

**Company Name** Repsol  
**Industry** Extractives  
**UNGP Core Score (\*)** 20.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	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
0.5	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
1	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	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)
2	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>		
2	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
2	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>20.5</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	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 1 &amp; 2: Among its commitments, the Company indicates: 'Acting in accordance with international reference standards, but not limited, to United Nations Guiding Principles on Business and Human Rights, Organization for Economic Cooperation and Development (OECD) guidelines for Multinational Enterprises, International Finance Corporation (IFC) Performance Standards and The Ten Principles of the United Nations Global Compact.' [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://www.repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: The Company states that it is committed to act 'in accordance with international reference standards, but not limited, to United Nations Guiding Principles on Business and Human Rights, [...]'. In addition, on its website section 'Our commitment to human rights', the Company indicates: 'We defend the international regulatory framework and ensure human rights. Therefore, we follow the principles set out in: [...] The UN Guiding Principles on Business and Human Rights; The OECD guidelines for multinational enterprises; The IFC performance standards.' [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://www.repsol.com">repsol.com</a> &amp; Our commitment to human rights, N/A: <a href="https://www.repsol.com">repsol.com</a>]</li> <li>• Met: OECD: As indicated above, the Company states on the website 'Our commitment to human rights': 'we follow the principles set out in [...] the OECD guidelines for multinational enterprises'. [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://www.repsol.com">repsol.com</a> &amp; Our commitment to human rights, N/A: <a href="https://www.repsol.com">repsol.com</a>]</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: ILO Core: The Company indicates in its code of ethics and business conduct that 'Repsol is committed to respecting internationally recognized human rights, which include the rights set forth in the International Bill of Human Rights, and the principles concerning fundamental rights in the eight International Labour Organization (ILO) core conventions as set out in the Declaration on Fundamental Principles and rights at Work'. [Code of Ethics and Business Conduct, 10/04/2019: <a href="https://www.repsol.com">repsol.com</a>]</li> <li>• Met: UNGC principles 3-6: The Company is signatory to the UN Global Compact [UNGC Website - Repsol, N/A: <a href="https://www.unglobalcompact.org">unglobalcompact.org</a>]</li> <li>• Met: Explicitly list All four ILO apply to EX BPs: In its Ethics and Conduct Code for Suppliers, the Company states that suppliers must respect the 'principles concerning fundamental rights in the eight International Labour Organization (ILO) Core conventions as set out in the Declaration on Fundamental Principles and Rights at work' (and lists all eight). It also adds that 'the supplier's responsibility to ensure respect for human rights includes, but is not limited to: 'Not using child labour; facilitating the freedom of association and collective bargaining of employees. Treating all employees with dignity and respect, refraining from any offensive conduct or that entails any kind of discrimination [...] not using forced labour'. The document states that the term 'supplier' refers to 'suppliers, contractors, sub suppliers and subcontractors, and other third party entities that provide goods and services to Repsol or who act on Repsol's behalf'. The Code of ethics, includes commitment to respect eight ILO core conventions and applies to business partners including, among others, non-operated joint ventures. [Ethics and Conduct Code for Suppliers, N/A: <a href="https://www.repsol.com">repsol.com</a> &amp; Code of Ethics and Business Conduct, 10/04/2019: <a href="https://www.repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: As indicated above, the Company states in its code that 'Repsol is committed to respecting internationally recognized</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>human rights, which include the rights set forth in the International Bill of Human Rights, and the principles concerning fundamental rights in the eight International Labour Organization (ILO) core conventions as set out in the Declaration on Fundamental Principles and Rights at work. Although it doesn't mention each ILO core area, on its website 'our commitment to human rights', and that contains the human rights and community relations policy, states 'we defend the international regulatory framework and ensure human rights. Therefore we follow the principles set out in: The International Bill of Human Rights; The International Labor Organization Declaration, and the eight fundamental conventions that underpin them: 1) Freedom of association and protection of the right to organize; 2) Right to organize and right to collective bargaining; 3) Forced labor; 4) Abolition of forced labor; 5) minimum age; 6) worst forms of child labor; 7) Equal Pay; 8) Discrimination (Employment and occupation)'. [Our commitment to human rights, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Code of Ethics and Business Conduct, 10/04/2019: <a href="https://repsol.com">repsol.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Respect H&amp;S of workers: The Company has a health, safety and environment policy. The Company states that their aim is 'To carry out all the activities of the Company considering the health of people, safety, and protection of the environment as essential values'. [Health, Safety and Environment Policy, 03/2017: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: In its Ethics and Code of Conduct for Suppliers, the Company indicates: 'Suppliers must perform their activities in order to minimize negative environmental impacts according to the applicable legislation in the host country and Repsol corporate regulations, and reaching a high level of safety in its facilities, products and services, with particular attention to protecting employees, contractors, customers and the local environment. Particularly, when these are carried out at Repsol facilities, the Supplier shall understand and enforce among its employees and subcontractors, all Company Health, Safety and Environment norms applicable to them'. In addition, the Code of Ethics and Business Conduct, which indicates that 'Business partners, including non-operated joint ventures, contractors, suppliers and other third parties [...] should act consistently with the Code, as well as any applicable contractual provisions, when working on our behalf or in collaboration with us'. Also indicates that the Company 'is committed to providing a safe and healthy work environment for personnel and others who visit or work at our facilities and job sites.' [Ethics and Conduct Code for Suppliers, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Code of Ethics and Business Conduct, 10/04/2019: <a href="https://repsol.com">repsol.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states in its website that they have a commitment to 'Promoting transparent and proactive engagement with communities in a timely, honest and culturally appropriate manner at appropriate stages throughout the life cycle of projects and assets on the basis of an open exchange of information.' The Company also states that their aim is to 'To achieve and maintain strong relationships with communities where the company has presence, based on recognition, trust, mutual respect and shared-value, through proactive engagement and responsible and transparent management of social impacts and opportunities.' In their response to the BHRRC the Company states 'The corporate ESHIA Standard establishes a continuous process of communication with affected stakeholders to ensure that impacts are identified and properly managed.' [Repsol: Business and Human Rights Resource Centre, 10/07/2018 &amp; Human Rights and Community Relations Policy, 03/06/2019: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: Regular stakeholder engagement: The Company discloses information on several engagement activities with communities, such as: Block 57 in Peru and the agreement reached with the native community of Nuevo Mundo as part of the sustainable coexistence project; Repsol Sinopec's Plataforma Educativa training program: 'On a mobile unit (platform truck), lectures are offered on environmental and safety education, as well as courses specifically aimed at the fishing community [...]'. [Block 57 and the sustainable coexistence project, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Repsol Sinopec's Plataforma Educativa training program, N/A: <a href="https://repsol.com">repsol.com</a>]</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: In its Integrated Report 2019, the Company states that is conducting 'fourteen operations [...] that are taking place near or are adjacent to the territories of indigenous communities. All the aforementioned operations have at least one of the following elements: public consultation and consultation plans; reference studies; social impact evaluations and action plans; relocation plans, community development plans; claim and complaint procedures; and other documents from community information centers.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			100% of significant assets have development programs for local communities based on the needs of the latter and participation plans for stakeholders based on their geographic distribution'. The Company also reports cases of communities being involved in the impact assessment. The Company also discloses some example of involvement in assessment and review, like the First Nations and Metis communities in Canada. [Integrated management Report 2019, 20/02/20: <a href="https://www.repsol.com">repsol.com</a> & Canada - Repsol Community Report, 2017: <a href="https://www.repsol.ca">repsol.ca</a> ]
A.1.5	Commitment to remedy	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: Commits to remedy: The Company states under the heading 'Our responsibility: to respect and remedy': 'Repsol uses all the means at its disposal to prevent its activities or decisions from having adverse impacts on human rights, and will do all it can to repair the damage of any such impacts that do occur.' The Company states in its Human rights policy that 'Respect means that Repsol will make reasonable efforts to prevent our activities from causing negative impacts on human rights or communities and, if they occur, will endeavour to mitigate or repair the impact'. However, no specific formal statement of commitment to remedy impacts caused or contributed by company's operations was found. [Integrated management Report 2019, 20/02/20: <a href="https://www.repsol.com">repsol.com</a> &amp; Human Rights and Community Relations Policy, 03/06/2019: <a href="https://www.repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Not obstructing access to other remedies: The Company indicates in its Human Rights and Community Relations Policy that it is committed to establish 'grievance mechanisms at the operational level, from the start of our activities, so people directly affected by our assets and right holders (employees, suppliers, contractors, communities or whoever third party) can notify Repsol of any situation of possible impact on human rights. These mechanisms shall not be used to preclude access to judicial or other extrajudicial grievance mechanisms, as well as the legitimate and peaceful activities of human rights defenders'. [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://www.repsol.com">repsol.com</a>]</li> <li>• Not met: Work with EX BPs to remedy impacts: The Company states in its Policy that it is committed to 'Promoting the knowledge and respect for the commitments in this policy among Repsol's business relations: partners, suppliers, contractors, distributors, etc., as well as any other public or private entity, including those in the extractive sector and public security forces directly related to our operations, products or services'. In addition, the Company indicates on its website section 'Operational grievance mechanisms': 'We are committed to verifying any report or complaint received and to actively cooperate to remediate any damage caused by our activity or contractors. This enables us to anticipate, respond to minor incidents arising from our activity before they escalate, and provide early reparations to the affected parties.' No information found in relation to how it works with its extractive business partners to remedy impact, through business partners' mechanisms or through collaborating with them in the development of third party non-judicial remedies. [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://www.repsol.com">repsol.com</a>]</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	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: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact.</li> <li>• Met: Senior responsibility for HR: On its website, the Company describes the governance bodies of its Sustainability model: [The Executive Committee] is in charge of deploying the Sustainability Plan in all the countries where we operate. The business committees and the management committees of our industrial complexes also pitch in to accomplish this task. These are the governance functions that it assumes: Define the long-term objectives; Prepare the action plans, indicators, and road maps; Announce advances in objectives, indicators, and road maps; Analyze the impact on our stakeholders.' Human Rights is part of its Sustainability model. Luis Cabra is the Executive Committee person in charge of Sustainability. Sustainability includes human rights. [Governance bodies, N/A: <a href="https://www.repsol.com">repsol.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: In its organizational chart, there is a EMD Technology Development, Resources, and Sustainability Division. The Company has provided to CHRB a number of sources where there are descriptions of specific activities related to human rights issues carried out. However no evidence found of how date to day responsibility is allocated within the Company. In its feedback to CHRB the Company has provided description of day-to-day responsibility, but that evidence has not been found in publicly available sources. [Organizational Chart, N/A: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Not met: Day-to-day responsibility for EX BRs: The Company indicates on its website: 'Our team of liaison officers are the face of the company before communities and create an amicable and good-faith environment. They are the link between the company and the communities to mediate in possible disagreements and conflict that may arise by seeking an understanding that is beneficial for both parties. At Repsol, we have a team of 70 community liaison officers in the different countries where we are present.' However, no further information found, including description of how day-to-day responsibilities for managing suppliers and extractive business partners. The Company provided information to CHRB for this indicator, but it was not material. [Dialogue with communities and indigenous peoples, N/A: <a href="https://repsol.com">repsol.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The Company has a commitment to conduct continuous human rights due diligence in its activities: 'This means: identify and assess potential impacts of our activities on human rights before undertaking a new activity or business relationship'. In addition, on its website the Company describes its methodology for assessing human rights impacts. The first steps of this process are: preliminary analysis of the project's context; definition of the study's scope and information analysis and identification of potential impacts on human rights. An example of the implementation of the process is the case of the Block RC 12 Occidental, in the region of La Guajira in northern Colombia, used below. [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://repsol.com">repsol.com</a> &amp; Due diligence: Assessing the impacts of our operations, N/A: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: identifying risks in EX business partners: The Company has a commitment to 'Conducting due diligence in human rights when establishing business relationships. Make reasonable efforts to prevent or mitigate negative impacts on human rights directly related to operations, products or services provided through our business relationships (which include relations with partners, suppliers, contractors, including private security contractors, commercial distributors, as well as any other private or public entities, including public security forces, directly related to our operations, products or services). In the specific case of relationships established with public or private security forces, Repsol will act in accordance with the recommendations of the Voluntary Principles on Security and Human Rights. Repsol expects our business relationships to respect human rights when conducting their activities anywhere in the world, and, accordingly, address any negative impacts in which they have involvement'. [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: As above.</li> <li>• Met: In consultation with stakeholders: In the case of the project in Block RC 12 Occidental, in the region of La Guajira in northern Colombia, 'The identification and assessment of impacts was carried out with a special focus on participation and respect for indigenous peoples and their cultures. Repsol's methodology was previously presented to the traditional authorities of the Wayuu ethnic group. The interviews were carried out between March–April 2018 in Alta Guajira, by a team with expert knowledge of the area and their customs. The interviews were carried out with a diverse group of participants, with the objective of guaranteeing the active and meaningful participation of the communities.' In addition, on its website 'Corporate Security', the Company indicates: 'We carry out human rights risk and impact assessments on Human Rights in our operations: all of them cover aspects of corporate security and human rights and risks and impacts are identified and assessed. Based on these assessments, we select and implement mitigation measures and monitor their effectiveness. These studies are carried out with the participation of the communities and on a regular basis, to ensure continuous improvement.' [No-go decision after performing a human rights impact assessment in La Guajira, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Corporate Security, N/A: <a href="https://repsol.com">repsol.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: In consultation with HR experts: See example of application above. In its 'Human Rights Impact Assessment: Peru BU Division' document, the Company indicates that its Human Rights Impact assessment in Block 109 was conducted by a crosscutting and multidisciplinary team which included local and international consultants (human rights experts and ESHIA expert). However, current source has more than three years and no more recent evidence has been found. [Human Rights Impact Assessment. Walking the talk -Community Relations – Peru BU Division, 2015: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: Triggered by new circumstances: The Company states in its Human Rights and Community Relations Policy that they have a commitment to 'Conducting continuous human rights due diligence in our activities. This means: identify and assess potential impacts of our activities on human rights before undertaking a new activity or business relationship, and when relevant operational changes occur...' [Human Rights and Community Relations Policy, 03/06/2019: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: Explains use of HRIAs or ESIA (inc HR): The Company indicates on its website the following: '[...] we perform Environmental, Social, and Health Impact Assessments (ESHIA). These assessments ensure that all potential impacts are identified as early as possible in the life cycle of a project, so that they're taken into account in the project's own design with the aim to prevent and mitigate its effects. We assess our own direct impacts and those indirect potentially caused by our business relations, included Extractive Business Partners. Social impact assessments are including the impacts on human rights'. [Due diligence: Assessing the impacts of our operations, N/A: <a href="https://repsol.com">repsol.com</a>]</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): The Company indicates on its website the following: 'we perform Environmental, Social, and Health Impact Assessments (ESHIA). These assessments ensure that all potential impacts are identified as early as possible in the life cycle of a project, so that they're taken into account in the project's own design with the aim to prevent and mitigate its effects. We assess our own direct impacts and those indirect potentially caused by our business relations, included Extractive Business Partners. Social impact assessments are including the impacts on human rights'. It also indicates that it assesses its impact applying evaluation and prioritization criteria. 'Our potential impacts may mainly arise in refineries and chemical complexes or in our exploration and production operations. Based on each context and local reality, through participatory, proactive and ongoing dialogue, we seek the appropriate solutions in each case'. In the Integrated report, the Company indicates the following: 'When a new operation arises or a significant change occurs, a social impact assessment is carried out. 100% of the impact assessments conducted in 2019 included social and human rights aspects, with a total of 17 impact assessments conducted in 7 countries'. [Due diligence: Assessing the impacts of our operations, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Integrated management Report 2019, 20/02/20: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: Public disclosure of salient risks: As indicated above, impacts depend on context and local reality. The Company publishes on its website an example of a due diligence process in 'La Guajira': 'the results of the study were shared through mass meetings in the local language (Wayunikki) where aspects related to territoriality, young people's loss of identity, labor, economics, the environment, and women's rights were identified. However, the most relevant impact identified was the protection of sacred areas and the cultural impact without any possible mitigation measures'. Onshore exploration activities can have 'potential effects on the health of people in the local surrounding area due to inhalation of gases associated with exploration activity', 'temporary use of land for carrying out exploration activities' or 'displacements to operations that may lead to overutilization of local services'. Offshore exploration and production can have the impact of 'temporary change of navigation routes in the fishing sector due to vessels and equipment involved in oil and gas activities'. [Due diligence: Assessing the impacts of our operations, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Management process of our potential impacts, N/A: <a href="https://repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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: Action Plans to mitigate risks: On its website the Company indicates: '[...] we perform Environmental, Social, and Health Impact Assessments (ESHIA). These assessments ensure that all potential impacts are identified as early as possible in the life cycle of a project, so that they're taken into account in the project's own design with the aim to prevent and mitigate its effects.' Human rights impact assessments are developed independently per operation, so each operation design an action plan adapted per each situation. For instance, in its 'Management process of our potential impacts' focused on hydrocarbon production activities, the Company indicates that it 'Designing and implementing mitigation and monitoring measures covering all phases of the project' after the identification of potential impacts. It also states on its website 'Corporate security' that 'We carry out human rights risk and impact assessments on Human Rights in our operations: all of them cover aspects of corporate security and human rights and risks and impacts are identified and assessed. Based on these assessments, we select and implement mitigation measures and monitor their effectiveness'. [Due diligence: Assessing the impacts of our operations, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Management process of our potential impacts, N/A: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: Including amongst EX BPs: The Company indicates that before acquiring an asset, it assess existing and potential risks and carry out a due diligence process. Following the assessment, 'we generally use a joint operating agreement (JOA) model that define the responsibilities and limits each partner has in the operation and management of an asset. The Company indicates cases in Brazil and Peru of actions carried out with business to ensure human rights respect: 'Repsol has a 10% stake in the consortium that operates this block in Peru [Block 88 in Camisea], and from the very start of our participation we've worked intensely with our partners to improve our human rights performance [...] Repsol has shared all its knowledge about the process to follow in areas with indigenous presence - especially in the cases of communities in voluntary isolation or first contact [...] in the first years of operations, we shared best practices in biodiversity monitoring programs, participatory social-environmental monitoring programs, community relations programs, anthropological contingency programs, and many others'. [Our relationship with our partners, N/A: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Met: Example of Actions decided: The Company's 'Good Neighbour program' in Canada includes water management commitment on actions to 'mitigate any impacts to the water areas in which we operate'. It includes continual investigation of alternative water sourcing options including deeper groundwater source identification, wastewater water reuse, flow back recycling, treatment technologies, engaging in 'early and meaningful dialogue with communities and landowners to address concerns and share our water management plans'. No further evidence found in latest years regarding example of actions taken to mitigate salient risks and impacts. [Due diligence: Assessing the impacts of our operations, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Global Sustainability Plan, 06/2017: <a href="https://repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</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: According to the Company's website section 'Our lessons learned': 'We set out action plans based on our incidents and claims related to safety, protection of the environment, and our relationship with society. We monitor and assess the efficiency of the actions to be able to respond to these impacts. This enables us to learn from our mistakes and gain opportunities to improve within the organization.' In its 'Management process of our potential impacts' focused on hydrocarbon production activities, the Company indicates that it after 'Designing and implementing mitigation and monitoring measures covering all phases of the project' ' Our management is complemented with monitoring to follow up on and control impacts with the aim to ensure compliance with the indications and mitigation measures undertaken.' It also states on its website 'Corporate security' that 'We carry out human rights risk and impact assessments on Human Rights in our operations: all of them cover aspects of corporate security and human rights and risks and impacts are identified and assessed. Based on these assessments, we select and implement mitigation measures and monitor their effectiveness'. [Management process of our potential impacts, N/A: <a href="https://repsol.com">repsol.com</a> &amp; Our lessons learned process, N/A: <a href="https://repsol.com">repsol.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Lessons learnt from checking effectiveness: The Company discloses some information about the case of the Agreement with the Nuevo Mundo Native Community in Peru: 'The lessons learned have been included in the management model and applied to other projects and assets.' However, no details found about specifics lessons learned. [Integrated management Report 2019, 20/02/20: <a href="https://repsol.com">repsol.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>
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>• Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process.</li> <li>• Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Met: Comms plan re action plans for risks: See indicator 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>• Not met: Responding to affected stakeholders concerns: On its website, the Company discloses information about how it reached an agreement with the Nuevo Mundo Community in Peru: 'After an initial controversy and through a process of transparent and participatory dialogue, Repsol and the Nuevo Mundo Community reached an agreement in February 2017. The General Assembly of the Nuevo Mundo Community endorsed this agreement, prior to the completion of the necessary activities for the development of the Sagari field and the Compression Plant. The agreement included aspects of interest in relation to local development projects, compensation for land use and hiring of local workers'. However, this indicator looks evidence to how the Company responded to specific concerns raised by a stakeholder to specific impacts. Evidence found refers to agreements reached with communities, but no details found about how specific concerns were raised by affected stakeholders and the Company responded to them [Block 57 and the sustainable coexistence project, N/A: <a href="https://repsol.com">repsol.com</a> &amp; No-go decision after performing a human rights impact assessment in La Guajira, N/A: <a href="https://repsol.com">repsol.com</a>]</li> <li>• Not met: Ensuring affected stakeholders can access communications: The Company discloses information about its participation strategy where indigenous communities are present or affected its activities, for example in Bolivia it conducts 'Monthly meetings with communal and community leaders'. However, this indicator looks for evidence of how, for concerns raised by stakeholders, the Company ensures that affected stakeholders can access these response communications. The Company also reports about coordination with Bolivian institutions to be aware of complaints and coordinate responses, however it is not clear how this channel is used to respond to affected stakeholders. [Integrated management Report 2019, 20/02/20: <a href="https://repsol.com">repsol.com</a> &amp; Operational grievance mechanism, N/A: <a href="https://repsol.com/responses.docx#_Hlk171132011,100815,101030,0,,">ttps://repsol.com/responses.docx#_Hlk171132011,100815,101030,0,,</a> HYPERLINK "<a href="https://repsol.com">repsol</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	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: Channel accessible to all workers: The Company indicates in its 2019 Integrated Management Report the following: 'Our Ethics and Compliance Channel (<a href="https://ethicscompliancechannel.repsol.com">ethicscompliancechannel.repsol.com</a>) is opened 24 hours a day, 7 days a week, and is managed by an outside service provider. Employees and third parties can communicate with the Ethics and Compliance Committee directly, and confidentially or anonymously, in any language, to raise queries and report breaches of the Code of Ethics and Compliance or the Crime Prevention Model.' The Code of Ethics and Business Conducts covers human rights. [Integrated management Report 2019, 20/02/20: <a href="https://repsol.com">repsol.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company reports that 'In 2017, the Company received 82 grievances related to human rights through 14 grievance mechanisms in 7 countries. Some 68 were resolved and 14 are still being handled.' No new relevant evidence found in latest reports. [Sustainability Report 2017, 2018: <a href="https://www.repsol.com">repsol.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: As indicated above, the Ethics and Compliance Channel allows reporting in any language. [Integrated management Report 2019, 20/02/20: <a href="https://www.repsol.com">repsol.com</a>]</li> <li>• Met: Opens own system to EX BPs workers: On its website section 'Ethics', the Company indicates: 'The Repsol Ethics &amp; Compliance Channel is a confidential means for company employees and any third parties to ask questions or confidentially and anonymously report potential breaches of the Code of Ethics and Business Conduct or the Crime Prevention Model. It is run by the independent company Navex, and the hotline is available 24/7.' [Repsol Ethics, N/A: <a href="https://www.repsol.com">repsol.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: The Company indicates that: 'Our Ethics and Compliance Channel is opened 24 hours a day, 7 days a week, and is managed by an outside service provider. Employees and third parties can communicate with the Ethics and Compliance Committee directly, and confidentially or anonymously, in any language, to raise queries and report breaches of the Code of Ethics and Compliance or the Crime Prevention Model.' [Integrated management Report 2019, 20/02/20: <a href="https://www.repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: As indicated above, the Company has an Ethics and Compliance channel accessible to employees and any third party in any language. In addition, on its website: 'we set up operational-level grievance mechanisms in the countries where we are present, adapted and accessible in the appropriate languages for every context'. [Integrated management Report 2019, 20/02/20: <a href="https://www.repsol.com">repsol.com</a> &amp; Our commitment to human rights, N/A: <a href="https://www.repsol.com">repsol.com</a>]</li> <li>• Met: EX BPs communities use global system: In addition to the evidence above the Ethics and Compliance Channel, on its website section 'Dialogue with communities and indigenous peoples', the Company indicates: 'Our grievance reporting channels are readily accessible in our operations to ensure dialogue and fluid communication with the different communities. With the aim to strengthen this commitment, we promote compliance with these channels among our suppliers wherever we operate'. [Dialogue with communities and indigenous peoples, N/A: <a href="https://www.repsol.com">repsol.com</a>]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	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: Describes how remedy has been provided: About the Block 57 operation and the Sustainable coexistence project, the Company indicates: 'After an initial controversy and through a process of transparent and participatory dialogue, Repsol and the Nuevo Mundo Community reached an agreement in February 2017. The General Assembly of the Nuevo Mundo Community endorsed this agreement, prior to the completion of the necessary activities for the development of the Sagari field and the Compression Plant. The agreement included aspects of interest in relation to local development projects, compensation for land use and hiring of local workers. The commitments have been implemented based on the Sustainable Coexistence Project, a model of social management with a systematic approach to continuous improvement, through the active participation of local stakeholders.' [Block 57 and the sustainable coexistence project, N/A: <a href="https://www.repsol.com">repsol.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: In its Bolivia Sustainability Plan 2018, the Company indicates that it implemented improvements to incident reporting channels at an operational level to respond to the concerns and complaints of communities living in surrounding areas: 'Using the lessons learned since 2011, we will implement improvements in incident reporting channels at an operational level to respond to any potential damage caused by the company's activities.' According to its Global Sustainability Plan 2019, the Company continues working in this matter: 'We have worked on the improvement of the grievance mechanisms in the assets with the highest human rights risk to improve their accessibility and foster the trust of stakeholders.' In addition, in its Sustainability Plan 2020, it sets as an objective for this year to 'Conclude the analysis of the effectiveness of the grievance mechanisms of assets with the highest levels of criticality in accordance with the United Nations Guiding Principles on Business and Human Rights'. [Global</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Sustainability Plan 2019, 11/02/2020: <a href="http://repsol.com">repsol.com</a> &amp; Global Sustainability Plan 2020, 11/02/2020: <a href="http://repsol.com">repsol.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Evaluation of the channel/mechanism: The Company describes how they have been reviewing their remedy process. As part of this process the Company states that 'In 2017, the Company defined this vision as the starting point for its roadmap. It has conveyed this commitment by reviewing the internal rules that regulate its processes and activities as the first phase of this transition from reactive strategies of conflict resolution to preventive management based on risks, impacts and opportunities. For this reason, in 11 especially important countries in social matters, 11 workshops were conducted, with the participation of nearly 200 people, to shore up the management of risks, impacts and social opportunities, and to consolidate a network of professionals who manage these relations with communities.' No new relevant evidence found in latest report. [Sustainability Report 2017, 2018: <a href="http://repsol.com">repsol.com</a>]</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		<ul style="list-style-type: none"> <li>• Headline: An indigenous community stops the construction of a Repsol plant in Peru (Lot 57)</li> <li>• Area: Right to land</li> <li>• Story: Indigenous communities in the Peruvian Amazon have protested against the construction of a gas compressor plant at 'Lot 57' in the southern region of Cuzco saying they had not been adequately consulted ahead of construction on land over which they have rights. The Nuevo Mundo community, located in the jungle basin of the Urubamba River, argued construction of the facility had begun without prior consultation with the community, as stipulated in Peruvian legislation. Work was halted in 2017, but commenced in November 2017.</li> <li>• Sources: [El Mundo 17/01/2017 -: <a href="http://eleconomistaamerica.com">eleconomistaamerica.com</a>][Energia16: <a href="http://energia16.com">energia16.com</a>][Company's website: <a href="http://repsol.com">repsol.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The company says in its 2017 Integrate Management Report that, " In our continuous process of relating with local communities, in early 2017 members of the Nuevo Mundo community mobilized in the proximity of Repsol facilities to demand larger compensation for the easement rights associated with the compression project. After some weeks of participative and transparent dialog, a long-term agreement was reached with the community. It was signed in the community assembly of February 28 pursuant to the laws of the indigenous community and the requirements of the law." [Integrated management Report 2017, 2017: <a href="http://repsol.com">repsol.com</a> &amp; Block 57 &amp; Sustainable Coexistence project, 2018]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The company provides significant detail on the development and progress of the project, spread across three documents, the 2017 Integrated Management Report, an explanation of the Block 57 and the sustainable coexistence project on its website, and the 2018 Integrated Management Report, outlining the engagement that has been undertaken with the Nuevo Mundo people and the agreement that was signed following a period of consultation and dialogue. [Integrated Management Report 2018, 2019 &amp; Integrated management Report 2017, 2017: <a href="http://repsol.com">repsol.com</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The company has a 'Human Rights and Community Relations' policy which states that it is committed to "Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respecting their rights, in accordance with existing legislation and with ILO Convention 169, whether or not incorporated into the national legislation of the countries in which we operate. [Human Rights and Community Relations Policy, N/A: <a href="http://repsol.com">repsol.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The location Block 57 is operated by Repsol and thus the 'Human Rights and Community Relations' policy is applicable to the operations. [Block 57 &amp; Sustainable Coexistence project, 2018]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company has an indigenous rights policy on its website that states it is 'committed to respecting and observing the rights of indigenous peoples in accordance with its values and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>commitments and the voluntary principles it subscribes to, as well as current international legislation, treaties and agreements, whether or not they are incorporated into the legislation of the countries in which we carry out operations, and in particular the obligations established by the states signing the International Labour Organization's Convention No. 169 on Indigenous and Tribal Peoples (1989): (...) the right to ownership and possession of the lands which they traditionally occupy and which have been recognized as belonging to them by the current applicable regulations; the right to free, prior and informed consultation in good faith and in a manner appropriate to the circumstances, in order to reach agreement or achieve consent in relation to the measures proposed. The company also states on their website a commitment to "Recognizing and respecting the right to prior, free and informed consent (PFIC) of indigenous peoples through their representative institutions." [Human Rights and Community Relations Policy, N/A: <a href="http://repsol.com">repsol.com</a> &amp; Dialogue with communities and indigenous peoples, N/A: <a href="http://repsol.com">repsol.com</a>]</p>
E(1).3	The Company has taken appropriate action	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: according to the company ' In our continuous process of relating with local communities, in early 2017 members of the Nuevo Mundo community mobilized in the proximity of Repsol facilities to demand larger compensation for the easement rights associated with the compression project. After some weeks of participative and transparent dialog, a long-term agreement was reached with the community. It was signed in the community assembly of February 28 pursuant to the laws of the indigenous community and the requirements of the law.' [Block 57 &amp; Sustainable Coexistence project, 2018 &amp; Integrated Management Report 2018, 2019]</li> <li>• Met: Provides remedies to affected stakeholders: According to the company ' In our continuous process of relating with local communities, in early 2017 members of the Nuevo Mundo community mobilized in the proximity of Repsol facilities to demand larger compensation for the easement rights associated with the compression project. After some weeks of participative and transparent dialog, a long-term agreement was reached with the community. It was signed in the community assembly of February 28 pursuant to the laws of the indigenous community and the requirements of the law.' [Block 57 &amp; Sustainable Coexistence project, 2018 &amp; Integrated Management Report 2018, 2019]</li> <li>• Met: Has reviewed management systems to prevent recurrence: Following the protests, the company has stopped the work for a few months before resuming them in 2017 after reaching an agreement with the Nuevo Mundo General Assembly. Repsol says that, "The agreement included aspects of interest in relation to local development projects, compensation for land use and hiring of local workers. The commitments have been implemented based on the Sustainable Coexistence Project, a model of social management with a systematic approach to continuous improvement, through the active participation of local stakeholders." [Integrated Management Report 2018, 2019 &amp; Block 57 &amp; Sustainable Coexistence project, 2018]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Remedies are satisfactory to the victims: The company says "After an initial controversy and through a process of transparent and participatory dialogue, Repsol and the Nuevo Mundo Community reached an agreement in February 2017. The General Assembly of the Nuevo Mundo Community endorsed this agreement, prior to the completion of the necessary activities for the development of the Sagari field and the Compression Plant." Endorsement by the Nuevo Mundo General Assembly can be considered sufficient evidence of satisfactory remedy. [Integrated Management Report 2018, 2019 &amp; Block 57 &amp; Sustainable Coexistence project, 2018]</li> <li>• Met: Has improved systems and engaged affected stakeholders: The company says "The Sustainable Coexistence Project already has tangible results in the social performance of Block 57, carried out in the diagnosis and change management process. This process involved all the functions of the Company, which has allowed the fulfilment of all agreements with the community, as well as creating an atmosphere of dialogue that promotes good neighbourly relations with the community and the sustainability of our operations...In compliance with the commitments of the Agreement of February 27th, 2017, the Nuevo Mundo Community has electric power, the improvement of the Community's streets has been completed, and the basis has been laid for the implementation of the Development Plan drawn up by the community. This has been done through capacity-building on issues of public management and negotiation for development, as well as technical advice and support for initiatives prioritized by</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			the same community for productive projects, crafts, scholarships, and the development of projects with the local government". [Block 57 & Sustainable Coexistence project, 2018 & Integrated Management Report 2018, 2019]

## 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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