

13.0

26

Corporate Human Rights Benchmark 2020 Company Scoresheet



Company Name Equinor Industry Extractives **UNGP Core Score (*)** 13.0 out of 26

Score	Out of	For indicators
Governance a	nd Policy Comm	nitments
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
2	2	A.1.5 Commitment to remedy
Embedding ro	espect and Hun	nan Rights Due Diligence
Embedding	g respect	
1	2	B.1.1 Embedding - Responsibility and resources for day-to-day
		human rights functions
Human Ri	ghts Due Diliger	nce (HRDD)
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying
		human rights risks and impacts
1	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
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts
		are addressed
Remedies and	Grievance Med	chanisms
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or
		concerns from workers
2	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

(*) 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	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company states in its Human Rights policy that it will 'We will conduct our business consistently with the United Nations (UN) Guiding Principles on Business and Human Rights and the ten principles of the UN Global Compact. We respect all internationally recognised human rights, including those set out in the International Bill of Human Rights, and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. [] We also respect applicable standards of international humanitarian law.' [Human Rights Policy 2020, 06/05/2020: equinor.com] Score 2 • Met: UNGPs: The Company states in its Human Rights Policy that it is 'committed to Respecting all internationally recognised human rights, in accordance with the UN Guiding Principles on Business and Human Rights', and provides links to the external voluntary codes it adheres to across its policy, code of conduct and its Business code - the "Equinor Book". [Human Rights Policy 2020, 06/05/2020: equinor.com & The Equinor Book 2018, 16/05/2018: equinor.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Company states that 'we respect all internationally recognised human rights, including those set out in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work'. [Equinor.'S Code of Conduct, 06/2018: equinor.com & Human Rights Policy 2020, 06/05/2020: equinor.com] • Met: UNGC principles 3-6: The Company states that 'we will conduct our business consistently with the United Nations Guiding Principles on Business and Human Rights and the ten principles of the United Nations Global Compact'. It is signatory to the UN Global Compact. [Human Rights Policy 2020, 06/05/2020: equinor.com & Communication on Progress 2019, 27/03/2019: unglobalcompact.org] • Not met: Explicitly list All four ILO apply to EX BPs: It's Human Rights Expectations for Suppliers document cover all ILO core: non discrimination, no forced labor, no child labour and respect to freedom of association and collective bargaining. With respect the last two, the Company states: 'We expect our suppliers to respect, without discrimination, their workers' right to freedom of assembly and association, to organize and to collective bargaining and to form trade unions. In places where these rights are restricted, we expect our suppliers to find alternative means for effective worker-employer collaboration.' It is not clear, however, the scope of this policy, whether it includes extractive business partners (including contractors), as it only refers to 'suppliers', without further definition. The Human rights policy covers all ILO core. However, regarding partners, the expectation is 'to follow the spirit and intent of this policy'. Not clear if they are required to apply it. [Human Rights Expectations for Suppliers, 01/2019: equinor.com & Supplier Declaration, 16/07/19: equinor.com] Score 2 • Met: Explicit commitment to All four ILO Core: The Company's Human Rights Policy reads:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: Respect H&S of workers: The Company indicates that it is 'committed to Respecting all internationally recognised human rights, and in particular () providing safe, healthy and secure working conditions'. [Human Rights Policy 2020, 06/05/2020: equinor.com] Met: H&S applies to EX BPs: The Company indicates that 'we require all our employees and hired contractors to comply with this policy and will offer capacity building to this end () we expect our suppliers and business partners to follow the spirit and intent of this policy when working for or together with us. [Human Rights Policy 2020, 06/05/2020: equinor.com]
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to stakeholder engagement: The Company commits in its Human Rights Policy to 'assess actual and potential human rights impacts from our activities and business relationships, including as appropriate by timely and meaningful engagement with those potentially or actually affected, including potentially or actually affected members of local communities, and aim to apply effective prevention and mitigation actions where needed. It indicates in the sustainability report that 'Stakeholder dialogue is an important part of the content selection process. We conduct our business in continuous engagement with our key stakeholders throughout the year. [] Key stakeholder groups include employees, shareholders, governments, business partners and suppliers, customers, and society at large, including non-governmental organisations and academia'. [Human Rights Policy 2020, 06/05/2020: equinor.com] Score 2 • Not met: Commits to engage stakeholders in design: On its website it indicates: 'using a set of risk assessment processes, we develop stakeholder mapping and strive for collaboration with local representatives to help us understand the topics that communities are interested in discussing [] Routinely using public consultation surveys, interviews, one-to-one meetings and community panels to better understand the expectations from local communities is an important process to ensure our commitment to the rights of indigenous peoples'. However, no particular commitment found to engage with them in the design or monitoring of the human rights approach. [Our approach to human rights, N/A: equinor.com] • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to remedy: The Company states in its Human Rights policy: 'We will provide or cooperate, including with our suppliers and business partners, in providing appropriate remediation to individuals, workers and local communities, were we have caused or contributed to adverse human rights. To such effect, we will also, where relevant, provide or cooperate in effective grievance mechanisms'. [Human Rights Policy 2020, 06/05/2020: equinor.com] Score 2 • Met: Not obstructing access to other remedies: Its Human Rights Policy reads: 'We will not obstruct affected stakeholders' access to other remedies or channels for remedies.' [Human Rights Policy 2020, 06/05/2020: equinor.com] • Met: Collaborating with other remedy initiatives: On its website section about Grievance, the Company states: 'Equinor will cooperate, as appropriate, with other non-judicial and judicial remedy processes, such as the OECD National Contact Points and Ombudsman offices, as well as providing the applicable regulatory and legal processes for grievance handling and access to remedy.' In addition, in its 2019 Sustainability Report, the Company states: 'Our operational-level grievance mechanisms cover our activities in Brazil, Tanzania and our Empire Wind operations in the USA. [] During 2019 there were no concerns raised through our operational-level grievance mechanisms, and none of our business activities involved involuntary resettlement or relocation of people.' [Sustainability Report 2018, 05/03/19: equinor.com & Grievance mechanism, N/A: equinor.com] • Met: Work with EX BPs to remedy impacts: The Company states in its Human Rights Policy: 'We will provide or cooperate, including with our suppliers and business partners, in providing appropriate remediation to individuals, workers and local communities, were we have caused or contributed to adverse human rights. To such effect, we will also, where relevant, provide or cooperate in effective griev

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility		The individual elements of the assessment are met or not as follows:
	and resources for day-to-day		Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact.
	human rights functions		Met: Senior responsibility for HR: The Company has a Human Rights Steering Committee whose role is 'to oversee the implementation of the human rights policy. Its members include senior leaders from our corporate procurement, people and leadership, legal and communications functions and from the exploration and
		1	development and production international business areas'. In addition, on its website the Company states: 'the Executive Vice President of GSB is the Chair of Equinor's Human Rights Steering Committee'. [Sustainability Report 2018, 05/03/19: equinor.com & Our approach to human rights, N/A: equinor.com] Score 2 • Not met: Day-to-day responsibility: The Company announced in its Sustainability Report 2019 ' the creation of a new position, Vice President of Human Rights'. However, no further details found on how day-to-day responsibility is allocated
			across the range of relevant functions of the Company. [Sustainability Report 2019, 16/03/2020: equinor.com]
D 2 1	Idontifying		Not met: Day-to-day responsibility for EX BRs The individual elements of the assessment are met or not as follows:
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 Met: Identifying risks in own operations: The Company indicates on the risk management section of its website that 'Equinor has developed an integrated human rights risk assessment tool allowing us to evaluate risk to people in all operations and supply chain activities. This approach enables Equinor's senior leaders to take holistic business decisions, which incorporates mitigating measures and risk re-assessments. In this way, risk to people's human rights are regularly reported to CEC and Board of Directors as part of the internal risk reporting process. Our management system allows the human rights, country entry and supply chain risk assessments to be evaluated alongside our Impact Assessments and in conjunction with key milestones within our Capital Value Process.' [Our approach to human rights, N/A: equinor.com] Met: identifying risks in EX business partners: In relation to business relationship, the Company states that it 'has developed an integrated human rights risk assessment tool allowing us to evaluate risk to people in all operations and supply chain activities.' [Our approach to human rights, N/A: equinor.com] Score 2 Met: Ongoing global risk identification: The Company indicates that 'risk management is an integrated part of all our business processes and decisions. Equinor has developed an integrated human rights risk assessment tool allowing us to evaluate risk to people in all operations and supply chain activities. This approach enables Equinor's senior leaders to take holistic business decisions, which incorporates mitigating measures and risk re-assessments. In this way, risk to people's human rights are regularly reported to CEC and Board of Directors as part of the internal risk reporting process. Our management system allows the human rights, country entry and supply chain risk assessments to be evaluated alongside our Impact Assessments and in conjunction with key milestones within our Capital Value Proce
			• Not met: In consultation with HR experts: On its website 'Human Rights' on the 'Awareness' section, the Company indicates: 'In collaboration with Impactt we have been developing our approach to supplier assessments in high risk areas, focusing on direct engagement with the supply chain workforce, where the workers voice is at the core.' However, it is not clear whether this process is only for supplier assessment as part of its monitoring process, or if it is part of the global due diligence process. [Human Rights, N/A: equinor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	 Met: Triggered by new circumstances: In addition, the Company states: 'Our management system allows the human rights, country entry and supply chain risk assessments to be evaluated alongside our Impact Assessments, in conjunction with key milestones within our Capital Value Process.' [Our approach to human rights, N/A: equinor.com] Not met: Explains use of HRIAs or ESIA (inc HR): The Company indicates that 'In joint ventures and in partner operated projects, we endeavour to promote Equinor's principles for impact assessment as a tool for managing environmental and social impacts in project performance'. It also says that 'Our requirements for impact assessments are based on national requirements in the countries we operate and guidance as set out in international standards'. However, it is not clear when social impact assessments (ESIAs) that include human rights are or will be carried out. [Impact assessments (ESIAs) that include human rights are or will be carried out. [Impact assessment, N/A: equinor.com] The individual elements of the assessment are met or not as follows: Score 1 Not met: Salient risk assessment (and context): The Company states in its SR 2018: 'We formally introduced human rights as a risk in our risk management framework. The approach assesses the risk to individuals, where the risk levels are based on the severity criteria set forth in the UNGPs. We expect that this tool will strengthen our ability to identify potential human rights effects of our operations and business partners' conduct.' In the SR 2019, it indicates: 'In 2019, we implemented the human rights risk assessment methodology, allowing risk to people's human rights to be reported for the first time through our risk management system. [] The identified potential impacts related to Equinor's business covered 11 separate categories of rights, categorised by employees, workers in the supply chain and local communities.' However, no further information found on the assessment proce
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	Score 2 • Not met: Both requirements under score 1 met The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks: In its SR 2019, the Company indicates: 'In 2019, we implemented the human rights risk assessment methodology, allowing risk to people's human rights to be reported for the first time through our risk management system. [] The identified potential impacts related to Equinor's business covered 11 separate categories of rights, categorised by employees, workers in the supply chain and local communities.' In addition, on its website 'Human Rights' on the 'Risk Management' section, it states: 'Equinor has developed an integrated human rights risk assessment tool allowing us to evaluate risk to people in all operations and supply chain activities. This approach enables Equinor's senior leaders to take holistic business decisions, which incorporates mitigating measures and risk re-assessments.' However, no further information found describing the system implementing action plans to mitigate the salient risks. [Human Rights, N/A: equinor.com & Sustainability Report 2019, 16/03/2020: equinor.com] • Not met: Including amongst EX BPs: As indicated above, on its website 'Human Rights' on the 'Risk Management' section, the Company states: 'Equinor has developed an integrated human rights risk assessment tool allowing us to evaluate risk to people in all operations and supply chain activities. This approach enables Equinor's senior leaders to take holistic business decisions, which incorporates mitigating measures and risk re-assessments.' However, no further information about the Action Plans/system put in place. [Human Rights, N/A: equinor.com & Sustainability Report 2019, 16/03/2020: equinor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not met: Example of Actions decided: The Company indicates in its Modern slavery statement 2019: 'In 2019 a total of 50 assessments were conducted on mostly tier one and on certain occasions to fourth tier suppliers across 16 countries. selected on the basis of perceived risk of harm to people. Findings include cases of excessive working hours, wage deductions for work mistakes. inadequate recruitment practices. wage levels below living wage, lack of rest days and passport retention. In two specific cases. these findings have been addressed through engagement with workers and capacity building of suppliers and subsuppliers, including collaboration in defining action plans. Combined results of efforts by suppliers involved in these cases include but are not limited to discontinued practice of passport retention, wage increase, improved conditions in accommodation areas. discontinuation of fees for work mistakes. strengthened recruitment processes, reduced worker paid recruitment fees, and tighter control of working hours. In one pilot, we have assessed the effectiveness of actions through new interviews with workers'. In addition, the Company states in its SR 2019: 'we have seen positive outcomes for workers through the discontinued practice of retention of worker ID documents, improved conditions in accommodation and sanitation areas, and discontinued fees for work mistakes. The positive steps from these two cases would not have been possible without the close collaboration with our direct suppliers, who have also updated their own internal procedures and allocated staff to develop their own practice in this area. This will be supplemented by the adoption of the "Employer Pays" principle for all new direct and indirect hires from 01 January 2020 by this supplier, as well as through ongoing due diligence of manning agencies in source countries, where this principle will be updated into agency agreements'. However, this evidence seems to refer to changes in individual suppliers' procedures for compliance monito
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: System to check if Actions are effective: The Company states in its SR 2019: 'In 2019, we continued this work [worker dialogue-focused reviews] and performed renewed engagement with workers to help us understand if the implemented actions improved their lives. This renewed engagement confirmed that the efforts taken by our supplier had resulted in return of passports, tighter control of working hours and a strengthened recruitment due diligence process which has significantly reduced worker paid recruitment fees for newly recruited workers compared to 2018. In this case, we believe that this continued engagement is an effective way of measuring results.' However, it is not clear whether the system is part of the monitoring strategy evaluated in indicator B.1.6, following up on specific corrective action plans for specific suppliers, or the due diligence system which is meant to track if salient risks are being mitigated generally. [Sustainability Report 2019, 16/03/2020: equinor.com] Not met: Lessons learnt from checking effectiveness: As indicated above, evidence found seems to refer to following up of specific action plans for specific partners. This indicator looks for lessons learnt related to how mitigating measures are being effective in reducing the risk faced by the Company, rather than moving a specific partner from a non-compliance situation to a compliant one. [Sustainability Report 2019, 16/03/2020: equinor.com] Score 2 Not met: Both requirement under score 1 met
B.2.5	Communicating: Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not met: Including EX business partners: In order to be awarded this indicator,
			the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points
			in B.2.1
			Score 2
			Not met: Responding to affected stakeholders concerns
			Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company indicates in its Code of Conduct that 'the Ethics Helpline is a multi-language service 24 hours a day, 7 days a week and provides a toll-free phone service and web submission portal. It is available for any person who has a legitimate concern. You may choose remain anonymous where allowed by law'. The human rights section of the code indicates to the employee to 'report any human rights abuse in our operations or in those of our business partners'. In addition, the Company's Ethics Helpline website reads: 'we continuously encourage and remind our employees and any external third party that interact with us, to raise concerns or report any suspected or potential breach of law or company policies'. [Equinor's Code of Conduct, 06/2018: equinor.com] Score 2 • Not met: Number grievances filed, addressed or resolved: The Company indicates in its Sustainability report 2019: 'During 2019 there were no concerns raised through our operational-level grievance. [] The number of cases received through the Ethics Helpline was 194 in 2019, an increase from 182 in 2018. The cases received included 62 reported concerns relating to harassment, discrimination and other conduct affecting the working environment. We experienced a decrease in the number of cases related to our suppliers.' However, no details found about the total number of cases related to human rights filed, and either addressed or resolved during the reporting year. [Sustainability Report 2019, 16/03/2020: equinor.com] • Not met: Channel is available in 6 languages: English, French, Spanish, Portuguese, Norwegian and Romanian. However, according the Company's website it has also presence in China, India, and other countries, which languages don't seem to be covered. [Ethics Helpline, N/A: secure.ethicspoint.eu & Where we are, N/A: equinor.com] • Met: Expect EX BPs to have equivalent grievance system: In addition to the Ethics
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	2	N/A: equinor.com The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Company indicates in its Sustainability report that 'The helpline allows for anonymous reporting and is open to employees, business partners and the general public. Equinor has a strict non- retaliation policy.' In addition, the Company has a framework for community grievance mechanisms: 'Equinor has developed internal requirements for establishing and running effective operational-level community grievance mechanisms.' [Sustainability Report 2019, 16/03/2020: equinor.com] Score 2 • Met: Describes accessibility and local languages: The Company's helpline is independently hosted; available online for anyone involved or affected by the Company's activities, and is in 6 different languages. [Human Rights, N/A: equinor.com] • Met: EX BPs communities use global system: The Company has an 'independently hosted helpline available for anyone involved in or affected by our activities to raise a concern. We call this the Ethics helpline, as it is related to our efforts to act in an ethical, sustainable and socially responsible manner, which includes respect for human rights. All information provided into this helpline is confidential and anonymous and is available in six different languages'. [Human Rights, N/A: equinor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts and incorporating lessons learned		The individual elements of the assessment are met or not as follows: Score 1 Not met: Describes how remedy has been provided: The Company states in its
			Sustainability report that 'During 2019 there were no concerns raised through our operational-level grievance mechanisms, and none of our business activities involved involuntary resettlement or relocation of people.' An in its SR 2017: 'In 2017 there were no grievances reported through the mechanisms in Tanzania and Brazil. Two grievances were received in connection with our Sheringham Shoal
		0	wind farm both of which have been settled.' However, it does not explain what the grievances were about or what it did to resolve these issues. No additional information was found in the new material checked. [Sustainability Report 2017, 31/12/2017 & Sustainability Report 2019, 16/03/2020: equinor.com] • Not met: Says how it would remedy key sector risks Score 2 • Not met: Changes introduced to stop repetition
			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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious		Headline: A consortium led by Lundin Petroleum may have been complicit in war
	allegation No 1		crimes committed in Sudan between 1997 and 2003
			Area: Security of Person
			• Story: Equinor holds 20% of Lundin Shares. In October 2018, The Swedish
			Government has authorised the prosecution of a case regarding the activities of
			two corporate directors within Swedish Oil company Lundin Petroleum (which
			Equinor holds a 20% share). The prosecution relates to an investigation into Lundin
			Petroleum, prompted by the submission of a report by the European Coalition on
			Oil in Sudan (ECOS) titled 'Unpaid Debt', for allegedly being complicit in crimes
			against humanity in Sudan and South Sudan between 1998 to 2003. These events
			occurred prior to Equinor's ownership in Lundin.
			During this time there was a non international armed conflict between the
			Government of Sudan and the Sudanese Peoples Liberation Army, among others.
			According to the report, when Lundin formed a consortium which carried out oil
			exploration in an area called Block 5A, this activity set off a battle for control of the
			disputed region and exacerbated conditions, leading to thousands of deaths and
			forced displacement of local populations. It is claimed that Lundin Consortium
			provided logistical assistance or directly or indirectly financed the Sudan Armed
			Forces and allied armed groups, who stand accused of having systematically
			committed war crimes and crimes against humanity against the civilian
			populations. In November 2018 the Swedish Prosecution Authority issued a
			notification of a corporate fine of SEK 3million and forfeiture of economic benefits
			of SEK 3,282 million against Lundin Petroleum in relation to past operations in
			Sudan. This fine would only be imposed at the conclusion of a trial, should one
			eventuate. However, Lundin's chairman and CEO both claim to be absolutely
			certain that neither they, nor any representative of the company did anything wrong during the time in Sudan. In an open letter published 15 November 2018
			they claim that the report 'Unpaid Debt' makes false and baseless claims against
			the company.
			• Sources: [Sudan Tribune - 22/10/2016: <u>sudantribune.com</u>][BHRRC: <u>business-</u>
			humanrights.org][European Coalition on Oil in Sudan - 27/02/2013:
			ecosonline.org][European Coalition on Oil in Sudan - June 2010: ecosonline.org]
E(1).1	The Company		The individual elements of the assessment are met or not as follows:
	has responded		Score 1
	publicly to the		Not met: Public response available: Equinor doesn't provide a public response to
			the reports that Lundin executives will likely be charged by Swedish Prosecutors,
	allegation		nor does it point to the public response provided by the Lundin executives in the
			form of an open letter written by the CEO & Chairman. In previously reported
			comments in 2013 by the Stavanger Aftenbladet, Statoil states that the company
		0	will not comment on Lundin's involvement in other countriesPress spokesperson
			Ola Anders Skauby is quoted as saying "We've got a good cooperation with Lundin
			on the licenses where we both have interests," [Lundin Letter from CEO &
			Chairman, 15/11/2018: <u>lundin-petroleum.com</u> & Stavanger Aftenbladet article,
			27/02/2013: <u>ecosonline.org</u>]
			Score 2
			Not met: Response goes into detail: Equinor doesn't provide a public response to
			the reports that Lundin executives will likely be charged by Swedish Prosecutors,
		<u> </u>	

Indicator Code	Indicator name	Score (out of 2)	Explanation
			nor does it point to the public response provided by the Lundin executives in the form of an open letter written by the CEO & Chairman. In previously reported comments in 2013 by the Stavanger Aftenbladet, Statoil states that the company will not comment on Lundin's involvement in other countriesPress spokesperson Ola Anders Skauby is quoted as saying "We've got a good cooperation with Lundin on the licenses where we both have interests," [Lundin Letter from CEO & Chairman, 15/11/2018: lundin-petroleum.com & Stavanger Aftenbladet article, 27/02/2013: ecosonline.org]
E(1).2	The Company		The individual elements of the assessment are met or not as follows:
	has appropriate policies in place	2	• Met: Company policies address the general issues raised: Equinor's 'Human Rights Policy' says "We respect all internationally recognized human rights, including those set out in the International Bill of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work and applicable standards of international humanitarian law." [Human Rights Policy, n/a & Lundin Human Rights Policy, 28/10/2015] • Met: Policies apply to the type of business relationships involved: The company's 'Human Rights Policy' says, "we expect our suppliers and business partners to follow the spirit and intent of this policy when working for or together with us""We will strive to exercise influence in our business relationships to avoid or mitigate adverse impacts to human rights directly linked to our activities". Equinor's stake in Lundin was non-controlling and so this is sufficient to apply to the type of business relationship. [Human Rights Policy, n/a] Score 2 • Met: Policies address the specific rights in question: The company in its Human Rights policy says "We respect all internationally recognized human rights, including those set out in the International Bill of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work and applicable standards of international humanitarian law". Additionally in its 2018 Sustainability Policy, the company says "Equinor is committed to conducting our security activities in line with our commitment to the Voluntary Principles on Security and Human Rights, 2019: voluntary principles.org & Sustainability Report 2018, 05/03/19: equinor.com]
E(1).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Denies allegations, but has engaged affected stakeholders: Lundin Petroleum denies that it violated the norms of international law or that it participated in or had, or ought to have had, knowledge of any of the illegal acts in South Sudan. In an article titled 'Lundin Petroleum experience in Sudan' written by Christine Batruch, Lundin's Vice President of Corporate Responsibility, it says that "As a principle, Lundin refrains from getting involved in the political affairs of a country; it believes that it cannot make a meaningful contribution in this sphere and prefers to restrict itself to its commercial mission. The situation it encountered in Sudan, however, was exceptional, and the company needed to make clear to the protagonists in the conflict that it saw peace as the best means to ensure sustainable oil operations". The article states that Carl Bildt, one of Lundin's Board of Directors, was responsible for meeting with high level representatives from the Sudanese Government as well as representatives from other nations including Kenya, Norway, UK and USA who were acting as peace mediators. [Lundin Petroleum report (Christine Bartruch), 24/11/2003: lundin-petroleum.com] • Not met: Denies allegations, but reviewed systems to prevent such impacts: In the article titled 'Lundin Petroleum experience in Sudan', written by Christine Batruch, Lundin's Vice President of Corporate Responsibility, it says "The company learned that, despite its desire to restrict itself to a commercial role, it could not ignore either the socio-political developments in its area of operations or the claims—even if unfounded—of a possible connection between its activities and the conflict. A reaffirmation of its values in a Code of Conduct, a greater involvement in community life, stakeholder engagement and the suspension of activities were the tools adopted by the company in response to the challenges it faced". However this isn't sufficient

Indicator Code	Indicator name	Score (out of 2)	Explanation
			were learned from its business dealings in Sudan, however it failures to provide
			details on the type of review that was carried out into its systems, and simply
			notes that, "A reaffirmation of its values in a Code of Conduct, a greater
			involvement in community life, stakeholder engagement and the suspension of
			activities were the tools adopted by the company in response to the challenges it
			faced". This is not sufficient detail. [Lundin Petroleum report (Christine Bartruch),
			24/11/2003: lundin-petroleum.com]
			Not met: Denies allegations, and ensures systems prevent such impacts: In the
			article titled 'Lundin Petroleum experience in Sudan', written by Christine Batruch,
			Lundin's Vice President of Corporate Responsibility, it identifies the lessons that
			were learned from its business dealings in Sudan, however it failures to provide
			details on the type of review that was carried out into its systems, and simply
			notes that, "A reaffirmation of its values in a Code of Conduct, a greater
			involvement in community life, stakeholder engagement and the suspension of
			activities were the tools adopted by the company in response to the challenges it
			faced". This is not sufficient detail demonstrating that its systems will prevent
			similar impacts occurring in the future. [Lundin Petroleum report (Christine
			Bartruch), 24/11/2003: lundin-petroleum.com]

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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