

**Company Name** Phillips 66  
**Industry** Extractives  
**Overall Score (\*)** 9.9 out of 100

Theme Score	Out of	For Theme
0.9	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
2.5	15	C. Remedies and Grievance Mechanisms
3.1	20	D. Performance: Company Human Rights Practices
2.0	20	E. Performance: Responses to Serious Allegations
1.0	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	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: General HRs commitment: In its Code of Business Ethics and Conduct, the Company states: 'We recognize and respect the dignity of all human beings. Although governments have the primary responsibility for protecting human rights, we believe business has a role in promoting respect for human rights throughout the world, as do other representative groups in civil society. We embrace the right of all people to live their lives free from social, political or economic discrimination or abuse.' However, it is not clear that the company has a commitment to Human Rights. [Code of Business Ethics and Conduct: <a href="https://www.phillips66.com/content/dam/Phillips66/2019/2019-Code-of-Business-Ethics-and-Conduct.pdf">s22.q4cdn.com</a>]</li> <li>Not met: UNGC principles 1 &amp; 2</li> <li>Not met: UDHR: In addition, on its website section 'Human Rights Position', the Company indicates: 'We conduct our operations in compliance with all applicable laws, in accordance with our company values and policies, and consistent with the spirit of the Universal Declaration of Human Rights.' However, 'consistent with' is not consider a commitment by CHRB. [Human Rights position: <a href="https://www.phillips66.com/content/dam/Phillips66/2019/2019-Human-Rights-Position.pdf">phillips66.com</a>]</li> <li>Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: ILO Core: The Company states in its code of conduct: ' we will not hold any person in slavery or servitude or use forced or indentured labor nor engage in human trafficking, and we shall seek to ensure that our supply chains are free of such practices.' In addition, there is a section about no discrimination. However, there is no reference to child labor, freedom of association and collective bargaining. [Code of Business Ethics and Conduct: <a href="https://www.phillips66.com/s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: Explicitly list All four ILO apply to EX BPs: In its Business Partner Code of Conduct the Company indicates: 'Not employ workers younger than sixteen (16) years of age or below the minimum employment age in the applicable jurisdiction; properly disclose the use of any "conflict" minerals contained in any products supplied to Phillips 66; not hold any person in slavery or servitude or use forced or indentured labor; and not engage in human trafficking.' It also indicates: 'Observe all applicable laws and regulations governing wages, hours, recruiting and employment practices, and prohibit unlawful discrimination, harassment and retaliation against their employees.' However, there is no reference to freedom of association and collective bargaining. [Business Partner Code of Conduct]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: See above [Code of Business Ethics and Conduct: <a href="https://www.phillips66.com/s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In addition, its Code indicates: 'We are committed to the safety of everyone who works in our facilities, lives in the communities where we operate or uses one of our products. We will conduct our business with care for the environment, and we must understand and comply with all applicable laws, regulations, and Company policies relating to health and safety.' [Code of Business Ethics and Conduct: <a href="https://www.phillips66.com/s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: In addition, its Business Partner Code of Conduct indicates: 'Conduct their operations in a manner that does not jeopardize the safety or healthy work environment of their employees, and provide workplaces that meet all applicable environmental, health and safety laws, regulations and directives.' [Business Partner Code of Conduct]</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</li> <li>• Not met: Voluntary Principles (VPs) participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights</li> <li>• Not met: ILO 169</li> <li>• Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)</li> <li>• Not met: Expects BPs to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment</li> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC performance standards</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expects BPs to commit to all these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: In its Code of Business Ethics and Conduct, the Company indicates: 'We are committed to the highest ethical standards. We want people to know they can count on us. This commitment flows naturally from our responsibilities to our shareholders, our customers, our families, our vendors, the communities where we live and work, and each other.' [Energy: Policy Risks and Disclosures: <a href="https://www.phillips66.com">phillips66.com</a>]</li> <li>• Met: Regular stakeholder engagement: In its Sustainability Report, the Company indicates: 'At the community level, stakeholder engagement is a key element in how we live our values and act as a good neighbour. The majority of our operating units – including more than 90 percent of our refining operations – have formal community education, outreach or engagement processes, programs or panels. For example, more than 90 percent of our refining operations have community advisory councils or panels to establish and maintain a dialogue between Phillips 66 and the community in an atmosphere of trust and mutual respect. CAC/CAP members are community members who meet with our refinery leadership team on</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			a regular basis to discuss activities and plans, share local interests and concerns, and give us feedback on our performance. We also have extensive community education programs and outreach so we can communicate directly with our neighbours, as we've done successfully in places such as Mossville, Louisiana.' [Sustainability Report 2019, 2019: <a href="http://phillips66.com">phillips66.com</a> & Sustainability Report, 2017: <a href="http://s22.q4cdn.com">s22.q4cdn.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</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects EX BPs to reflect company HRD commitments</li> </ul>

### A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	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: Its Code of Business Ethics and Conduct has a message from its CEO as an introduction. [Code of Business Ethics and Conduct: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: Board level responsibility for HRs</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member: 'Operating Excellence: Drives focus on safety, asset availability and environmental stewardship' has a 35% weight within the Annual incentives for named Executive Officers. Metrics considered in this performance area include 'Total Recordable Rate', 'Lost Workday Case Rate' and 'Process Safety Rate' (also 'Environmental events'). No evidence found, however, of these metrics including health and safety of local communities and workers in extractive business partners. [Proxy Statement, 2017: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: At least one key EX RH risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions</li> <li>• Not met: Senior responsibility for HR</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key EX HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions</li> <li>• Not met: Communicates its policy to all workers in own operations</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy to EX contractors and joint ventures</li> <li>• Not met: Including to EX BPs (removed)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on EX BPs</li> </ul>
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments</li> <li>• Not met: Trains relevant EX managers including security personnel</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Not met: Monitoring EX BP's</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of EX supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR affects selection EXs business partners</li> <li>• Not met: HR affects on-going EX business partner relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with EX business partners to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: In its Sustainability Report, the Company states: 'We respect all human rights and approach our stakeholder engagement from this view of mutual respect.' However, there is no further information on the process or system to identify its stakeholders and engage with them. [Sustainability Report, 2017: <a href="https://www.phillips66.com">s22.q4cdn.com</a> &amp; Sustainability Report 2019, 2019: <a href="https://www.phillips66.com">phillips66.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Engagement includes EX business partners workers</li> <li>• Met: Engagement includes EX business partners communities: In addition, the Company indicates: 'At the community level, stakeholder engagement is a key element in how we live our values and act as a good neighbour. The majority of our operating units – including more than 90 percent of our refining operations – have formal community education, outreach</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>or engagement processes, programs or panels. For example, more than 90 percent of our refining operations have community advisory councils or panels to establish and maintain a dialogue between Phillips 66 and the community in an atmosphere of trust and mutual respect. CAC/CAP members are community members who meet with our refinery leadership team on a regular basis to discuss activities and plans, share local interests and concerns, and give us feedback on our performance. We also have extensive community education programs and outreach so we can communicate directly with our neighbours, as we've done successfully in places such as Mossville, Louisiana.' [Sustainability Report, 2017: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Sustainability Report 2019, 2019: <a href="https://phillips66.com">phillips66.com</a>]</p> <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	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: Identifying risks in own operations</li> <li>• Not met: identifying risks in EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<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: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	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: Channel accessible to all workers: The Company discloses a number of channels to report complaints, including ethics helpline, email, intranet for employees and mail. This channel is available to all workers. The Code contains a general human rights commitment and an explicit commitment to some ILO core elements. [Code of Business Ethics and Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages: In its Code of Business Ethics and Conduct, the Company indicates: 'Representatives fluent in many languages are available. Translation services are also available' However, no further details found on whether all needed languages are covered or the languages in which it is available. [Code of Business Ethics and Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: Expect EX BPs to have equivalent grievance system</li> <li>• Met: Opens own system to EX BPs workers: In its Business Partner Code of Conduct the Company indicates: 'Business partners are also expected to cooperate with Phillips 66 if we or our advisors are investigating any ethics matter involving the business partner. You can contact the Global Compliance and Ethics Office directly or anonymously through the Phillips 66 Ethics HelpLine.' [Business Partner Code of Conduct]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</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>• Not met: Response timescales: The Company states in its Code of conduct: 'All issues brought to the attention of the Global Compliance and Ethics Office are handled according to our reporting process. [...] The Compliance and Ethics HelpLine is operated by a third party and is available 24 hours a day, seven days a week'. [Code of Business Ethics and Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: How complainants will be informed: In addition, it indicates: 'If you choose to remain anonymous and would like an update or wish to follow up with the Global Compliance and Ethics Office, you can request a follow-up identification code' [Code of Business Ethics and Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.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	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Code of conduct states: 'The Company strictly prohibits retaliation against any individual who makes a good faith report of alleged wrongdoing or who participates in an investigation. [...] Any form of retaliation, and any employee who retaliates against someone who makes a report in good faith may be subject to disciplinary action, up to and including termination.' [Code of Business Ethics and Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: In addition, it indicates: 'Although you are encouraged to identify yourself to assist our Company in effectively addressing your concern, you may choose to remain anonymous. [...] We will take care to maintain the confidentiality of your report, consistent with resolving the issue and in accordance with applicable law. Most calls are completely</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			confidential.' In addition, the helpline is handled by a third party. [Code of Business Ethics and Conduct: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects EX BPs to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage target timeframe or achieved</li> <li>• Not met: Describes how living wage determined</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Pays living wages</li> <li>• Not met: Reviews living wages definition with unions</li> </ul>
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Member of EITI</li> <li>• Not met: Reports of taxes and revenues beyond legal minimums</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Reports taxes and revenue by country</li> <li>• Not met: Steps taken re non EITI countries</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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 not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation</li> <li>• Not met: Discloses % covered by collective bargaining</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: The Company discloses in its Sustainability Report the Total Recordable Rate (TRR) of its combined workforce, employees and contractors compared to industry average TRR. The TRR is a measure of the rate of recordable workplace injuries. [Sustainability Report 2019, 2019: <a href="https://phillips66.com">phillips66.com</a>]</li> <li>• Met: Lost days or near miss disclosures: The Company discloses in its Sustainability Report Lost Time Incident Rate (an OSHA metric focusing on accidents that result in a lost workday) for the past five years. [Sustainability Report 2019, 2019: <a href="https://phillips66.com">phillips66.com</a>]</li> <li>• Met: Fatalities disclosures: The Company discloses the number of fatalities for the past five years. [Sustainability Report 2019, 2019: <a href="https://phillips66.com">phillips66.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Met: Set targets for H&amp;S performance: In its Sustainability Report, the Company states: 'We're determined to be the energy industry's safest and most reliable company. [...] Our HSE policy states our commitment to protecting our workforce, customers and communities while achieving our goals for growth, returns and distributions. [...] We continue to improve our safety performance over the years and strive toward a year with no incidents.' [Sustainability Report, 2017: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Sustainability Report 2019, 2019: <a href="https://phillips66.com">phillips66.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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Process to identify indigenous rights holders</li> <li>Not met: How engages with communities in assessment</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Approach to identification of land tenure rights holders</li> <li>Not met: Describes approach to doing so if no recent deals</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How valuation and compensation works</li> <li>Not met: Steps to meet IFC PS 5 in state deals</li> <li>Not met: Describes approach if no recent deals</li> </ul>
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: How implements security (inc VPs or ICOC)</li> <li>Not met: Example of respecting HRs in security</li> <li>Not met: Ensures Business Partners follow security approach</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Assesses and involves communities</li> <li>Not met: Working with local community</li> </ul>
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Action to prevent water and sanitation risks: In its Sustainability Report, the Company indicates: 'Phillips 66 uses robust water and waste management programs and practices at all our operating facilities. [...] We empower and incentivize our sites to find new and efficient ways to reduce waste and conserve resources. For example: [...] Our Ponca City Refinery in Ponca City, Oklahoma, partnered with a local municipality to construct water wells that can serve both the refinery and the local community, ensuring efficient use of the area's limited groundwater resources.' [Sustainability Report, 2017: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Sustainability Report 2019, 2019: <a href="https://phillips66.com">phillips66.com</a>]</li> </ul> Score 2 <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		No allegations meeting the CHRB severity threshold were found, and so the score of 7.91 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.98 out of 20 points for theme E.

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.95 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Phillips 66 made data public that met one or more elements of the methodology in 9 cases, leading to a disclosure score of 0.95 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>Not met: Company reports on GRI</li> <li>Not met: Company reports on SASB</li> </ul>



Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	<p>Phillips 66 met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• 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> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)</li> <li>• 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.

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.