

**Company Name** Gazprom  
**Industry** Extractives  
**Overall Score (\*)** 10.4 out of 100

Theme Score	Out of	For Theme
1.3	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
3.8	20	D. Performance: Company Human Rights Practices
2.1	20	E. Performance: Responses to Serious Allegations
2.8	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 2019 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"> <li>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. The annual report also contains commitments to specific rights, but no commitment found to generally respect 'human rights'. [HR Policy: <a href="http://gazprom.com">gazprom.com</a> &amp; Annual report 2018, 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>Not met: UNGC principles 1 &amp; 2</li> <li>Not met: UDHR</li> <li>Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
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"> <li>Met: ILO Core: The Company publishes the following statement in the Annual report: 'Governed by the standards of the International Labour Organization, Gazprom respects the fundamental rights and principles set forth in ILO conventions and recommendations, covering in particular: freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour;</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>elimination of discrimination in respect of employment and occupation'. [Annual report 2018, 2018: <a href="http://gazprom.com">gazprom.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Explicitly list All four ILO apply to EX BPs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: The Company publishes the following statement in the Annual report: 'Governed by the standards of the International Labour Organization, Gazprom respects the fundamental rights and principles set forth in ILO conventions and recommendations, covering in particular: freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour; elimination of discrimination in respect of employment and occupation'. [Annual report 2018, 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company indicates that "Occupational health remains one of the most important areas of activities of the Gazprom Interregional Trade Union, as it aims to improve the process of creating safe working conditions, to conserve life and health of personnel, and provides for consultations and employee engagement in the occupational health and safety system." It also "strives to ensure safe working conditions by observing the existing laws and technical standards. The Company develops and introduces its own work safety standards containing high requirements to safety." The annual report 2018, in its statement of commitment to different labour rights, states that 'Gazprom also adheres to international standards on hours and conditions of work, occupational safety', etc. The Company discloses a health and safety policy, but it is in Russian. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a> &amp; Code of Corporate Ethics Updated, 26/10/2018]</li> <li>• Not met: H&amp;S applies to EX BPs</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: Voluntary Principles (VPs) participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights: The Company indicates that "Conservation of the ethnic and cultural identity of the peoples living in remote Far North areas, where Gazprom Group operates, is an important mission for the Company. Management of human rights of indigenous small-numbered peoples in the regions of presence is in the purview of Gazprom's leadership, authorities of municipalities and NGOs." In addition, Gazprom runs a wide range of initiatives to protect the national identity, cultural heritage and traditional activities of indigenous communities. However, no evidence found of a specific commitment to respect these peoples rights. As indicated below, in the environmental policy, the Company 'undertakes to pursue' the commitment to 'take into account the interests of indigenous minorities and their rights to maintaining traditional lifestyles and preserving their native habitat'. However, it only commits to 'take into account', not to formally respect their rights. [Code of Corporate Ethics Updated, 26/10/2018 &amp; Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>• Not met: ILO 169</li> <li>• Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)</li> <li>• Not met: Expects BPs to respect these rights: The Company requires the fulfilment of the following commitments 'by its partners, contractors and counterparts: [...] take into account the interests of the indigenous minorities and their rights to maintaining traditional lifestyles and preserving their native habitat'. However, the requirement is to 'take into account', not formally respect the rights of indigenous people. In addition, no evidence found a commitment to respecting human rights related to safety and security of operations following the Voluntary principles or other initiatives. [Environmental Policy, 25/5/2015: <a href="http://gazprom.com">http://gazprom.com</a> phase new companies for me\Gazprom\Comentarios sobre gazprom.docx#_Hlk15463027 1,733,801,179,,<a href="http://gazprom.com">gazprom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment</li> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC performance standards</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 commit to all these rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Regular stakeholder engagement: The Company indicates that "Gazprom Group's operations are linked with construction of new gas and oil production and transportation infrastructure facilities. That work requires taking into account opinions of various groups of stakeholders: local authorities, environmentalists, communities. Gazprom Group is open to dialogue with each one of them." [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Commits to engage stakeholders in design</li> <li>Not met: Regular stakeholder design engagement: The Company uses the following engagement mechanisms for local communities: 'Open public hearings; Information centers; Information disclosure; Charity and sponsorship projects; Environmental education and awareness-building campaign; Group-wide and areas-of-operation opinion surveys'. However, no evidence found on whether the results of engagement are used to design and/or monitor the Company's human rights approach. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul>
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"> <li>Not met: Commits to remedy: The environmental 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." The Company also requires its business partners 'To reduce adverse environmental impacts, ensure resource management, and make every effort to preserve the climate and biodiversity and compensate for possible environmental damage.' However no evidence has been found of a clear commitment to remedy the adverse impacts beyond environmental impacts in the supply chain on individuals, workers and communities. [Environmental Report 2018, 2018: <a href="http://gazprom.com">gazprom.com</a> pdf &amp; Environmental Policy, 25/5/2015: <a href="http://gazprom.com">http://gazprom.com</a> phase new companies for me\Gazprom\Comentarios sobre gazprom.docx#_Hlk154630271,733,801,179,,<a href="http://gazprom.com">gazprom.com</a>]</li> </ul> Score 2 <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: Score 1 <ul style="list-style-type: none"> <li>Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <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: Score 1 <ul style="list-style-type: none"> <li>Not met: CEO or Board approves policy: The code of conduct has been approved by the board of directors. However no evidence found on this document of references to human rights, with the exception of the following, regarding discrimination: '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.' The 'Board of Directors reviewed and commended the Company's occupational, industrial and fire safety efforts and environmental protection measures.' However, as indicated above, no further details regarding human rights found. [Code of Corporate Ethics Updated, 26/10/2018 &amp; Gazprom efficiently developing its personnel management system, 22/7/2019: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Board level responsibility for HRs: The Company has a Corporate Ethics Commission which are appointed by an order of the Company. The Commission passes resolutions aimed at 'providing employees with clarifications on the provisions of this Code [of Conduct] and the application thereof'. However, this Code lacks evidence of human rights commitments, and it is unclear if the members of this commission are also members of the Board. [Code of Corporate Ethics Updated, 26/10/2018]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs: The Company has indicated that the Board reviews the human resources policy and personnel incentive system and the occupational, industrial and fire safety efforts and environmental protection measures. However, no description of the process of reviewing salient human rights issues could be found. [Gazprom meeting highest international standards for industrial and environmental safety, 21/2/2018: <a href="http://gazprom.com">gazprom.com</a> & Gazprom efficiently developing its personnel management system, 22/7/2019: <a href="http://gazprom.com">gazprom.com</a> ] • Met: Examples or trends re HR discussion: The Company discloses a press release where the Board acknowledges discussing health and safety: 'The Gazprom Board of Directors reviewed and commended the Company's occupational, industrial and fire safety efforts and environmental protection measures. It was emphasized that Gazprom had a well-organized system for occupational health and workplace safety...' [Gazprom meeting highest international standards for industrial and environmental safety, 21/2/2018: <a href="http://gazprom.com">gazprom.com</a> & Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a> ] 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: Commits to ILO core conventions • Not met: Senior responsibility for HR 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 risks is integrated as part of enterprise risk system: The Company includes a list of social risks in its Risk Management System, however, these only include health and safety and human resource risks. No description could be found relating to human and labour rights, beyond health and safety. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a> ] 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Met: Communicates its policy to all workers in own operations: The Code of Corporate Ethics includes a guarantee of protection from discrimination, and the 'Company's employees shall attend a special training course on the implementation of this Code and take a subsequent knowledge test at least once every three years'. Given that is a training course, local languages are assumed. [Code of Corporate Ethics Updated, 26/10/2018] Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to 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: Commits to all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy to EX contractors and joint ventures: The Company's Environmental Policy include mechanisms of 'communication of the Environmental Policy commitments to all persons working for the Company or on its behalf, including subcontractors working at the Company's facilities.' However, no description of how the policy is communicated and if it is communicated to all business partners could be found, nor does this have to do with human rights beyond comment on indigenous. In addition, the Company provides code of ethics and safety policy (In Russian). However, it is not clear how it is actively communicated to extractive business partners. [Environmental Policy, 25/5/2015: <a href="http://gazprom.com">http://gazprom.com</a> phase new companies for me\Gazprom\Comentarios sobre gazprom.docx#_Hlk15463027 1,733,801,179,,<a href="http://gazprom.com">gazprom.com</a> &amp; Code of Corporate Ethics Updated, 26/10/2018]</li> <li>• Not met: Including to EX BPs (removed)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on EX BPs</li> </ul>
B.1.5	Training on Human Rights	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"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Met: Trains all workers on HR policy commitments: 'The Company's employees shall attend a special training course on the implementation of this Code and take a subsequent knowledge test at least once every three years.' The Code includes the Company's policy of non-discrimination. [Code of Corporate Ethics Updated, 26/10/2018]</li> <li>• Not met: Trains relevant EX managers including security personnel</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2</li> <li>• 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.</li> <li>• Not met: Monitoring EX BP's</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of EX supply chain monitored</li> </ul>
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 EXs 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 Updated, 26/10/2018]</li> <li>• Not met: HR affects on-going EX 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 EX business partners to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially	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: Stakeholder process or systems: No information regarding stakeholder identification beyond a list of engagement mechanisms could be found. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	affected stakeholders		<ul style="list-style-type: none"> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Engagement includes EX business partners workers</li> <li>• Not met: Engagement includes EX business partners communities</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• 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, equal opportunity, occupational health and safety. The Company also reports on risks related to human resources. However, no evidence has been found of a description on how it identifies human/labour rights risks in specific locations or activities. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: identifying risks in EX business partners</li> <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)</li> </ul>
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"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided</li> </ul> Score 2 <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: Score 1 <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 <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: Score 1 <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 business partners</li> </ul> Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>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: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul> Score 2 <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 BPs 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: Score 1 <ul style="list-style-type: none"> <li>Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Describes accessibility and local languages</li> <li>Not met: Expects EX BPs to have community grievance systems</li> <li>Not met: EX BPs communities use global system</li> </ul>
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"> <li>Not met: Engages users to create or assess system</li> <li>Not met: Description of how they do this</li> </ul> Score 2 <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 consult users in creation or assessment</li> </ul>
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"> <li>Not met: Response timescales</li> <li>Not met: How complainants will be informed</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Public statement prohibiting retaliation</li> <li>Not met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Has not retaliated in practice</li> <li>Not met: Expects EX BPs 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: Score 1 <ul style="list-style-type: none"> <li>Not met: Won't impede state based mechanisms: Although the Company provided comments to CHRB, no evidence found of a public source containing a statement committing not to impede state based mechanisms.</li> <li>Not met: Complainants not asked to waive rights</li> </ul> Score 2 <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: Score 1 <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 <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	<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: Living wage target timeframe or achieved: No evidence has been found of a description or discussion on how living wages are determined. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>• Not met: Describes how living wage determined: The Company has disclosed to CHRB that 'Minimal living wages are established by Russian government.' However, no further evidence was provided of how that wage was determined.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Pays living wages: 'The Company offers a competitive remuneration package, which includes a salary, a performance-based bonus and employee fringe benefits', and 'all PJSC Gazprom subsidiaries and entities have a remuneration and incentive system based on a Uniform Salary Plan and a time-rate-plus-bonus payment system based on a salary grade structure.' However, no evidence could be found that all employees make what can be considered a living wage, being this sufficient to meet basic needs of employee and family/dependents and provide for some discretionary income. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>• Not met: Reviews living wages definition with unions: 'Every year, Gazprom readjusts wages and salaries in accordance with provisions of the General Collective Agreement, subject to price growth. Effective from January 1, 2017, base rates and basic salaries of employees at subsidiaries and entities PJSC Gazprom located in the territory of the Russian Federation were increased by 5%.' However, it is unclear if this readjustment includes a discussion of living wage. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul>
D.3.2	Transparency and accountability (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: Member of EITI</li> <li>• Not met: Reports of taxes and revenues beyond legal minimums</li> </ul> <p>Score 2</p> <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)	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>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: No evidence has been found of a commitment to not to interfere with union rights. The Company has provided some documents in Russian. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining: 'All employees of PJSC Gazprom and its subsidiaries are covered by collective agreements. At PJSC Gazprom Neft and its subsidiaries, 42% of employees are covered by collective agreements. At Gazprom Energy holding LLC and companies consolidated under its managements, 99% of employees are covered by collective agreements. At Gazprom Neftekhim Salavat LLC and its subsidiaries, 84% of employees are covered by collective agreements.' [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul> <p>Score 2</p> <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)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: In the 2017 sustainability report the Company has reported the following data for the year 2017: lost time injury frequency rate, fatality injury frequency rate, and lost day rate. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>• Met: Lost days or near miss disclosures</li> <li>• Met: Fatalities disclosures: See above</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Set targets for H&amp;S performance: For 2018, the Company set the following targets: 'Maintain zero fatality rate for PJSC Gazprom's employees; Reduce total traffic accidents in PJSC Gazprom's subsidiaries (whether through the fault of employee or employer) by at least 5% versus the 2015–2017 average [...]; Reduce the cardiovascular mortality rate at workplaces by 5% versus the mid-term forecast using linear regression over the past five years; Reduce the number of accidents and incidents at hazardous facilities of PJSC Gazprom by 5% versus the mid-term forecast using linear regression over the past five years' Unclear what targets are for 2019. [Annual report 2017, 2017: <a href="http://gazprom.com">gazprom.com</a> &amp; Annual report 2018, 2018: <a href="http://gazprom.com">gazprom.com</a>]</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)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>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: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>Not met: How engages with communities in assessment</li> </ul> <p>Score 2</p> <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	<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: Approach to identification of land tenure rights holders</li> <li>Not met: Describes approach to doing so if no recent deals</li> </ul> <p>Score 2</p> <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	<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: 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> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Assesses and involves communities</li> <li>Not met: Working with local community</li> </ul>
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 indicates that "We take a comprehensive approach to disturbed land reclamation, biodiversity restoration, water pollution prevention, and waste management." In addition, the Company identifies "acceptable water quality within its areas of operations" as one of its materiality risks. 'Gazprom Group performed a large number of environmental events aimed at increasing water utilization efficiency both in industrial and in household sectors.' However, it is unclear if this was done to combat a specific related to risk to the right to safe access to water. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a> &amp; PJSC Gazprom Environmental Report 2017: <a href="http://gazprom.com">gazprom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Water targets considering local factors: The Company reports on water usage trends, however, no clear targets relating to this could be found, particularly considering the water use by local communities. [PJSC Gazprom Environmental Report 2017: <a href="http://gazprom.com">gazprom.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		No allegations meeting the CHRB severity threshold were found, and so the score of 8.35 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.09 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	0.84 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 8 cases, leading to a disclosure score of 0.84 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"> <li>• Met: Company reports on GRI: The appendix 1 of the Gazprom Group's Sustainability Report contains the GRI Report. [Gazprom Group's Sustainability Report 2017, Sep 2018: <a href="http://gazprom.com">gazprom.com</a>]</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
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"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)</li> <li>• Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)</li> </ul>

### 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 2019 Key Findings report and technical annex 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.