 2018 annual human rights risk assessment covered the Group's activities and operations in 117 locations and 29 countries globally (or 8% of the total assessed locations.) The assessment revealed that 9 areas have a possibility to be at risk of human rights violations and are at a level which requires continuous monitoring. Such areas are in 4 countries which are Thailand, Cambodia, Laos and the Philippines. The plausible risks are: forced labor, occupational safety, community health and safety, and human rights management in the supply chain. [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a> &amp; Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: identifying risks in EX business partners: See above, one of the risk areas is human rights management in the supply chain. [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: PTT has established a practice where it reviews risks of human rights violations in conjunction with relevant organizations annually or as frequent as needed. [Project management: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: In consultation with stakeholders: The Company indicates that it identifies potentially affected stakeholders through materiality assessment that 'assesses the needs of all stakeholder groups through various channels, including meetings, complaint mechanism, and questionnaires. The issues identified in the process will then be prioritized in accordance with its significance to the Company and to the stakeholders'. 'Preventions of human rights violation within PTT Group' is included as issue for 'community in the vicinity of PTT operational areas'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: In consultation with HR experts</li> <li>• Met: Triggered by new circumstances: 'PTT has established a practice where it reviews risks of human rights violations in conjunction with relevant organizations annually or as frequent as needed. Instances where such reviews are needed include significant changes in business operations, a new business development, or a divisional-/project-level change. A review may also take place if there is an occurrence of a potential violation of human rights issue'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR): The Company states that it conducts 'Environmental, Social and Health Impact studies for all projects. These studies are within the scope of the Environmental Impact Assessment (EIA) preparation process'. It adds 'The assessment includes social, environmental, and health surveys as well as engagement with stakeholder groups in order to use the information collected to assess potential impacts and identify preventive mitigation and monitoring measures '. However, no details found in relation on whether these assessments include human rights. [Project management: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): In its Human Rights website section, the Company describes its process to identify and assess human rights risks: 'PTT has conducted human rights risks assessment for PTT Group since 2015. The latest review of operational areas and risk assessment was conducted in 2018. This risk assessment addresses various operations in industry groups and operational areas. The assessment covers 117 operational areas in 29 countries where PTT operates. The process covers identification of key issues, impacts on vulnerable groups, and the likelihood of impacts at the national-level of operations. Vulnerable groups include women, indigenous people, LBGTQI, underprivileged people and children. The objective behind this risk assessment is to consolidate corporate human rights risk reports, in conjunction with project-level human right risks reports'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Public disclosure of salient risks: In its CSR the Company states that 'PTT's 2018 annual human rights risk assessment covered the Group's activities and operations in 117 locations and 29 countries globally (or 8% of the total assessed locations.) The assessment revealed that 9 areas have a possibility to be at risk of human rights violations and are at a level which requires continuous monitoring. Such areas are in 4 countries which are Thailand, Cambodia, Laos and the Philippines. The plausible risks are: forced labor, occupational safety, community health and safety, and human rights management in the supply chain. Since then, each area has accordingly devised a risk mitigation and management plan for its supply chain. The plan passes on the expectations and commitment to conducting business operation whilst respecting labor rights to suppliers in the supply chain. The PTT Group Sustainability Alignment Committee receives quarterly progress updates regarding the plan'. [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: See above</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: The Company, following the description of the risk assessment discloses a figure where it describes, for each Company level (own operations, joint ventures where it has controls, joint ventures where it doesn't have control, contractors and tier-1 suppliers), which are the potential human rights issues identified, the percentage of assessed areas with risks identified and percentage of those that have mitigation or remediation processes implemented. For each Company level, the Company describes mitigation plans for risk areas. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a> &amp; Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Including amongst EX BPs: See above [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Example of Actions decided: In the case of contractors operation, the Company identified 'safety and occupational health, employment and working</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			environment, community rights, and environment'. Mitigation plans include, among other actions: 'Employees' individual development plan', 'drug and alcohol screening plan', 'provide first-aid supplies', 'collect data and statistics of occupational safety', etc. [Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ] Score 2 • Met: Both requirements under score 1 met: See above
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: The company 'also assigns community relation officers to regularly meet and consult with communities and related stakeholders on a monthly basis, to follow up on concerns and complaints, as well as monitor expectations and satisfactions of relevant stakeholders'. However, it is not clear it what its system for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ] • 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 [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a> & Project management: <a href="http://pttplc.com">pttplc.com</a> ] • Met: Comms plan re assessing risks: See indicator B.2.2 [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a> & Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ] • Met: Comms plan re action plans for risks: See indicator B.2.3 [Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ] • Not met: Comms plan re reviewing action plans: See indicator B.2.4 • Met: Including EX business partners [Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ] Score 2 • Not met: Responding to affected stakeholders concerns: On its website section 'Project Management' the Company states: 'PTT has defined the approaches and communication channels for gathering opinions and grievances of stakeholders and communities. PTT systematically and efficiently responds to complaints at all stages of the project lifecycle before, during and after project development. For major capital projects, the channels for addressing grievances are through the tripartite committee, comprised of PTT, representatives of relevant stakeholders, and government agencies.' In addition, it indicates that, 'in respond to human rights concerns from potentially affected stakeholders, PTT has established channels of communication for easy access, such as emergency hotline in all operational sites, coordination mechanism with community leaders, and PTT Contact Center via phone and website'. However, no evidence found on how it has responded to specific human rights concerns raised by stakeholders. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a> & Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ] • Met: Ensuring affected stakeholders can access communications: In addition to explained above, the Company adds that it 'also assigns community relation officers to regularly meet and consult with communities and related stakeholders on a monthly basis, to follow up on concerns and complaints, as well as monitor expectations and satisfactions of relevant stakeholders. All feedbacks obtained from these processes are used as inputs for project improvements and to find solutions to effectively minimize concerns among communities and stakeholders'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a> & Performance - Human Rights: <a href="http://pttplc.com">pttplc.com</a> ]

### 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	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: PTT has set up channels to respond to and manage human rights-related grievances from all its stakeholders – inside and outside of the organization. Internal channels for employees include the labor unions and the labor relations grievance system, whereas external channels for non-employees and the public are the customer relations center, the Office of the President and the company secretariat, and the investor relations department [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company states that 'no human rights grievances were filed in 2018'. [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages: It is not clear whether the channels are communicated and available in all languages. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Expect EX BPs to have equivalent grievance system</li> <li>• Met: Opens own system to EX BPs workers: The Company indicates various channels available for suppliers and external parties, including online channels and complaint letters directly to CEO, Audit Committee, Executive Vice President, Office of Corporate Audit, Executive Vice President, Corporate Human Resource, or Vice President, Office of the President and Corporate Secretary, and Investor Relations. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>
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: In its Human Rights website section, the Company indicates: 'PTT has developed grievance mechanism to receive complaints through internal and external channels, in order to ensure accessibility of all stakeholders and ensure the process that addresses all kinds of grievances, which also include human rights grievances.' There are external channels, such as Customer Relations Center, submitting complaint letters directly to CEO, Audit Committee, Executive Vice President, Office of Corporate Audit, Executive Vice President, Corporate Human Resource, or Vice President, Office of the President and Corporate Secretary, and Investor Relations, or through various online channels'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The Company indicates that External Parties can submit complaints and grievances through PTT Customer Relations; Submit complaint letters directly to CEO, Audit Committee, Executive Vice President, Office of Corporate Audit, Executive Vice President, Corporate Human Resource, or Vice President, Office of the President and Corporate Secretary, and Investor Relations and through various online channels, including a couple of webpages and Facebook pages of PTT News, We love PTT, PTT Blue Society, PTT Blue Card Application, etc. However, it is not clear it is available in local languages. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Expects EX BPs to have community grievance systems</li> <li>• Not met: EX BPs communities use global system</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</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	0.5	<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: Response timescales: The Company indicates that it 'also sets up reasonable timeline for complaint management. For each step along the process, complaints received from employee must be manage within 30 days, while complaints received from external complainants must be investigated, resolved, and notified to complainants of its resolution and progresses within 7 working days'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: How complainants will be informed: It is not clear how complainants will be informed. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</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	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> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	with State-based judicial and non-judicial grievance mechanisms		<ul style="list-style-type: none"> <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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Says how it would remedy key sector risks: The Company indicates that it 'provides channels to receive complaints particularly in crisis and emergencies in all areas of operations, set the process for expedient access to remedy, both as financial remedies (compensation, financial supports), and non-financial remedies. Non-financial remedies may include establishing emergency point to receive grievances and complaints to provide initial remediation, providing advices or recommendation supports from specialist, as well as providing communication channel to listen to concerns and complaints from stakeholders. (...) For each complaint received, PTT will analyze the causes, find solution, and identify prevention measures. In case that the prevention and remediation processes cannot accommodate initial solution, PTT will designate the mechanism on prevention and remediation through grievance mechanism in the form of a tripartite taskforce. The taskforce consists of representatives from stakeholders including representative from local administration bodies, community leaders and relevant government agencies. This is to ensure that the case is properly and effectively managed, for the satisfaction of all parties'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</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)	0.5	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</li> <li>• Met: Describes how living wage determined: The Company indicates that the 'composition of PTT's living wage and remuneration includes: Salary is in accordance with the compensation structure that is comparable to Thailand's leading businesses and varies according to the work value of each level of the employee.(...) PTT also encourages the negotiation process through the State Enterprise Employees Union of PTT Public Company Limited, with the Relations Committee acting in charge of complaints, claims or expectations of employees. (...) The Company describes all welfare and benefits that can be included depending on the circumstances. The determination of the rate of welfare payments and various benefits is determined by the survey study from the world's leading consultants in order to standardize the pay to leading businesses in that country'. [Human Rights on Website - updated, 23/08/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> Score 2 <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	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>• Met: Reports of taxes and revenues beyond legal minimums: PTT discloses revenues, taxes and royalties by countries for the year 2017 in the separate document 'Consolidated Revenue Transparency 2017' [Consolidated Revenue Transparency 2017, December 2017: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Reports taxes and revenue by country: As above. [Consolidated Revenue Transparency 2017, December 2017: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Steps taken re non EITI countries</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.3	Freedom of association and collective bargaining (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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company indicates that 'The Enterprise Employees Union of PTT Public Company Limited is an independent entity that plays an important role in verifying and investigating grievances with the JCC, whose responsibility is to provide an overview and ensure that the policies and guidelines are up-to-date and benefit employees. The Union's goal is to ensure that employment conditions do not fall below the minimum standard required by laws and state enterprise requirements. PTT encourages and provides opportunities for active employee participation in the Union'. The company's union recognition, approximately 60.4% of total employees, is taken as a proxy for non intimidation or retaliation under this indicator. [Sustainable Human Resource Management: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining: In 2018, 2,235 PTT employees are members of PTT's labor union, or 60.4% of total employees. [Performance - Sustainable Human Resource Management, June 2018: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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)	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: Injury Rate disclosures: Lost time injury frequency rate (per 200,000 hours worked) = 0.02 (2018) [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Lost days or near miss disclosures: Lost day rate (per 200,000 hours worked) =0.07 (2018) [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Met: Fatalities disclosures: Fatalities = 0 (2018) [Sustainability Report 2018, 08/03/2019: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: In its website section about health and Safety Performance, the Company discloses information about its H&amp;S targets for 2020: 0 Lost Time Accident (LTA), 0.066 per 200,000 hours Total recordable injuries rate (TRIR) – Total workforce. [Health and Safety - Performance: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: Met targets or explains why not</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: The Company indicates that 'Consultation is crucial and should take place with indigenous and minority communities whenever decisions are made that may impact on their lands, livelihoods and culture. The claims of minorities will sometimes come into conflict with economic development projects. The affected peoples should be involved in the consultation process where their concerns and expectations taken into account in the design of the relevant projects'. However, no evidence found of a description of the process to identify and recognise affected or potentially affected indigenous peoples. [Human Rights Management System, n/a: <a href="http://pttplc.com">pttplc.com</a>]</li> <li>• Not met: How engages with communities in assessment</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: In its website section about Project Management, the Company states: 'PTT avoids operating projects which require permanent community resettlement. Locations and routes for construction are designed to avoid or minimize disturbance to land use and property to the minimum level in order to gain acceptance from communities through different engagement processes, including the EIA study and public consultation. In case no alternatives are available, PTT provides information to and builds the understanding of the affected people in order to gain their acceptance. Expenses are provided to compensate for the dismantling of homes and any areas needed for making a living as well as for the restoration of livelihood areas and rehabilitation.' However, it is not clear how they identify land holders. [Project management: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works: The Company indicates that its basic human rights risk management when it comes to resettlement include 'Develop approach for resettlement (i.e. guidelines, standards, and procedures) which is consistent with international standards from United Nations High Commissioner for Refugees (UNHCR), IFC, etc'. Also, 'Use informed decision-making where practicable in project planning on resettlement including: Avoid the need for resettlement or reduce the scope of resettlement required; Replace land with land; Replace assets with assets; Provide monetary compensation if above is not practicable; Engage in meaningful consultation with communities to inform them of potential impacts; Apply free, prior and informed consent of all impacted/relevant individuals including community, minority including indigenous people, etc; Ensure the monitoring and assessment of indicators that reflect the successful resettlement; When resettlement is unavoidable, commit to work collaboratively and transparently with local communities, including indigenous peoples'. However, it is not clear what its valuation methods are and how legitimate tenure rights holders were involved in the determining the valuation. [Human Rights Management System, n/a: <a href="http://pttplc.com">pttplc.com</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): In its website section about Security, Safety and Occupational Health, the Company describes how it implements its security approach: 'PTT has established PTT Group Security Management as well as guidance for PTT group security risk assessment for setting up performance monitoring framework to ensure security aspect is consistent throughout PTT and PTT Group. In 2011, PTT Way of Conduct was issued which is part of personnel job responsibilities is being followed by PTT group. Central operators are responsible for evaluating job performance to be in accordance with PTT group security risk assessment manual. The output from assessment and appeals for security and safety issues are analysed and used in order to improve successively security management system. PTT collaborates with government agencies for timely warning and emergency notifications in case of an emergency. Security practice training is regularly performed in all PTT sites, together with emergency practice training for personnel to prepare and effectively cope with emergency situations.</li> </ul> <p>PTT is concerned about human right issues arising from security. Hence, PTT has addressed human right regulation including quality, security, health, and environment policies to be followed. The regulations cover life, property, and data protection, as well as organizing training courses, such as martial art and people frisking skills, for PTT security personnel and included in one of the requirement for employment. Evaluation of security personnel performance is regularly monitored through security assessment of PTT group for assuring that all security personnel recognize their right in performing their job duty in which do not abuse ignore or deny basic human rights.' However, it does not include VP commitments. [Security, Safety and Occupational Health: <a href="http://pttplc.com">pttplc.com</a>]</p> <ul style="list-style-type: none"> <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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 'To ensure efficient water management, PTT has established the PTT Group Water Management Team, consisting of water and utilities management experts. The Team's tasks are to monitor, evaluate, report water situations in the eastern part of Thailand, and forecast the need for water in industrial estates during the next 10 years as part of effective water management. In addition, the Team also takes into consideration the most efficient management to minimize the adverse effects to the environment and the communities regarding the EEC Development. A risk management plan is in place to address possible draught events. These short-term and long-term operation plans are submitted to the management of companies within the group and the Risk Management &amp; Internal Control Committee on a quarterly basis'. Also, 'PTT Group has implemented water management to reduce the risk of water shortages and create benefits for the community as follows: Increase of water reserves, e.g., expansion of water reservoirs, seeking new water sources, etc; Research and Development for desalination; Sustainable consumption and 3Rs Principles (Reduce/ Reuse/ Recycle); Corporate Social Responsibility'. However, it is not clear how it implements corrective action plans for identified specific risks to the right to water and sanitation in its own operations. [Water Management: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Water targets considering local factors</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: Indonesian government sues PTTEP Australasia over Montara oil spill for USD 2 bn</li> <li>Area: Environment Damage</li> <li>Story: On May 3, 2017, the Indonesian government filed a lawsuit against PTT Exploration and Production (PTTEP) and its Australian subsidiary, PTTEP Australasia (PTTEP AA), over the so-called Montara oil spill off Australia in 2009, claiming that the accident caused environmental damage in the archipelago's waters. The Indonesian government is seeking USD 2 billion in damages at the Central Jakarta District Court.</li> </ul> <p>Due to the oil spill, 70,341.76 square kilometres area of the Timor Sea that borders the East Nusa Tenggara Province got polluted. In January of 2010, the leak was plugged and secured permanently. However, during the first year of the Montara oil spill-triggered pollution, fish catches from the Timor Sea waters dropped by 80 per cent.</p> <p>Over the years, Indonesia had tried to negotiate with the company to come to a resolution but was not satisfied with their response. According to the government, PTTEP was not willing to take responsibility for the pollution. A government representative pointed out that PTTEP AA harboured no good will of providing compensation to the victims of the oil spill and even denied polluting the Timor Sea.</p> <p>In response, PTTEP and PTTEP AA claimed that they are confident in proving that there was no damage as per the claim made by the Indonesian Government and reported by the media.</p> <ul style="list-style-type: none"> <li>Sources: [The Nation, 7/5/2017: <a href="http://nationmultimedia.com">nationmultimedia.com</a>][The Australian, 5/5/2017: <a href="http://theaustralian.com.au">theaustralian.com.au</a>][Organisation of Asia-Pacific News Agencies, 7/5/2017: <a href="http://m.oananeews.org">m.oananeews.org</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	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: Public response available: The Company states that "We refer to news reports regarding a lawsuit filed by the Ministry of Environment, Indonesia against PTT Exploration and Production Public Company Limited (PTTEP) and its subsidiary PTTEP Australasia (Ashmore Cartier) Pty Ltd (or 'PTTEP AA') at the Central Jakarta District Court, claiming compensation for damage which it is alleged resulted from a well blow-out during development of the company's Montara field in Australian waters of the Timor Sea in 2009." [Statement on Legal action commenced in Indonesia, 06/05/17]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Response goes into detail: The Company states that " PTTEP would like to clarify that, following the Montara incident, PTTEP AA as the operator of the Montara field coordinated with the Australian Government to fund independent research institutions to conduct scientific studies on the environmental impacts that may have resulted from the oil spill. The studies found no lasting impact on the highly sensitive and biodiverse ecosystems in Australian waters in the areas closest to Indonesian waters. Satellite imagery, aerial surveys and trajectory modelling showed that the majority of oil remained in Australian waters and that no oil reached the Australian or Indonesian coastlines.</li> </ul> <p>In 2010, PTTEP and PTTEP AA received a claim for compensation from the Government of Indonesia (Gol) regarding alleged impacts on the environment and the fishery sector in Indonesia.</p> <p>Representatives of PTTEP AA met with the Gol on a number of occasions in 2010 and 2011 and negotiated sincerely and cooperatively in good faith with the intention of establishing an independent committee mechanism under a Memorandum of Understanding (MoU) to establish whether there had been any damage to the environment in Indonesia, and if so, how this would be compensated. To further this objective, PTTEP AA submitted independent scientific research results to the Gol, including the results of water sampling in and around the reefs closest to Indonesian waters where testing had showed no presence of hydrocarbons from the Montara oil spill, and that the condition of the coral communities in that area was consistent with surveys conducted before the spill. At the time, the Gol would not permit PTTEP AA to access Indonesian waters around West Timor for further scientific studies." [Statement on Legal action commenced in Indonesia, 06/05/17]</p>
E(1).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: The Company states that "PTTEP's environmental management system is designed to address any environmental and social impacts that may arise from our operations. These include greenhouse gas management, water resources management, and waste management. The company remains committed to pursue opportunities to improve our environmental performance and mitigate any negative impacts." [Corporate Sustainability Report 2017, December 2017]</li> <li>Met: Policies apply to the type of business relationships involved: The Company requires suppliers to commit to the environmental standards set out in the supplier code of conduct. [PTT Supplier Sustainable Code of Conduct, N/A: <a href="http://pttplc.com">pttplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Policies address the specific rights in question: The Company states that "One of PTTEP's top priorities is to prevent oil and chemical spills which could cause adverse environmental and social impacts. PTTEP sets a target of zero spills and reviews the Spill Contingency Plan annually. The company regularly reviews specific spill response plan for every operation site to increase the effectiveness of the plan and to ensure compliance with the company's Emergency and Crisis Management Standards and other relevant international standards." [Corporate Sustainability Report 2017, December 2017]</li> </ul>
E(1).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>Met: Engages with affected stakeholders: The Company states that " Representatives of PTTEP AA met with the Gov on a number of occasions in 2010 and 2011 and negotiated sincerely and cooperatively in good faith with the intention of establishing an independent committee mechanism under a Memorandum of Understanding (MoU) to establish whether there had been any damage to the environment in Indonesia, and if so, how this would be compensated." [Statement on Legal action commenced in Indonesia, 06/05/17]</li> <li>Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies.</li> <li>Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case.</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: CHRB did not find evidence of the Company improving the system or engaging with stakeholders followed by the case.</li> </ul>

## 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, PTT 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	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company reports against the GRI indicators, and includes a table on their website with reference to the relevant pages in the Sustainability report. [PTT GRI Reporting table, June 2018: <a href="http://pttgc.com">pttgc.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	PTT met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <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>• Not 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> Discussing challenges openly <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>• Not 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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and Wales.

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