

**Company Name**           Petroleo Brasileiro (Petrobras)  
**Industry**                 Extractives  
**UNGP Core Score (\*)**   14.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0.5	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
1	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
<b>Remedies and Grievance Mechanisms</b>		
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
1	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>14.5</b>	<b>26</b>	

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

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

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

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: The Company states in its Social Responsibility Policy disclosed on its website that it commits to 'Respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships, and fight against discrimination in all forms.' In addition, in its Sustainability Report, it states: 'Our commitment to respect human rights is expressed in the corporate value "respect for life, people, and the environment", in our Ethics Code and our Social Responsibility Policy'. [Social Responsibility Policy, N/A: <a href="http://petrobras.com.br">petrobras.com.br</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: The Company states it is signatory of UN Global Compact [Support for Principles and Initiatives: <a href="http://petrobras.com.br">petrobras.com.br</a>]</li> <li>• Met: UDHR: See above. In addition, in its 2019 Disclosure to CHRB Platform, the Company indicates: 'The Corporate Standard Social Responsibility Terms and Concepts encompasses the definition of Human Rights: "rights set forth in the International Charter of Human Rights, which consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and in the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization – ILO".' [2019 Disclosure, 06/2019]</li> <li>• Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: The Company discloses in its Human Rights Guidelines that 'Our work in Human Rights is guided by the United Nations Guiding Principles on Business and Human Rights'. However, 'guided by' is not considered a formal commitment according CHRB wording criteria. [Human Rights Guidelines, 2020: <a href="http://petrobras.com.br">petrobras.com.br</a>]</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: UNGC principles 3-6: The Company indicates in its Sustainability Report 2019 that 'In 2003, we adhered to the UN Global Compact, whose principles are related to human rights and work practices.' [Sustainability Report 2019, 10/06/2020: <a href="http://api.mziq.com">api.mziq.com</a>]</li> <li>• Met: Explicitly list All four ILO apply to EX BPs: The Company states that 'contracted companies must declare and ensure that they respect internationally recognized human rights, as established in the International Charter of Human Rights, in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work, in the Guiding Principles on Business and UN Human Rights ("Guiding Principles") and Decree No. 9,571, of November 21, 2018, which establishes the National Guidelines for Business and Human Rights. In addition, the contractual clause statements must include the commitment of the contracted companies to the following items: 'Refrain from using child labor and slavery-like or degrading working conditions, and to include a specific clause to that effect in contracts signed with input suppliers and/or service providers; Respect the right of employees to form or associate with unions, as well as to negotiate collectively; Be committed to equal treatment and non-discrimination'. In the same document they state that 'In relation to business partners and other external organizations, such as our suppliers, we have a "standard clause" in our contract model, which requires them to be aware of and comply with the guidelines of our Code of Ethics and our Conduct Guide'. Finally In its Code of ethics, the Company explicitly discloses about BP obligations, which includes: ' require to the service providers that their employees comply with the ethics principles and commitments defined in this Code, while contracts with System companies are in force'. Code includes all ILO</li> </ul>

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			<p>core. [Sustainability Report 2019, 10/06/2020: <a href="http://api.mziq.com">api.mziq.com</a> &amp; Ethics Principles - Code of Ethics, 13/12/2018: <a href="https://mz-filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: The Company's conduct guidelines requires to 'not practice or condone any form of child labor or forced, slave or degrading labor'. The code of ethics commits to respect and promote diversity and combat all forms of prejudice and discrimination and, in relation to freedom of association and collective bargaining, it states the following: 'acknowledge the right of free association of its employees, respecting and valuing their participation in unions and not doing any kind of negative discrimination against unionized employees; pursuit permanent reconciliation of interests and realization of rights, through institutional channels of negotiation, in its relationship with the unions representing employees'. The Company states that 'all our employees are covered by collective bargaining agreements, either by the Land Staff Agreement, always negotiated in September, or by the Maritime Staff Agreement, always negotiated in November'. [Ethics Principles - Code of Ethics, 13/12/2018: <a href="https://mz-filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In its Ethics Code the Company states that it commits to 'ensure safety and health at work, providing for that all necessary conditions and equipment'. The Conduct guide also states that is a requirement to ensure 'protection of the lives, physical integrity and personal safety of the employees and the people with whom Petrobras interacts, as well as maintain the security of the facilities and the preservation of environment'. [Ethics Principles - Code of Ethics, 13/12/2018: <a href="https://mz-filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a> &amp; Conduct Guide, 2018: <a href="http://petrobras.com.br">http://petrobras.com.br</a> - CHR 2019.docx#_Hlk171120061,44764,44985,0,,HYPERLINK "<a href="http://petrobras.com.br">petrobr</a>]</li> <li>• Met: H&amp;S applies to EX BPs: See above. In addition, the Company's Ethics Code indicates: 'Regarding relation with Business Partners, Suppliers, Service Providers and Trainees, Petrobras System undertakes to: 4.1. make available to employees of service providers and trainees of Petrobras System, when operating in its facilities, the same healthy and safe conditions at work offered to its employees;' As indicated above, the conduct guide also states that business or institutional partners are company partners in joint ventures and/or businesses or other legal entities' and 'companies that, by means of formal partnerships, assist and/or facilitate Company activities'. [Ethics Principles - Code of Ethics, 13/12/2018: <a href="https://mz-filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a> &amp; 2019 Disclosure, 06/2019]</li> </ul>
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: The Company has identified and listed the stakeholders with whom it engages, these include the local community, business relations and suppliers, clients, civil societies to mention a few. In addition it indicates on its website section 'Stakeholders': We conduct various types of surveys and monitoring actions among these audiences and with a few segments. We also maintain relationship channels and practices for communication and engagement, such as websites, newspapers, magazines and visitation programs. In order to improve and broaden our initiatives, we are in constant dialog with these groups.' In addition, in its 2019 Disclosure to CHR Platform, the Company describes its engagement action with communities and civil organizations. [Stakeholders: <a href="http://petrobras.com.br">petrobras.com.br</a> &amp; 2019 Disclosure, 06/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Met: Regular stakeholder design engagement: The company state that 'the Corporate Standards for Community Relationship Management and Corporate Standard Diagnosis and Analysis of the Community provides guidelines to manage community relationship in areas that are or may be affected by Petrobras' activities.' In all, twenty-three assessments were produced, eighteen in 2018, and another five in 2017, where information gathered served as inputs that were used in the respective community relationship plans. Thus we prepared 23 Community Relationship Plans addressing the communities present in the scope of our Operational Units in the Brazilian territory. [2019 Disclosure, 06/2019]</li> </ul>
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"> <li>• Not met: Commits to remedy: The Company states that 'we aim to ensure the incorporation of respect for Human Rights in all areas of our business and in relations with our stakeholders, as well as identifying potential risks of Human Rights violations related to operations, products, or services provided by Petrobras, remedying the impacts we cause'. Also, the Company describes specific guidelines 'which must be pursued in the development of activities, in order to enable the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>achievement of the objectives intended by the Company'. In the Human Rights Due Diligence guideline, the Company states to 'Remedy and repair impacts on Human Rights resulting from our activities'. However, 'to aim' remedying impacts and 'pursue' guidelines that include remediation do not imply a formal commitment to remedy. [Human Rights Guidelines, 2020: <a href="http://petrobras.com.br">petrobras.com.br</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact.</li> <li>• Not met: Senior responsibility for HR: The Company indicates that 'The Social Responsibility Department is responsible for coordinate the development of human rights guidelines and developing a human rights action plan in the company that should be deployed in several areas. In June 2020, we implemented the Human Rights guideline for the company and after that stage an action plan for Human Rights will be developed, integrating all the Human Rights actions that are already in course in addition to new ones that will be proposed'. In addition, describes the responsibilities of The Social Responsibility Department, The Human Resources Department and The Health, Security and Environmental (HSE) department. Also, states that ' The senior role of each of these departments is carried out by an Executive Manager'. However, it is not clear which is the specific department/team or senior position which lead and overview the implementation of the human rights strategy. [2020 CHRB Disclosure Platform, 2020: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: In its Disclosure at CHRB Platform, the Company indicates: 'The Social Responsibility Department is responsible for identifying, analyzing, and mitigating social risks related to the interaction of our business, society and the environment and to promote the social and environmental management in our supply chain; managing our relationship with nearby communities on a continuous and transparent basis and managing the socio-environmental investment, contributing to nearby communities, collaborating to environmental conservation and livelihoods improvement. The Human Resources Department is responsible for matters relating to managing union relations and is responsible to some issues related to decent work, permanent negotiation and dialogue (assignment is describe in the collective labor agreement). We state our commitment to value diversity at the Human Resources Policy and there is a specific area responsible to develop and monitor initiatives that reinforce the respect to human and cultural diversity of the workforce (non-discrimination and equal opportunities). The HSE department is responsible for safety, environment and health activities committing to caring for life and the environment, reducing risk to people’s security and health by strengthen process safety and anticipating and responding promptly to emergencies. The HSE department is also responsible for “Commitment to Life” program, which focuses on accident prevention, search of new risk and control solutions. The General Ombudsmen Office is responsible for handling complaints, requests for information, denouncements, requests, queries, opinions, and suggestions from all stakeholders in a confidential, independent, free, and accessible manner.' [2020 CHRB Disclosure Platform, 2020: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Day-to-day responsibility for EX BRs: See above [2020 CHRB Disclosure Platform, 2020: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: In its Sustainability Report 2018, the Company indicates: 'According to our Corporate Risk Policy, which establishes that risks must be assessed in all our decisions, we prepared in 2018 new guidelines for managing social risks in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. [...] Were carried out 41 social risk assessments in projects along 2017-2018, of which 19 in 2018.' In addition, in its 2017 Sustainability Report, the Company stated: 'Our Risk Policy provides inputs to prepare maps that indicate the probability and impact of our main risks. Risk maps have been prepared taking into account categories that include social risks. The risk analysis allows us to establish criteria and objectives for the preparation of action plans for mitigation and treatment of identified social risks, which will be monitored during project implementation and operations. Our Corporate Standard for Social Risk Management was reviewed in 2017, addressing the various stages of the business life cycle and the methodology for characterizing the social context in the places where we operate, as well as for identification, analysis, evaluation, treatment, and monitoring of social risks.' Finally, in its 2019 Disclosure to CHRB, the Company indicates: 'In our Corporate Standard of Social Risks' Management we consider the following dimensions for identification and risk analysis related to our operations and nearby communities: indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and health environment, right to integrity and security, labor practice at the supply chain, infrastructure and public services, education and professional qualification, income generation and jobs opportunities, technological development and access to technology.' [Sustainability Report, 2017 &amp; Sustainability Report 2018, 06/10/2018: <a href="https://mz-filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a>]</li> <li>• Not met: identifying risks in EX business partners: In its 2018 Disclosure to CHRB, the Company indicates: 'In order to promote social responsibility in the supply chain in the implementation of investment projects, especially in the Construction and Assembly contracts (Engineering, Procurement, and Construction - EPC), we have included a specific contractual annex on Communication and Social Responsibility. This contractual annex guides the social risks management during construction work implementation by the supplier. We can highlight the following requirement aspects: preparation of a Communication and Social Responsibility Plan, optimizing the procurement for local labor, and promote the reallocation of professionals at the time of demobilization.' Also, the Company discloses in the 2020 CHRB Disclosure that it adopts 'standards and processes that guide our performance in Social Risk Management and Community Relationship in our investment projects and in our operations. These processes seek to prevent the violation of human rights in the communities where we operate. In order to identify, evaluate and address the risks and impacts associated with our activities, when investment projects are submitted for phase transition approval, they are evaluated by a multidisciplinary review group that includes professionals in the areas of Social Responsibility, Health, Safety, and the Environment, and the business areas responsible for the projects. [...] We identify, analyze, and respond to social impacts related to the communities in our operations through the community relationship process. The diagnosis and analysis of the communities surrounding our operations are carried out by multidisciplinary teams based in the operations units, in order to recognize the local reality and direct actions related to the communities'. However, it is not clear whether this system has a process to identify human rights risks and impacts, as it seems to be focused in manage possible social conflicts more than identify human rights issues, and whether includes extractive business partners. [Disclosure CHRB Platform, 24 Aug 2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; 2020 CHRB Disclosure Platform, 2020: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: See above [Sustainability Report, 2017 &amp; Sustainability Report 2018, 06/10/2018: <a href="https://mz-filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: In consultation with stakeholders: The Company indicates that 'In 2019, we did not have consultations or public hearings convened by environmental agencies in relation to our projects. However, proactively, we held meetings involving communities, in addition to other stakeholders and external bodies, to present and discuss our projects. [...] In these meetings, the community participates and can express itself in relation to our projects and activities. All comments are considered in the design and implementation of the projects. Before starting any project, it is common to approach local authorities and communities based in the area indirectly influenced by the project to provide clarification. Based on this approach, social actions are designed and implemented in conjunction with local and regional authorities, as well as institutions representing the region, to support local development. We identify, analyze, and respond to social impacts related to the communities in our operations through the community relationship process. Once the information is gathered and systematized, we elaborate community relationship plans in order to provide answers to questions of the community surrounding the operational unit in question. Based on this information, annual community relationship plans are drawn up based on levels of engagement, considering all the community driven activities. The levels of engagement are Inform, Consult, Involve, and Commit'. [2020 CHRB Disclosure Platform, 2020: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: In consultation with HR experts: Petrobras discloses that through 'specific diagnostic tools, we identify the impacts and risks of changes caused by a specific action. In this process, municipal indicators are consulted, such as Municipal Human Development Index (HDI-M), Gini Index and Social Vulnerability Index, and also specific data from communities mapped in the territory, such as, social actors, traditional people groups and communities, conflicts, or any impacts and risks arising from our activities.' However, it is not clear if the systems in place to identify its human rights risks and impacts is made in consultation with specific human rights experts. [2020 CHRB Disclosure Platform, 2020: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Sustainability Report 2019, 10/06/2020: <a href="https://api.mziq.com">api.mziq.com</a>]</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): In its Disclosure at CHRB Platform, the Company indicates: 'Our Corporate Standard of Social Risk Management encompasses the various steps of the life cycle of our business and the methodology characterization of the social context in places where we operate, as well as the identification, analysis, evaluation, treatment and monitoring of social risks. It considers the following key issues: livelihoods and subsistence of local communities, indigenous peoples, traditional communities and vulnerable groups, access to land, water, cultural heritage, pressure on public services and other issues related to the quality of life of the local population. The identification of social risks [see below] allows us to establish criteria and objectives for the treatment of the identified risks as well as to support building a trust relationship with the communities where we operate'. The Company provided new information in its latest Disclosure to CHRB Platform, however it was not material in relation with this indicator. [Disclosure CHRB Platform, 24 Aug 2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Sustainability Report 2019, 10/06/2020: <a href="https://api.mziq.com">api.mziq.com</a>]</li> <li>• Met: Public disclosure of salient risks: In its Sustainability Report 2017, the Company indicates: 'Regarding to the workforce, potential social risks related to human rights include discrimination and lack of equal opportunities, which can be avoided by reinforcing the values of our company and by valuing diversity in the workplace. Regarding to communities, these issues include risks of interference in local livelihoods, indigenous peoples, traditional communities and vulnerable groups, access to land, water, preservation of cultural heritage, pressure on public services and other related issues quality of life of the local population. [...] Regarding the suppliers, issues related to labor rights (freedom of association and collective bargaining,), prohibition of forced and compulsory child labor in the production chain, fighting discrimination in the workplace, working conditions (e.g. health and safety) and impacts on local communities, are specific requirements in registration, declarations, and specific contractual clauses whose compliance is monitored throughout the term of contracts.' No new relevant evidence was found in latest year report. [Sustainability Report, 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>



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B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: In its Disclosure at CHRB Platform, the Company indicates: 'We have incorporated in the Systematics new requirements for the decision-making process which include: Social Responsibility reports and participation of Social Responsibility analysts in the multidisciplinary review group that elaborates recommendations for the project's phase transition. The Social Responsibility report includes the social context and the diagnosis of communities, as well as actions to mitigate social risks.' The Company also indicates that in the risk management system, the risks are described, they are assigned to a responsible person and the treatment measures are described, with their deadlines. Periodically, the system requests an update of the risk status. The Company provided new information in its latest Disclosure to CHRB Platform, however it was not material in relation with this indicator. [Disclosure CHRB Platform, 24 Aug 2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided: The Company describes in its Sustainability report 2019 a case in which a notable amount of the local labor force was hired that occurred in the Duque de Caxias Refinery (REDUC) surrounding area by the following example: 'At Reduc, for example, we created an integration process between our representatives and contractors, labor unions, and surrounding communities that has improved our relationship with these agents and brought results, such as more job offers for local communities, increased productivity, and cost reductions. We hold meetings in order to plan strategies to encourage the hiring of local labor through the Federal government's National Employment System, a free public service for job offers and demand'. However, no evidence found of an example in which it is described the specific conclusions reached and actions taken on at least one salient human rights issue as a result of assessment processes. [Sustainability Report 2019, 10/06/2020: <a href="https://api.mziq.com">api.mziq.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met: The Company provided comments to CHRB regarding this indicator. However, evidence was not material. [2020 CHRB Disclosure Platform, 2020: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: System to check if Actions are effective: In its Disclosure at CHRB Platform, the Company indicates: 'Actions to mitigate social risks are continuously tracked according to Corporate Standard of Social Risk Management. This tracking includes the execution and the effectiveness of actions, with possible inclusion or exclusion of new salient risks. As a Petrobras project management practice (in line with the recommendations of IPA and PMI), the risks identified in the Risk Workshops are recorded in the Risk Management System. In this system, the risks are described, they are assigned to a responsible person and the treatment measures are described, with their deadlines. Periodically, the system requests an update of the risk status. The total risk of the projects is monitored by the Project Management team, which periodically undertakes risk review workshops with a multidisciplinary team from different areas of the company.' Among Social Risks the Company includes issues such as: 'Regarding the workforce [...] discrimination and lack of equality of opportunity. Regarding communities [...] interference with livelihoods and subsistence of local communities, relationships with indigenous peoples, traditional and vulnerable groups, access to land, water, preservation of cultural heritage, pressure on public services'. The Company provided new information in its latest Disclosure to CHRB Platform, however it was not material in relation with this indicator. [2020 CHRB Disclosure Platform, 2020: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness: The Company indicates in its disclosure to CHRB Platform that 'In the process of monitoring the community relationship, we found that our actions have led to greater community engagement. A challenge we identified is how to develop instruments for evaluating actions that are accessible and easily understood by communities. In addition, in some communities, we identified a shortage of active and representative leaders'. Also, provides examples of participation in social projects in communities such as Uçá Project, Maré Unida project, Mão na Massa project and The Agroflorestar Project. However, no description of lessons learnt in terms of effectiveness of its actions in relation to specific salient human rights issues. [2020 CHRB Disclosure Platform, 2020: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Sustainability Report 2019, 10/06/2020: <a href="https://api.mziq.com">api.mziq.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out identification of human rights risks and impacts but it is not clear whether it does it globally, including extractive business partners.</li> <li>• Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Responding to affected stakeholders concerns: In its Disclosure at CHRB Platform, the Company indicates: ' we implement community consultations through public hearings conducted by the licensing authority, forums for information about the project, its social and environmental impacts and discussion of Environmental Studies, in order to brief interested parties about the project content, clarifying questions and hearing criticisms and suggestions about. [...] In addition to the public hearing and environmental licensing, we consider community relationship as a long-term process that has as one of its objectives to develop interaction and continuous relationship with the communities in the surrounding areas, maintaining permanent channels of dialogue, aiming to understand the roles and attributions of the different social actors, sharing responsibilities, generating mutual trust and aligning expectations of all parties.' In addition, in 2018 Disclosure to CHRB Platform, the Company added: 'We also received 269 manifestation groups and demands at the local level. The measures adopted to approach the topics consisted of: clarifying matters at the regular meetings of the Community Committee, including the participation of external speakers and government representatives; visits from community leaders, people from the communities and government representatives to our units, aiming at bringing these stakeholders closer and get them acquainted with our activities; meetings, lectures and training for communities; simulations and drills involving communities. One of the ways of dealing with the identified demands was the implementation of socioenvironmental projects in the places where we work in complementary education, professional qualification, improvement of the employability condition of young people, children and adolescents rights, environmental education, among others.' [2019 Disclosure, 06/2019 &amp; Disclosure CHRB Platform, 24 Aug 2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Ensuring affected stakeholders can access communications: See above. It also indicates: 'Our interaction with communities takes place in several ways: dialogue spaces, leadership visits to the Operational Units, lectures, training, emergency preparedness exercises, visits of our teams to communities, among others. We would like to highlight the spaces for voluntary dialogue, commonly called Community Committees. In these spaces, we address issues of common interest both to our activities and to the communities, such as: communication about the risks of operations and emergency preparedness exercises, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues raised by the participants. ' [2019 Disclosure, 06/2019 &amp; Disclosure CHRB Platform, 24 Aug 2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>



## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The indicators in its 2019 Disclosure document that : 'Through the General Ombudsman's Office, Petrobras acts in information requests that arrive via the Citizen Information Service, [...], and also operates in denunciations, complaints, requests, praises and suggestions Company states in its code of ethics (which applies to all employees and contains human rights) [...]. We also make available to our public other means of contact, such as telephone, electronic forms, face-to-face service and the Reporting Channel, for manifestation of denunciations, respecting the confidentiality of the source whenever necessary. Our Reporting Channel is managed by an independent and specialized company. Available 24/7 in three languages (Portuguese, English and Spanish) and in all countries where we operate, the channel centralizes the collection of complaints, including those related to discrimination, harassment and human rights violations.' In its website 'Petrobras Denouncement Channel', there is information related to this grievance mechanism: The Denouncement Channel is 'an independent, confidential and impartial tool available to external and internal audiences of Petrobras and its controlled companies.' [2019 Disclosure, 06/2019 &amp; Report Channel]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: In its Sustainability report 2019, Petrobras discloses that received a total of 2,323 complaints and divide these complaints by type, which are workplace violence, fraud and corruption, property and immaterial damages, HSE, human resources and AMS and non applicable. Also, the number of information requested about contracts/agreements, human resources, internal control and other themes. In addition, in its CHRB Disclosure platform 2020, the Company informed that 'Our external and independent reporting channel is capable of handling complaints of moral and sexual harassment. In 2019, this channel received 38 reports of discrimination, involving mainly issues of gender and race, skin color or ethnicity, of which 4 are still being treated, 28 were evaluated and files as dismissed, unfounded, or inconclusive, and 6 were confirmed or partially confirmed. The confirmed reports involve a prejudiced approach related to race, skin color, or ethnicity (3), sexual orientation (2) and gender (1) [...] In 2019, the Ombudsman's Office received nine statements related to the unionization of employees. Of this total, four were complaints (two were considered unfounded and two were dismissed) and five were complaints (three with their presented request unanswered and two were dismissed)'. However, it is not the overall figures of human rights complaints filed and either addressed or resolved. [2020 CHRB Disclosure Platform, 2020: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Sustainability Report 2019, 10/06/2020: <a href="https://api.mziq.com">api.mziq.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: The Denouncement Channel is available in Portuguese, English and Spanish, [Report Channel]</li> <li>• Met: Opens own system to EX BPs workers: Its Report Channel 'is prepared to receive complaints related to suppliers, such as those related to violations of the exercise of freedom of association and collective bargaining, among other issues of labor practices and human rights.' [Sustainability Report 2018, 06/10/2018: <a href="https://filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: Its Report Channel, the independent, confidential and impartial tool to report violations of its Ethics Code and the law, 'is available to external and internal audiences of Petrobras and its controlled companies.' In addition, it indicates in its 2019 Disclosure document that : 'Through the General Ombudsman's Office, Petrobras acts in information requests that arrive via the Citizen Information Service, [...], and also operates in denunciations, complaints, requests, praises and suggestions Company states in its code of ethics (which applies to all employees and contains human rights) [...]. We also make available to our public other means of contact, such as telephone, electronic forms, face-to-face service and the Reporting Channel, for manifestation of denunciations, respecting the confidentiality of the source whenever necessary. Our Reporting Channel is managed by an independent and specialized company. Available 24/7 in three languages (Portuguese, English and Spanish) and in all countries where we operate, the channel centralizes the collection of complaints, including those related to discrimination, harassment and human rights violations.' [Report Channel &amp; 2019 Disclosure, 06/2019]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The company provides a free of charge number in the countries where the company operates as well as international collect call number. The company's hotline 'Denouncement Channel' is available in Portuguese, English and Spanish. [Report Channel]</li> <li>• Met: EX BPs communities use global system: The Company's Reporting Channel 'is available to all stakeholders, internal or external, including to communities where our business partners in the extractive sector operate, via phone, form or by call free of charge.' In addition, in its Sustainability Report 2018, the Company states: 'Our Reporting Channel, under the management of the Ombudsman's Office, is prepared to receive complaints related to suppliers, such as those related to violations of the exercise of freedom of association and collective bargaining, among other issues of labor practices and human rights.' [Sustainability Report 2018, 06/10/2018: <a href="https://mz-filemanager.s3.amazonaws.com">mz-filemanager.s3.amazonaws.com</a> &amp; 2019 Disclosure, 06/2019]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: The Company indicates that 'In 2019, we had one significant conflict relative to traditional communities registered during the reporting period. It was with fishing communities, due to the oil spill that occurred on March 25, 2019, at Campo Marlim Leste, originating from P-53, a unit located in the Campos Basin. As the oil reached the coast of the fishing community in the municipalities of Arraial do Cabo, Búzios, and Cabo Frio, a preventive Conduct Adjustment Agreement (TAC) was signed with the Public Defendant's Office of Rio de Janeiro. The TAC established the criteria for qualifying beneficiaries and the amount of reparations to be paid for losses suffered by this community due to the stoppage of fishing activity for two months. Thus, proactively and preventively (there is no litigation on the issue), a TAC was signed that provides for the payment of a total reparations of approximately BRL 9 Million to approximately 2,000 fishermen, shellfishers, and shellfish gatherers, of which 1,400 have already been compensated in 2019. [Sustainability Report 2019, 10/06/2020: <a href="https://api.mziq.com">api.mziq.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

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

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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