

Company Name Woodside Petroleum
Industry Extractive
UNGP Core Score (*) 14.0 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
2	2	A.1.4 Commitment to engage with stakeholders
2	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	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)
1	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
0.5	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
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
14.0	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 Company states in its Human Rights Policy that it is committed to conducting business in a way that respects the human rights of all people, including its employees, the communities in which it is active, and those working within its supply chains. [Human Right Policy] • Not met: UNGC principles 1 & 2 • Not met: UDHR <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company indicates that its business conducts is 'informed by the UN Guiding Principles on Business and Human Rights'. However, 'informed by' is not considered a formal commitment following CHRB wording criteria. [Human Right Policy] • 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"> • Not met: ILO Core: The Company's Human Rights Policy cover all ILO Core, including freedom of association and collective bargaining, where it states: 'Recognising the rights of our employees to freedom of association and to join representative organisations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules and regulations.' However, CHRB could not find alternative measures to support these rights where they are restricted by law. [Human Rights Policy 2019, 12/2019: files.woodside & Code of conduct 2019, 12/2019: files.woodside] • Not met: UNGC principles 3-6 • Not met: Explicitly list All four ILO apply to EX BPs: The Company's inclusion and diversity policy is committed to diversity and 'ensuring that there are clear reporting processes and procedures in place to prevent and stop discrimination, bullying and harassment'. It also clarifies that 'this policy applies to all personnel, contractors and joint ventures in activities under Woodside's operational control'. Responsibility for the application of the Human Rights Policy 'rests with all Woodside employees, contractors and joint ventures engaged in activities under woodside's operational control'. In addition, the Company's human rights policy, covers all ILO core areas with the exception of discrimination. With respect freedom of association and collective bargaining, it states: 'Recognising the rights of our employees to freedom of association and to join representative organisations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules and regulations.' However, CHRB could not find alternative measures to support these rights where they are restricted by law. [Supplier Code of Business Conduct, N/A: files.woodside & Inclusion and Diversity Policy] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company's Human Rights Policy cover all ILO Core, including freedom of association and collective bargaining, where it states: 'Recognising the rights of our employees to freedom of association and to join representative organisations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules and regulations.' However, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'consistent with applicable laws'. [Code of conduct 2019, 12/2019: files.woodside & Human Rights Policy 2019, 12/2019: files.woodside]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Respect H&S of workers: The Company states that it is committed to managing its activities to minimise adverse health, safety or environmental impacts, incorporating a right first time approach to quality. [Health, Safety, Environment and Quality Policy, 12/2019: files.woodside] • Met: H&S applies to EX BPs: The Company's health and safety policy states that 'responsibility for the application of this policy rests with all Woodside employees, contractors and joint ventures engaged in activities under Woodside operational control. Woodside managers are also responsible for the promotion of this policy in non-operated joint ventures'. [Health, Safety, Environment and Quality Policy, 12/2018]
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: Commits to stakeholder engagement: The Company states that one of the principles to achieve the objectives of the Human rights policy is proactively engaging with stakeholders in the communities potentially impacted by its activities. [Human Rights Policy 2019, 12/2019: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: The Company states that it respects, considers and responds to the interests of its stakeholders. It is committed to open dialogue and consultation with local communities and their representatives, nongovernmental organisations and government at all levels to ensure that actual and potential impacts arising from its operations are identified and appropriately managed. [Code of conduct 2019, 12/2019: files.woodside]
A.1.5	Commitment to remedy	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: Commits to remedy: The Company states in its 'Our approach to human rights' that it 'is committed to remedying any adverse human rights impacts on individuals, workers and communities that we have caused or contributed to'. [Our approach to human rights, 07/2020: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Collaborating with other remedy initiatives: The Company indicates that it 'would provide reasonable cooperation and seek to participate constructively in the event a claim was brought against us through a state-based non-judicial grievance mechanism. Our internal processes should not undermine legal processes nor attempt to supplant Commonwealth law. If there is a case of impediment for stakeholders accessing judicial and non-judicial processes, Corporate Affairs will work with the team concerned on an appropriate response. It also states that 'In the event of any state-based non-judicial grievance mechanism complaints being brought against it, Woodside would provide reasonable cooperation in the matter and any associated investigation. Wherever possible, Woodside would seek to participate in non-judicial grievance mechanisms provided by the state to resolve the complaint'. [Community Concerns, N/A: woodside.com.au] • Met: Work with EX BPs to remedy impacts: The Company indicates in its 'Our approach to human rights' that it is 'also committed to working with our suppliers to remedy adverse human rights impacts directly linked to our supply chain'. The Company includes contractors in its supply chain wording. [Our approach to human rights, 07/2020: files.woodside]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2. See indicator A.1.2. Companies are awarded this if they are committed either to the ILO Declaration (or each ILO Core area) or the UN Global Compact. • Met: Senior responsibility for HR: The Senior Vice President Corporate and Legal is responsible for human rights management and has deliverables relating to human rights as part of their performance agreement. Day-to-day responsibility for Woodside's human rights performance is managed by the Corporate Affairs Manager Sustainability. The Corporate Affairs Manager Sustainability chairs the Human Rights Working Group (HRWG), who meet monthly to support an integrated approach to human rights and consider opportunities to improve our performance. [Our approach to human rights, 07/2020: files.woodside]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company states that 'human rights responsibilities are shared by members of the HRWG by carrying out a coordinated human rights approach at an operational level'. 'The HRWG consists of representatives from a range of functions including corporate affairs, contracting and procurement, legal, people and global capability, and security and emergency management. Human rights responsibilities are shared by members of the HRWG by carrying out a coordinated human rights approach at an operational level'. No new relevant evidence found in latest review. [Our approach to human rights 2020, 02/2020: files.woodside] • Not met: Day-to-day responsibility for EX BRs: As indicated above, HRWG includes representatives from contract and procurement. No further details found. No new relevant evidence found in latest review. [Our approach to human rights 2020, 02/2020: files.woodside]
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"> • Met: Identifying risks in own operations: The Company indicates in its Sustainable Development Report and in its 'Our approach to human rights' document: '[...] human rights due diligence is mandatory for all operations and activities under our operational control in countries determined to have human rights risk. For non-operated activities and interests in high-risk countries, we request the operator provide the relevant human rights due diligence documentation or, if this is not available, we may undertake our own due diligence if necessary'. Country risk is determined by a biannual desktop country human rights impact assessment. It also indicates that 'we conduct social impact assessments for all major development activities to identify community impacts and opportunities, including those related to human rights. Our community grievance mechanism, perception surveys and opportunity assessments also take stakeholder views into account. Activities undertaken in the past two years include human rights assessments'. [Sustainable Development Report 2019, 01/2020: files.woodside & Our approach to human rights, 07/2020: files.woodside] • Met: identifying risks in EX business partners: As indicated above, the Company indicates: 'For non-operated activities and interests in high-risk countries, we request the operator provide the relevant human rights due diligence documentation or, if this is not available, we may undertake our own due diligence if necessary'. [Our approach to human rights, 07/2020: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: As indicated above, human rights due diligence is mandatory for all operations and country risk for human rights is determined biannually, and for non-operated activities and interest in high-risk countries, it request the operator provide the human due diligence documentation or if not available it may undertake a due diligence process. [Our approach to human rights, 07/2020: files.woodside] • Met: In consultation with stakeholders: The Company states in its 'Our approach to human rights' document that one of the 4 key steps involved in its human rights due diligence process is: 'Engage stakeholders to verify human rights risks and impacts'. [Our approach to human rights, 07/2020: files.woodside] • Not met: In consultation with HR experts: The Company indicates: 'In 2019, an external human rights specialist completed a human rights risk assessment on our operated exploration, development and production activities. The key objectives of the assessment were to: Identify our salient human rights risks; and Evaluate our management system framework to identify and recommend opportunities for improvement.' No further details found, however, in relation to which experts the Company worked with. [Our approach to human rights, 07/2020: files.woodside] • Met: Triggered by new circumstances: The Company indicates that 'we also undertake human rights due diligence in the assessment of new business opportunities. This involves identifying and evaluating actual or potential human rights risks to inform investment decisions and prevent or mitigate adverse impacts'. [Risk Management Policy, 12/2012] • Met: Explains use of HRIAs or ESIA (inc HR): As indicated above, the Company states that it conducts 'social impact assessments for all major development activities to identify community impacts and opportunities, including those related to human rights. Our community grievance mechanisms, perception surveys and opportunity assessments also take stakeholder views into account. Activities undertaken in the past two years include human rights assessments, stakeholder mapping, social impact assessments and community grievance reporting'. [Our approach to human rights, 07/2020: files.woodside]

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)	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): The Company indicates that human rights are considered throughout the life of a project, including in risk assessments and supplier selection. Human rights due diligence is mandatory for all operations and activities under our operational control in countries determined to have human rights risk'. 'Country risk is determined by a biannual desktop country human rights risk assessment'. It also states that 'in 2019, an external specialist completed a human rights risk assessment on our operated exploration, development and production activities. The key objectives of the assessment were to: Identify our salient human rights risks and Evaluate our management system framework to identify and recommend opportunities for improvement'. [Our approach to human rights, 07/2020: files.woodside] • Met: Public disclosure of salient risks: The 'human rights salience assessment' shows that 'the salient human rights risks identified, which have the potential to impact rights holders are: association with regimes linked to human rights abuses; impacting cultural heritage and traditions, inadequate community consultation, excessive use of force by Woodside security personnel or third-party security providers and environmental damage impacting the livelihood of communities'. [Our approach to human rights, 07/2020: files.woodside] <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	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"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs: The Company indicates that 'Our supply chain human rights framework helps us to prioritise our due diligence activities. We focus our efforts on existing and potential contractors that are considered to be high-risk, based on the category of product or service they provide (e.g. involving low qualification labour intensive work) and their location, with attention given to suppliers specific to our industry. Suppliers identified as high-risk are required to complete a modern slavery questionnaire and develop and implement a modern slavery management plan'. However, evidence seems to focus on supplier basis, and monitoring them based on risk, rather than applying a risk/impact approach and carrying action plans to mitigate these. [Our approach to human rights, 07/2020: files.woodside] • Met: Example of Actions decided: The Company discloses information of its actions to manage one of its salient human rights issues 'Impacting cultural heritage and traditions': 'We have implemented comprehensive cultural heritage management plans to protect the heritage values of the Burrup Peninsula. We make significant efforts to monitor and manage our environmental impacts on cultural heritage, including rock art. In 2019, we worked with Traditional Owners to develop cultural heritage management plans for our Burrup Hub developments including Pluto Train 2 and Scarborough. We also worked with an independent consultant to complete a desktop study of submerged near-shore heritage for the Scarborough development.' It also reports on its activities related to salient risk 'associations with regimes linked to human rights abuses: 'We continue to align our policies and procedures with internationally recognised security and human rights principles. In line with our security and human rights framework, we completed due diligence on several new security providers and conducted four private security provider conformity assessments. We also reviewed security and human rights threat and risk assessments for countries including Timor-Leste, Senegal, Peru and Myanmar and completed in-country assurance reviews.' [Sustainable Development Report 2019, 01/2020: files.woodside] <p>Score 2</p> <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	<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: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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. • Met: Comms plan re assessing risks: See indicator B.2.2. • Not met: Comms plan re action plans for risks: r to be awarded this indicator, the Company has to achieve a full score in 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"> • Met: Responding to affected stakeholders concerns: The Company discloses in its 'approach to human rights' document 'some of the key concerns raised by stakeholders in the local communities'. These include four examples from Senegal and Australia. Concerns are related to access to fishing grounds and fish stocks, socio economic benefits for communities, indigenous heritage and cultural relations, and community lifestyle. For each one, it discloses 'how we took these views into account'. [Our approach to human rights, 07/2020: files.woodside] • Not met: Ensuring affected stakeholders can access communications: Although the Company describes measures related to concerns in the examples of the report, no details found on how the Company directly communicates and engage with affected stakeholders communicating how it is addressing concerns. [Our approach to human rights, 07/2020: files.woodside]

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 states in its Human Rights Policy that it provides accessible grievance mechanisms for individuals or communities to raise complaints or concerns, and processes for their resolution. The Company also has a helpline for employees to report any unacceptable conduct. [Human Rights Policy 2019, 12/2019: files.woodside & Whistleblower Policy, 12/2019: files.woodside] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company reports that there were no reported security-related human rights incidents in 2019. It also reports that 'the Audit & Risk Committee received reports on misconduct investigations, breaches of the Code and matters reported to the external helpline. Investigations of 113 allegations of improper behaviour or breaches of the Code were closed out in 2019. Forty-two allegations were substantiated and 71 were unsubstantiated. A further 27 allegations remain under investigation at year end. Outcomes for the employees and contractors responsible for the substantiated breaches include six contracts being either terminated or not renewed, 20 written warnings and nine verbal warnings. One termination was fraud-related'. However, it is not clear how many case related to human rights issues were filed and addressed or resolved. In addition, in its 'Our approach to human rights' document, the Company indicates that, regarding community concerns, 'there were zero allegations of human rights abuses raised in connection with Woodside or its operations in 2019'. As indicated, not clear in the context beyond community. [Sustainable Development Report 2019, 01/2020: files.woodside & Our approach to human rights, 07/2020: files.woodside] • Not met: Channel is available in all appropriate languages: The Company states that Employees and our stakeholders have access to a confidential, externally-managed helpline for reporting misconduct. However, it is not clear in which languages the channel is available. [Sustainable Development Report 2019, 01/2020: files.woodside]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Opens own system to EX BPs workers: The Whistleblower policy states that 'this policy applies to reports of unacceptable conduct which are made by current or past: Woodside directors, officers and employees [...] Woodside contractors and suppliers [...] employees of Woodside contractors and suppliers'. It also indicates that its purpose includes help providing 'employees and contractors with a supportive working environment in which they feel able to raise issues of legitimate concern to them and to Woodside'. [Whistleblower Policy, 12/2019: files.woodside]
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: The Company states in its Human Rights Policy that it provides accessible grievance mechanisms for individuals or communities to raise complaints or concerns, and processes for their resolution. On its website, the Company describes its community grievance mechanisms, that 'this community grievance mechanism is available for individuals and communities who consider themselves affected by Woodside's activities. It is available in English and French. Our community grievance mechanism in Senegal has been adapted to enable community members to contact Woodside directly or through another third party and is also available in English and French'. [Human Rights Policy 2019, 12/2019: files.woodside & Community Concerns, N/A: woodside.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The grievance system for communities is available online. According to its website: 'Our community grievance mechanism in Senegal has been adapted to enable community members to contact Woodside directly or through another third party and is also available in English and French. The community grievance mechanism in Myanmar is available in English and Myanmar languages'. In addition, the Company indicates that it is non-operator of its interests in Peru and there are no current exploration or operational activities in this country, and with respect Timor-Leste, it indicates that currently there are no exploration or operational activities underway that require a grievance mechanism in local languages. [Community Concerns, N/A: woodside.com.au] • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system: It is not clear if communities and affected stakeholders can file complaints related to the Company's extractive business partners. [Community Concerns, N/A: woodside.com.au & Supplier Code of Business Conduct, N/A: files.woodside]
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 describes a case where stakeholders perceived potential impacts in their access to fishing grounds in Senegal. The Company describes how it engages with them: 'Access to major fishing areas around the Sangomar Field Development are unlikely to be affected even with the 500 metre exclusion zone around the offshore facility for safety purposes. As a result of the Environmental and Social Impact Assessment, several management and mitigation measures will be implemented to minimise potential impacts to marine environment'. However, it is not clear whether impact has materialised and in that case which were the measures to provide remedy. [Our approach to human rights, 07/2020: files.woodside] • 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 • 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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