

Company Name Gazprom
Industry Extractives
UNGP Core Score (*) 4.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	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
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	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)
1	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
Remedies and Grievance Mechanisms		
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
4.5	26	

(*) 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	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: UNGC principles 1 & 2: The Gazprom Group states in its sustainability report that 'supports 10 Principles of the United Nations Global Compact creating the framework for business community activities as related to human rights, labour relations, environmental protection and countering corruption, as well as 2030 Sustainable Development Agenda enacted by the Resolution of the UN General Assembly and 17 sustainable development goals (SDGs) defined in it'. [Sustainability Report 2018, 14/10/2019: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company publishes the following statement in the 2018 Annual report: 'Governed by the standards of the International Labour Organization, Gazprom respects the fundamental rights and principles set forth in ILO conventions and recommendations, covering in particular: freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour; elimination of discrimination in respect of employment and occupation'. Moreover, in the 2019 Annual Report, it indicates that it has committed to 'The Declaration on Fundamental Principles and Rights at Work, adopted by the International Labour Organization (ILO) on 18 June 1998'. [Annual report 2018, 2018: gazprom.com & 2019 Annual Report, 2020: gazprom.com] • Met: UNGC principles 3-6: The Company indicates that 'The Gazprom Group supports 10 Principles of the United Nations Global Compact creating the framework for business community activities as related to human rights, labour relations'. Moreover, in the 2019 Annual Report, it indicates that it has committed to the UN Global Compact Principles. [Sustainability Report 2018, 14/10/2019: gazprom.com & 2019 Annual Report, 2020: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicitly list All four ILO apply to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company publishes the following statement in the Annual report: 'Governed by the standards of the International Labour Organization, Gazprom respects the fundamental rights and principles set forth in ILO conventions and recommendations, covering in particular: freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour; elimination of discrimination in respect of employment and occupation'. No further evidence found in the latest reports. [Annual report 2018, 2018: gazprom.com] • Met: Respect H&S of workers: The Annual Report 2018, in its statement of commitment to different labour rights, states that 'Gazprom also adheres to international standards on hours and conditions of work, occupational safety', etc. The Company discloses a health and safety policy, but it is in Russian. The Company indicates, in its 2019 Code of Corporate Ethics, that it 'strives to ensure safe working conditions by observing the existing laws and technical standards. The Company develops and introduces its own work safety standards containing high requirements to safety'. Moreover, in its 2019 Annual Report, it states that 'Gazprom puts the health and safety of its employees at the top of its agenda by consistently improving its safety management system and monitoring risks and challenges to its stable operations'. Finally, in its Occupational Health, Industrial, Fire and Traffic Safety Policy, it indicates that Gazprom and its subsidiaries assume

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the following obligations: 'to continuously reduce the rates of workplace injuries, occupational diseases and accidents, as well as to minimize the risks of fires and work-related road accidents; to ensure compliance with industrial safety regulations and regulatory documents at the federal, regional and corporate levels; (...) to ensure the implementation of industrial safety solutions, technologies and methods'. [Annual report 2018, 2018: gazprom.com & Occupational Industrial Fire and Road Safety Policy, 17/09/2019: gazprom.com]</p> <ul style="list-style-type: none"> • Not met: H&S applies to EX BPs: The Company indicates that 'Gazprom and its subsidiaries assume the following obligations in order to achieve the goals set out herein: (...) to demand that suppliers and contractors operating in the interest of Gazprom and its subsidiaries follow the requirements of industrial safety regulations and regulatory documents at the federal, regional and corporate levels'. However, it is not clear that the Company also expects its extractive business partners to commit to respecting the health and safety of their workers beyond legal compliance. [Occupational Industrial Fire and Road Safety Policy, 17/09/2019: gazprom.com]
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"> • Met: Regular stakeholder engagement: In its 2018 Sustainability Report, it states that 'The list of potential material topics was extended as a result of stakeholder engagement'. Also, in the same document, the Company discloses examples of engagement with different stakeholders, such as 'Cooperation with representatives of indigenous peoples of the North (organization of the national festivals, preserving the lifestyle, traditional habitat, national crafts etc.)'. [Gazprom Group's Sustainability Report 2017, Sep 2018: gazprom.com & Sustainability Report 2018, 14/10/2019: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company provided feedback to CHRB regarding this indicator, but supporting document is still not public. • Not met: Regular stakeholder design engagement: The Company uses the following engagement mechanisms for local communities: 'Open public hearings; Information centers; Information disclosure; Charity and sponsorship projects; Environmental education and awareness-building campaign; Group-wide and areas-of-operation opinion surveys'. However, no evidence found on whether the results of engagement are used to design and/or monitor the Company's human rights approach. No further evidence found in the latest reports [Gazprom Group's Sustainability Report 2017, Sep 2018: gazprom.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The environmental report indicates that "Gazprom pays constant attention to practical ways of resolving the issues of restoration and preservation of disturbed soils. Biological and technical remediation works aimed at recovery of land productivity and its economic value, landscapes preservation are conducted." The Company also requires its business partners 'To reduce adverse environmental impacts, ensure resource management, and make every effort to preserve the climate and biodiversity and compensate for possible environmental damage.' However no evidence has been found of a clear commitment to remedy the adverse impacts beyond environmental impacts in the supply chain on individuals, workers and communities. No further evidence in latest reports. [Environmental Report 2018, 2018: gazprom.com pdf & Environmental Policy, 25/5/2015: http://gazprom.com phase new companies for me\Gazprom\Comentarios sobre gazprom.docx#_Hlk154630271,733,801,179,,gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts

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	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"> • Met: Commits to ILO core conventions: See indicator A.1.2. Commitment to the UN Global Compact.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Senior responsibility for HR: The Company's Corporate Ethics Commission 'is responsible for the implementation of the Code of Corporate Ethics' as well as considering 'cases of employee conflicts of interest. However, the Code does not have the Company's HR commitments. It is not clear it has a senior manager(s) roles responsible for relevant human rights issues within the Company. [2019 Annual Report, 2020: gazprom.com] Score 2 <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying 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"> • Not met: Identifying risks in own operations: The Company uses a materiality matrix to identify risks in its operations and it has identified some aspects related to human rights such as: local communities, freedom of association and collective bargaining, water management, equal opportunity, occupational health and safety. The Company also reports on risks related to human resources. However, no evidence has been found of a description on how it identifies human/labour rights risks. The Company has provided comments to CHRB regarding this indicator. However, evidence was not found in publicly available sources. No further evidence found in the latest reports. [Gazprom Group's Sustainability Report 2017, Sep 2018: gazprom.com] Score 2 <ul style="list-style-type: none"> • Not met: identifying risks in EX business partners • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company has indicated that it does not have public information available regarding this indicator. • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: The Company indicates that 'The special labour conditions assessment (SLCA) is carried out at the companies included in the Integrated System of Process Safety Management Perimeter in accordance with the schedules updated annually. Based on its outcomes, the labour conditions classes are established, and activities aimed at the employees' labour conditions improvement are developed and implemented'. [Sustainability Report 2018, 14/10/2019: gazprom.com] • Not met: Including amongst EX BPs • Met: Example of Actions decided: The Company indicates, in its 2018 Sustainability Report, that 'The key occupational risks, as related to occupational hazards affecting the employees, remain vibroacoustic factors (noise, vibration) and hardworking process. In order to improve the labour conditions and make them healthier, the companies included in the Integrated System of Process Safety Management Perimeter carried out 6,000 activities in 2018 for the total amount of RUB 510 million, and labour conditions were improved for 12,300 employees'. The Company then gives examples of actions taken to reduce the content of harmful substances in the working areas air and to eliminate noise. It indicates that 'In 2013–2019, the number of workplaces with harmful and hazardous labour conditions declined from 38.0% to 14.3% due to implementation of the activities aimed at labour conditions improvement at the companies included in the Integrated System of Process Safety Management Perimeter'. [Sustainability Report 2018, 14/10/2019: gazprom.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met: See above.

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company indicates that ‘In 2013–2019, the number of workplaces with harmful and hazardous labour conditions declined from 38.0% to 14.3% due to implementation of the activities aimed at labour conditions improvement at the companies included in the Integrated System of Process Safety Management Perimeter’. Also, ‘In order to improve the labour conditions and make them healthier, the companies included in the Integrated System of Process Safety Management Perimeter carried out 6,000 activities in 2018 for the total amount of RUB 510 million, and labour conditions were improved for 12,300 employees’. However, CHRB is looking for a system(s) for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. Evidence seems to refer to one particular issue. No further evidence found. [Sustainability Report 2018, 14/10/2019: gazprom.com] • Not met: Lessons learnt from checking effectiveness: The Company indicates that ‘Proceeding from the SLCA (Special labour conditions assessment) outcomes, the commission developed the Lists of Recommendations for Labour Conditions Improvement and the appropriate activities are carried out in a timely manner’. However, no example found of lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of the due diligence process. [Sustainability Report 2018, 14/10/2019: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • 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 • Not met: Including EX business partners: The Company has provided comments to CHRB regarding this indicator. However, content was not material. 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. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company has provided comments to CHRB regarding this indicator. However, content was not material. • Not met: Ensuring affected stakeholders can access communications: The Company has provided comments to CHRB regarding this indicator. However, content was not material.

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company indicates, in its Code of Corporate Ethics, that ‘The Corporate Ethics Commission (hereinafter referred to as “the Commission”) shall be responsible for the enforcement of the requirements and provisions of the Code’. The same document provides an email address and a phone number to address the Commission. [2019 Code of Corporate Ethics, 20/08/2019: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: Regarding the Hotline service in 2019, the Company indicates that ‘More than 900 reports were received (mainly via e-mail), of which most reports were not directly related to the purpose and objectives of the Hotline and only 81 reports concerned possible violations of Russian laws at Gazprom Group — The majority of reports concerned possible violations of procurement rules; complaints related to gas sales to end consumers (primarily, households); possible fraudulent activities by third parties and other violations’. However, it is not clear the number of grievances about human rights issues filed, addressed or resolved. [2019 Annual Report, 2020: gazprom.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Channel is available in all appropriate languages • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BPs workers
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"> • Not met: Grievance mechanism for community: The Company indicates, in its Code of Corporate Ethics, that ‘The Corporate Ethics Commission (hereinafter referred to as “the Commission”) shall be responsible for the enforcement of the requirements and provisions of the Code’. The same document provides an email address and a phone number to address the Commission. However, it is not clear that it has one or more channel/mechanisms, or participates in a shared mechanism, accessible to all external individuals and communities who may be adversely impacted by the Company to raise complaints/concerns, including about human rights issues related to the Company, particularly in high risk locations. [2019 Code of Corporate Ethics, 20/08/2019: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company has indicated that it does not have publicly available information regarding this indicator. • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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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