

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Gazprom
Industry Extractives
Overall Score (*) 6.5 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
1.9	20	D. Performance: Company Human Rights Practices
1.3	20	E. Performance: Responses to Serious Allegations
2.5	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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: General HRs commitment: The company indicates that "Guided by the International Labor Organization Conventions, the Gazprom Group adheres to international standards on freedom of association, wages, working time and conditions, remuneration, social security, paid vacations, occupational safety, etc." However no evidence has been found of a formal commitment to respect human rights. [HR Policy: gazprom.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: The Company "guarantees protection from any and all forms of discrimination to its employees, as defined by the existing laws of the Russian Federation and the norms of international law" However no evidence has been found of a commitment to respect and protect the other ILO core labour standards at a minimum. [Code of Corporate Ethics, Sept 1, 2016: gazprom.com] • Not met: UNGC principles 3-6 • Not met: All four ILO apply to EX BPs

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: All four ILO Core • Met: Respect H&S of workers: The Company indicates that “Gazprom puts safety and the protection of human lives at the center of its operations and makes constant efforts to meet its occupational health and safety (OHS) commitments. Gazprom maintains a safe working environment for its employees and complies with all laws and regulations on occupational and industrial safety. Gazprom strives to eliminate work-related injuries, and to prevent accidents and minimize their impact thus ensuring the safety of its partners, contractors and members of local communities.” [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] • Not met: H&S applies to Ex BPs
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Based on UN Instruments • Not met: VPs participant • Not met: Uses only ICoCA members • Met: Respecting indigenous rights: The Company indicates that “Gazprom feels responsible for the future of the Northern indigenous small-numbered peoples in areas where the Group pursues projects as part of its core activities. In particular, Gazprom runs a wide range of initiatives to protect the national identity, cultural heritage and traditional activities of indigenous communities, and is committed to protecting their rights” In addition The company it states that “The Company aims to: respect the interests and rights of indigenous peoples to maintain their traditional lifestyles and preserve their native habitat”. [Code of Corporate Ethics, Sept 1, 2016: gazprom.com & Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] • Not met: ILO 169 • Not met: UNDRIP • Not met: Expects BPs to respect these rights <p>Score 2</p> <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	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The company indicates that “Gazprom is committed to transparency and openness to dialogue with stakeholders. Gazprom PJSC departments and Group companies systematically identify and engage stakeholder groups.” These include local communities (through PR departments of subsidiaries, regional policy commission), employees, and business partners. [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] • Not met: Regular stakeholder engagement <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The sustainability report indicates that “Gazprom pays constant attention to practical ways of resolving the issues of restoration and preservation of disturbed soils. Biological and technical remediation works aimed at recovery of land productivity and its economic value, landscapes preservation are conducted.” However no evidence has been found of a clear commitment to remedy the adverse impacts on individuals, workers and communities. [PJSC Gazprom Environmental Report 2017: gazprom.com] <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <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: The code of conduct has been approved by the board of directors. However this code barely contains references to human rights. [Code of Corporate Ethics, Sept 1, 2016: gazprom.com] 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key EX RH risk, beyond employee H&S 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key EX HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> 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: In order to get any Score under this indicator, the human rights policy commitment must include the ILO core labour standards at a minimum and the company policies do not include a commitment to respect some of them. 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: In order to get any Score under this indicator, the human rights policy commitment must include the ILO core labour standards at a minimum and the company policies do not include a commitment to respect some of them. 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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: In order to get any Score under this indicator, the human rights policy commitment must include the ILO core labour standards at a minimum and the company policies do not include a commitment to respect some of them. • 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: The company indicates that "The Company selects its suppliers and contractors primarily on a competitive basis. The main principle of such competitive selection is fair competition. The Company's employees shall not have any hidden preferences and shall not create advantages for individual suppliers or contractors. The Company seeks to work with reputable counterparties that are in compliance with applicable laws and the generally accepted norms of corporate and business ethics. The Company prohibits violations of antimonopoly laws, including unfair competition, in the countries where the Company runs its business." However no evidence has been found of a clear description of how HR performance affects business relationships. [Code of Corporate Ethics, Sept 1, 2016: gazprom.com] • 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 uses a materiality matrix to identify risks in its operations and it has identified the some aspects related to human rights such as: local communities, Freedom of association and collective bargaining, water management, diversity and equal opportunity, occupational health and safety. However, no evidence has been found of a description on how it identifies human rights risks in specific locations or activities. [Gazprom Group's Sustainability Report 2016, 2016: gazprom.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Channel accessible to all workers: The company has a “Hotline for fighting fraud, corruption, and embezzlement at Gazprom Group” however no evidence has been found are accessible to all works and can be used to report human rights concerns. [Regulation on Hotline for fighting fraud, corruption, and embezzlement at GazpromGroup: gazprom.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
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 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	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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	publicly available and explained		Score 2 • 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 • Not met: Public statement prohibiting retaliation • 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, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Living wage target timeframe: The Company indicates that “Gazprom’s HR policy is aligned to internationally recognized standards, such as freedom of association, fair wages and working conditions, working hours, equal pay for work of equal value, social security, paid vacation [...]” However no evidence has been found of a description or discussion on how living wages are determined. [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] • Not met: Describes how living wage determined: see above Score 2 • Not met: Pays living wages • Not met: Reviews living 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 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: The Company indicates that “In its social and labor relations, Gazprom adheres to applicable labor laws, industry agreements(10), the General Collective Agreement of Gazprom PJSC and its subsidiaries for 2016–18, collective bargaining agreements and other local regulations of Gazprom Group companies.” However no evidence has been found of a clear commitment to not to interfere with union rights [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] • Not met: Discloses % covered by collective bargaining Score 2 • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: In the 2016 Sustainability report the company has reported the following data for the year 2016: Lost-time injury frequency rate (LTIFR) = 0.16 Fatal injury frequency rate (FIFR)= 0.008 [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] Not met: Lost days or near miss disclosures Met: Fatalities disclosures: See above Score 2 <ul style="list-style-type: none"> 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)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Process to identify indigenous rights holders: The company indicates that "Before starting a project involving operations, the Group teams up with the local authorities at its design stage to conduct public discussion with representatives of indigenous small-numbered peoples of the North. This procedure enables the Group to consult the interests of local communities. For instance, a roundtable discussion on "Implementation of Operating Programs in Cooperation with Indigenous Small-numbered Peoples of the North: Rights, Obligations, Key Issues and Regulations" was held in the city of Mirny in Sakha (Yakutia) in 2016. At the event organized by Sakha's authorities, Gazprom Geologorazvedka LLC presented a report on its operating principles in the region. The meeting also focused on ethnological studies conducted by the Sakha Academy of Sciences at the request of Gazprom Geologorazvedka LLC to explore the impact from the company's exploration activities on the environment of indigenous communities." [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] 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
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: The company indicates that "Gazprom's environmental sustainability activities are aimed at preventing air, water, and soil pollution." However no evidence has been found of a commitment with the right to water and sanitation on its operations [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] 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 5.19 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.30 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	0.53 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Gazprom made data public that met one or more elements of the methodology in 5 cases, leading to a disclosure score of 0.53 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The appendix 1 of the Gazprom Group's Sustainability Report 2016 contains the GRI Report. [Gazprom Group's Sustainability Report 2016, 2016: gazprom.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Gazprom 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.