

# Corporate Human Rights Benchmark 2020 Company Scoresheet



Company Name Oil & Natural Gas Corporation (ONGC)

**Industry** Extractives UNGP Core Score (\*) 4.5 out of 26

Score	Out of	For indicators
Governance ar	nd Policy Comm	itments
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
	-	nan Rights Due Diligence
Embedding	•	D. 1. 1. Euch adding. Decreasibility and recovered for day to day
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rig	ghts Due Diligen	ice (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	<b>Grievance Mec</b>	hanisms
1	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1	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	The individual elements of the assessment are met or not as follows:  Score 1  • Met: General HRs commitment: The Company is committed to conducting its business operations and strategies with the ten universally accepted principles in the area of Human rights, Child Labour, Anti-corruption and Environment. The Company also embraces and supports these ten principles , particularly that on Human rights. [Annual Report 2018-2019, 2019: <a href="mailto:ongcindia.com">ongcindia.com</a> ]  • Met: UNGC principles 1 & 2: The Company states that "ONGC Group is also fully committed to the principles of United Nations Global Compact (UNGC) on human rights". [Annual Report 2018-2019, 2019: <a href="mailto:ongcindia.com">ongcindia.com</a> ]  Score 2  • Not met: UNGPs  • 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  Not met: ILO Core: The Company is committed to prohibit child Labour, discrimination and forced labour for both itself and contractors. However no evidence found of a commitment to respect and support the rights to collective bargaining and freedom of association. [Sustainability Report FY'19, 2020: ongcindia.com]  Met: UNGC principles 3-6: The Company states that 'ONGC Group is also fully committed to the principles of United Nations Global Compact (UNGC) on human rights'. [Sustainability Report FY'19, 2020: ongcindia.com]  Not met: Explicitly list All four ILO apply to EX BPs  Score 2  Not met: Explicit commitment to All four ILO Core: The Company is committed to prohibit child Labour, discrimination and forced labour for both itself and contractors. However no evidence found of a commitment to respect and support the rights to collective bargaining and freedom of association. [Sustainability Report FY'19, 2020: ongcindia.com]  Not met: Respect H&S of workers: The Company pursues its business activities in a safe and sustainable manner. All work practices, procedures and production endeavours comply with the highest Health, Safety and Environment standards as per the Industry norms, Government and relevant statutory bodies. All the products of the Company conform strictly to the respective product-making-procedures, laws, statutes and standards governing their production. However, there is no explicit reference to respecting the health and safety of workers to award this score. [Annual Report 2016-17, 2017: ongcindia.com]  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  • Met: Regular stakeholder engagement: The Company conducts regular engagements, both formal and informal. These engagements enable ONGC group to develop mutually beneficial relationship with stakeholders. The Company also outlines in its Sustainability report the specific stakeholders groups it engages with, the mode of engagement and topics discussed. Stakeholders include suppliers, employees and local communities. [Sustainability Report FY'19, 2020: ongcindia.com]  Score 2  • Not met: Commits to engage stakeholders in design  • Not met: Regular stakeholder design engagement

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to		The individual elements of the assessment are met or not as follows:
	remedy		Score 1
	,		Not met: Commits to remedy
		0	Score 2
			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  • Met: Commits to ILO core conventions: See indicator A.1.2  • Not met: Senior responsibility for HR  Score 2  • 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  Not met: Identifying risks in own operations  Not met: identifying risks in EX business partners  Score 2  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  Not met: Salient risk assessment (and context)  Not met: Public disclosure of salient risks  Score 2  Not met: Both requirements under score 1 met
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  Not met: Action Plans to mitigate risks  Not met: Including amongst EX BPs  Not met: Example of Actions decided  Score 2  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  Not met: System to check if Actions are effective  Not met: Lessons learnt from checking effectiveness Score 2  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  Not met: Comms plan re identifying risks  Not met: Comms plan re assessing risks  Not met: Comms plan re action plans for risks  Not met: Comms plan re reviewing action plans  Not met: Including EX business partners  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	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Channel accessible to all workers: The Company has a four-tier Grievance Management system in place to address employee grievances related to policy/policies. The channel of grievance is 'Reporting Authority of the employee, Sectional In-charge, Key Executive, Appeals Committee.' The Company also has a 'grievance redressal system' for external stakeholders, and the matter will be escalated up to the Board. [Annual Report 2018-2019, 2019: ongcindia.com & Public Grievance Portal: grievance.ongc.co.in] Score 2  • Not met: Number grievances filed, addressed or resolved  • 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)/mec hanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Grievance mechanism for community: The Company has a four-tier Grievance Management system in place to address employee grievances related to policy/policies. The channel of grievance is 'Reporting Authority of the employee, Sectional In-charge, Key Executive, Appeals Committee.' The Company also has a 'grievance redressal system' for external stakeholders, and the matter will be escalated up to the Board. [Annual Report 2018-2019, 2019: ongcindia.com & Public Grievance Portal: grievance.ongc.co.in] Score 2  • 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	The individual elements of the assessment are met or not as follows:  Score 1  Not met: Describes how remedy has been provided  Not met: Says how it would remedy key sector risks  Score 2  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		Headline: Pawan Hans helicopter carrying five ONGC employees involved in fatal crash in India Area: H&S Story: Helicopter carrying five ONGC workers and two pilots crashed while heading out to an oil rig at Mumbai High, resulting in the deaths of the seven individuals. The helicopter (VT PWA), took off at 10.14 am from Juhu airport and was expected to land at a platform around 11am however, it lost contact around 10.30am. Helicopter and speedboats were mobilized to cunduct a search and seven bodies were receovered from the site. An investigation was launched by the Company and the Aircraft Accident Investigation Bureau (AAIB), however, the cause of the accident still remains uncertain. The Company stated it will give support to the affected individuals. Sources: [The Times of India, 13/01/18: timesofindia.indiatimes.com] [Oil and Natural Gas Corporation website, 14/01/18: ongcindia.com][Oifshore Engineer, 15/01/18: oedigital.com]
E(1).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1  • Met: Public response available: The Company stated on its website that "Oil and Natural Gas Corporation (ONGC) is set to institute a high-level independent investigation into the ill-fated Chopper crash on Saturday, which led to the demise of six passengers on-board and one still missing. Mr. Shashi Shanker, CMD ONGC, while expressing his grief at this irreparable loss, said no compensation can substitute such tragic loss. We are trying to provide all supports to help the families to tide over this colossal crisis." [ONGC response to the helicopter crash: ongcindia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Response goes into detail: The Company states on its website that "Bodies of ONGC Officials Mr. P N Srinivasan, Mr. R Saravanan, Mr. Jose Antony, Mr. Pankaj Garg and one of the pilots Capt. R Ohatkar, have been identified. The identification process for the sixth body is still on. During the Search and Rescue (SAR) Operations on January 14, 2018 the VDR of the chopper has been recovered. Search operation is on for the remaining debris of the production chopper VT – PWA. ONGC and Coast Guard vessels: CG-268, CG-241, CG-314, Suriya-3, and CG-769, Samudra Sevak, HAL Anant, TAG-20, TAG 17, TAG-15, OSVs LJ Johnson and BS Negi and Ocean Crewser-III have been relentlessly combing the area. The search operation is being steered by the ONGC top Management led by Shashi Shanker, CMD ONGC. Mr. Shanker, who has been camping in Mumbai to oversee the search operations as well as ensuring all supports for the bereaved families, has stated that a high level independent investigation will be immediately instituted to ascertain the reasons. The recovered bodies of ONGC Executives, after necessary procedures, have been handed over to the family members and two families have taken the bodies to their native places for last rites as desired by the family members. ONGC is extending all possible help to the bereaved families in this hour
E(1).2	The Company has appropriate policies in place	0.5	of grief and crisis. " [ONGC on the fatalities of the helicopter crash: worldoil.com]  The individual elements of the assessment are met or not as follows:  Score 1  • Met: Company policies address the general issues raised: The Company presents its commitment to Health and Safety in its H&E policy. [Health and Safety, 29/05/2018: ongcindia.com]  • Not met: Policies apply to the type of business relationships involved: It is not clear if the policy goes down to the Company's business relationships. [Health and Safety, 29/05/2018: ongcindia.com] & Sustainability Report FT 2017, 2018: ongcindia.com]  Score 2  • Met: Policies address the specific rights in question: The Company discloses injury rates and lost days on its Sustainability Report. [Sustainability Report FT 2017, 2018: ongcindia.com]
E(1).3	The Company has taken appropriate action	1.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Engages with affected stakeholders: The Company states on its website that "Mr. Shashi Shanker, CMD ONGC, while expressing his grief at this irreparable loss, said no compensation can substitute such tragic loss. We are trying to provide all supports to help the families to tide over this colossal crisis." [ONGC response to the helicopter crash: ongcindia.com]  • Met: Provides remedies to affected stakeholders: The Company states on its website that "Mr. Shashi Shanker, CMD ONGC, while expressing his grief at this irreparable loss, said no compensation can substitute such tragic loss. We are trying to provide all supports to help the families to tide over this colossal crisis." [ONGC response to the helicopter crash: ongcindia.com]  • Met: Has reviewed management systems to prevent recurrence: The Company states on its website that "Laying stress on safety issues, CMD already had discussions with CMD of Pawan Hans, to work out various modalities ensuring accident-free future operations. Mr. Shanker also pointed out that "all permissible steps will be taken to restore safety and confidence of offshore-going personnel". He also noted that stern action will be taken if any lapses are found on safety front. Stressing on the importance of Air-logistics, he said that "we will go beyond DGCA compliance procedures for the aircrafts and that a critical review of safety-adequacy of each and every aspect of the helicopter fleet and its operation will be carried out to bring about necessary changes"." [ONGC response to the helicopter crash: ongcindia.com]  Score 2  • Not met: Remedies are satisfactory to the victims: There is no evidence that remedies provided were satisfactory to the affected stakeholders.  • Met: Has improved systems and engaged affected stakeholders: See above [ONGC response to the helicopter crash: ongcindia.com]
E(2).0	Serious allegation No 2		Headline: Explosion on-board ONGC's Sagar Bhushan Drillship docked at Cochin Shipyard kills five and injures seven     Area: H&S     Story: A drillship owned by Oil & Natural Gas Corporation exploded and killed five people whilst undergoing maintenance work at a shipyard. A blast has been reported at 9.15 am on the 13th of February 2018 at Cochin Shipyard where the drillship Sagar Bhushan had been docked since 7 December 2017. The drillship was undergoing mandatory repairs at the time of the accident. Later, the shipyard

Indicator Code	Indicator name	Score (out of 2)	Explanation
			confirmed that five people had been killed and seven injured as a result of the explosion. There is no public report regarding the Company's response towards this incident and it is not clear if the Company compensated the victims of the incident and their families.
			• Sources: [The Indian Express, 14/02/18: indianexpress.com
			][BBC News, 13/02/18: <a href="mailto:bbc.co.uk">bbc.co.uk</a> ][Oil & Natural Gas Corporation Limited, 13/02/18: <a href="mailto:ongcindia.com">ongcindia.com</a> ][Manoramaonline, 15/02/18: <a href="mailto:english.manoramaonline.com">english.manoramaonline.com</a> ]
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1  • Met: Public response available: The Company stated on its website that "A blast has been reported in ONGC drillship Sagar Bhushan at 9.15 am today at Cochin Shipyard where it has been dry docking since 7 December 2017. The drillship was undergoing mandatory Special Survey (Hull & Machinery) repairs in Cochin Shipyard as per class requirement. The cause of the incident is being ascertained." [Statement regarding the drill blast: ongcindia.com] Score 2  • Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Company policies address the general issues raised: The Company presents its commitment to Health and Safety in its H&S policy. [Health and Safety, 29/05/2018: ongcindia.com]  • Not met: Policies apply to the type of business relationships involved: It is not clear if the commitment goes down to its business relationships. [Health and Safety, 29/05/2018: ongcindia.com & Sustainability Report FT 2017, 2018: ongcindia.com]  Score 2  • Met: Policies address the specific rights in question: The Company discloses injury rates and lost days on its Sustainability Report. [Sustainability Report FT 2017, 2018: ongcindia.com]
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1  Not met: Engages with affected stakeholders: There is no evidence regarding the Company's engagement with affected stakeholders.  Not met: Provides remedies to affected stakeholders: There is no evidence of the Company providing remedy to affected stakeholders.  Not met: Has reviewed management systems to prevent recurrence Score 2  Not met: Remedies are satisfactory to the victims  Not met: Has improved systems and engaged affected stakeholders: There is no evidence of the Company improving its systems followed by the accident.
E(3).0	Serious allegation No 3		<ul> <li>Headline: Two workers died in fire at ONGC Ahmedabad well</li> <li>Area: Health &amp; safety - systemic</li> <li>Story: On March 14, 2019, reports indicated there was a fire at a well of the ONGC Ahmedabad asset that claimed the lives of two contract workers, and four others sustained severe burn injuries.</li> <li>According to the press, the fire occurred during repairs and maintenance. One of the deceased was charred in the fire, another worker succumbed to injuries, and four others suffered from severe burns.</li> <li>Sources: [The Economic times - 15/03/2019: energy.economictimes.indiatimes.com] [PSU Watch - 15/03/2019: psuwatch.com] [Business Standard - 14/03/2019: business-standard.com] []</li> </ul>
E(3).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Public response available: The company's response to the fire states:  "While reasons behind this accident are being enquired into, ONGC is committed to provide all support as per its policy to the bereaved families as well as the ones who have suffered burn injuries." [Fire incident at ONGC Ahmedabad Asset, 14/03/2019: ongcindia.com]  Score 2  • Not met: Response goes into detail
E(3).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Company policies address the general issues raised: The company states that its responsibility "is to safeguard our people property and environment. We

Indicator Code	Indicator name	Score (out of 2)	Explanation
			perform our business as per the integrated HSE policy." It's Health, Safety and Environment slogan is "All Accidents are Preventable." [Health and Safety, 29/05/2018: ongcindia.com]  • Not met: Policies apply to the type of business relationships involved: There is no indication that the company's health, safety and environment policy applies to contractors.  Score 2  • Met: Policies address the specific rights in question: The company publishes injury rate and fatalities. [Health and Safety, 29/05/2018: ongcindia.com]
E(3).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1  Not met: Engages with affected stakeholders: There is no evidence to suggest that the company has engaged with affected stakeholders.  Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that the company has encouraged its suppliers to engage with affected stakeholders.  Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that the company has provided remedies to affected stakeholders.  Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that the company has reviewed management systems to prevent recurrence. Score 2  Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that the company has provided remedies that are satisfactory to the victims.  Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that the company has improved systems and engaged affected stakeholders.
E(4).0	Serious allegation No 4		Headline: Fire at Oil and Natural Gas Corp's Uran Plant kills four people in India     Area: Health & Safety     Story: In September 2019, a major fire broke out at an Oil and Natural Gas Corporation plant in Navi Mumbai. The oil and gas processing plant at Uran is located in Maharashtra, 45 kilometers away from Mumbai. At least four people were killed and 11 injured. Two days later, the Company had launched an investigative probe and started repairs. No details of the accident have been released to the public.     Sources: [Hydrocarbons Technology - 03/09/2019: hydrocarbonstechnology.com] [Hindustan Times - 05/09/2020: hindustantimes.com]
E(4).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Public response available [Press release about Uran fire, 3/9/2020:  ongcindia.com]  Score 2  • Met: Response goes into detail: The day of the accident, the Company posted a press release on its website detailing the accident. The press release states that 'Strong smell of hydrocarbon was reported by Fire Station to Process Control Room at 0647 hrs on 03.09.2019 at Uran Plant of ONGC Ltd. Immediately, Resident Production Superintendent rushed to the area in full safety gears. A fire tender also reached the site immediately with CISF personnel in full safety gears. Major fire incident occurred at 0655 hrs. All out efforts were made to control the fire and fire was brought under control by 0855 hr with firefighting by Fire section, Uran Plant as well as with the help of Fire Tenders from MARG (Mutual Aid Resource Group). Fire was completely extinguished by 1000 hrs. Three CISF fire personnel who had come along with fire tender and Resident Production Superintendent succumbed to fatal injury.' [Press release about Uran fire, 3/9/2020: ongcindia.com]
E(4).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Company policies address the general issues raised: The Company states that its responsibility 'is to safeguard our people property and environment. We perform our business as per the integrated HSE policy.' It's Health, Safety and Environment slogan is 'All Accidents are Preventable.' [Health and Safety, 29/05/2018: ongcindia.com]  • Not met: Policies apply to the type of business relationships involved: No information found

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Met: Policies address the specific rights in question: The Company discloses recordable incident rates for the past three years. [Sustainability Report FT 2018, 2019: ongcindia.com]
E(4).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows:  Score 1  Not met: Engages with affected stakeholders  Not met: Encourages linked business to engage affected stakeholders  Not met: Provides remedies to affected stakeholders  Not met: Has reviewed management systems to prevent recurrence  Not met: Denies allegations, but has engaged affected stakeholders  Not met: Denies allegations, but reviewed systems to prevent such impacts  Score 2  Not met: Remedies are satisfactory to the victims  Not met: Has improved systems and engaged affected stakeholders  Not met: Denies allegations, but implements review recommendations  Not met: Denies allegations, and ensures systems prevent such impacts

#### 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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