

Company Name Suncor Energy
Industry Extractives
UNGP Core Score (*) 6.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
6.0	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Human rights policy states the following: 'Suncor has a corporate responsibility to respect human rights and to ensure that we are not complicit in human rights abuses. We seek to avoid infringing on the rights of others and strive to remedy harms that occur as a result of our activities. Our responsibility to respect human rights applies to all of our activities and to our business relationships with others. [Human rights policy: sustainability-prd-cdn.suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: Although the Company states in its human rights policy that it's commitment to respect human rights is informed by, among other standards, the 'Guiding Principles on Business and Human Rights: Implementing the UN "Protect, Respect, and Remedy" Framework'. However, the commitment is 'informed by', which is not considered a formal statement of commitment following CHRB wording criteria. [Human rights policy: sustainability-prd-cdn.suncor.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company supports the ten principles of the Global Compact with respect to human rights. [UNGC Commitment letter: s3-us-west-2.amazonaws.com] • Not met: Explicitly list All four ILO apply to EX BPs: The Code for suppliers states that 'Suncor respects human rights and we have processes in place to ensure that we are not complicit in human rights abuses. Our commitment to respect human rights applies to all of our activities and to our business relationships with others'. 'We expect that our business associates will abide by the laws of the countries in which they operate while also respecting human rights principles.' However, the Supplier Code does not explicitly list all ILO Core and there is no reference to alternative measures to support human rights (freedom of association and collective bargaining) where they are restricted by law. [Supplier Code of Conduct, 2019: suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: Human Rights policy states that employment policies adhere to all applicable domestic laws and honour internationally accepted labour standards including those concerning freedom of association and collective bargaining, non-discrimination, forced labour, and underage workers in the workplace [Human rights policy: sustainability-prd-cdn.suncor.com] • Met: Respect H&S of workers: Through the 'Journey to zero' program the Company establishes its commitments to prevent incidents, leadership being accountable for safety performance, management systems that promote safety excellence and 'fully engaging all employees in safety and providing a safe work environment for all employees and contractors'. • Met: H&S applies to EX BPs: The code for suppliers states that 'we expect that our business associates will share Suncor's commitment to safety and promote the health and well-being of their personnel and others affected by their operations. [Supplier Code of Conduct, 2019: suncor.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The stakeholder relations policy states that 'Mutual respect is the keystone around which productive stakeholder relations must be constructed. Suncor respects the values and cultures of our stakeholders, as well as those of their communities and countries'. 'Suncor

Indicator Code	Indicator name	Score (out of 2)	Explanation
			acknowledges and accepts its responsibility to engage our stakeholders wherever they are affected by our operations. Suncor encourages stakeholders to define how they wish to be consulted and will strive to meet their needs'. [Stakeholder relations policy, 2019: sustainability-prd-cdn.suncor.com] <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states in its Human rights policy that 'Suncor has a corporate responsibility to respect human rights and to ensure that we are not complicit in human rights abuses. We seek to avoid infringing on the rights of others and strive to remedy harms that occur as a result of our activities. Our responsibility to respect human rights applies to all of our activities and to our business relationships with others'. [Human rights policy: sustainability-prd-cdn.suncor.com] Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Senior responsibility for HR: The Company states in its human rights policy that 'The President and Chief Executive Officer of Suncor is accountable to the Board of Directors for ensuring this policy is effectively implemented'. However the Company has not published any documents describing how day-to-day responsibility, resources and decision making process are allocated across the range of relevant functions of the Company, including the senior manager directly responsible for human rights issues. [Human rights policy: sustainability-prd-cdn.suncor.com] Score 2 <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company indicates that 'Principal risks are generally considered those that have the potential to materially impact our ability to meet or support our business strategy. In the constantly evolving energy business, new risks can emerge and established risks can take on new forms or orders of magnitude. We manage identification of new Principal risks through our Critical and Principal Risk processes'. In its Sustainability Report 2018, the Company discloses risk matrix, however there is no clear reference to human rights risks, only to health and safety. No evidence found, however, of a description of the process to identify these risks. [Human rights policy: sustainability-prd-cdn.suncor.com & Report on Sustainability, 2019: sustainability.suncor.com] Score 2 <ul style="list-style-type: none"> • Not met: identifying risks in EX business partners • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Salient risk assessment (and context): The Company indicates that 'Once identified, risks are assessed and evaluated in terms of magnitude of impact and likelihood using an internal risk-matrix tool. A single risk matrix tool allows employees to consistently assess risks and evaluate the consequence and likelihood of risk events. It also helps to assign responsibility for different levels of residual risk. The consequence is based on the following five receptors on the risk matrix: Health and safety; Environmental; Regulatory; Reputation; Financial impact'. However, no evidence found of a description of a process to identify its human rights risks and impacts in specific locations or activities, covering its own operations. [Report on Sustainability, 2019: sustainability.suncor.com] Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks: Although the Company states that 'We make risk-informed decisions that reflect our triple bottom line responsibilities. This requires ongoing identification, assessment, treatment and monitoring of risks inherent to our assets, activities and operations', no evidence found of a global system to take action to prevent, mitigate or remediate its salient human rights issues. [Report on Sustainability, 2019: sustainability.suncor.com] Not met: Including amongst EX BPs Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective: No description found of a system for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [Report on Sustainability, 2019: sustainability.suncor.com] Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Comms plan re identifying risks Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Code of conduct describes the integrity hotline. It includes online access and phone contacts for different countries. It is operated by an external third party. The code covers all employees and states that 'we all share a responsibility to report potential violations of our code'. The integrity hotline website indicates that some of the topics to report about are violation of policy, misconduct or inappropriate behaviour, discrimination, harassment or workplace violence. [Standards of business conduct, N/A: suncor.com & Suncor Ethics Point: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages Met: Opens own system to EX BPs workers: The code for suppliers contains guidelines for them to use the Suncor Integrity Hotline including website and phone access. [Supplier code of conduct: suncor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company indicates its Suncor's Operational Excellence Management System (OEMS) which aims to improve the relations between the Company and its stakeholders and indigenous communities. As part of this system, the Company discloses a grievance mechanism, it states: 'enables us to receive, investigate and respond to complaints from stakeholders and Indigenous communities that may arise from direct and/or indirect impacts associated with Suncor's operations'. [Report on Sustainability, 2019: sustainability.suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems: Although the Company indicates its grievance mechanism in order to identify indigenous communities and stakeholders complaints, it is not clear whether there is a mechanism to its business partners' communities and stakeholders. [Report on Sustainability, 2019: sustainability.suncor.com] • Not met: EX BPs communities use global system: The Company mentions its grievance mechanism in order to verify its stakeholders complaints. However, there is no sufficient evidence to indicate its application to its business partners' communities and stakeholders. [Report on Sustainability, 2019: sustainability.suncor.com]
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company indicates that 'We work to continuously learn, share and improve safety efforts by embedding safety leadership into our culture, fully engaging all employees in safety and providing a safe work environment for all employees and contractors'. However, it is not clear the approach it took to provide or enable a timely remedy for victims of adverse human rights impacts which it has caused or to which it has contributed. [Personal and process safety _ Report on Sustainability, 21/08/2019: sustainability.suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

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

Disclaimer

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

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

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

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