

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

Score	Out of	For indicators
Governance and Policy Commitments		
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
1.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
2	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
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	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
20.5	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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"> • Met: General HRs commitment: The Company commits to 'respecting internationally recognised Human Rights standards within its operations'. In addition, in its Registration Document 2018, the Company states: 'TOTAL is committed to respecting internationally recognized human rights wherever the Group operates, in particular the Universal Declaration of Human Rights, the Fundamental Conventions of the International Labor Organization, the UN Guiding Principles on Business and Human Rights, the OECD guidelines for multinational enterprises and the Voluntary Principles on Security and Human Rights (VPSHR)'. The Registration Document is the company's official report approved by the Board. [Human Rights Internal Guide, 2015: total.com & Universal Registration Document 2019, 20/03/2020: total.com] • Met: UNGC principles 1 & 2: The company is a member of the United Nations Global. [Code of Conduct, 12/2018: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: As indicated above, the Registration document states that 'TOTAL is committed to respecting internationally recognized human rights wherever the Group operates, in particular [...] the UN Guiding Principles on Business and Human Rights [...]'. [Code of Conduct, 12/2018: total.com & Universal Registration Document 2019, 20/03/2020: total.com] • Met: OECD: The Company states in its Code of Conduct the following: 'We abide by the OECD Guidelines for Multinational Enterprises as well as the principles of the United Nations Global Compact.' [Code of Conduct, 12/2018: total.com]
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"> • Met: UNGC principles 3-6: The company is a member of the UNGC since 2002. [Code of Conduct, 12/2018: total.com] • Met: Explicitly list All four ILO apply to EX BPs: See above. In addition, the Company states in its Code of Conduct: 'Our Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings. [...] We apply the Code of Conduct in all joint ventures we control. Otherwise, we do our utmost to ensure that the partner who controls the joint venture adheres to principles that are equivalent to those set out in our Code of Conduct.' Moreover, Total's Principles of Purchasing Policy outlines the standards for respecting fundamental principles of the International Labour Organisation stating, "In particular with rules relating to the prohibition of forced labour and child labour...treatment of discrimination...freedom of association and collective bargaining." The Human rights briefing update also states that our policies and strategies help to underscore our commitment to our stakeholders including contractors, suppliers and joint venture partners, and what we expect in return. They also provide guidance to our employees and everyone who works on our behalf. [Code of Conduct, 12/2018: total.com & Fundamental Principles of Purchasing, N/A: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Code of Conduct indicates that it takes necessary steps to ensure decent working conditions, including: 'prohibition on forced labor and child labor, a commitment to non-discrimination and freedom of association, and a guarantee that any problems that arise can be reported to human resources staff. [...] We are careful to create working conditions that show respect for people and that allow for freedom of association and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>collective bargaining. Harassment in any form is not tolerated'. [Code of Conduct, 12/2018: total.com]</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: The Company Code of Conduct states that its 'Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings. [...] We apply the Code of Conduct in all joint ventures we control. Otherwise, we do our utmost to ensure that the partner who controls the joint venture adheres to principles that are equivalent to those set out in our Code of Conduct.' [Code of Conduct, 12/2018: total.com] • Met: H&S applies to EX BPs: The Company's Code of Conduct states that 'suppliers, contractors and business partners are expected to apply these standards that are equivalent to ours [the Company's]'. Therefore, respect for health and safety extends to business partners. [Code of Conduct, 12/2018: total.com]
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"> • Met: Regular stakeholder engagement: In its Registration Document 2018, the Company indicates: 'in 2018 upon publication of the Information Document on Human Rights, the Human Rights Department of the Civil Society Engagement Division consulted certain of its stakeholders on the risk map published in the 2017 Vigilance Plan. This consultation led to the conclusion that the mapping could thus be maintained. Among these numerous stakeholders, TOTAL maintains regular dialogue with the Group's employees and their representatives who have a privileged position and role'. In the latest report, the Company indicates: 'Among the numerous stakeholders with which TOTAL maintains regular dialogue, the Group's employees and their representatives have privileged position an role. [...]' In accordance with internationally recognized human rights standards, TOTAL requires the Group entities to maintain a regular dialogue with their stakeholders and make sure that their activities either have no negative consequences on local communities'. [Universal Registration Document 2019, 20/03/2020: total.com & Registration Document 2018, 03/2019: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Regular stakeholder design engagement: The Company's updated Human Rights Briefing Paper 2018, states that Total works with the Danish Institute for Human Rights (DIHR). In 2017, the Company conducted a dedicated human rights impact assessment in Papua New Guinea focusing on gender, security and conflict. Furthermore, the Company requires its business units to engage with their stakeholders on a regular basis and to avoid, minimize, mitigate and remedy negative impacts on local communities related to their activities. The Company has also issued a stakeholder engagement guide and manual for exploration and production business segments. In addition, in its Registration Document 2018, the Company reports: 'Since 2002, the Group has engaged GoodCorporation, a company specialized in ethical assessments, to verify the proper application of the principles set out in the Code of Conduct at the Subsidiary level. These assessments include criteria relating to human rights and fundamental freedoms, and corruption. As part of the process, a selection of employees and external stakeholders of the Subsidiary are questioned to understand how their Activities are perceived locally. Following the assessment, the Subsidiary in question defines and implements an action plan and a monitoring procedure'. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com & Registration Document 2018, 03/2019: total.com]
A.1.5	Commitment to remedy	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"> • Met: Commits to remedy: The Company's Human rights Internal Guide states that [Total] business units should "avoid, minimize, mitigate and remedy negative impacts on local communities related to their [business unit] operations." [Human Rights Internal Guide, 2015: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Company's Human Rights Internal Guide states that "the Group respects the rights of communities by identifying and addressing impacts...and where appropriate by providing remedy for adverse impacts that could not be avoided." Further this guide also states that "access to these mechanisms [remediation] for vulnerable individuals and groups should be ensured." [Human Rights Internal Guide, 2015: total.com] • 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	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"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: In its 2019 Registration Document, the Company indicates: 'The Human Rights Steering Committee (formerly the Human Rights Committee) is responsible for monitoring the implementation of this 'human rights roadmap.[...] The Group's Human Rights Department provides advice and support to employees and operational divisions and supervises efforts made to promote respect for human rights in close collaboration with the Ethics division and in accordance with the Group's Code of Conduct. The Human Rights Department and the Ethics division rely on a network of Ethics officers [...] in charge of promoting the values set out in the Code of Conduct among employees working in the Group's subsidiaries and ensuring that the Group's commitments are correctly implemented at the local level'. In addition, the Company states in its Human Rights Internal Guide that the Human Rights Coordination Committee 'coordinates the activities undertaken internally and externally by the Group's Business units in this [human rights] domain'. It is 'managed by the Ethics Committee chair in cooperation with the Group's Human Rights lawyers'. 'The Ethics Committee ensures in particular that the Code of Conduct is widely communicated. It also listens to, supports and advises employees and other stakeholders. [...] The chair of the Ethics Committee reports regularly to the Executive Committee and the Board of Directors'. [Universal Registration Document 2019, 20/03/2020: total.com & Human Rights Internal Guide, 2015: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: Its Code of Conduct sets the responsibilities of the Ethics Committee, which 'ensures compliance with the Code of Conduct and verifies that it is properly applied.' For example, some of its responsibilities are: 'Ensuring that the Code of Conduct is widely communicated and proposing any changes it deems necessary; Receiving reports from whistleblowers in connection with the Code of Conduct and ensuring they are addressed; Submitting recommendations to the executive team on all ethics-related issues and drawing its attention to potential challenges to our activities on ethical grounds; Advising Total's training departments on incorporating a presentation on the Code of Conduct into training programs, in particular those intended for new hires and managers.' In addition it indicates: 'The Ethics Committee is backed by an international network of Ethics Officers, who report to the Country Chairs and serve as a liaison in their respective countries for matters relating to ethics and the Code of Conduct.' [Code of Conduct, 12/2018: total.com] • Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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"> • Met: Identifying risks in own operations: The Company uses the Human Rights Compliance Assessment (HRCA) tool developed by the Danish Institute for Human Rights to assist Total's business units in identifying and addressing Human Rights Risks in business unit operation. [Human Rights Internal Guide, 2015: total.com] • Met: identifying risks in EX business partners: Total's Human Rights Impact Assessment Document section 12.6. 'Identifying and Assessing Impacts states 'Assessment includes impacts that are caused or contributed to by the Project, and also those that are directly linked to the Company through products, services or other activities by any of its business partners'. [Human Rights Impact Assessment (HRIA), 2015: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company indicates that in 2016 held 'a series of consultations with our internal and external stakeholders to identify the salient human rights issues associated with our activities and business relationships, based on the UN Guiding Principles Reporting Framework. The process enabled us to identify six salient issues across our three broad, focal human rights areas [...] More recently, we have continued to learn extensively from observations and key findings in [among other actions], human rights assessments carried out in selected Total business units across the world with the support of independent third party organizations such as the Danish Institute for Human Rights'. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: In consultation with stakeholders: The Company's Human Rights Briefing Paper Update 2018 states: 'Our Due Diligence Actions: Our Stakeholder Relationship Management Tool+ (SRM+) is an effective tool for defining and regularly re-adjusting the societal/CSR strategy of our business units. Based on identifying and mapping our main stakeholders and a clear understanding of local expectations and issues, the aim is to assess the quality of the relationship and then jointly define an action plan to build a long-term trusting relationship grounded in respect for human rights.' [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com & Human Rights Impact Assessment (HRIA), 2015: business-humanrights.org] • Met: In consultation with HR experts: In its Human Rights Impact Assessment Document, the Company indicates: 'Contractor personnel employed for the assessment include a project manager and consultants able to organize and carry out the HRIA including the stakeholder engagement process (Human Rights expert, sociologist, anthropologist, etc.). It is also necessary to have local consultants as part of the team, to bring local knowledge and understanding of the context and to facilitate engagement with stakeholders. The Human Rights expert shall be a person with the experience and capacity to understand and evaluate Human Rights risks and potential impacts and at least one person in the team shall have experience in, and the ability to, engage effectively with stakeholders.' [Human Rights Impact Assessment (HRIA), 2015: business-humanrights.org] • Met: Triggered by new circumstances: Total's General Specification Sustainable Development Human Rights Impact Assessment Document outlines the need for and scope of a dedicated HRIA given a series of contexts. These contexts detail a number of triggers including new country operation and new business relationships. [Human Rights Impact Assessment (HRIA), 2015: business-humanrights.org] • Met: Explains use of HRIAs or ESIA (inc HR): See above [Human Rights Impact Assessment (HRIA), 2015: business-humanrights.org]
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"> • Met: Salient risk assessment (and context): Total states in its Human Rights Internal Guide "we integrate respect for Human Rights into our risk and impact management processes, including but not limited to new country entry evaluations, acquisitions and divestitures procedures, environmental and social baselines and impact assessments, purchasing systems, etc." In addition to this, the Company "Conduct assessments to identify, prevent or mitigate potential Human Rights impacts that may be caused directly by the Business unit's projects or operations, or by project partners and suppliers." To do Total uses "The Human Rights Compliance Assessment (HRCA), a tool developed by the Danish Institute to assist Business units in identifying and addressing Human Rights risks in Business units operations, was adapted to the Group's specific context and needs." [Human Rights Internal Guide, 2015: total.com] • Met: Public disclosure of salient risks: The Company discloses the salient human rights issues that it discovered from consultations with internal and external stakeholders in 2016. 'The process enabled us to identify six salient issues across our three broad, focal human rights areas'. Areas and issues are as follows: 'Under Human Rights in the Workplace: Forced Labor and Child Labor, Discrimination, and Just and favourable conditions of work and safety as its salient issues'; 'Human Rights and Local Communities: Access to land and Right to Health and An Adequate Standard of Living'; 'Human Rights and Security: Risk of Misuse of Force'. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
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"> • Met: Action Plans to mitigate risks: In its Human Rights Briefing Paper Update 2018, the Company explains its salient issues and then devotes a section to explain the actions that is carrying out in relation to each one of human rights in the workplace (forced labour, discrimination safety), local communities (access to land, right to health and adequate standard of living) and security (misuse of Force). [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com] • Met: Including amongst EX BPs: As above. In addition, contractors, and in some cases joint ventures are part of the different processes and interventions described in the document. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Example of Actions decided: For instance, its actions to address human rights issues in the Workplace - Labour Rights includes: 'Strengthening our governance: [...] In January 2015, Total signed a global CSR agreement with international union federation IndustriALL Global Union, which represents more than 50 million workers in 140 countries in the energy, mining and manufacturing sectors.[...] Reinforcing awareness and training: 'In October 2017, we held a Contracts and Human Rights Session facilitated by Shift, a leading center of expertise on business and human rights, with the Contracts Legal Practice Group – on embedding human rights in contracts for lawyers. This session also provided the opportunity for our lawyers to share relevant examples of contract provisions that have been useful in helping the company ensure that our partners respect human rights. [...] Our due diligence actions: [...] As part of the new TGP qualification and monitoring methodology which will be gradually launched across our business units starting 2018, a human rights risk analysis will be carried out for potential suppliers, or suppliers renewing a contract with Total up to certain monetary threshold. [...] Collaboration: We continue to actively participate in international working groups that address human rights issues in the supply chain.[...]'. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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	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: System to check if Actions are effective: Total has partnered with GoodCorporation conducting ethical assessments of the company's business units. The partnership has resulted in a risk based process involving employees, suppliers and subcontractors, customers and other business partners, host countries, local community and management to evaluate the practical implementation of Total ethical and human rights principles set out in the code of Conduct. This process entails conducting on-site visits and multiple conversation with rights holders. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com] <p>• Not met: Lessons learnt from checking effectiveness: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.</p> <p>Score 2</p> <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	0.5	<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: Comms plan re identifying risks: See indicator B.2.1 • Met: Comms plan re assessing risks: See indicator B.2.2 • Met: Comms plan re action plans for risks: See indicator B.2.3 • 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 • 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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This indicator looks for evidence of how the Company has responded, in terms of communication, to specific human rights concerns. • Not met: Ensuring affected stakeholders can access communications: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.

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"> • Met: Channel accessible to all workers: The Company indicates: 'To support employees on a day-to-day basis, the Group encourages a climate of dialogue and trust enabling individuals to express their opinions and concerns. Employees can thus go to their line manager, an HR or other manager, their Compliance Officer or their Ethics Officer. The Group's employees and Suppliers, as well as any other external stakeholder, can contact the Ethics Committee to ask questions or report any incident involving a risk of non-compliance with the Code of Conduct by using a generic email address (ethics@total.com). [...] The Human Rights Department and the Ethics division rely on a network of Ethic officers [...] in charge of promoting the values set out in the Code of Conduct among employees working in Subsidiaries and ensuring that the Group's commitments are correctly implemented at the local level'. [Universal Registration Document 2019, 20/03/2020: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company indicates: 'In 2019, the Ethics Committee handle almost 190 referrals (internal, external, anonymous) in relation to compliance with the Code of Conduct. 50% of these reports were about questions related to human resources. Approximately one third of the cases result in corrective measures' However, it is not clear how many reports were related to human rights, and how many of them were addressed or closed during the year. [Universal Registration Document 2019, 20/03/2020: total.com] • Not met: Channel is available in all appropriate languages • Met: Opens own system to EX BPs workers: As indicated above, the Company's Ethics Committee address is open to employees, suppliers as well as any other external stakeholder. [Universal Registration Document 2019, 20/03/2020: total.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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"> • Met: Grievance mechanism for community: In its Registration Document 2019, the Company indicates: 'In accordance with the One MAESTRO framework, the group operational entities are implementing procedures to handle grievances in order to provide residents and local communities with a preferential channel to voice their problems and grievances. Handling these grievances locally makes possible to offer a response to anyone who feels that they have suffered damage and to improve internal processes in order to reduce nuisances or impacts that may be caused by the operations. Within the One MAESTRO perimeter [...], 100% of Refining & Chemicals sites have an operational grievance mechanism. Deployment is gradual in the Group's other segments.' In addition, in its Registration document 2018, the Company indicates: 'The Group framework provides for the implementation of operational procedures to handle grievances by providing local communities [...]. The Group's local entities handle these grievances in order to offer an appropriate response to anyone who feels that they have suffered damage as a result of the activity and to improve internal processes in order to reduce nuisances or impacts that may be caused by the activities. At Exploration & Production, a set of tools is made available to the subsidiaries, including, in particular, a standard procedure designed to make it easier for local communities to access the grievances mechanisms. This standard procedure complies with the United Nations guiding principles on Business and Human Rights'. [Registration Document 2018, 03/2019: total.com & Universal Registration Document 2019, 20/03/2020: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: According to its Human Rights Briefing Update Paper: 'The Community Liaison Officer (CLOs) maintains a dialogue between the business unit and the local communities. CLOs, who are employees of Total and come from the local community and therefore speak the local language and understand local customs. As such they often play a key role in integrating the company into the local context.' In addition, in its Registration document 2019, it indicates: 'The approach to dialogue at Exploration & Production is managed in certain subsidiaries by local community liaison officers who speak the language and understand the customs.' However, it is not clear that all communities throughout Total's operation have a mechanism for grievances (seems to refer to E&P). [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com & Universal Registration Document 2019, 20/03/2020: total.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: EX BPs communities use global system: As indicated above, the local mechanisms for communities are open to anyone. In addition, as indicated in indicator C.1 the Company's channel to the Ethics Committee for complaints is open to employees, suppliers as well as any other external stakeholder in. Business partners are required to abide by the Code of conduct. [Universal Registration Document 2019, 20/03/2020: total.com]
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"> • Met: Describes how remedy has been provided: Total describes a situation in PNG where a family's canoe was capsized by one of the Company's transportation boats. The local family claimed that their personal belongings including gardening tools, a flashlight and various food items were lost as a result. Upon receiving the grievance, the Company Onsite Grievance Committee met to discuss the matter and subsequently offered food rations, gardening tools and solar lamps which was accepted by the local family. The settlement process was completed within 14 days with community members witnessing the transaction for transparency reasons. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com] • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts: The Company indicates with respect its procedures to manage stakeholder grievances: [...] Monitoring the handling of the grievance and analyzing it to see where improvements can be made.' However, CHRB could not find further information about a specific incident (of further details of general approach to amend systems/procedures to prevent similar incidents happening in the future). [Universal Registration Document 2019, 20/03/2020: total.com] • 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		<ul style="list-style-type: none"> • Headline: Niger Delta oil spills • Area: Environmental damage • Story: Total is a partner in the Joint Venture Shell Petroleum Development Company of Nigeria Limited (SPDC), holding a 10% stake in the company. SPDC has been criticised for frequent oil spills in the Niger Delta, which have caused serious damage to the environment, human health and livelihoods. <p>In November 2013, Amnesty International (AI) and the Centre for Environment, Human Rights and Development (CEHRD) published a report entitled 'Nigeria: Bad information: Oil spill investigations in the Niger Delta' that alleged specific cases in which the SPDC joint venture had falsely reported the cause of oil spills, the volume of oil spilt, or the extent and adequacy of clean up measures or compensation.</p> <p>In June 2014, a ruling by the London Technological and Construction Court ruled that where there are inadequate systems in place, the Company would be responsible for the resulting pollution caused by criminals. In January 2015, it was reported in the press that the Company had agreed to pay approximately USD 80m (GBP 55m) to compensate a Nigerian community for E15 two spills in 2008 and 2009. GBP 35m was to be split between individual villagers and GBP 20m would go to the Bodo community to build health clinics and refurbish schools. In 2017, Shell tried to strike out the lawsuit alleging that some members of the community had obstructed the clean up. The Court dismissed the claim. Later that year the company sought to prevent the community from going back to court by requesting to include a clause in the settlement, according to which any disruptive act by any resident of the Bodo community would lead to termination of the lawsuit. However, on 24 May 2018, a UK judge ruled that the Bodo community should retain the right to revive the claim for another year with no conditions attached, in the event of the clean-up not being completed to an adequate.</p> <p>During 2018, allegations related to these operations remain ongoing: On March 16, 2018, Amnesty International has exposed evidence that Shell and Eni are taking weeks to respond to reports of spills and publishing misleading information about the cause and severity of spills, which may result in communities not receiving compensation. Similarly, on August 4, 2018, the Nigerian Times reported that members of Bakiri community, in the area of Bayelsa State, conducted a demonstration against the alleged neglect by Shell Petroleum Development Company (SPDC), accusing the company of neither sending relief materials nor a medical team to care for the health challenges posed by an incident that took place in May 2018. It is reported that the oil spill occurred along the 24 inch Trans-Ramos pipeline of SPDC and had affected communities in Bayelsa and Delta states and that over 50 fishing settlements had been destroyed by the spill.</p> <p>On July 24, 2019, the press reported that the Supreme Court in London will hear an appeal by Nigerian farmers and fishermen from Bille and Ogale communities, which allege they have suffered from decades of pollution, to pursue claims in England against Shell over oil spills in the Niger Delta.</p> <ul style="list-style-type: none"> • Sources: [Amnesty International, 07/11/2013 -: amnesty.org][The Guardian, 07/01/2015 -: theguardian.com][The Independent, 16/03/2018: independent.co.uk][Amnesty International, -: amnesty.org]
E(1).1	The Company has responded publicly to the allegation	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: Public response available: Shell/SPDC responded publicly in a hearing in the Hague. However, CHRb could not find evidence that Total has made any public comments to the allegations related to SPDC. Even if Total is not the operating partner in the JV, it can respond to the allegation or at least refer to SPDC's response. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	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"> • Met: Company policies address the general issues raised: According to a statement on its website it states that 'Total holds... respect for the environment,... as paramount priorities' [Safety Health Environment Quality Charter, 2014: total.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: Its supplier code states that suppliers must protect the environment [Fundamental Principles of Purchasing, N/A: total.com] Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Total has a public environmental policy covering oil spill clean ups and prevention measures. [Safety Health Environment Quality Charter, 2014: total.com]
E(1).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Met: Provides remedies to affected stakeholders: SPDC agreed to pay for the clean up following a court case. However, at a later stage, they attempted to prevent the community from pursuing legal action if the clean-up was not performed to an adequate standard. Therefore it cannot be considered to provide remedy satisfactory to the victims. In addition, SPDC has indicated: 'SPDC is pleased that after significant engagement in 2016 and 2017 with the communities and other stakeholders managed by the BMI, the clean-up and remediation activities commenced in September 2017. (...) Should activities continue uninterrupted it is expected to take approximately three years. Phase 1 of the clean-up is expected to be completed in early 2018 as per plan. However, for clean-up and remediation to be successful, the repeated re-contamination of cleaned-up sites due to crude oil theft and illegal refining must end. A coordinated approach among all stakeholders, particularly federal and state government agencies is essential to address the ongoing problem of re-pollution'. [SPDC response to Niger Delta: reports.shell.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Campaign groups are suing Total for breaching corporate duty law in Uganda • Area: land rights • Story: On October 23, 2019, the press reported that six French and Ugandan NGOs including Friends of the Earth are suing Total to disclose how it is addressing the human and environmental impacts of a Ugandan oil field. In June 2019, the groups filed a legal notification against Total alleging that the company failed to properly compensate local landowners affected by work on the Tilenga project in Uganda. A survey revealed that the project led to 'the expropriation of tens of thousands of people who have already lost their homes, their agricultural lands and their crops, in return for clearly insufficient compensation that they have been forced to accept often under pressure and intimidation and other impacts. The Company was given a three-month period to comply with the French law that requires large French companies to publish annual plans that address the adverse impact of their activities, subsidiaries and suppliers, on people and the environment. In January 2020, the judges in the high court considered that the case did not fall within their jurisdiction, rather it should sit with the Commercial Court and in March 2020, the NGOs filed an appeal of that decision. <ul style="list-style-type: none"> • Sources: [The Independent - 24/10/2019: independent.co.uk][Reuters - 23/10/2019: reuters.com][Banktrack - 27/06/2019: banktrack.org][Friends of the Earth France, 25/03/2020: amisdelaterre.org]
E(2).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: The company has a public response available on its website. It states that "Total E&P Uganda and its partners have implemented measures to prevent the risks identified for the EACOP and Tilenga projects." It states that the Tilenga and EACOP projects were designed to limit the impact on local communities. [TOTAL RESPONDS TO QUESTIONS FROM NGOS ABOUT ITS PROJECTS IN UGANDA, 30/09/2019: total.com] Score 2 <ul style="list-style-type: none"> • Met: Response goes into detail: The company stated that a total of 622 people were affected by its first relocation plan in Tilenga. The company outlined its plans for financial compensation or compensation in kind to landowners. Total also stated that other measures have been implemented to support local communities, and more are planned. [TOTAL RESPONDS TO QUESTIONS FROM NGOS ABOUT ITS PROJECTS IN UGANDA, 30/09/2019: total.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).2	The Company has appropriate policies in place	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"> • Met: Company policies address the general issues raised: The company has a policy on informing and consulting local and national populations and actors about its projects. The company also states that it commits to respect the “Rights of local communities, through the implementation of grievance mechanisms in communities that are impacted by our activities.” [Inform and Involve, 09/2019: total.com] • Met: Policies apply to the type of business relationships involved: The company’s Human Rights Guide applies to business unit operations. [Human Rights Internal Guide, 2015: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Within its Human Rights Guide, the company has a policy covering property rights, access to land and cultural heritage. The company notes that these rights are covered by Article 17 of the Universal Declaration of Human Rights, to which the company’s code of conduct refers. The company states that depending on its business units’ operations, there may be negative impacts on livelihoods of local population, including physical displacement. The company states that it applies international best practice in its land access and acquisition process in order to avoid or minimize human rights impacts. [Human Rights Internal Guide, 2015: total.com]
E(2).3	The Company has taken appropriate action	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: Engages with affected stakeholders: The company states that it consulted with nearly 70,000 people during the environmental and social impact assessments it conducted in Uganda and Tanzania. [TOTAL RESPONDS TO QUESTIONS FROM NGOS ABOUT ITS PROJECTS IN UGANDA, 30/09/2019: total.com] • Met: Encourages linked business to engage affected stakeholders: The company states that “Total is fully aware of the potential impacts on local communities. Ongoing transparent dialogue ensures that any concerns expressed are handled appropriately. Stakeholders are informed and consulted at every step of project implementation.” [TOTAL RESPONDS TO QUESTIONS FROM NGOS ABOUT ITS PROJECTS IN UGANDA, 30/09/2019: total.com] • Met: Provides remedies to affected stakeholders: The company reported that a total of 622 people, made up of owners and renters, were affected by its relocation plan. It reported that owners were offered financial or in kind compensation, and 31 owners opted for in kind and 591 people opted for financial compensation. [TOTAL RESPONDS TO QUESTIONS FROM NGOS ABOUT ITS PROJECTS IN UGANDA, 30/09/2019: total.com] • Not met: Has reviewed management systems to prevent recurrence: The company states that it implements “awareness-raising and training sessions on human rights and local communities for relevant personnel, including a focus on our salient human rights issues of access to land and right to health and an adequate standard of living.” The company reportedly conducted a two day training in Uganda. However, this training was held before the relevant allegation in 2017. [Inform and Involve, 09/2019: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: Though the company describes in detail in its 2019 Universal Registration Document, the process of compensation, according to NGOs, some people are dissatisfied with the remedy and are continuing to search for remedy. [Universal Registration Document 2019, 20/03/2020: total.com] • Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that the company has improved systems and engaged affected stakeholders.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Total amongst other companies sued over environmental contamination by a group of indigenous people in Argentina • Area: Environmental damage • Story: December 17, 2018, An investigative report by Greenpeace reported that its Andino team investigated the impacts of the oil and gas developments in northern Patagonia, an area where the indigenous group the Mapuche live. The report claimed that Royal Dutch Shell, Total and other companies were involved in illegal dumping of highly toxic oily sludge waste at various sites in the region. One of the alleged illegal waste ponds was estimated to cover an area of 6.3 to 13.6 Hectares of land and is located 6km north of the town Anelo. According to the report, the wastes are hazardous and can cause damage, directly or indirectly to living beings or contaminate the soil. The report says that a local whistleblower

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>provided Greenpeace with video evidence of the dump site, with a subsequent investigation by the organisation claiming to have tracked the trucks dumping the waste to two sites, one operated by Royal Dutch Shell and the other by Total.</p> <ul style="list-style-type: none"> • Sources: [Le Figaro Premium - 17/12/2018: lefigaro.fr][Greenpeace - 17/12/2018: greenpeace.fr][Agence France Presse - 17/12/2018: france24.com][Latin America Bureau - 11/03/2019: lab.org.uk]
E(3).1	The Company has responded publicly to the allegation	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"> • Met: Public response available: The company provides a public response to the allegations on its website. [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company's response provides sufficient detail about the allegation and explains the company's own position on the issue. [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com]
E(3).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The Company has a commitment to protect the rights of local communities, including the health & safety of the people in the community, and respect the environment. [Code of Conduct, 12/2018: total.com] • Met: Policies apply to the type of business relationships involved: The commitment goes down to the Company's business partners. [Code of Conduct, 12/2018: total.com & Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The Company systematically monitors the discharged water quality and the level of soil pollution, however it is not a member of the CEO Water Mandate. [2017 Registration Document including the Annual Financial Report, 2017: total.com]
E(3).3	The Company has taken 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"> • Not met: Engages with affected stakeholders: The company says that it provided a response to Greenpeace Andino in 2018 following the release of their report, in the form of a letter signed by the Chairman and CEO, however the contents of that letter is not publicly available. All information used by CHRB must be public. Although the company has responded to the Greenpeace letter, it has failed to provide evidence of meaningful engagement with the Mapuche Confederation of Neuquén, and thus doesn't satisfy this requirement. [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com] • Not met: Encourages linked business to engage affected stakeholders: Total says that it conducted a number of onsite inspections at Treater S.A.'s facilities. Additionally there have been samples taken as part of an investigation by the Neuquén Province Public Prosecutor's office, which Total says shows no signs of anomalies in soil quality. The company also notes that it ceased sending waste to the Treater S.A. site after a follow-up inspection of the facilities which found the site to be saturated, however there is no evidence of Total encouraging Treater S.A. to engage with the Mapuche Confederation of Neuquén. [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com] • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of Total or Treater S.A providing remedies to the affected communities in the area . [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com] • Met: Has reviewed management systems to prevent recurrence: Total provides evidence of having reviewed its management systems through conducting onsite inspections at Treater S.A.'s facilities and also in its decision to stop sending waste to the Treater S.A. operated site. [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: CHRB did not find evidence of the Company providing remedy to the affected communities. [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com] • Not met: Has improved systems and engaged affected stakeholders: Total provides evidence that it has improved its systems, saying "When Total Austral inspected Treater S.A.'s facilities again, it nonetheless noticed that the site was saturated, the industry having underestimated the increase in volumes from Vaca Muerta. In consultation with Treater S.A., Total Austral stopped sending waste to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			their site. It now uses another waste management service provider, while waiting for the construction of a new waste treatment facility that Total Austral has taken the initiative to build, potentially with other oil and gas operators." However there is insufficient evidence to demonstrate engagement with the affected communities. [Response to Treater S.A. allegations, 19/06/2019: sustainable-performance.total.com]
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Bright Shipping-owned Sanchi collision leaves 32 crew members missing in China • Area: H&S • Story: Thirty-two people went missing after an oil tanker collided with a cargo ship off China's eastern coast on the 6th of January 2018, resulting in the deaths of all the thirty-two individuals on board. The victims were from the Iranian tanker Sanchi, which was carrying 136,000 tonnes of oil condensate. South Korean petrochemical company Hanwha Total Co., a 50-50 partnership between the Seoul-based Hanwha Group and French oil giant Total, contracted the Sanchi to import Iranian condensate to South Korea. The other ship involved in the collision, CF Crystal, was a bulk carrier with had a flag of Hong Kong. Hanwha Total Co., and its parent company Total S.A. did not communicate on this case in public. • Sources: [The Guardian, 07/01/18: theguardian.com][Reuters, 07/01/18: reuters.com]
E(4).1	The Company has responded publicly to the allegation	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: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	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"> • Met: Company policies address the general issues raised: The Company has a Health and Safety policy. [Code of Conduct, 12/2018: total.com] • Met: Policies apply to the type of business relationships involved: The company has a Health and Safety policy which apply also to its suppliers. [Code of Conduct, 12/2018: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company discloses its injury rates and lost days. [Human Rights Briefing Update Paper 2018, 04/2018: sustainable-performance.total.com]
E(4).3	The Company has taken appropriate action	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: Engages with affected stakeholders: The Company's response to the accident is not available in public. • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders: CHR B has found no evidence for remedies • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Headline: NGO report alleges a Total site used as a prison in Yemen • Area: Cruel and inhuman treatment • Story: On November 7, 2019, the press reported that a new report by NGO is alleging that there is a secret prison in Total facility in Yemen based on testimonies from international human rights organisations, a former detainee and the family of another detainee. A number of Shabwa residents spoke of arbitrary arrests and detentions in the province, pointing the finger at Balhaf. According to a report from the Observatoire des armements, 'Three witness statements (including two from victims themselves) and one open source confirm that Yemeni citizens were detained in a Total controlled logistics zone at Balhaf in 2017 and 2018. The accounts contain details of inhuman and degrading treatment (torture and denial of medical care) by Emirati soldiers.' According to the press, Total owns 39.6% of the gas liquefaction complex in the Balhaf region, where activists and NGOs confirmed the existence of prison inside a military base set up by the UAE, and now the NGOs are wondering whether Total did not know the existence of this detention centre. • Sources: [MENA rights group - 20/06/2020: tasnimnews.com][Huffpost - 07/11/2019: huffingtonpost.fr][Le Monde - 07/11/2019: lemonde.fr][Observatoire des armements - 07/11/2019: obsarm.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(5).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: The Company provided a general response to the case saying that 'When made aware of allegations with regards to the handed over area, Total requested, and continues to request, information from Yemen LNG. Yemen LNG has asked the Commander of the Coalition in Balhaf who has denied such allegations. Total does not have any further information on how the Coalition is using the requisitioned area.' [Universal Registration Document 2019, 20/03/2020: total.com & Response to Yemen prison allegation: business-humanrights.org] Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(5).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: In its Code of Conduct, the Company states that it 'complies with the Voluntary Principles on Security and Human Rights'. Furthermore, it indicates that it adheres to the Voluntary Principles on Security and Human Rights and that it 'take all necessary steps to ensure compliance with the Voluntary Principles on Security and Human Rights' [Code of Conduct, 12/2018: total.com & Universal Registration Document 2019, 20/03/2020: total.com] • Met: Policies apply to the type of business relationships involved: The code of conduct applies to business partners too [Code of Conduct, 12/2018: total.com & Universal Registration Document 2019, 20/03/2020: total.com] Score 2 <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: No policy could be found relating to cruel or inhumane treatment.
E(5).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Met: Encourages linked business to engage affected stakeholders: In its response on BHRRC, the company states that 'When made aware of allegations with regards to the handed over area, Total requested, and continues to request, information from Yemen LNG. Yemen LNG has asked the Commander of the Coalition in Balhaf who has denied such allegations. Total does not have any further information on how the Coalition is using the requisitioned area.' [Response to Yemen prison allegation: business-humanrights.org] • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence • Not met: Denies allegations, but has engaged affected stakeholders • Not met: Denies allegations, but reviewed systems to prevent such impacts Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders • Not met: Denies allegations, but implements review recommendations • Not met: Denies allegations, and ensures systems prevent such impacts

Disclaimer

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

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

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