Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name CNOOC Industry Extractives
Overall Score (*) 3.6 out of 100

Theme Score	Out of	For Theme
1.2	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
1.3	20	D. Performance: Company Human Rights Practices
0.7	20	E. Performance: Responses to Serious Allegations
0.4	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: Score 1 • Met: General HRs commitment: The Chairman's statement on the CSR Report states 'We stepped up our efforts in sustainable development, adhering to the Ten Principles of the UN Global Compact in the areas of human rights, labour, environment and anti-corruption.' The Company also states 'The Board of Directors (the "Board") of SNOOC Limited actively supports the Company's commitment to CSR and gives close attention to CSR Progress. This includeshuman rights issues related to sustainable development.' The Company also states 'CNOOC Limited respects the basic human rights which all employees are entitled to in accordance with the laws in each jurisdiction. ' [CNOOC CSR Report, 2017: cnoocltd.com] • Met: UNGC principles 1 & 2: 'The Company is a member of the UNGC. The Company states that it 'adheres to the Ten Principles of the UN Global Compact in the areas of human rights, labour, environment and anti-corruption. [CNOOC CSR Report, 2017: cnoocltd.com] • Not met: UDHR • Not met: UDHR • Not met: UNGPs • Not met: UNGPs • Not met: OECD

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the		The individual elements of the assessment are met or not as follows: Score 1
	human rights of workers		Met: UNGC principles 3-6: Being a member of the UN Global Compact, the Company will fully comply with the 10 principles advocated by the Global Compact
		0.5	and fulfil our responsibility in the areas of human rights, labor rights, environmental
			protection and anti-corruption. [CNOOC CSR Report, 2017: cnoocltd.com] • Not met: All four ILO apply to EX BPs Score 2
			Not met: All four ILO Core
			Not met: Respect H&S of workers
			Not met: H&S applies to Ex BPs
A.1.3.EX	Commitment to		The individual elements of the assessment are met or not as follows:
	respect human		Score 1
	rights		Not met: Based on UN Instruments Not met: VPs partsipant
	particularly		Not met: VPs partcipant Not met: Uses only ICoCA members
	relevant to the		Not met: Oses only reock members Not met: Respecting indigenous rights
	industry (EX)		Not met: ILO 169
			Not met: UNDRIP
		0	Not met: Expects BPs to respect these rights
			Score 2
			Not met: FPIC commitment
			Not met: Vol Guidelines on Tenure
			Not met: IFC performance standards
			Not met: Zero tolerance for land grabs
			Not met: Respecting the right to water
			Not met: Expects BPs to respect all these rights
A.1.4	Commitment to		The individual elements of the assessment are met or not as follows:
	engage with		Score 1
	stakeholders		Not met: Commits to stakeholder engagement: The Company states 'we will work to stake holder and make a said responsibility on a spin that drives the
			together with stakeholders and make social responsibility an engine that drives the Company and society forward together.' The Company also states 'To fully
			communicate with stakeholders to understand their expectations and demands is
			the foundation of our social responsibility and sustainable development. We have
			been always communicating with stakeholders on multiple social responsibility
		0	issues through an open, transparent and multichannel mechanism.' However, the
			Company does not does not disclose a public document stating its commitment to
			engage with its potentially and actually affected stakeholders [CNOOC CSR Report,
			2017: cnoocltd.com]
			Not met: Regular stakeholder engagement
			Score 2
			Not met: Commits to engage stakeholders in design
			Not met: Regular stakeholder design engagement
A.1.5	Commitment to		The individual elements of the assessment are met or not as follows:
	remedy		Score 1
			Not met: Commits to remedy Score 2
		0	Not met: Not obstructing access to other remedies
			Not met: Not obstructing access to other remedies Not met: Collaborating with other remedy initiatives
			Not met: Collaborating with other remedy initiatives Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to		The individual elements of the assessment are met or not as follows:
, 1.1.0	respect the		Score 1
	-	0	Not met: Zero tolerance attacks on HRs Defenders (HRDs)
	rights of human		Score 2
	rights		Not met: Expects EX BPs to reflect company HRD commitments
	defenders		·

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment		The individual elements of the assessment are met or not as follows:
	from the top		Score 1
			Not met: CEO or Board approves policy: The Company disclosed in its response
		0.5	to Business and human rights resources centre action platform that 'Audit
			Committee of the Company' has oversight of human rights issues. However it has
			not published any documents stating that its human rights policy is approved at
			board level or by CEO. [BHRRC Action Platform: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: Board level responsibility for HRs: The Company states that the board ' actively supports the Company's commitment to CSR and gives close attention to CSR progress. This includes strategy and risks, performance, internal operations, occupational health and safety, environment, and human rights issues related to sustainable development and CSR, as well as the methods and results of compliance in operations and sales.' [CNOOC CSR Report, 2017: cnoocltd.com] Score 2 Met: Speeches/letters by Board members or CEO: The Company's chairman's statement includes a commitment to human rights. [CNOOC CSR Report, 2017: cnoocltd.com]
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Board/Committee review of salient HRs: The Company Board actively supports the Company's commitment to CSR and gives close attention to CSR progress. This includes strategy and riskshealth and safety, environment, and human rights issues related to sustainable development and CSR, as well as the methods and results of compliance in operations and sales.' However, the Company has not specified that the board reviews the salient human rights risks or the process it has in place to discuss these risks. [CNOOC CSR Report, 2017: cnoocltd.com] Not met: Examples or trends re HR discussion Score 2 Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Incentives for at least one board member Not met: At least one key EX RH risk, beyond employee H&S Score 2 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: Score 1 Not met: Senior responsibility fo HR (inc ILO) Score 2 Not met: Day-to-day responsibility 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: Score 1 Not met: Senior manager incentives for human rights Not met: At least one key EX HR risk, beyond employee H&S Score 2 Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: HR part of enterprise risk system Score 2 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: Score 1 Not met: Communicates its policy to all workers in own operations Score 2 Not met: Communication of policy commitments to stakeholder 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: Score 1 Not met: Steps to communicate policy commitments to BRs Not met: Including to EX BPs Score 2 Not met: How HR commitments made binding/contractual Not met: Including on EX BPs

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Trains all workers on HR policy commitments Not met: Trains relevant managers including security personnel Score 2 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: Score 1 Not met: Monitoring implementation of HR policy commitments Not met: Monitoring EX BP's Score 2 Not met: Describes corrective action process Not met: Example of corrective action Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: HR affects selection extractives business partners Not met: HR affects on-going business partner relationships Score 2 Not met: Both requirement under score 1 met Not met: Working with business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Stakeholder process or systems Not met: Frequency and triggers for engagement Not met: workers in SP engaged Not met: communities in the SC engaged Score 2 Not met: Analysis of stakeholder views and company's actions on them

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	The individual elements of the assessment are met or not as follows: Score 1 Not met: Identifying risks in own operations: The Company discusses identifying safety risks. The Company also states that the Board of Directors is responsible for giving 'close attention to CSR Progress' which includes human rights issues. However, it is not clear whether this includes identifying risks in own operations. [CNOOC CSR Report, 2017: cnoocltd.com Not met: identifying risks in EX business partners Score 2 Not met: Ongoing global risk identification Not met: In consultation with stakeholders Not met: In consultation with HR experts Not met: Triggered by new circumstances Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Salient risk assessment (and context) Not met: Public disclosure of salient risks Score 2 Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Action Plans to mitigate risks Not met: Example of Actions decided Not met: Including amongst EX BRs Score 2 Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 Not met: Both requirement under score 1 met
B.2.5	Communicating: Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Comms plan re identifying risks Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including EX BRs Score 2 Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from workers	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Channel accessible to all workers: The Company states 'CNOOC Limited and its subsidiaries have set up full-time and part-time organizations and positions to handle complaints and grievances. Anyone can make reports, allegations and grievances about violations and breaches of regulations to management, compliance monitoring personnel, legal advisers, internal audit department or other relevant departments of the subsidiaries by letter, in person, telephone, or email, etc.' However, it is not clear whether this grievance mechanism covers human rights risks. [CNOOC CSR Report, 2017: cnoocltd.com] Score 2 Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages Not met: Expect EX BPs to have equivalent grievance system Not met: Opens own system to EX BP workers
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Grievance mechanism for community Score 2 Not met: Describes accessibility and local languages Not met: Expects EX BP to have community grievance systems Not met: EX BP communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mec hanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Engages users to create or assess system Not met: Description of how they do this Score 2 Not met: Engages with users on system performance Not met: Provides user engagement example on performance Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/c hannel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Response timescales Not met: How complainants will be informed Score 2 Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Public statement prohibiting retaliation: The Company states in its Code of Ethics for Directors and Senior Officers 'A director or Senior Officer will not be

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns made		penalized for making a good-faith report of violations of this Code of Ethics or other illegal or unethical conduct, nor will we permit retaliation of any kind against anyone who makes a good-faith report'. However, this does not cover broader workers and other stakeholders. [Code of Ethics for Directors and Senior Officers, 26/08/2015: cnoocltd.com • Not met: Practical measures to prevent retaliation Score 2 • Not met: Has not retaliated in practice • Not met: Expects EX BRs to prohibit retaliation
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: Score 1 Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks Score 2 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

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,	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Living wage target timeframe Not met: Describes how living wage determined
	which includes JVs)	-	Score 2 • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
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: Score 1 Not met: Member of EITI Not met: Reports of taxes beyond legal minimums: The Company reports In 2017, the Company's tax payments (including income tax, value-added tax, mineral fee, resource tax and etc.) reached RMB37.249 billion. However, the Company does not go into further details on tax payments. [CNOOC CSR Report, 2017: cnoocltd.com] Score 2 Not met: Reports taxes and revenue by country Not met: Steps taken re non EITI countries Not met: Disclosures contract terms where not a requirement
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: Score 1 Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation Not met: Discloses % covered by collective bargaining Score 2 Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Injury Rate disclosures: The Company discloses recordable incidents and the rate of recordable incidents for employees and employees and direct contractors for the past three years. According to OSHA statistical methods, all indicators (except for total work hours) are calculated on the basis of 200,000 man-hours. [CNOOC CSR Report, 2017: cnoocltd.com • Met: Lost days or near miss disclosures: The Company discloses the cases of lost work days and the rate of lost work days for the past three years. According to OSHA statistical methods, all indicators (except for total work hours) are calculated on the basis of 200,000 man-hours. [CNOOC CSR Report, 2017: cnoocltd.com

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: Fatalities disclosures: The Company reports that they had one direct contractor casualty in 2017 on the basis of 200,000 man hours. The Company reports the casualty rates for the past three years. [CNOOC CSR Report, 2017: cnoocltd.com] Score 2 Not met: Set targets for H&S performance Not met: Met targets or explains why not
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: Score 1 Not met: Process to identify indigenous rights holders Not met: How engages with communities in assessment Score 2 Not met: Commits to FPIC (or ICMM) Not met: Gives recent example FPIC or dropping deal
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: Score 1 Not met: Approach to identification of land tenure rights holders Not met: Describes approach to doing so if no recent deals Score 2 Not met: How valuation and compensation works Not met: Steps to meet IFC PS 5 in state deals Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: How implements security (inc VPs or ICOC) Not met: Example of respecting HRs in security Not met: Ensures Business Partners follow security approach Score 2 Not met: Assesses and involves communities Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Action to prevent water and sanitation risks: The Company reports on water saving and fresh water consumption. However, the Company has not detailed actions to prevent water and sanitation risks. [CNOOC CSR Report, 2017: cnoocltd.com] Score 2 Not met: Water targets considering local factors Not met: Reports progress in meeting targets and shows trends in progress made

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		No allegations meeting the CHRB severity thresholds were found, and so the score of 2.87 out of 80 points scored in themes A-D & F has been applied to produce a score of 0.72 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.42 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, CNOOC made data public that met one or more elements of the methodology in 4 cases, leading to a disclosure score of 0.42 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: Score 2 Not met: Company reports on GRI: The Company has an ESG Reporting Guideline index. However, it is not clearly reported under the GRI reporting standards. [CNOOC CSR Report, 2017: cnoocltd.com] Not met: Company reports on SASB Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	CNOOC met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			Not met: Score 2 for A.2.2 : Board discussions
			Not met: Score 2 for B.1.6: Monitoring and corrective actions
			Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive
			complaints or concerns from workers
			• Not met: Score 2 for C.3 : Users are involved in the design and performance of the
			channel(s)/mechanism(s)
			Discussing challenges openly
			Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness
			of actions to respond to human rights risks and impacts
			Not met: Score 2 for C.7: Remedying adverse impacts and incorporating lessons learned
			Demonstrating a forward focus
			Not met: Score 2 for A.2.3 : Incentives and performance management
			Not met: Score 2 for B.1.2 : Incentives and performance management
			• Not met: Score 1 for D.3.1: Living wage (in own extractive operations, which
			includes JVs)
			• 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.