

**Company Name** ENEOS Holdings (former JXTG Holdings)  
**Industry** Extractive  
**UNGP Core Score (\*)** 7.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
1	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>7.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note 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 2020 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

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: According to its Human Rights Policy, the Company states that it 'is committed to upholding human rights. If it is determined that our business activities cause or have caused adverse impacts on human rights, we will take appropriate action to remedy such impacts in accordance with our responsibility to respect human rights.' [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: JXTG Holdings is a member of United Nations Global Compact, and it states in its Human Rights Policy: '[...] we support and respect the 10 principles of the UN Global Compact.' [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: UDHR: According to its Human Rights Policy, the Company 'supports and respects the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) [...]' [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: International Bill of Rights: According to its Human Rights Policy, the Company states that 'The ENEOS Group supports and respects the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights)'. [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: The Company states in its Human Rights Policy: 'This policy was formulated as a guideline for promoting respect for human rights across the entire Group and fulfilling related obligations pursuant to the United Nations Guiding Principles on Business and Human Rights.' In addition, on its website section 'Human Rights', it indicates that 'The ENEOS Group supports international norms such as the United Nations Guiding Principles on Business and Human Rights'. [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> &amp; Human Rights, N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: ILO Core: According to its Human Rights Policy: 'The ENEOS Group supports and respects the International Bill of Human Rights (...)along with international norms on human rights such as the ILO Declaration on the Fundamental Principles and Rights at Work of the International Labor Organization'. [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: UNGC principles 3-6: In addition, the Company indicates: 'As a participant in the UN Global Compact, we support and respect the 10 principles of the UN Global Compact.' [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Explicitly list All four ILO apply to EX BPs: The Company states that it has established basic principles on respect for human rights under its Code of Conduct: 'We shall not engage in any type of discrimination or harassment. We shall not engage in any forms of forced labor or child labor. We shall not engage in business transactions which may lead to the prolongation of conflicts, human rights violations, or inhumane acts'. In addition, the Company discloses its Mining &amp; Metals Group Basic Procurement Policy, found in the tab Supply Chain Management website: 'the Group asks that its business partners comply with the following': 'Comply with labor-related laws and regulations; Abide by laws and regulations related to safety and health and develop a proper labor environment; Prohibit child labor and forced labor; Prohibit discrimination based on race, gender, etc., and respect the human rights, personality, and individuality of employees'.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Moreover, the Company indicates in its 2019 Data Book that 'The JXTG Group supports [...] the fundamental labor rights of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of child labor, the elimination of discrimination in respect of employment and occupation). We conduct our business activities with respect for the human rights not only of our employees, but of all stakeholders, including our suppliers, customers, business partners and members of local communities'. Although the Company mentions discrimination, forced and child labor, there is no explicit mention that it expects its suppliers to commit to the right of freedom of association and collective bargaining, which is also a requirement. [Code of Conduct, N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> &amp; Supply chain management, N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: In its Code of Conduct, the Company describes that its basic principles on respect for human rights are to 'not infringe on human rights through our business activities. We respect internationally-accepted human rights standards and diversity [...]. We shall not engage in any type of discrimination or harassment. We shall not engage in any forms of forced labor or child labor. We shall not engage in business transactions which may lead to the prolongation of conflicts, human rights violations, or inhumane acts'. In addition, in its CSR Report 2019, the Company indicates: 'Four Group companies - JXTG Holdings, JXTG Nippon Oil &amp; Energy, JX Nippon Oil &amp; Gas Exploration, and JX Nippon Mining &amp; Metals - participate in the UN Global Compact, supporting the compact's 10 principles in the four categories of human rights, labor standards, the environment, and anti-corruption.' The company includes a table listing the 10 principles, including: 'Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining'. [Code of Conduct, N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> &amp; CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: Respect H&amp;S of workers: According to the Code of business conduct the Company states that 'We regard safety and security as the foundation of our business activities, set high safety and security standards, always ensure safety and security, and take appropriate measures to prevent any incidents and injuries.' Moreover, regarding health commitments the Company states that 'Health is the core element of our business continuity and development. We take active measures to maintain and enhance the mental and physical health of individuals employed by our group companies'. [Code of Conduct, N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: H&amp;S applies to EX BPs: According to CSR Report, the Company states that the JX Nippon Mining &amp; Metals Group Policy for Selecting Procurement Partners asks that its business partners comply with the following: 'comply with laws, regulations, and social norms, such as those below, and place priority on human rights and environmental impact; [...]'Abide by laws and regulations related to safety and health and develop a proper labor environment.' [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</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 Human Rights Policy, the Company states that it is committed to upholding human rights and, 'as part of our efforts, the JXTG Group will promote the following initiatives. [...]Dialogue and Discussions. The ENEOS Group conducts in earnest dialogue and discussions with relevant stakeholders to ensure that it comprehends and addresses the impacts it has on human rights from the perspective of those affected'. [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: Regular stakeholder engagement: The Stakeholder Engagement section discloses information describing the main means of communication by stakeholder group, including: local communities, NGO, employees and business partners. In addition, in the Human Rights section, the Company states that it 'conducts in earnest dialogue and discussions with relevant stakeholders to ensure that it comprehends and addresses the impacts it has on human rights from the perspective of those affected.' Moreover, 'The development and operation of mines can have a particularly significant impact on the surrounding environment. It is therefore essential to give due consideration to the human rights of local residents and implement measures to ensure coexistence and mutual prosperity with local communities. The JX Nippon Mining &amp; Metals Group's Minera Lumina Copper Chile, the operator of the Caserones Copper Mine, applies a basic three-point policy for supporting local communities: respect for life, protection of the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			community and environment, and compliance with laws and regulations. In keeping with this policy, after the project launch in 2007, the operator began holding briefings and engaging in dialogue with the Collas, the indigenous people who live in the area around the mine site, in an effort to build up trust'. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to remedy: The Company states in its Human Rights Policy that it 'is committed to upholding human rights. If it is determined that our business activities cause or have caused adverse impacts on human rights, we will take appropriate action to remedy such impacts in accordance with our responsibility to respect human rights'. [Human Rights Policy (website), N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies: The Company indicates that people who contact the compliance hotline or the harassment contact point 'are free to seek remediation through external parties for any incidents they have reported to these contact points'. Also, 'In addition to reporting within Group companies, whistle-blowers, who may elect to remain anonymous, can also make reports to designated external attorneys-at-law'. However, no commitment recognising it should not obstruct access to other remedies found. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Collaborating with other remedy initiatives: As it was mentioned above, the complaint can 'also make reports to designated external attorneys-at-law'. However, no commitment including collaborating in initiatives that provide access to remedy found. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Work with EX BPs to remedy impacts: It describes that 'We are now working to set up similar hotlines for overseas subsidiaries in accordance with the circumstances of each country. At certain overseas subsidiaries, we have already Introduced in-house whistle-blowing systems that accept reports in multiple languages'. However, no commitment found that also includes working with business relationships to remedy adverse impacts or through collaborating with those business relationships on the development of third party non-judicial remedies. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company respects ILO Declaration.</li> <li>• Met: Senior responsibility for HR: According to the CSR Report, the Company states that 'The Human Rights Promotion and Human Resource Development Committee is chaired by the officer (director) responsible for the Human Resources Department of JXTG Holdings, and has been established under the JXTG Group CSR Council, which is chaired by the president of JXTG Holdings. The committee is responsible for deliberation on Group-wide policies and approaches to human rights. It confirms and evaluates the activities of each Group company and shares information.' [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.</li> <li>• Not met: Day-to-day responsibility for EX BRs: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.</li> </ul>

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:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company states that 'The JXTG Group has checked for human rights violations (harassment, etc.) at each workplace through employee awareness surveys and legal compliance inspections. In fiscal 2018, we began implementing human rights due diligence based on our human rights policy. The Group identified human rights issues for human rights due diligence, referencing the Guiding Principles on Business and Human Rights (United Nations) and Guidance on Human Rights Due Diligence (Japan Federation of Bar Associations). In the human rights due diligence we carried out in fiscal 2019, we verified whether any human rights violations involving employees or customers, as well as local residents living near refineries and plants, local residents living near service stations, or suppliers, were committed by the Group'. As indicated below, the Company also consulted with Human Rights Now. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: identifying risks in EX business partners: In addition, it reports: 'With the cooperation of its suppliers, the JXTG Group introduced CSR procurement in fiscal 2018. In CSR procurement, we ask our suppliers to respond to verification surveys for human rights due diligence in order to ascertain the status of supplier' human rights efforts.' However, there is not enough evidence about how the Company actively identifies human rights risks in its supply chain. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</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: As indicated above, the Company used employees surveys as part of the process to identify its human rights issues: 'We collect the opinions of employees through JXTG Group employee awareness surveys, which target all officers and employees (including temporary workers), as well as various other surveys and initiatives, for use in in-house initiatives.' However, it is not clear whether it consulted other affected or potentially affected stakeholders. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: In consultation with HR experts: It also indicates: 'For our human rights risk assessment, implemented as part of our efforts to ensure respect for human rights, we asked Human Rights Now to conduct desk research in the interest of ensuring verification from a third-party perspective. Within the JXTG Group CSR promotion structure, we will carefully review the feedback received and make improvements to our business and human rights initiatives as necessary.' [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: Triggered by new circumstances: The Company indicates that 'The JXTG Group has developed company rules and regulations for combating various kinds of risks in its business activities. For the screening of new investments, in addition to country risks (...), we analyze and evaluate ESG-related risks, including environmental risks (...), and human resources risks including human rights, along with occupational health and safety aspects. Based on this, appropriate actions are taken when necessary'. [2019 Integrated Report, 11/2019: <a href="http://ssl4.eir-parts.net">ssl4.eir-parts.net</a>]</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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1</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> Score 2 <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>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The webpage now indicates that 'The ENEOS Group has established a compliance hotline and a harassment contact point as internal contact points for consultation and reporting of issues including human rights violations. These contact points accept anonymous reports of and provide consultation on issues ranging from human rights issues that may occur in the course of day-to-day operations to serious human rights violations'. [Human Rights, N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates in its CSR Report 2019 that: 'In fiscal 2018, the JXTG Group's compliance hotlines received 104 reports.' However, there is no detail about the number of grievances related to human rights. [CSR Report - ESG Data Book 2019, 11/2019: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect EX BPs to have equivalent grievance system</li> <li>• Not met: Opens own system to EX BPs workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community: The Company indicates that 'The ENEOS Group has established a compliance hotline and a harassment contact point as internal contact points for consultation and reporting of issues including human rights violations. These contact points accept anonymous reports of and provide consultation on issues ranging from human rights issues that may occur in the course of day-to-day operations to serious human rights violations'. However, with current evidence it is not clear whether communities or other external stakeholders are allowed to file complaints. [Human Rights, N/A: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <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.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>



## Performance: Responses to Serious Allegations (Not included in the overall score)

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.

### 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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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