

Company Name Inpex
Industry Extractive
UNGP Core Score (*) 5.0 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
1	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)
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
Remedies and Grievance Mechanisms		
1.5	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
5.0	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: General HRs commitment: The Company is committed to respecting human rights. The Company states that 'Guided by the UN Guiding Principles on Business and Human Rights, this Policy was developed to comprehensively define our firm commitment to respect human rights.' [Basic Policies, 05/22/2017: inpex.co.jp] • Met: UNGC principles 1 & 2: INPEX Corporation has been a participant in the United Nations Global Compact since December, 2011. [We Support the Global Compact, 03/2020: inpex.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company states in its Sustainability Report 2019 that it supports international standards such as [...] the United Nations Guiding Principles on Business and Human Rights. It also indicates that 'to demonstrate the stance on respect for human rights and fulfil the responsibilities, in May 2017 INPEX established and announced the INPEX Group Human Rights policy'. In the Human Rights Policy, however, the Company states that 'Guided by the UN Guiding Principles on Business and Human Rights, this Policy was developed to comprehensively define our firm commitment to respect human rights'. 'Guided by' does not constitute a formal commitment to the UNGPs according to CHRB wording criteria (Human rights policy considered to be the main document in this context). [Sustainability Report 2019, 2019: inpex.co.jp & Human Rights Policy, 05/22/2017: inpex.co.jp] • 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 explicitly committed to respecting the ILO fundamental rights at work. 'We treat everyone who works for INPEX fairly and without discrimination in the workplace. We do not tolerate forced labour or illegal forms of child labour. We respect the freedom of association and the right to organize in accordance with ILO principles'. The right to collectively bargain is also reinforced by the company. In the sustainability report it states: 'The labour agreement with the INPEX labour union stipulates that the union possesses the three labour rights (the right to organize, the right to bargain collectively, and the right to act collectively)'. [Human Rights Policy, 05/22/2017: inpex.co.jp & Sustainability Report 2019, 2019: inpex.co.jp] • Met: UNGC principles 3-6: INPEX Corporation has been a participant in the United Nations Global Compact since December, 2011. [We Support the Global Compact, 03/2020: inpex.co.jp] • Not met: Explicitly list All four ILO apply to EX BPs: The Company discloses in its Human Rights Policy that expects its business partners to respect human rights. However, its not clear if the Company explicitly states to its business partners the commitment to respecting worker's right to collective bargain. [Human Rights Policy, 05/22/2017: inpex.co.jp & Sustainability Report 2019, 2019: inpex.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company explicitly committed to respect its business partners employees and its workers freedom of association and not to discriminate nor tolerate forced labor or child labor. The right to collectively bargain is also reinforced by the company. In the sustainability report it states: 'The labor agreement with the INPEX labor union stipulates that the union possesses the three labor rights (the right to organize, the right to bargain collectively, and the right to act collectively)'. [Human Rights Policy, 05/22/2017: inpex.co.jp & Sustainability Report 2019, 2019: inpex.co.jp] • Met: Respect H&S of workers: The Company committed to respecting the health and safety of workers. "Through the implementation of this Policy, and by openly

Indicator Code	Indicator name	Score (out of 2)	Explanation
			communicating our HSE information to our stakeholders, we seek to be recognized as a company that endeavours to continually improve HSE performance." [Health, Safety and Environmental Policy, 06/26/2018: inpex.co.jp] <ul style="list-style-type: none"> • Not met: H&S applies to EX BPs
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company explicitly commits to engage with stakeholders. "We will mitigate and seek to prevent potential adverse impacts identified while engaging with those who may be directly affected or their legal representatives in an appropriate manner. We will integrate the findings of the assessments in our operations across functional groups." [Basic Policies, 05/22/2017: inpex.co.jp] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: Although the Company states in its Human Rights Policy that it 'will conduct assessments on potential human rights impacts. We will mitigate and seek to prevent potential adverse impacts identified while engaging with those who may be directly affected or their legal representatives in an appropriate manner', it is not clear if the Company lets affected stakeholders be active participants in the development of the Company's approach to human rights. [Basic Policies, 05/22/2017: inpex.co.jp & Human Rights Policy, 05/22/2017: inpex.co.jp] • Not met: Regular stakeholder design engagement
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"> • Met: Commits to remedy: The Company explicitly commits to remedy adverse impacts of individuals. "Where we identify that we have caused or directly contributed to adverse human rights impacts, we will provide or cooperate in providing access to appropriate remediation through legitimate processes, including grievance mechanisms where relevant." [Basic Policies, 05/22/2017: inpex.co.jp] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 [Sustainability Report 2019, 2019: inpex.co.jp & Human Rights Policy, 05/22/2017: inpex.co.jp] • Not met: Senior responsibility for HR: The Company has a board level Compliance Committee responsible for corporate ethics and the Code of Conduct, including Human Rights Policy. However, there is no specific senior management responsibility for human right issues. [Sustainability Report 2019, 2019: inpex.co.jp] 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 • Not met: identifying risks in EX business partners Score 2 <ul style="list-style-type: none"> • 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) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: The Company states in its Reconciliation Action Plan(RAP) that 'RAP progress and achievements were broadly and regularly communicated to INPEX staff and contractors, the Aboriginal and Torres Strait Islander communities' and it will 'regularly communicate RAP progress and achievements broadly and consistently to INPEX staff and contractors, Aboriginal and Torres Strait Islander communities and wider Australian public' during 2019 to 2022. However, no evidence found of the Company communicating the process to identify which are its human rights risks and impacts. See indicator B.2.1 [Reconciliation Action Plan August 2019 to July 2020, 03/2020: inpx.co.jp] • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks: The Company states in its Reconciliation Action Plan that 'Develop, implement and review a strategy to communicate the Reconciliate Action Plan (RAP) to all relevant internal and external stakeholders and make it available to all stakeholders'. However, no evidence found of communication or demonstration that it has a system to prevent and mitigate its salient human rights risks and impacts in general. See indicator B.2.3 [Reconciliation Action Plan 2016-2018, 2016-2018: inpx.com.au] • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications: According to its Reconciliation Action Plan, the Company states that "Identify appropriate communications channels to each Aboriginal and Torres Strait Islander peoples during the recruitment process" as well as track its progress and report. However, it does not provide further information regarding how it ensures that affected stakeholders are able to access communications in the context of human rights concerns raised [Reconciliation Action Plan 2016-2018, 2016-2018: inpx.com.au]

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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company has a Whistle-blower Hotline. "We set up a hotline that uses a Whistle-blower Hotline that complies with the Whistle-blower Protection Act. The Hotline is accessible to our executives and employees." [Sustainability Report 2019, 2019: inpx.co.jp] Score 2 <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: The Company states that 'three reports to the internal hotline and five to the external hotline were submitted in fiscal 2018. The Compliance Committee, taking into consideration the advice of attorneys and other experts, appropriately responded to each report in accordance with the Helpline Procedures. There were no compliance violations related to bribery and corruption, discrimination, or human rights abuse among those reports.' [Sustainability Report 2019, 2019: inpx.co.jp]

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 states that 'a community grievance management procedure is in place to appropriately address grievances received from local communities' only in Australia. [Local Communities, 03/2020: inpex.co.jp] <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 • 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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