

**Corporate Human Rights Benchmark
2019 Company Scoresheet**

Company Name Petrobras
Industry Extractives
Overall Score (*) 46.6 out of 100

Theme Score	Out of	For Theme
3.1	10	A. Governance and Policies
11.3	25	B. Embedding Respect and Human Rights Due Diligence
6.7	15	C. Remedies and Grievance Mechanisms
10.6	20	D. Performance: Company Human Rights Practices
9.3	20	E. Performance: Responses to Serious Allegations
5.6	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	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states in its Social Responsibility Policy disclosed on its website that it commits to 'Respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships, and fight against discrimination in all forms.' In addition, in its Sustainability Report, it states: 'Our commitment to respect human rights is expressed in the corporate value "respect for life, people, and the environment", in our Ethics Code and our Social Responsibility Policy'. [Social Responsibility Policy: petrobras.com.br] • Met: UNGC principles 1 & 2: The Company states it is signatory of UN Global Compact [Support for Principles and Initiatives: petrobras.com.br] • Met: UDHR: See above. In addition, in its 2019 Disclosure to CHRB Platform, the Company indicates: 'The Corporate Standard Social Responsibility Terms and Concepts encompasses the definition of Human Rights: "rights set forth in the International Charter of Human Rights, which consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and in the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization – ILO".' [2019 Disclosure, 06/2019] • Not met: International Bill of Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: its 2019 Disclosure to CHRB Platform, the Company states: 'In November 2018, we signed the Open Letter Companies for Human Rights proposed by the Brazilian Human Rights Ministry, Brazilian Attorney General's Office and Brazilian Labor Ministry inspired in the UNGPs in which companies commit to 6 actions to promote Human Rights and protect the rights of people.' However, 'inspired in ...' is also not considered a clear commitment statement to the UNGP. [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org & 2019 Disclosure, 06/2019] • Not met: OECD
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"> • Met: UNGC principles 3-6: The Company indicates in its Sustainability Report 2018 that 'We are signatories of the UN Global Compact since 2003' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] • Not met: Explicitly list All four ILO apply to EX BPs: The Conduct guide states that for its purposes, business or institutional partners are considered to be company partners in joint ventures and/or businesses or other legal entities; companies that, by means of formal partnerships, assist and/or facilitate Company activities'. The ethics principles state, in relation to 'business partners, suppliers, service providers and trainees, that it undertakes to: 'select and hire suppliers and service providers based on criteria strictly legal and technical of quality, cost and timelines, and demand an ethics profile in their management and social and environmental responsibility practices, refusing unfair competition, violation of human rights, child labor, forced or compulsory labor practices, and other practices contrary to the principles of this Code, including the production chain of such suppliers'. However, it is not clear if the company has a commitment to FA&CB for business partners. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br & Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company's conduct guidelines requires to 'not practice or condone any form of child labor or forced, slave or degrading labor'. The code of ethics commits to respect and promote diversity and combat all forms of prejudice and discrimination and, in relation to freedom of association and collective bargaining, it states the following: 'acknowledge the right of free association of its employees, respecting and valuing their participation in unions and not doing any kind of negative discrimination against unionized employees; pursuit permanent reconciliation of interests and realization of rights, through institutional channels of negotiation, in its relationship with the unions representing employees'. The Company states that 'all our employees are covered by collective bargaining agreements, either by the Land Staff Agreement, always negotiated in September, or by the Maritime Staff Agreement, always negotiated in November'. [Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br] • Met: Respect H&S of workers: In its Ethics Code the Company states that it commits to 'ensure safety and health at work, providing for that all necessary conditions and equipment'. The Conduct guide also states that is a requirement to ensure 'protection of the lives, physical integrity and personal safety of the employees and the people with whom Petrobras interacts, as well as maintain the security of the facilities and the preservation of environment'. [Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br & Conduct Guide, 2018: http://petrobras.com.br - CHRB 2019.docx#_Hlk17112006 1,44764,44985,0,, HYPERLINK "petrobr] • Met: H&S applies to EX BPs: See above. In addition, the Company's Ethics Code indicates: 'Regarding relation with Business Partners, Suppliers, Service Providers and Trainees, Petrobras System undertakes to: 4.1. make available to employees of service providers and trainees of Petrobras System, when operating in its facilities, the same healthy and safe conditions at work offered to its employees;' As indicated above, the conduct guide also states that business or institutional partners are company partners in joint ventures and/or businesses or other legal entities' and 'companies that, by means of formal partnerships, assist and/or facilitate Company activities'. [Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br & 2019 Disclosure, 06/2019]
A.1.3.EX	Commitment to respect human rights particularly	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Based on UN Instruments: Its Social Responsibility Policy guidelines, does not include commitments to respect human rights in maintaining the safety and security of operations based on UN instrument nor is a participant of the

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry (EX)		<p>Voluntary Principles nor commits to use only ICoCA members. [Social Responsibility Policy: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not met: Voluntary Principles (VPs) participant [Social Responsibility Policy: petrobras.com.br] • Not met: Uses only ICoCA members [Social Responsibility Policy: petrobras.com.br] • Not met: Respecting indigenous rights: In its 2019 Disclosure to CHRB Platform, the Company states: 'In our relationship with indigenous peoples, quilombola communities and other traditional communities, we observe the provision in the Brazilian National Policy of Development of Indigenous Peoples and Traditional Communities (Decree Number 6,040/07), the Normative Instructions and Inter-ministry Ordinance of each body in charge, in this case, the National Indigenous Foundation – FUNAI, the Palmares Cultural Foundation (FCP) and the National Historic and Artistic Heritage Institute (IPHAN); abroad we follow the applicable legislation.' However, no commitment statement to respect indigenous peoples rights. [2019 Disclosure, 06/2019 & Social Responsibility Policy: petrobras.com.br] • Not met: ILO 169 [2019 Disclosure, 06/2019 & Social Responsibility Policy: petrobras.com.br] • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) [2019 Disclosure, 06/2019 & Social Responsibility Policy: petrobras.com.br] • Not met: Expects BPs to respect these rights: In its 2019 Disclosure to CHRB Platform, the Company indicates: 'In December 2018, there was a review of the EPC contracts, construction and assembly of refining process units and Stationary Production Units (UEPs), and civil construction service agreements. [...] the contract clause, declaratory in nature, must include contractor's commitment to the following items regarding communities: Formal policy regarding the respect for Human Rights and disseminate to its stakeholders; Do not practice or agree to any form of sexual exploitation of children and adolescents through employee awareness to fight this violence; Do not practice acts that create excessive force in the interaction between security forces, communities and workers; Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations; Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement); Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks; Make efforts to hire local labor Repair any damages caused t communities' However, there is no reference to UN instrument, Voluntary Principles, ICoCA, ILO Convention 169, UN Declaration on the Rights of Indigenous Peoples . [2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water: On its website section 'Water Resources' the Company indicates: 'Our water resource management aims mainly at the constant pursuit of water use rationalization, which allows us both to ensure the supply we need for our activities and to contribute to water conservation in our facilities' influence areas.' In addition, in its Water at Petrobras document, it indicates: 'We are aligned to global and local initiatives regarding sustainable water use. We were, for example, the first Brazilian company to become associate member of World Water Council (WWC), a global network which mission is to promote awareness, provoke action and build political commitments on critical water issues for facilitating conservation, protection, development, planning, management and efficient use of the resource.' However, there is no commitment to respect the right to water. [Water resources: petrobras.com.br] • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	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"> • Met: Regular stakeholder engagement: The Company has identified and listed the stakeholders with whom it engages, these include the local community, business relations and suppliers, clients, civil societies to mention a few. In addition it indicates on its website section 'Stakeholders': We conduct various types of surveys and monitoring actions among these audiences and with a few segments. We also maintain relationship channels and practices for communication and engagement,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>such as websites, newspapers, magazines and visitation programs. In order to improve and broaden our initiatives, we are in constant dialog with these groups.' In addition, in its 2019 Disclosure to CHRB Platform, the Company describes its engagement action with communities and civil organizations. [Stakeholders: petrobras.com.br & 2019 Disclosure, 06/2019]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Met: Regular stakeholder design engagement: The company state that 'the Corporate Standards for Community Relationship Management and Corporate Standard Diagnosis and Analysis of the Community provides guidelines to manage community relationship in areas that are or may be affected by Petrobras' activities.' In all, twenty-three assessments were produced, eighteen in 2018, and another five in 2017, where information gathered served as inputs that were used in the respective community relationship plans. Thus we prepared 23 Community Relationship Plans addressing the communities present in the scope of our Operational Units in the Brazilian territory. [2019 Disclosure, 06/2019]
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"> • Not met: Commits to remedy: The Ethics Code states that the Company commits to 'identify, evaluate and manage its environmental liabilities, acting preventively and correctively in the solution of the problems which cause them', '[...] keep permanent channels of communication and dialogue with the communities where it operates, with the purpose to prevent, monitor, evaluate and manage the impacts of its activities', 'fix possible losses from damage under its responsibility to affected people or communities, with the maximum agility.' In addition, in its 2019 Disclosure, the Company indicates: 'Regarding relation with the Communities, Petrobras System undertakes to: 7.1 keep permanent channels of communication and dialogue with the communities where it operates, with the purpose to prevent, monitor, evaluate and manage the impacts of its activities; 7.5 fix possible losses from damage under its responsibility to affected people or communities, with the maximum agility. We have as commitment in our Social Responsibility Policy: guideline 3: "Respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships, and fight against discrimination in all forms." and guideline 6 "Be prepared for emergencies, potential conflicts and crises involving our nearby communities".' However, 'manage', 'fix', 'mitigate' are not considered a clear commitment to remedy the adverse impacts on individuals, workers and communities it has caused or contributed to in relation to human rights. [Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br & 2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates in its Disclosure at CHRB Platform: 'We establish as requirement of our Guide to Ethical Conduct: 4.1.1 Do not practice, submit to, or condone any act of violence, prejudice, abuse, discrimination, threat, blackmail, perjury, retaliation, psychological abuse, bullying or sexual harassment, or any other act contrary to the ethical principles of the Petrobras System. We also guarantee of confidentiality and accepts a communication or report of misconduct or of an indication of misconduct made in good faith, and shall not allow retaliation or punishment against any persons making such disclosure or complaint.' However, this statement does not mention the Human Rights Defenders (people who oppose a company's operations or have raised questions about a company's activities, whoever they are). [2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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"> • Met: CEO or Board approves policy: The Code of Ethics was approved by the Petrobras Executive Board and by the Board of Directors on December. [Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br] • Met: Board level responsibility for HRs: In its Disclosure at CHRB Platform, the Company indicates: 'The Safety, Environment and Health Committee is a permanent statutory body, directly linked to Petrobras' Board of Directors, whose purpose is to advise the Board of Directors in the fulfilment of its responsibilities of guidance and superior management of the Company, to the analysis and issuance of recommendations related to the strategic issues of Safety, Environment and Health (HSE) and other directives and guidelines related to HSE Management of the Company, to be submitted to the Board of Directors, as well as analysis of the opportunities and risks related to health, safety and environment and to the discussion of other issues that the Board of Directors deem pertinent to undergo prior consideration by the Committee'. [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org & 2018 Annual Report, N/A: investidorpetrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: The company state that 'the Board members and the executive office members reinforce Petrobras's commitment with the corporate value "respect for life, people and the environment" on their presentations, speeches as spokespersons, interviews for media, statements reporting's, and other relationships with the company's stakeholders.' However, we were not able to find any public evidence of this.
A.2.2	Board discussions	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"> • Met: Board/Committee review of salient HRs: In its Disclosure at CHRB Platform, the Company indicates: 'The Board of Directors established six committees with specific assignments to advise it on the fulfilment of its responsibilities of guidance and senior management of Petrobras. Among them the Health, Safety and Environment Committee with specific assignments to analysis and issuance of recommendations related to the strategic issues of safety, environment and health and other guidelines related to the HSE management of the company.', 'The Executive Board also relies on few committees, composed of executive managers, whit the duty to assist this body on specific matters. Among them, we can highlight the following three committees that have, among their attributions, the responsibility to discuss and advise the Executive Board in subjects related to human resources; safety, environment and health; and social responsibility: The Human Resources, Organization and Governance Committee, the Health, Safety and Environment Committee and the Disclosure, Communication and Social Responsibility Committee.' [2019 Disclosure, 06/2019] • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key EX RH risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Senior responsibility for HR: The Company indicates that 'Human Rights is a cross cutting issue addressed by several Petrobras' departments in Brazil where 96% of our production is carried out.', such as the Social Responsibility Department, the Human Resources Department or the HSE department. The senior role of each of these departments is carried out by an Executive Manager. However, it is not clear which is the specific department/team or senior position which lead and overview the implementation of the human rights strategy. [2019 Disclosure, 06/2019] Score 2 • Met: Day-to-day responsibility: In its Disclosure at CHRB Platform, the Company indicates: 'The Social Responsibility Department is responsible for identifying, analyzing, and mitigating social risks related to the interaction of our business, society and the environment and to promote the social and environmental management in our supply chain; managing our relationship with nearby communities on a continuous and transparent basis and managing the socio-environmental investment, contributing to nearby communities, collaborating to environmental conservation and livelihoods improvement. The Human Resources Department is responsible for matters relating to managing union relations and is responsible to some issues related to decent work, permanent negotiation and dialogue (assignment is describe in the collective labor agreement). We state our commitment to value diversity at the Human Resources Policy and there is a specific area responsible to develop and monitor initiatives that reinforce the respect to human and cultural diversity of the workforce (non-discrimination and equal opportunities). The HSE department is responsible for safety, environment and health activities committing to caring for life and the environment, reducing risk to people's security and health by strengthen process safety and anticipating and responding promptly to emergencies. The HSE department is also responsible for "Commitment to Life" program, which focuses on accident prevention, search of new risk and control solutions. The General Ombudsmen Office is responsible for handling complaints, requests for information, denunciations, requests, queries, opinions, and suggestions from all stakeholders in a confidential, independent, free, and accessible manner.' [2019 Disclosure, 06/2019] • Met: Day-to-day responsibility for EX BRs: See above [2019 Disclosure, 06/2019]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key EX HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: In its Annual Report 2017, the Company presents its Risk Management system. Its risks are classified in 5 groups, one of them its 'Compliance', where 'Risks related to compliance with laws and regulations of our Code of Ethics, Code of Conduct and other related documents' are included. Human rights risks are part of this group of risks. In addition, the Company carries social risk assessments in its projects, which will be evaluated in section B.2. No new relevant evidence in latest reports. [Annual Report, 2017 & 2018 Annual Report, N/A: investidorpetrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: In its Disclosure at CHRB Platform, the Company indicates: 'We have an Executive Risk Committee responsible to monitor business risk treatment and contingency actions and to analyse and make recommendations on risk management policies and processes, as well as the main risks' mitigation actions.' However, there is no information about an assessment of the adequacy of the enterprise risk management system in managing human rights during last reporting year. [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: In its Disclosure at CHRB Platform, the Company indicates: 'All employees must read and sign a declaration of knowledge of the Code of Ethics and the Guide of Conduct. [...] The theme of Human Rights is addressed in all the training courses for new employees. In addition, the topic was addressed in the Code of Ethics and Conduct of Conduct training provided to the entire workforce (holding employees, outsourced employees and employees from subsidiaries). This training has not been translated

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>into other languages. This course is available for the entire Workforce on a regular basis. [...] The Code of Ethics and Conduct training program included 12,970 participants from service providers (outsourced employees) and 657 participants from other companies in the Petrobras system (employees from subsidiaries). For those who were not been trained in 2017, we also offer distance training addressing the Petrobras System's Code of Ethics and the Guide to Conduct, with the attendance of employees of subsidiaries. The online course had 2,940 employees trained and approved in 2018. [...] We have started a continuous cycle of mandatory training, called "Commitment to Compliance Trail," which will help employees to identify compliance risks and how to act in those situations. The training is conducted in the Distance Learning method, and involves senior management, managers, consultants and employees of all careers. In 2018, more than 40,000 employees were trained. In addition to being in accordance with the best practices in compliance, the initiative follows legal determinations and guidelines of regulators.' [2019 Disclosure, 06/2019]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Met: Communication of policy commitments to stakeholder: In addition, it indicates: 'In Petrobras website our communication of policies are available for all our stakeholders (Portuguese and English). The Code of Ethics and Conduct training program included 12,970 participants from service providers (outsourced employees) and 657 participants from other companies in the Petrobras system (employees from subsidiaries). For those who were not been trained in 2017, we also offer distance training addressing the Petrobras System's Code of Ethics and the Guide to Conduct, with the attendance of employees of subsidiaries. The online course had 2,940 employees trained and approved in 2018. [...] Moreover, our engagement with the communities surrounding our Operational Units (OU) takes place in several ways: spaces for dialogue, community leadership visits to the OU, lectures, training, emergency exercises, visits of our teams to the communities, among others. In 2018, 65 meetings of community committees and 568 visits to the communities were held. We consider the Community Committees, voluntary dialogue spaces, one of the most important engagement processes with communities. Currently, we coordinate 13 community committees surrounding Units coverage areas. In these communities, we deal with issues of common interest that are related to our activities and the interests of the communities, such as: risks of operations and emergency exercises preparedness, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues.' [2019 Disclosure, 06/2019] • Met: How policy commitments are made accessible to audience: As above
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"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy to EX contractors and joint ventures: The Company states in its 2019 Disclosure to CHRB: 'Our Code of Ethics and Guide of Ethical Conduct address the relationship with our customers, partners, and suppliers. Our Social Responsibility Policy expresses the commitment to respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships. Regarding our suppliers, our contracts include a clause that requires service providers to refrain from using child labor and slave-like labor or degrading labor conditions. In December 2018, we reviewed our EPC contract drafts to study the inclusion of a new social responsibility clause. This clause will be implemented during 2019. According to the new clause, company providers must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, [...] Moreover, new clause, which is declaratory, states that company providers must: [...]; Refrain from using child labor and slave labor or degrading labor conditions, as well as include a specific clause in this sense in agreements signed with suppliers of inputs and/or service providers; Safe and healthy work environment that includes adequate food, accommodation and sanitary conditions; Respect the right of its employees to form or join trade unions and to bargain collectively; Commit to equal treatment and no-discrimination;[...]'. However it is not clear whether BP includes Joint Ventures in these human rights commitment communication actions. [2019 Disclosure, 06/2019] • Not met: Including to EX BPs (removed): (Removed)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, the Company included a human rights clause to its contracts with suppliers. [2019 Disclosure, 06/2019] • Not met: Including on EX BPs
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"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Trains all workers on HR policy commitments: The Company indicates in its 2019 Disclosure to CHRB Platform the following: 'All basic career training courses have specific topics on the human rights issues addressed in our Ethics Code. In 2016 and 2017 we promoted 144 basic career training for 1,350 participants. In 2016 and 2017, we promoted 47 specific courses (273 participants) related to topics such ethics, social responsibility, diversity and human rights. Moreover, in 2017, Petrobras provided the e-learning course "ethics code and conduct guide" for all employees. The course had 44,893 participations, equivalent to 93% of the employees. Of this total, 6,796 were employees with management function (including the CEO and Executive Directors).The course also had the participation of 12,970 outsourced workers and 657 employees from others Petrobras subsidiaries working at Petrobras Holding. In 2018 we promoted basic career training for 874 new employees including topics of "Human Rights". We also provide distance training addressing the Petrobras System's Code of Ethics and the Guide to Conduct, with the attendance of employees of subsidiaries. The online course had 2,940 employees trained and approved in 2018.' [2019 Disclosure, 06/2019] • Met: Trains relevant EX managers including security personnel: It also indicates in its 2018 Sustainability Report: 'All security professionals acting in their duties, both employees and service providers, were trained and go through a refresh every two years, which involves the basic concepts of human rights and human relations, among others.' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Met: Both requirements under score 1 met
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"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Monitoring implementation of HR policy commitments: In its Disclosure at CHRB Platform, it indicates: 'Regarding our operations, the implementation of our Social Responsibility Policy is part of Evolution Project. The monitoring and control of the performance related to the goals and initiatives set by this project are carried out by a system of critical analysis where the strategic initiatives and main goals are followed up by subcommittees, including Health, Safety and Environment (HSE); and Human Resources (HR), Communication and Management. These subcommittees, which are composed of executive managers and perform a monthly analysis of indicators and related initiatives, recommending studies and actions to the responsible areas in the company. The Evolution Project Leadership Committee (EPLC), composed of ten executive managers led by the Director of Strategy and Management System, evaluates the top indicators and deviations detected in the subcommittees, recommending studies and actions to rebalance the plan. In addition, it presents the results of this evaluation to the Steering Committee, a group composed of the executive board and the CEO of the company. In parallel, each area of the company conducts Critical Analysis meetings (CAMs), providing inputs for the consolidated analyses carried out by the subcommittees and the EPLC. In addition, the areas address the recommendations received from these subcommittees and the Evolution Project Leadership Committee, being responsible for corrective actions.' [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org & 2018 Annual Report, N/A: investidorpetrobras.com.br] • Not met: Monitoring EX BP's: The Company states in its 2019 Disclosure to CHRB Platform: 'Regarding our suppliers, we have a corporate register of suppliers, [...], with the objective of previously evaluating our suppliers under technical, economic-financial, legal-fiscal, integrity and HSE (Health Safety and Environment) requirements. The evaluation criteria vary according to the importance of the items delivered and the type of supplier. [...] Our Code of Ethics requires suppliers and their employees to respect the ethical principles and the commitments of conduct defined in it, as long as their contracts with us remain in force. Based on this code and the standards for the supervision of contracts for goods and services, the contract manager will have the role of guaranteeing the compliance of the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>contractual clauses with respect to Health, Environment and Safety aspects, as well as Social Responsibility. The relationship with suppliers during contractual execution is made through: supervision of the contract's execution; Supplier Performance Index (FDI), which assesses, among other items, the performance with respect to HSE practices; Report of Occurrences (RO) in service contracts, where the necessary nonconformities and improvements are notified.' However it is not clear whether 'suppliers' include all extractive business partners (Joint Ventures included). [2019 Disclosure, 06/2019]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Met: Describes corrective action process: In addition, the Company indicates: 'In cases of noncompliance, the supplier may be asked to carry out a plan to correct the divergence noted. Current contracts may be up to a Commission for Analysis and Application of Sanctions (CAASE). [...] In terms of negative impacts on labor practices, 14 companies were sanctioned in 2018 for occurrences considered to be of high severity. In terms of negative impacts on society, six companies were penalized in the year for reasons of suitability. For this reason, these 20 suppliers had their relationships terminated with us for a specified period.' [2019 Disclosure, 06/2019] • Met: Example of corrective action: As indicated above the Company indicates that 'In terms of negative impacts on labor practices, 14 companies were sanctioned in 2018 for occurrences considered to be of high severity. In terms of negative impacts on society, six companies were penalized in the year for reasons of suitability. For this reason, these 20 suppliers had their relationships terminated with us for a specified period.' [2019 Disclosure, 06/2019] • Not met: Discloses % of EX supply chain monitored
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"> • Not met: HR affects selection EXs business partners: The Company states that 'Every supplier when submitting the proposals in our bidding process or before signing any contract with PETROBRAS must present a "Declaration of compliance with the Code of Ethics, Guide of Ethical Conduct and the Social Responsibility Policy of PETROBRAS". All those declarations are part of a clause at the Standard Contract of Service Agreement.' In addition, in its Sustainability Report 2018, the Company indicates: 'We have a corporate register of suppliers, which has been constantly simplified and modernized, with the objective of previously evaluating our suppliers under technical, economic-financial, legal-fiscal, integrity and HSE (Health Safety and Environment) requirements. The evaluation criteria vary according to the importance of the items delivered and the type of supplier. During part of the year 2018, the registry was the basis for the selection of suppliers in our bids and our contracting. [...] In 2018 we evaluated [...] 2,984 companies in HSE requirements. These evaluations helped to broaden our base of qualified suppliers, contributing to the safety and speed of future bidding processes.' However, it is not clear if this includes BPs. [2019 Disclosure, 06/2019 & Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] • Not met: HR affects on-going EX business partner relationships: In addition, the Company indicates: 'In cases of noncompliance, the supplier may be asked to carry out a plan to correct the divergence noted. Current contracts may be up to a Commission for Analysis and Application of Sanctions (CAASE). [...] In terms of negative impacts on labor practices, 14 companies were sanctioned in 2018 for occurrences considered to be of high severity. In terms of negative impacts on society, six companies were penalized in the year for reasons of suitability. For this reason, these 20 suppliers had their relationships terminated with us for a specified period.' However, it is not clear whether suppliers include extractive business partners. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with EX business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	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"> • Met: Stakeholder process or systems: In its Sustainability Report the Company indicates: 'We classify stakeholders as groups of individuals and organizations that have common social, political, economic, environmental, or cultural issues and needs and that establish or may establish relationships with us and are capable of influencing or being influenced by our activities, business and reputation. The selection of the stakeholders will be determined through the prioritization made from the analysis of their relevance and impact, in addition to the relationships already established with us. The criteria may differ according to each target

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>audience.' In addition, it describes how it engages with some of these stakeholders, including Communities. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br]</p> <ul style="list-style-type: none"> • Met: Frequency and triggers for engagement: The Company describes in its 2018 Sustainability Report, the engagement activities undertaken during the year with each one of its stakeholders groups. For instance, it summarizes the number of Community Committee meetings, Community visits, Engagement and participation of the social responsibility team in Public Hearing Meetings, etc. In addition, in its Disclosure at CHRB Platform, the Company indicates: 'Our interaction with communities takes place in several ways: dialogue spaces, leadership visits to the Operational Units, lectures, training, emergency preparedness exercises, visits of our teams to communities, among others. We would like to highlight the spaces for voluntary dialogue, commonly called Community Committees. In these spaces, we address issues of common interest both to our activities and to the communities, such as: communication about the risks of operations and emergency preparedness exercises, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues raised by the participants.' However, there is no further information about other stakeholders. [2019 Disclosure, 06/2019 & Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] • Not met: Engagement includes EX business partners workers: Although the Suppliers are one of the Company's selected Stakeholders, it is not clear whether their workers are included in the engagement process. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] • Met: Engagement includes EX business partners communities: The Company indicates 'we engage with communities that neighbour the places where we operate', and based on the engagement they develop relationship plans for each of these communities. These engagements can be done by dialogue spaces, leadership visits to the operational units, training, team visit to communities [...]. The company also highlighted the 'community committees' approach that target local social actors, local leaderships, public agencies, civil society organisations among other to engage with the company. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br & 2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: In its Sustainability Report 2018, the Company indicates: 'According to our Corporate Risk Policy, which establishes that risks must be assessed in all our decisions, we prepared in 2018 new guidelines for managing social risks in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. [...] Were carried out 41 social risk assessments in projects along 2017-2018, of which 19 in 2018.' In addition, in its 2017 Sustainability Report, the Company stated: 'Our Risk Policy provides inputs to prepare maps that indicate the probability and impact of our main risks. Risk maps have been prepared taking into account categories that include social risks. The risk analysis allows us to establish criteria and objectives for the preparation of action plans for mitigation and treatment of identified social risks, which will be monitored during project implementation and operations. Our Corporate Standard for Social Risk Management was reviewed in 2017, addressing the various stages of the business life cycle and the methodology for characterizing the social context in the places where we operate, as well as for identification, analysis, evaluation, treatment, and monitoring of social risks.' Finally, in its 2019 Disclosure to CHRB, the Company indicates: 'In our Corporate Standard of Social Risks' Management we consider the following dimensions for identification and risk analysis related to our operations and nearby communities: indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and health environment, right to integrity and security, labor practice at the supply chain, infrastructure and public services, education and professional qualification, income generation and jobs opportunities, technological development and access to technology.' [Sustainability Report, 2017 & Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: identifying risks in EX business partners: The Company states: 'We prepared in 2018 new guidelines for managing social risks in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. [...] The recommendations for project gate transition consider the social context of communities and include actions to mitigate social risks, such as the promotion of human rights, among others.' In addition, in its 2018 Disclosure at CHRB Platform, the Company indicates: 'In order to promote social responsibility in the supply chain in the implementation of investment projects, especially in the Construction and Assembly contracts (Engineering, Procurement, and Construction - EPC), we have included a specific contractual annex on Communication and Social Responsibility. This contractual annex guides the social risks management during construction work implementation by the supplier. We can highlight the following requirement aspects: preparation of a Communication and Social Responsibility Plan, optimizing the procurement for local labor, and promote the reallocation of professionals at the time of demobilization.' However, it is not clear whether this system has a process to identify human rights risks and impacts, as it seems to be focused in manage possible social conflicts more than identify human rights issues, and whether includes extractive business partners. [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org & 2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above [Sustainability Report, 2017 & Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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"> • Met: Salient risk assessment (and context): In its Disclosure at CHRB Platform, the Company indicates: 'Our Corporate Standard of Social Risk Management encompasses the various steps of the life cycle of our business and the methodology characterization of the social context in places where we operate, as well as the identification, analysis, evaluation, treatment and monitoring of social risks. It considers the following key issues: livelihoods and subsistence of local communities, indigenous peoples, traditional communities and vulnerable groups, access to land, water, cultural heritage, pressure on public services and other issues related to the quality of life of the local population. The identification of social risks [see below] allows us to establish criteria and objectives for the treatment of the identified risks as well as to support building a trust relationship with the communities where we operate'. The Company provided new information in its latest Disclosure to CHRB Platform, however it was not material in relation with this indicator. [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org] • Met: Public disclosure of salient risks: In its Sustainability Report 2017, the Company indicates: 'Regarding to the workforce, potential social risks related to human rights include discrimination and lack of equal opportunities, which can be avoided by reinforcing the values of our company and by valuing diversity in the workplace. Regarding to communities, these issues include risks of interference in local livelihoods, indigenous peoples, traditional communities and vulnerable groups, access to land, water, preservation of cultural heritage, pressure on public services and other related issues quality of life of the local population. [...] Regarding the suppliers, issues related to labor rights (freedom of association and collective bargaining,), prohibition of forced and compulsory child labor in the production chain, fighting discrimination in the workplace, working conditions (e.g. health and safety) and impacts on local communities, are specific requirements in registration, declarations, and specific contractual clauses whose compliance is monitored throughout the term of contracts.' No new relevant evidence was found in latest year report. [Sustainability Report, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking	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"> • Met: Action Plans to mitigate risks: In its Disclosure at CHRB Platform, the Company indicates: 'We have incorporated in the Systematics new requirements for the decision-making process which include: Social Responsibility reports and participation of Social Responsibility analysts in the multidisciplinary review group that elaborates recommendations for the project's phase transition. The Social Responsibility report includes the social context and the diagnosis of communities, as well as actions to mitigate social risks.' The Company also indicates that in the

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>risk management system, the risks are described, they are assigned to a responsible person and the treatment measures are described, with their deadlines. Periodically, the system requests an update of the risk status. The Company provided new information in its latest Disclosure to CHRB Platform, however it was not material in relation with this indicator. [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org]</p> <ul style="list-style-type: none"> • Not met: Including amongst EX BPs • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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"> • Met: System to check if Actions are effective: In its Disclosure at CHRB Platform, the Company indicates: 'Actions to mitigate social risks are continuously tracked according to Corporate Standard of Social Risk Management. This tracking includes the execution and the effectiveness of actions, with possible inclusion or exclusion of new salient risks. As a Petrobras project management practice (in line with the recommendations of IPA and PMI), the risks identified in the Risk Workshops are recorded in the Risk Management System. In this system, the risks are described, they are assigned to a responsible person and the treatment measures are described, with their deadlines. Periodically, the system requests an update of the risk status. The total risk of the projects is monitored by the Project Management team, which periodically undertakes risk review workshops with a multidisciplinary team from different areas of the company.' Among Social Risks the Company includes issues such as: 'Regarding the workforce [...] discrimination and lack of equality of opportunity. Regarding communities [...] interference with livelihoods and subsistence of local communities, relationships with indigenous peoples, traditional and vulnerable groups, access to land, water, preservation of cultural heritage, pressure on public services' The Company provided new information in its latest Disclosure to CHRB Platform, however it was not material in relation with this indicator. [Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: The Company describes partially its process to identify its human rights risks and impacts. (See indicator B.2.1) • Met: Comms plan re assessing risks: The Company describes its process for assessing its human rights risks and publicly discloses its salient human rights issues. (See indicator B.2.2) • Not met: Comms plan re action plans for risks: Although the Company describes system (see b.2.3), no evidence found of specific examples. • Not met: Comms plan re reviewing action plans: Although the Company describes its system, no evidence found of examples of lessons learned. (See indicator B.2.4) • Not met: Including EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Met: Responding to affected stakeholders concerns: In its Disclosure at CHRB Platform, the Company indicates: ' we implement community consultations through public hearings conducted by the licensing authority, forums for information about the project, its social and environmental impacts and discussion of Environmental Studies, in order to brief interested parties about the project content, clarifying questions and hearing criticisms and suggestions about. [...] In addition to the public hearing and environmental licensing, we consider community relationship as a long-term process that has as one of its objectives to develop interaction and continuous relationship with the communities in the surrounding areas, maintaining permanent channels of dialogue, aiming to understand the roles and attributions of the different social actors, sharing responsibilities, generating mutual trust and aligning expectations of all parties.' In addition, in 2018 Disclosure to CHRB Platform, the Company added: 'We also received 269 manifestation groups and demands at the local level. The measures adopted to approach the topics consisted of: clarifying matters at the regular meetings of the Community Committee, including the participation of external speakers and government representatives; visits from community leaders, people from the communities and government representatives to our units, aiming at bringing these stakeholders closer and get them acquainted with our activities; meetings, lectures and training for communities; simulations and drills involving communities. One of the ways of dealing with the identified demands was the implementation of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>socioenvironmental projects in the places where we work in complementary education, professional qualification, improvement of the employability condition of young people, children and adolescents rights, environmental education, among others.' [2019 Disclosure, 06/2019 & Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org]</p> <ul style="list-style-type: none"> • Met: Ensuring affected stakeholders can access communications: See above. It also indicates: 'Our interaction with communities takes place in several ways: dialogue spaces, leadership visits to the Operational Units, lectures, training, emergency preparedness exercises, visits of our teams to communities, among others. We would like to highlight the spaces for voluntary dialogue, commonly called Community Committees. In these spaces, we address issues of common interest both to our activities and to the communities, such as: communication about the risks of operations and emergency preparedness exercises, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues raised by the participants.' [2019 Disclosure, 06/2019 & Disclosure CHRB Platform, 24 Aug 2018: business-humanrights.org]

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The indicates in its 2019 Disclosure document that : 'Through the General Ombudsman's Office, Petrobras acts in information requests that arrive via the Citizen Information Service, [...], and also operates in denunciations, complaints, requests, praises and suggestions Company states in its code of ethics (which applies to all employees and contains human rights) [...]. We also make available to our public other means of contact, such as telephone, electronic forms, face-to-face service and the Reporting Channel, for manifestation of denunciations, respecting the confidentiality of the source whenever necessary. Our Reporting Channel is managed by an independent and specialized company. Available 24/7 in three languages (Portuguese, English and Spanish) and in all countries where we operate, the channel centralizes the collection of complaints, including those related to discrimination, harassment and human rights violations.' In its website 'Petrobras Denouncement Channel', there is information related to this grievance mechanism: The Denouncement Channel is 'an independent, confidential and impartial tool available to external and internal audiences of Petrobras and its controlled companies.' [2019 Disclosure, 06/2019 & Report Channel: contatoseguro.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: 'In 2018, our Reporting Channel received a total of 2,396 complaints, including both holding company and subsidiaries. Of these, 878 referred to human rights issues.' In its 2018 Sustainability Report the Company indicates: 'Of the 5,741 requests for information received in 2018, 5,625 were closed by the end of the year. Of these, 4,361 were closed in up to 20 days, while another 819 were closed between 21 and 30 days.' [2019 Disclosure, 06/2019 & Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] • Met: Channel is available in all appropriate languages: The Denouncement Channel is available in Portuguese, English and Spanish, [Report Channel: contatoseguro.com.br] • Not met: Expect EX BPs to have equivalent grievance system: The Company states that 'Our contracts include a clause that states that company providers must have a communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations.' However, it is not clear whether extractive Business Partners are included in this provision. [2019 Disclosure, 06/2019] • Met: Opens own system to EX BPs workers: Its Report Channel 'is prepared to receive complaints related to suppliers, such as those related to violations of the exercise of freedom of association and collective bargaining, among other issues of labor practices and human rights.' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or	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"> • Met: Grievance mechanism for community: Its Report Channel, the independent, confidential and impartial tool to report violations of its Ethics Code and the law, 'is available to external and internal audiences of Petrobras and its controlled companies.' In addition, it indicates in its 2019 Disclosure document that : 'Through

Indicator Code	Indicator name	Score (out of 2)	Explanation
	concerns from external individuals and communities		<p>the General Ombudsman's Office, Petrobras acts in information requests that arrive via the Citizen Information Service, [...], and also operates in denunciations, complaints, requests, praises and suggestions. Company states in its code of ethics (which applies to all employees and contains human rights) [...] . We also make available to our public other means of contact, such as telephone, electronic forms, face-to-face service and the Reporting Channel, for manifestation of denunciations, respecting the confidentiality of the source whenever necessary. Our Reporting Channel is managed by an independent and specialized company. Available 24/7 in three languages (Portuguese, English and Spanish) and in all countries where we operate, the channel centralizes the collection of complaints, including those related to discrimination, harassment and human rights violations.' [Report Channel: contatoseguro.com.br & 2019 Disclosure, 06/2019]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The company provides a free of charge number in the countries where the company operates as well as international collect call number. The company's hotline 'Denouncement Channel' is available in Portuguese, English and Spanish. [Report Channel: contatoseguro.com.br] • Met: EX BPs communities use global system: The Company's Reporting Channel 'is available to all stakeholders, internal or external, including to communities where our business partners in the extractive sector operate, via phone, form or by call free of charge.' In addition, in its Sustainability Report 2018, the Company states: 'Our Reporting Channel, under the management of the Ombudsman's Office, is prepared to receive complaints related to suppliers, such as those related to violations of the exercise of freedom of association and collective bargaining, among other issues of labor practices and human rights.' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br & 2019 Disclosure, 06/2019]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> • Not met: Engages users to create or assess system • Met: Description of how they do this: The Company indicates in its 2019 Disclosure to CHRB Platform: 'Users of the denouncement channel managing software located at General Ombudsman's Office, Compliance and Internal Audit areas, often submit requests for new or modified functionalities, in order to comply with regulatory issues or internal needs, such as customized user profiles and reports. These requests are discussed with Ombudsman's Office management and the approved ones are forwarded to the company responsible for the channel for implementation.' [2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the 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"> • Not met: Response timescales: On its 'Report Channel' website, the Company indicates: 'After registering the denouncement, Contato Seguro will forward, with assurance of anonymity, the information to the Petrobras General Ombudsman Office which will analyze and determine the area responsible for conducting the investigation.' However, CHRB could not find further information about response timescales. [Report Channel: contatoseguro.com.br] • Met: How complainants will be informed: In its Disclosure at CHRB Platform, the Company indicates: 'During the investigation process the demander is periodically updated on the progress of the denouncement and, upon conclusion, receives a response which indicates whether or not there was any substance in his demand.' [2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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"> • Met: Public statement prohibiting retaliation: The Company indicates in its Conduct Guide that 'The Petrobras System has an absolute guarantee of confidentiality and accepts a communication or report of misconduct or of an indication of misconduct made in good faith, and shall not allow retaliation or punishment against any persons making such disclosure or complaint'. [2019 Disclosure, 06/2019 & Conduct Guide, 2018: http://petrobras.com.br - CHRB 2019.docx#_Hlk17112006_1,44764,44985,0,, HYPERLINK "petrobr] • Met: Practical measures to prevent retaliation: The Company indicates in its Ethics Code: ' Ombudsman agencies or instances eventually responsible for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>processing complaints of ethics transgressions will preserve the anonymity of the complainant, in order to avoid retaliation against them and it will notice them of the measures taken'. For grievances raised by phone, the company state that 'the telephone number that originated the call will not be identified in any circumstance.' [Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BPs to prohibit retaliation: The Company states that 'Our contracts include a clause that states that company providers must have a communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations. In addition the company states that 'contractors must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work [...]. [2019 Disclosure, 06/2019]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms: The Company provided information to CHR B in relation to this indicator but it was not material. [2019 Disclosure, 06/2019] • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company state on information provided to CHR B that it 'provides for or cooperates in remediation to victims where it has identified that it has caused or contributed to adverse human rights impacts (or others have brought such information to the company's attention, such as through its grievance channel(s)/mechanism(s). However, it is not clear if the company has a commitment to remedy. [2019 Disclosure, 06/2019] • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	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"> • Met: Living wage target timeframe or achieved: See D.3.1.S2.iii • Met: Describes how living wage determined: In its Disclosure at CHR B Platform, the Company indicates: 'The salary ranges take into account the microregion (1) where the city where the employee will perform his functions, and the respective cost of living, to compose a Minimum Remuneration by Level and Region (RMNR), providing a living wage.' [2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Pays living wages: In its Sustainability Report 2018, the Company indicates: 'The standard entry-level salary varies according to the hired position. Currently, in the case of the graduate level, the lowest compensation is equivalent to 10.9 times the amount of the national minimum wage. In the case of the technical level, the minimum compensation is equivalent to 4.7 times the amount of the national minimum wage.' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] • Met: Reviews living wages definition with unions: In addition, it indicates: ' In 2018, the commitment signed with the oil worker unions in 2017 for automatic salary readjustment by the IPCA (4.19%) was fulfilled on the base date of September 2018, which released both parties from a new collective bargaining process.' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> Met: Member of EITI: The Company is a member of the EITI. No new relevant information in latest report. [Sustainability Report, 2017] Score 2 <ul style="list-style-type: none"> Met: Reports taxes and revenue by country: Petrobras had been publishing the payments made to the Government in Brazil and abroad for several years. On its website section 'Tributes and Royalties', the Company states: 'We present here the amounts paid to the government as taxes and government participation on our oil and gas exploration and production activities.' [Tributes and Governments Participations, 08/2019: investidorpetrobras.com.br]
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Ethics Code, the Company states that it acknowledges 'the right of free association of its employees, respecting and valuing their participation in unions and not doing any kind of negative discrimination against unionized employees; pursuit permanent reconciliation of interests and realization of rights, through institutional channels of negotiation, in its relationship with the unions representing the employees'. And it adds: 'The violation of the principles and commitments expressed in this Code may result in the adoption of disciplinary measures, in accordance with the standards of the companies comprising Petrobras System.' [Ethics Principles - Code of Ethics, 13/12/2018: investidorpetrobras.com.br] Met: Discloses % covered by collective bargaining: The Company indicates in its Sustainability Report 2018 that: 'All our employees are covered by collective bargaining agreements, either by the Land Staff Agreement, always negotiated in September, or by the Maritime Staff Agreement, always negotiated in November.' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] Score 2 <ul style="list-style-type: none"> Met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Injury Rate disclosures: In its Sustainability Report 2018, the Company discloses fatality and Lost Time Injury Rate (LTIR) for the years 2014-2018, and Recordable Accident Rate (RAR) for 2015-2018. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] Met: Lost days or near miss disclosures: See above [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] Met: Fatalities disclosures: See above. The company report 6 fatalities for the year 2018. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] Score 2 <ul style="list-style-type: none"> Met: Set targets for H&S performance: The Company included health and safety targets related to Recordable Accident Rate (RAR) (0,99 for 2019) and Lost Labor Time (LLT) (%) (2.00 for 2019). [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br] Not met: Met targets or explains why not
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Process to identify indigenous rights holders: In its 2019 Disclosure to CHRB Platform, the Company indicates: 'We carry out diagnoses and analysis of the community relationship in order to assess the characteristics and needs of the communities surrounding our Operating Units. From this process, which had a new cycle completed in 2018, we identified traditional peoples and communities, particularly fishermen and quilombolas, as well as riverine, caçaras and indigenous peoples. [...] Indigenous communities exist in municipalities within the area covered by the licensed projects of the Santos Basin Operational Unit, in the municipalities of the north coast of São Paulo and in the south coast of the state of Rio de Janeiro. Although there is no specific forum for indigenous communities, these communities are invited to attend public hearings related our projects in the region.' However, CHRB could not find information about how the Company proactively identifies and recognises affected or potentially affected indigenous people. [2019 Disclosure, 06/2019]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How engages with communities in assessment: As indicated above, the Company carries out 'diagnoses and analysis of the community relationship in order to assess the characteristics and needs of the communities surrounding our Operating Units. From this process, which had a new cycle completed in 2018, we identified traditional peoples and communities, particularly fishermen and quilombolas, as well as riverine, caçaras and indigenous peoples. The relationship plans already include specific actions for these communities, as well as other surrounding communities, in order to direct our actions towards their involvement and development.' However, CHRB could not find further description on how the Company engages with communities in carrying out the assessment. [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br & 2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals: The Company indicates in its 2019 Disclosure to CHRB Platform that it has included a new clause in its contracts with providers: '[the] new clause, which is declaratory, states that company providers must: 'Assess the social risks of its activities in surrounding communities, developing actions to identify, prevent and mitigate adverse impacts on human rights issues (interference in indigenous peoples and traditional communities, in socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement, among others).' However, there is no further information about its own approach to identify legitimate tenure rights holders, or to land resettlements. [2019 Disclosure, 06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: How implements security (inc VPs or ICOC): In its Disclosure at CHRB Platform, the Company indicates: 'Our security activities are performed observing national and international legislation regarding individual and collective rights, good practices and recommendations for respecting human rights. The Protective Intelligence and Corporate Security Policy establishes principles and guidelines for the planning, orientation, execution and improvements of the actions of protective intelligence and corporate security worldwide. The principles are the commitment to protecting people and to preventive action, always in accordance with legal requirements, recommendations and standards. In compliance with national legislation, the operation of security professionals (employees and contractors) is limited to the internal environment of our facilities'. However, there is no reference to the Voluntary Principles or the International Code of Conduct for Private Security Providers. [2019 Disclosure, 06/2019] <ul style="list-style-type: none"> • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (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"> • Met: Action to prevent water and sanitation risks: In its Disclosure at CHRB Platform, the Company indicates: public water management organizations define the maximum water flows each user can withdraw, based upon conservative/restrictive hydrological criteria. Thus, withdrawing more water than authorized is illegal. Furthermore, regulation establishes that, in scarcity situations, human consumption is the prior use to be supplied, which means that all other users should reduce their withdrawals. Our facilities respect the legally permitted maximum volumes and, at corporate level, we did not have knowledge of any significant impact in quantity, distribution of freshwater and water accessibility occasioned by one of our operational units or activities.' In addition, in its website 'Water Resources', the Company indicates: 'Our water resource management aims mainly at the constant pursuit of water use rationalization, which allows us both to ensure the supply we need for our activities and to contribute to water conservation in our facilities' influence areas. In this regard, we seek to adopt little intensive technologies in water use, to minimize water use in operations and processes, and to reuse and identify alternative supply sources, always keeping local water availability and the actions' technical and economic feasibility in mind. Insofar as the wastewater that is generated is concerned, we seek to minimize the amount of polluting substances we discharge, and to properly segregate, treat, and dispose of the currents, always aligned with the release standards and attentive to the capacity of the receiving bodies of water to assimilate the wastewater.' The Company describes in its website some of the initiatives related to water management such as: Water resources and waste water information system; Identification and Mitigation of water risks; among others. [2019 Disclosure, 06/2019 & Water resources: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

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 37.31 out of 80 points scored in themes A-D & F has been applied to produce a score of 9.33 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	2.84 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Petrobras made data public that met one or more elements of the methodology in 27 cases, leading to a disclosure score of 2.84 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"> • Met: Company reports on GRI: In its Sustainability Report 2018, the Company indicates: 'We have adopted the sustainability reporting guidelines of the Global Reporting Initiative (GRI Standards).' [Sustainability Report 2018, 06/10/2018: investidorpetrobras.com.br & GRI Index 2018, 12/2018: investidorpetrobras.com.br]
F.3	Key, High Quality Disclosures	0.8 out of 4	<p>Petrobras 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"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p>

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

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