

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Anadarko Petroleum  
**Industry** Extractives  
**Overall Score (\*)** 13.0 out of 100

| Theme Score | Out of | For Theme   |
|-------------|--------|---|
| 1.5         | 10     | A. Governance and Policies                          |
| 1.4         | 25     | B. Embedding Respect and Human Rights Due Diligence |
| 1.7         | 15     | C. Remedies and Grievance Mechanisms                |
| 0.0         | 20     | D. Performance: Company Human Rights Practices      |
| 7.5         | 20     | E. Performance: Responses to Serious Allegations    |
| 1.0         | 10     | F. Transparency                                     |

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2018 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

#### A. Governance and Policies (10% of Total)

##### A.1 Policy Commitments (5% of Total)

| Indicator Code | Indicator name                                    | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| A.1.1          | Commitment to respect human rights                | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: General HRs commitment: In its approach to human rights, the Company states that 'as a responsible global operator, it is our obligation to respect human rights and comply with all applicable laws'. [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a> ]<br>• Not met: UNGC principles 1 & 2<br>• Not met: UDHR<br>• Not met: International Bill of Rights<br>Score 2<br>• Not met: UNGPs: The company indicates that "Consistent with the United Nations Guiding Principles on Business and Human Rights, Anadarko recognizes that federal and state governments are responsible for protecting and fulfilling human rights and as a responsible operator, it is our obligation to respect human rights and comply with all applicable laws'. However, acting in a manner 'consistent with' does not count as a commitment to respect the principles, following the CHRB criteria on wording. [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a> ]<br>• Not met: OECD |
| A.1.2          | Commitment to respect the human rights of workers | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not met: ILO Core: With regard to the ILO Core Labour standards the company indicates in its Code of Conduct that they are committed to: diversity in recruiting,  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>hiring and developing compensating and promoting employees and that all the decisions are made without regard to any identity or category in particular. They also indicate in the webpage that they require themselves and their contractor the prohibition of the practice of most forms of forced and compulsory labour and child labour. However no evidence has been found for a commitment of the right to freedom of association and effective recognition of the right to collective bargaining. [Code of business conduct and ethics.: <a href="http://anadarko.com">anadarko.com</a> &amp; Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: All four ILO apply to EX BPs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: All four ILO Core</li> <li>• Met: Respect H&amp;S of workers: The company states that they are committed to conduct the business the right way for the company and the stakeholders. They state that "We work to ensure that all of our activities are conducted to meet or exceed applicable health, safety and environmental (HSE) laws, regulations and international standards." [Safety: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Met: H&amp;S applies to Ex BPs: The company indicates in the webpage that they are committed to review the contractors" HSE performance history when they are contracted and periodically thereafter if they continuously work for them, to communicate them their rights to exercise Stop Work Authority, to communicate safety concerns, to provide HSE expectations to contractors and working with them to minimize risks in the workplace. [Contractor Performance and Safety: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul>  |
| A.1.3.EX       | Commitment to respect human rights particularly relevant to the industry (EX) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Based on UN Instruments</li> <li>• Not met: VPs participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights: The company indicates that it strives "to communicate and work with indigenous populations in a respectful and culturally sensitive manner. We support informed and non-coercive negotiations among ourselves, our investors and communities, including any indigenous populations, prior to the construction and development of our operations." However this is not a commitment to respect indigenous peoples rights and neither mentions the relevant parts of the ILO Convention on Indigenous and Tribal People, [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: ILO 169</li> <li>• Not met: UNDRIP</li> <li>• Not met: Expects BPs to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment</li> <li>• Not met: Vol Guidelines on Tenure</li> <li>• Not met: IFC performance standards: The company indicates that their "feedback mechanism echoes international best practice guidelines, specifically Principle 6 of the Equator Principles, IFC standards and guidance, as well as the 'access to remedy' pillar as articulated in the United Nations Guiding Principles on Business and Human Rights". However there is no direct statement of commitment to adopt the IFC Performance Standards [Grievance Mechanisms: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expects BPs to respect all these rights</li> </ul> |
| 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"> <li>• Met: Commits to stakeholder engagement: "Anadarko is committed to sustainable and prudent development, safety in our operations and building trust within the communities where it operates. Working collaboratively with our local partners and all of our stakeholders is a foundation for everything Anadarko does worldwide." With this statement the company shows the commitment it has to engage with stakeholders, furthermore, they seek to be proactive in engaging with local governments and the citizens they represent and take time to communicate with the stakeholders that are impacted by their activities. [Stakeholder Engagement: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: The company states that they have a tracking mechanism in place to record comments and concerns on behalf of their stakeholder at any time and for any level of engagement. The statistics gathered through Anadarko hotline and other mechanisms are then assimilated</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | and analysed for prompt response and evaluation by leadership and technical team to find mutually beneficial solutions. However no evidence has been found of a commitment to engage stakeholders in design. [Grievance Mechanisms: <a href="http://anadarko.com">anadarko.com</a> ]<br><ul style="list-style-type: none"> <li>• Not met: Regular stakeholder design engagement</li> </ul>   |
| A.1.5          | Commitment to remedy                                       | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Commits to remedy: The company indicates that in one of their locations (Mozambique) the feedback mechanism echoes best practice guidelines, among others the 'Access to remedy' pillar as articulated in the UNGP on Business and HR. They also mention that when issues coming out from the feedback mechanisms are addressed and remediated it contributes to improve overall social and environmental performance. However these statements do not imply a commitment to remedy. [Stakeholder Engagement: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>  |
| A.1.6          | Commitment to respect the rights of human rights defenders | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): The company indicates in its' code of conduct that in no event they will take or threaten any adverse action against employees or discriminate them in any manner for reporting wrongdoing in good faith and they do not tolerate retaliation in any way against any employee for reporting their concerns. They also state that the opposite will result in disciplinary acts including termination of employment and criminal prosecution. No evidence found, however, on commitment to not tolerate attacks against people who oppose company's operations or defenders of human rights. [Code of business conduct and ethics.: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Expects EX BPs to reflect company HRD commitments</li> </ul> |

## A.2 Policy Commitments (5% of Total)

| Indicator Code | Indicator name                        | Score (out of 2) | Explanation  |
|----------------|---------------------------------------|------------------|--|
| A.2.1          | Commitment from the top               | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: CEO or Board approves policy</li> <li>• Not met: Board level responsibility for HRs: The company has several Codes Of Conduct, one for all employees, other for Marketers and an specific one for the CEO, the CFO and the CAO. However no evidence has been found of documents tasking board members or board committees with specific governance of areas of human rights. [Good Governance: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>  |
| A.2.2          | Board discussions                     | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>  |
| A.2.3          | Incentives and performance management | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Incentives for at least one board member: The Company indicates in the 2018 Proxy statement that part of the variable pay includes an 'Annual Incentive Program' where 10% of the weight is linked to Health, Safety and Environmental performance metrics. Those metrics include the total recordable incident rate and the level 3 incidents (incidents involving a significant environmental impact, impact to the public and/or significant monetary damages, or a fatality or permanent disability), these include employees and contractors. [PROXY STATEMENT ANNUAL MEETING OF STOCKHOLDERS: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Not met: At least one key EX RH risk, beyond employee H&amp;S: The Company indicates in the 2018 Proxy statement that part of the variable pay includes an 'Annual Incentive Program' where 10% of the weight is linked to Health, Safety and Environmental performance metrics. Those metrics include the total recordable incident rate and the level 3 incidents (incidents involving a significant environmental impact, impact to the public and/or significant monetary damages, or a fatality or permanent disability), these include employees and contractors. However, it is not clear whether this objective includes health and safety of local</li> </ul> |

| Indicator Code | Indicator name | Score (out of 2) | Explanation  |
|----------------|----------------|------------------|--|
|                |                |                  | communities. [PROXY STATEMENT ANNUAL MEETING OF STOCKHOLDERS: <a href="http://anadarko.com">anadarko.com</a> ]<br>Score 2<br>• Not met: Performance criteria made public |

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

| 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:<br>Score 1<br>• Not met: Senior responsibility fo HR (inc ILO)<br>Score 2<br>• Not met: Day-to-day responsibility<br>• Not met: Day-to-day responsibility for EX BRs  |
| B.1.2          | Incentives and performance management  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not met: Senior manager incentives for human rights<br>• Not met: At least one key EX HR risk, beyond employee H&S<br>Score 2<br>• Not met: Performance criteria made public  |
| B.1.3          | Integration with enterprise risk management  | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: HR part of enterprise risk system: The company indicates that "where applicable, Anadarko also assesses potential impacts to human rights from our operations at the project or asset level within the Environmental, Social, and Health Impact Assessment (ESHIA) process. As needed, potential risks to human rights are identified and analysed for new facilities in countries where we have not previously operated and for large-scale capital projects. Should any risks be identified in this process, Anadarko develops corresponding action plans to mitigate those risks and publicly communicate them." [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a> ]<br>Score 2<br>• Not met: Audit Ctte or independent risk assessment |
| B.1.4.a        | Communication /dissemination of policy commitment(s) within Company's own operations | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not met: Communicates its policy to all workers in own operations: Score A.1.2 concerning the ILO Core Labour Standards was not met implying this, that this indicator can not be scored.<br>Score 2<br>• Not met: Communication of policy commitments to stakeholder<br>• Not met: How policy commitments are made accessible to audience  |
| B.1.4.b        | Communication /dissemination of policy commitment(s) to business relationships       | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not met: Steps to communicate policy commitments to BRs: Score A.1.2 concerning the ILO Core Labour Standards was not met implying this, that this indicator can not be scored.<br>• Not met: Including to EX BPs<br>Score 2<br>• Not met: How HR commitments made binding/contractual<br>• Not met: Including on EX BPs  |
| B.1.5          | Training on Human Rights   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not met: Trains all workers on HR policy commitments: Score A.1.2 concerning the ILO Core Labour Standards was not met implying this, that this indicator can not be scored.<br>• Not met: Trains relevant managers including security personnel<br>Score 2<br>• Not met: Both requirements under score 1 met   |
| B.1.6          | Monitoring and corrective actions  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not met: Monitoring implementation of HR policy commitments<br>• Not met: Monitoring EX BP's<br>Score 2<br>• Not met: Describes corrective action process<br>• Not met: Example of corrective action<br>• Not met: Discloses % of supply chain monitored  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| B.1.7          | Engaging business relationships                               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects selection extractives business partners: The company indicates that they expect contractors to embrace the company's culture of maintaining a safe work environment and recognizing that HSE incidents are preventable, respect their core values, strive for zero injuries and incidents, reports all incidents and share lessons learned and adhere to applicable laws, regulation, company policies and procedures and recognized standards. However the company does not indicate if this measurements are taken into account to select or terminate BRs [Contractor Performance and Safety: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Not met: HR affects on-going business partner relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with business partners to improve performance</li> </ul>  |
| B.1.8          | Approach to engagement with potentially affected 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"> <li>• Met: Stakeholder process or systems: The company indicates that community concerns vary considerably depending on variables such as population density, geographical phase and the operational phase. Examples of this concerns and their responses include: Colombia where they engage with fishing communities to ensure that awareness of Anadarko activities are well understood or Mozambique where they have been undertaken consultations in the local language of preference and maintaining group discussions with community leaders and at-risk populations. [Stakeolder Engagement: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Met: Frequency and triggers for engagement: The Company states on its website that 'Anadarko conducts a comprehensive stakeholder-engagement process for new projects and where appropriate, existing ones, which communicates and shares information with identified stakeholders on its plans and activities. As appropriate, Anadarko also takes into account and incorporates stakeholder and local community concerns and feedback on operational impacts to surrounding communities from project inception to closure [Stakeolder Engagement: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Met: workers in SP engaged: See above [Stakeolder Engagement: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Met: communities in the SC engaged: See above [Stakeolder Engagement: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul> |

## B.2 Human Rights Due Diligence (15% of Total)

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| B.2.1          | Identifying: Processes and triggers for identifying 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"> <li>• Not met: Identifying risks in own operations: The Company states on its website "as needed, potential risks to human rights are identified and analysed for new facilities in countries where we have not previously operated and for large-scale capital projects". The risks identified get an action plan developed to mitigate those risk and publicly communicate them. However it does not provide details of the process. [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Not met: identifying risks in EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR): The company indicates that "Where applicable, Anadarko also assesses potential impacts to human rights from our operations at the project or asset level within the Environmental, Social, and Health Impact Assessment (ESHIA) process.". However no evidence has been found of an explanation of when HRIAs are or will be carried out. [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> |
| B.2.2          | Assessing: Assessment of risks and impacts identified (salient risks)              | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                | and key industry risks)   |                  |   |
| 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:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Action Plans to mitigate risks: The company indicates that once potential risk to human rights are identified and analysed for new facilities in new countries they develop corresponding action plans to mitigate those risk and publicly communicate them. However the Company does not publish any documents with description of processes to integrate and act on the findings of its human rights risk assessments. [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>Not met: Example of Actions decided</li> <li>Not met: Including amongst EX BRs</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul> |
| B.2.4          | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: System to check if Actions are effective</li> <li>Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> </ul>  |
| B.2.5          | Communicating : Accounting for how human rights impacts are addressed   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Comms plan re identifying risks</li> <li>Not met: Comms plan re assessing risks</li> <li>Not met: Comms plan re action plans for risks</li> <li>Not met: Comms plan re reviewing action plans</li> <li>Not met: Including EX BRs</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Responding to affected stakeholders concerns</li> <li>Not met: Ensuring affected stakeholders can access communications</li> </ul>  |

### C. Remedies and Grievance Mechanisms (15% of Total)

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| C.1            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers                              | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The Code of conduct describes the grievance mechanisms including five different ways to report, including telephone, email, website, contacting supervisor or HR representative. All employees are expected to 'act in a manner consistent with the Code'. It also states that 'employees must report any known or suspected violations of law, any Anadarko policy, or this code, including a situation where you are requested to take any action that would be a violation. Importantly, a failure to report a known or suspected violation is itself a violation of the Code and may result in disciplinary action, up to and including termination of employment'. [Grievance Mechanisms: <a href="http://anadarko.com">anadarko.com</a> &amp; Code of business conduct and ethics.: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved</li> <li>Not met: Channel is available in all appropriate languages</li> <li>Not met: Expect EX BPs to have equivalent grievance system</li> <li>Not met: Opens own system to EX BP workers</li> </ul> |
| C.2            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not met: Grievance mechanism for community: The company indicates that "Engagement with stakeholders takes many forms, including but not limited to one-on-one meetings, open houses, focus groups and rig tours. We have tracking mechanisms in place to record comments and concerns on behalf of our stakeholders at any time and for any level of engagement." However, there is no direct statement that individuals can raise human rights related concerns. [Stakeholder Engagement: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Not met: Describes accessibility and local languages</li> <li>Not met: Expects EX BP to have community grievance systems</li> <li>Not met: EX BP communities use global system</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| C.3            | Users are involved in the design and performance of the channel(s)/mechanism(s)        | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: EX BPs in creation or assessment</li> </ul>  |
| C.4            | Procedures related to the mechanism(s)/channel(s) are publicly available and explained | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Response timescales: The Company states on its website that 'All concerns are targeted for resolution within 30 days'. However, its not clear when affected individuals receive responses, who handles complaints, how those making complaints are informed and whether the engagement can be conducted in local languages.</li> <li>• Not met: How complainants will be informed: See above</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>   |
| C.5            | Commitment to non-retaliation over complaints or concerns made                         | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Public statement prohibiting retaliation: "Anadarko does not tolerate retaliation in any way against any employee for reporting their concerns. In fact, retaliation will result in disciplinary action up to and including termination of employment, and may result in criminal prosecution." However it is not clear whether the company commits to no retaliation with regards to external stakeholders. [Code of business conduct and ethics.: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: "When you contact the Anadarko Hotline, you can choose to remain anonymous. Anadarko will not know your identity and will not attempt to discover your identity, although your identity may become known unintentionally during an investigation." The Anadarko Hotline is maintained by a leading independent third-party reporting service. [Grievance Mechanisms: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects EX BRs to prohibit retaliation</li> </ul> |
| C.6            | Company involvement with State-based judicial and non-judicial grievance mechanisms    | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>  |
| C.7            | Remedying adverse impacts and incorporating lessons learned                            | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>   |

## D. Performance: Company Human Rights Practices (20% of Total)

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| D.3.1          | Living wage (in own extractive operations, which includes JVs) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Living wage target timeframe</li> <li>• Not met: Describes how living wage determined</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Pays living wages</li> <li>• Not met: Reviews living wages definition with unions</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| D.3.2          | Transparency and accountability (in own extractive operations, which includes JVs)                                      | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Member of EITI</li> <li>• Not met: Reports of taxes beyond legal minimums</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Reports taxes and revenue by country</li> <li>• Not met: Steps taken re non EITI countries</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>  |
| D.3.3          | Freedom of association and collective bargaining (in own extractive operations, which includes JVs)                     | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation</li> <li>• Not met: Discloses % covered by collective bargaining</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>  |
| D.3.4          | Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)               | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: The company indicates that "In 2016, our employee total recordable incident rate (TRIR) (recordable incidents per 100 workers) for the year was an industry-leading 0.36." [Safety: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance</li> <li>• Not met: Met targets or explains why not</li> </ul>   |
| D.3.5          | Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Process to identify indigenous rights holders: "Anadarko strives to communicate and work with indigenous populations in a respectful and culturally sensitive manner. We support informed and non-coercive negotiations among ourselves, our investors and communities, including any indigenous populations, prior to the construction and development of our operations." However, it is not clear how the Company identifies affected and potentially affected indigenous peoples and right holders. [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Not met: How engages with communities in assessment: The company describes how it engages with Ute Indian Tribes and work diligently with the tribe and maintain a trusting relationship and a partnership and they meet on a regular basis with individual members of the tribe to foster continuous and transparent communication. However, no evidence found of the Company describing how it engages directly with indigenous community(ies) in carrying out the assessment. [Our Approach to Human Rights: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Commits to FPIC (or ICMM)</li> <li>• Not met: Gives recent example FPIC or dropping deal</li> </ul> |
| D.3.6          | Land rights (in own extractive operations, which includes JVs)  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: Approach to identification of land tenure rights holders</li> <li>• Not met: Describes approach to doing so if no recent deals</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works</li> <li>• Not met: Steps to meet IFC PS 5 in state deals</li> <li>• Not met: Describes approach if no recent deals</li> </ul>  |
| D.3.7          | Security (in own extractive operations, which includes JVs)   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not met: How implements security (inc VPs or ICOC)</li> <li>• Not met: Example of respecting HRs in security</li> <li>• Not met: Ensures Business Partners follow security approach</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not met: Assesses and involves communities</li> <li>• Not met: Working with local community</li> </ul>  |



| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.3.8          | Water and sanitation (in own extractive operations, which includes JVs) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action to prevent water and sanitation risks: The company has a Water Management statement in the HSE section where they indicate the use they make of the water. However, no evidence has been found of corrective action plans for identified specific risks to the right to water and sanitation. [Health, Safety and Environment: <a href="http://anadarko.com">anadarko.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: The company indicates that they take into account the use they make of water and address water management and challenges according to local conditions and considerations. However no evidence has been found on specific targets on water stewardship that take into account local communities [Health, Safety and Environment: <a href="http://anadarko.com">anadarko.com</a>]</li> <li>• Not met: Reports progress in meeting targets and shows trends in progress made</li> </ul> |

## E. Performance: Responses to Serious Allegations (20% of Total)

| Indicator Code | Indicator name                                       | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| E(1).0         | Serious allegation No 1                              |                  | <ul style="list-style-type: none"> <li>• Area: Health and safety</li> <li>• Headline: Anadarko ordered to pay USD 159.5 million for 2010 gulf spill</li> <li>• Sources: Anadarko Petroleum Ordered To Pay \$159.5 Mln For 2010 Gulf Spill - NASDAQ.com - 30/11/2015 - <a href="http://reuters.com">reuters.com</a> Anadarko 10K 2014 - p122 t 127 'U.S. Supreme Court rejects BP, Anadarko over Deepwater Horizon spill penalties' Reuters (June 29, 2015) - <a href="http://reuters.com">reuters.com</a> Anadarko Pays \$12.5M To Settle Deepwater Horizon Suit - Law360 - 19/05/2014 US EPA - <a href="http://epa.gov">epa.gov</a></li> <li>• Allegation: In April 2010 a series of explosions occurred on the Deepwater Horizon drilling rig that services the Macondo well in the Gulf of Mexico. The explosions and the resulting fire resulted in the deaths of 11 people and injury to 16 others. The rig sank about 36 hours later and nearly five million barrels of oil were released into the Gulf of Mexico. The well was operated by BP. Anadarko held a 25% non-operating interest. In October 2011, Anadarko agreed to pay USD 4 billion to settle all claims arising from the 2010 Gulf of Mexico oil spill. Pursuant to the Settlement Agreement, the company has been fully indemnified by BP against all claims, causes of action, losses, costs, expenses, liabilities, damages, or judgments of any kind arising out of the Deepwater Horizon events, related damage claims arising under the Oil Pollution Act of 1990 (OPA), claims for natural resource damages (NRD) and assessment costs. The agreement does not indemnify the company against fines and penalties, punitive damages, shareholder derivative or securities laws claims, or certain other claims. On November 30, 2015, Anadarko Petroleum Corp was ordered to pay a further USD 159.5 million civil fine for its role in the disaster. The Company continues to face legal proceedings.</li> </ul> <p>In December 2013, Anadarko asked the Appeals Court to throw out a judge's decision (from March 21, 2014) that held Anadarko liable under the Clean Water Act. Additional amounts may still be assessed as a result of potential civil and/or criminal penalties under various federal, state, and/or local statutes and/or regulations as a result of the Deepwater Horizon events, including the Outer Continental Shelf Lands Act, the Migratory Bird Treaty Act, and possibly other federal, state and local laws.</p> <p>On May 16, 2014 the company settled a securities fraud lawsuit over allegedly misleading statements it made about its liability in the Macondo case. The company had been accused (in a lawsuit filed in May 2010) by the Employees Retirement System of the Government of the Virgin Islands and the Pension Trust Fund for Operating Engineers in Alameda of understating its role in the Macondo project and falsely claiming it faced minimal financial liability from the blowout. The settlement deal saw Anadarko agree to pay USD 12.5 million.</p> |
| E(1).1         | The Company has responded publicly to the allegation | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: In regards to the 2015 court case, Anadarko had argued that no fine was justified. Anadarko continues to blame BP for the explosion at the well. In a 2010 statement Anadarko chairman and CEO Jim Hackett said: "The mounting evidence clearly demonstrates that this tragedy was preventable and the direct result of BP's reckless decisions and actions." The full statement from the Company (available on the Anadarko website) says that the company will donate any revenue it is entitled to receive from oil recovered from the clean-up efforts to charities along the Gulf Coast.</li> </ul>   |

| Indicator Code | Indicator name                                | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | Score 2<br>• Not met: Response goes into detail  |
| E(1).2         | The Company has appropriate policies in place | 2                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Company policies address the general issues raised<br>• Met: Policies apply to the type of business relationships involved<br>Score 2<br>• Met: Policies address the specific rights in question: The Company states on its website 'At Anadarko, we are committed to conducting our business the right way for our company and our stakeholders. We manage and operate our worldwide assets in a manner consistent with our core values to protect the health and safety of our employees, contractors and the public. We work to ensure that all of our activities are conducted to meet or exceed applicable health, safety and environmental (HSE) laws, regulations and international standards'.<br>The Company states on its website that 'Anadarko Commits to: reviewing a contractor's HSE performance history when they are contracted by Anadarko and periodically thereafter as long as they continue to do work for Anadarko; communicating to its contractors their rights to exercise Stop Work Authority; providing HSE expectations to contractors; informing contractors of their role in emergency management and providing communication tools to report HSE incidents consistent with Anadarko's policies and procedures; working with contractors to minimize potential HSE risks in the workplace'. |
| E(1).3         | The Company has taken appropriate action      | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not met: Engages with affected stakeholders<br>• Not met: Encourages linked business to engage affected stakeholders<br>• Not met: Denies allegations, but has engaged affected stakeholders: The Company continues to blame BP for the explosion at the well.<br>• Not met: Denies allegations, but reviewed systems to prevent such impacts<br>Score 2<br>• Not met: Denies allegations, but implements review recommendations  |

## F. Transparency (10% of Total)

| Indicator Code | Indicator name                             | Score         | Explanation   |
|----------------|--|---------------|---|
| F.1            | Company willingness to publish information | 0.95 out of 4 | Out of a total of 38 indicators assessed under sections A-D of the benchmark, Anadarko Petroleum made data public that met one or more elements of the methodology in 9 cases, leading to a disclosure score of 0.95 out of 4 points.   |
| F.2            | Recognised Reporting Initiatives           | 0 out of 2    | The individual elements of the assessment are met or not as follows:<br>Score 2<br>• Not met: Company reports on GRI<br>• Not met: Company reports on SASB<br>• Not met: Company reports on UNGPRF  |
| F.3            | Key, High Quality Disclosures              | 0 out of 4    | Anadarko Petroleum met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.<br>Specificity and use of concrete examples<br>• Not met: Score 2 for A.2.2 : Board discussions<br>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions<br>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers<br>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)<br>Discussing challenges openly<br>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts<br>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned<br>Demonstrating a forward focus<br>• Not met: Score 2 for A.2.3 : Incentives and performance management<br>• Not met: Score 2 for B.1.2 : Incentives and performance management<br>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)<br>• Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs) |

### 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 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, 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.