

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Devon Energy
Industry Extractives
Overall Score (*) 7.5 out of 100

Theme Score	Out of	For Theme
0.6	10	A. Governance and Policies
0.2	25	B. Embedding Respect and Human Rights Due Diligence
0.8	15	C. Remedies and Grievance Mechanisms
3.8	20	D. Performance: Company Human Rights Practices
1.5	20	E. Performance: Responses to Serious Allegations
0.6	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	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: General HRs commitment • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights Score 2 • Not met: UNGPs • 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: Score 1 • Not met: ILO Core • Not met: UNGC principles 3-6 • Not met: All four ILO apply to EX BPs Score 2 • Not met: All four ILO Core • Met: Respect H&S of workers: The code of conduct refers to the EHS Philosophy, which states that 'we will comply with all applicable environmental, health and safety laws and regulations and adopt best sound professional judgement where laws and regulations do not exist'. 'Occupational health and safety values will not be compromised'. In all Environment, health and safety the Philosophy document commits to job competency and contingency planning. • Not met: H&S applies to Ex BPs

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Based on UN Instruments • Not met: VPs participant • Not met: Uses only ICoCA members • Not met: Respecting indigenous rights • Not met: ILO 169 • Not met: UNDRIP • Not met: Expects BPs to respect these rights Score 2 <ul style="list-style-type: none"> • 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 engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement • Not met: Regular stakeholder engagement Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
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: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

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: Score 1 <ul style="list-style-type: none"> • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Incentives for at least one board member: The Company's named executive officers, which include the President & CEO, have annual performance cash bonus which include meeting targets in relation to employee SIF rate, contractor SIF rate, vehicle SIF rate and percent of overall contractor spending on Devon's safest contractors. The 'SIF' rate records serious incidents or fatalities. [Proxy Statement, 2018: s2.g4cdn.com] • Not met: At least one key EX RH risk, beyond employee H&S: Although the Company has health and safety-related objectives which include contractors, no evidence found of incentive covering also safety of local communities. [Proxy Statement, 2018: s2.g4cdn.com] Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> Not met: Senior responsibility fo HR (inc ILO) Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Senior manager incentives for human rights: The Company's named executive officers, which include senior managers as the Chief Operating Officer and some executive VPs, have annual performance cash bonus which include meeting targets in relation to employee SIF rate, contractor SIF rate, vehicle SIF rate and percent of overall contractor spending on Devon's safest contractors. The 'SIF' rate records serious incidents or fatalities. [Proxy Statement, 2018: s2.g4cdn.com] Score 2 <ul style="list-style-type: none"> Not met: At least one key EX HR risk, beyond employee H&S: Although the Company has health and safety-related objectives which include contractors, no evidence found of incentive covering also safety of local communities. [Proxy Statement, 2018: s2.g4cdn.com] 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 <ul style="list-style-type: none"> Not met: HR part of enterprise risk system Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not met: Communicates its policy to all workers in own operations Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not met: Steps to communicate policy commitments to BRs Not met: Including to EX BPs Score 2 <ul style="list-style-type: none"> Not met: How HR commitments made binding/contractual 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: Score 1 <ul style="list-style-type: none"> Not met: Trains all workers on HR policy commitments Not met: Trains relevant managers including security personnel Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not met: Monitoring implementation of HR policy commitments Not met: Monitoring EX BP's Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not met: HR affects selection extractives business partners Not met: HR affects on-going business partner relationships Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met Not met: Working with business partners to improve performance

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: identifying risks in EX business partners Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including amongst EX BRs Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX BRs Score 2 <ul style="list-style-type: none"> • 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)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company has an 'ethics point', a website operated by a third party and available for employees to report violations related to ethics. [Ethics & Compliance helpline: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages Not met: Expect EX BPs to have equivalent grievance system Not met: Opens own system to EX BP workers: Although the EthicsPoint is on a public website, it is not clear whether it is open to other people beyond employees.
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: Score 1 <ul style="list-style-type: none"> Not met: Grievance mechanism for community: During the previous review, the ethics point website indicated who could make reports. No evidence found of such statement during this last review. [Ethics & Compliance helpline: secure.ethicspoint.com & Ethics & Compliance helpline FAQ: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> 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)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Engages users to create or assess system Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> 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)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Response timescales Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Public statement prohibiting retaliation: The Company indicates in the ethics helpline that 'Devon will not tolerate retaliation against who, in good faith, reports and actual or suspected violation of law of this Code'. However, it is not clear whether the channel is open to external stakeholders to make reports. [Ethics & Compliance helpline: secure.ethicspoint.com & Ethics & Compliance helpline FAQ: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Practical measures to prevent retaliation: In relation to the ethics point, the Company indicates that 'Employees who do retaliate will be subject to disciplinary action, including the possibility of termination of employment'. Also, reports can be made anonymously. However, it is not clear whether the channel is open to external stakeholders. 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 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> 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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating lessons learned		<ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks Score 2 <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

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: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • 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)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Reports of taxes beyond legal minimums: The Company discloses taxes and royalties on oil and natural gas, and discloses the states of the USA in which these were paid. It also indicates that it 'pays royalties to mineral rights owners. In 2015, these payments totalled more than \$1.1 billion to individuals, nearly \$130 million to the U.S Government, more than \$100 million to various state governments and \$100 million to municipal governments in Canada. [CSR report, 2016] Score 2 <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: The Company indicates that it only has operations in the USA and Canada. In the Annual report it states that 'Our operations are concentrated in various North American onshore areas in the U.S and Canada. Additionally, we control EnLink, a publicly traded MLP with an integrated midstream business with significant size and scale in Key operating regions in the U.S'. [Form 10-K, Annual report, 2017: s2.q4cdn.com]
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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company discloses injury rate for the last four years. [CSR report, 2016 & Health & Safety on website] • Not met: Lost days or near miss disclosures • Met: Fatalities disclosures: In the EHS Orientation document the Company reports that it had 0 fatalities in 2015. Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: The Company has improved the injury rates over time and the Company explains the measures and plans implemented, including 'more pre-task meetings with workers to discuss job-site risks and strategies to avoid hazards', establishing a 'Senior safety Leadership Team', etc. However, no evidence found in relation to targets. [CSR report, 2016] • 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 <ul style="list-style-type: none"> • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment Score 2 <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks Score 2 <ul style="list-style-type: none"> • 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 6.01 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.50 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	0.63 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Devon Energy made data public that met one or more elements of the methodology in 6 cases, leading to a disclosure score of 0.63 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 <ul style="list-style-type: none"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Devon Energy 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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.