Corporate Human Rights Benchmark 2018 Company Scoresheet

CHRB
Corporate Human Rights Benchmark

Company Name	Goldcorp
Industry	Extractives
Overall Score (*)	24.8 out of 100

Theme Score	Out of	For Theme
4.2	10	A. Governance and Policies
2.3	25	B. Embedding Respect and Human Rights Due Diligence
2.5	15	C. Remedies and Grievance Mechanisms
6.9	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
4.0	10	F. Transparency

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company's Human Rights Policy contains the following commitment: 'Goldcorp is committed to respecting human rights as set forth in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and under international humanitarian law. Goldcorp is also committed to respecting the rights of Indigenous Peoples.' [Human Rights Policy, July 2015: s22.q4cdn.com] Score 2 • Met: UNGPs: See above
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Company states in its Human Rights policy that 'Goldcorp respects workers' rights, including freedom of peaceful assembly and association, and engagement in collective bargaining consistent with the relevant International Labor Organization (ILO) conventions on that subject. Goldcorp does not tolerate the use of forced, compulsory or child labour. Goldcorp is committed to creating a safe and diverse workplace where decisions are non-discriminatory towards ethnic origin, religion, political belief, gender, sexual orientation, age, nationality, education or disability.' [Human Rights Policy, July 2015: s22.q4cdn.com] • Met: All four ILO apply to EX BPs: Regarding the scope of application, the policy states the following: 'This policy applies to Goldcorp Inc. and its wholly owned subsidiaries'. Also: 'All Goldcorp board members, officers, contractors or any third

Indicator Code	Indicator name	Score (out of 2)	Explanation
			party conducting work or acting on Goldcorp's behalf will behave in a manner that respects human rights and avoids infringing upon them. Goldcorp will take appropriate measures to ensure that this policy is respected. For employees, non-compliance with this policy may be grounds for disciplinary action up to and including termination of employment. For contractors, non-compliance may be grounds for contract termination' [Human Rights Policy, July 2015: s22.q4cdn.com] Score 2 • Met: All four ILO Core: See above • Not met: Respect H&S of workers • Not met: H&S applies to Ex BPs
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: VPs partcipant: The Human Rights Policy contains the following commitment on security and human rights: 'Where Goldcorp or its wholly owned subsidiaries hires private security forces to protect employees, contractors, partners, resources, and company property, such contractors must comply with local and international law, and with the Voluntary Principles on Security and Human Rights'. In 2016 the Company became a Signatory to the Voluntary Principles on Security and Human Rights. [Human Rights Policy, July 2015: s22.q4cdn.com & 2016 Sustainability Report, December 2016] • Not met: Uses only ICoCA members • Met: Respecting indigenous rights: The Human Rights policy states that the company 'respects the rights, interests, perspectives and traditions of Indigenous Peoples in accordance with The International Council on Mining and Metal's Position Statement on Indigenous Peoples and Mining, the International Labour Organisation's Convention 169 and other applicable international best practice.' [Human Rights Policy, July 2015: s22.q4cdn.com] • Met: Expects BPs to respect these rights: The Human Rights policy 'applies to Goldcorp Inc. and its wholly owned subsidiaries. Goldcorp Inc. expects that each of its wholly owned subsidiaries that conduct mining operations will establish procedures to ensure compliance with this policy. All Goldcorp board members, officers, contractors or any third party conducting work or acting on Goldcorp's behalf will behave in a manner that respects human rights and avoids infringing upon them. Goldcorp will take appropriate measures to ensure that this policy is respected. For employees, non-compliance with this policy may be grounds for disciplinary action up to and including termination of employment. For contractors, non-compliance may be grounds for contract termination.' [Human Rights Policy, July 2015: s22.q4cdn.com] Score 2 • Met: FPIC commitment: 'Goldcorp respects the rights, interests, perspectives and traditions of Indigenous Peoples in accordance with The International Council on Mining and Metal's Position Statement on Indigenous Peoples and Mining.' • Not met: Vol Guidelines on Tenure • Not met: IFC performance standards • Not met: Zero tolerance for land grabs: The policy has a commitment to respect indigenous peoples rights but does not provide a commitment related to the ownership and use of land and natural resources. • Not met: Respecting the right to water: The Company has a Water Stewardship Strategy which requires that every Goldcorp site must establish water milestones for their local environment'. However, the Company has not disclosed documents describing a policy commitment to the right to water and sanitation, which also applies to its extractive business partners. [2016 Sustainability Report, December 2016] • Not met: Expects BPs to respect all these rights
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to stakeholder engagement: The Company states in its Sustainability report that 'the Human Rights Policy commits us to integrate human rights best practices into all of our business and decision-making processes. The policy mandates that we operate in a way that respects the human rights of employees and the communities in which we operate. International humanitarian laws were consulted in developing the policy, and it includes our commitment to seek to establish constructive dialogues and partnerships with a variety of stakeholders on human rights performance.' [2016 Sustainability Report, December 2016] Score 2 • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to remedy Score 2 • 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 • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 • 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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: CEO or Board approves policy: The Company's Human Rights Policy is signed by the President & CEO. [Human Rights Policy, July 2015: s22.q4cdn.com] • Met: Board level responsibility for HRs: In addition, it indicates in the Sustainability Report that the 'Sustainability, Environment, Health and Safety Committee of the Board is responsible for overseeing the Human Rights Policy and information regarding assessments and performance will be made available to the public through annual GRI reporting'. [2016 Sustainability Report, December 2016] Score 2 • 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 • Not met: Board/Committee review of salient HRs: The Company states in its Sustainability Report that it has an Environment, Health & Safety Committee made up of Board members, but it is not clear whether or how they review salient human rights issues. [2016 Sustainability Report, December 2016] • Not met: Examples or trends re HR discussion Score 2 • 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 • Met: Incentives for at least one board member: In the 'Management Information Circular' document the Company explains that corporate performance is part of executive compensation approach. At the start of each year, the Board, upon recommendation from the HRCC, adopts a corporate performance scorecard that sets out key performance indicators to guide and motivate executives to execute on our strategy over the course of the year. Objectives include enhancing sustainability performance through implementation of systems for SEMS performance. SEMS is our integrated management system for Safety and Health, Environment, Corporate Social Responsibility (CSR) and Security. Additionally objectives are set for Safety including achieving zero fatalities and Improving overall safety performance 5% from 2015. [AGM Circular, March 2017: s22.q4cdn.com] • 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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Senior responsibility fo HR (inc ILO): The Executive VP of Corporate Affairs and Sustainability is the owner of the Human Rights Policy with specific accountability assigned to the Corporate Director of Corporate Social Responsibility. Additionally, each of our operations has sustainability managers and CSR/community relations teams. However, the Company does not disclose additional details such as how resources and decision making process are allocated. The Company has not disclosed documents indicating how it allocates day-to-day responsibility for managing human rights issues with its extractive business partners' [2016 Sustainability Report, December 2016] 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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR part of enterprise risk system: The Company states that it will assess human rights risks and impacts through mechanisms such as enterprise risk management and due diligence processes. In its Sustainability Report, the Company states 'The primary focus of the ERM process is the identification and assessment of significant risks and the implementation of suitable risk responses. The process includes bottom-up risk identification and assessment from operations, regional business units and corporate functions'. 'On a quarterly basis, significant risk information from these and other sources is consolidated and reviewed by Regional Risk Committees, which involves an assessment and discussion of operational and external risks. External risks emerging from environmental, social, political and economic issues where we operate are identified through a country-level risk assessment process. All risks are revisited and updated regularly to ensure that the previous risk assessment is still appropriate and the risk impact and likelihoods have not changed.' [Human Rights Policy, July 2015: s22.q4cdn.com & 2016 Sustainability Report, December 2016] Score 2 • Not met: Audit Ctte or independent risk assessment: The Company states that the Board delegates responsibility for the execution of certain elements of risk oversight to Board committees to ensure appropriate expertise, attention and diligence. The committees oversee their relevant risk areas and report to the Board regularly. This oversight responsibility includes the procedures and programs implemented to mitigate risk, and the allocation of adequate resources to address risk. Management is responsible for ensuring that the Board and its committees are kept well informed of changing risks. However, it does not specify how the Board reviews these risks or the adequacy of the enterprise risk management approach.
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Communicates its policy to all workers in own operations: The Company indicates that 'the Human Rights Policy is available on our website at goldcorp.com in English, Spanish and French'. The Sustainability section of the website discloses a map indicating the countries where the Company operates. These are: Argentina, Canada, Mexico, Guatemala, Chile and Dominican Republic. [2016 Sustainability Report, December 2016 & Map of projects and operations, June 2018: csr.goldcorp.com] Score 2 • Not met: Communication of policy commitments to stakeholder: Although the Company devotes a section of the Sustainability report to stakeholder engagement, it does not disclose how it communicates its human rights policy commitments to them, including local communities and potentially affected stakeholders. Details

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			should include how it ensures the form and frequency of the information communicated is accessible to its intended audience. • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Steps to communicate policy commitments to BRs: The Company indicates in the Human Rights Policy that: 'Goldcorp will take actions to embed a human rights culture in our company and ensure employees and contractors are made aware of this Human Rights Policy and understand their responsibility to comply. These measures include awareness-raising and training on the policy and specific aspects within it, such as how to report concerns related to human rights via company grievance mechanisms'. In addition, in the Stakeholders relations section of the Sustainability report, the Company indicates that common topics of engagement/issues of concern in its relation with business partners (which, according to the report, are 'suppliers, contractors, industry organizations and other companies') include 'supplier requirements', 'agreement terms', and other topics. However, it is not described how human rights policy commitments are communicated nor whether it includes human rights policy in contractual or other binding agreements. [Human Rights Policy, July 2015: s22.q4cdn.com & 2016 Sustainability Report, December 2016] • Not met: Including to EX BPs Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on EX BPs
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Trains all workers on HR policy commitments: The Company states that 88% of its workforce with daily access to computers received online training to raise awareness about its Human Rights policy. It plans to roll out formal training to employees and contractors who do not have regular access to computers, however it is not clear what the time frame will be or whether the plan is to ensure all workers receive human rights training. [2016 Sustainability Report, December 2016] • Met: Trains relevant managers including security personnel: The Company states in its Sustainability report that it 'designed and piloted Respecting Rights: Championing Human Rights at Goldcorp, an in-depth participatory workshop for employees whose work offers distinct opportunities to understand our human rights commitments and apply our Human Rights Policy. The goal of this workshop is to improve understanding of human rights and increase knowledge of our Human Rights Policy among the management team and key employees overseeing departments that may have exposure to human rights risks in order to promote its successful implementation across all our operations.' In relation to the training of security personnel, the Company states that 'Our Latin American sites provide detailed training on human rights, use of force and the Voluntary Principles to their security personnel and contract security guards. This training is provided through workshops, presentations, videos and role-plays, and documented through attendance sheets or signed certifications. In 2016, several sites also engaged relevant public security partners located within their area of influence in order to build awareness of the Voluntary Principles and their importance.' Finally, the Company describes on its website, in responsible mining section, a case of study of security personnel training at Marlin mine in Guatemala: 'All security staff are required to undergo annual training on the Universal Declaration on Human Rights and to sign a form indicating that they have received the requisite training and will comply with the Company's human rights requirements. The security contractors include human rights training in their new employee orientation. All security staff receive at least one pre-shift briefing per month on the use of force and firearms. These issues are also reinforced as part of the bi-annual firearms training. Company security supervisors provide ongoing training and refresher classes. In addition, it is also indicated that: The new contract terms with Marlin's security providers indicate that the contractors will ensure that they vet prospective security staff for human rights abuses before they are presented to the Company. Goldcorp's Office of the Security Director performs additional enquiries as well. Regularly-scheduled Voluntary Principles reviews conducted by third-party experts include assessments of the background checks, training and interviews with the security contractors'. [2016 Sustainability Report, December 2016 & Closed sites - Marlin, June 2018: goldcorp.com] Score 2 • Not met: Both requirements under score 1 met

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B.1.6	Monitoring and corrective actions	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Monitoring implementation of HR policy commitments: The Company has a management systems described on its website as follows: 'The SEMS is our integrated management system for Safety and Health, Environment, Corporate Social Responsibility (CSR) and Security. Composed of a framework and clearly defined standards, the SEMS provides organizational structure, responsibilities and practices for implementing and maintaining a desired level of sustainability performance. It is designed to apply across the entire mining life cycle'. Regarding communities and human rights management, the Company indicates: 'the policies that define our community commitments are outlined in our Corporate Social Responsibility (CSR) Policy, Security Policy and Human Rights Policy, and are embedded within our SEMS. Our SEMS Social Performance Standards guide the implementation of these policies, providing specific, measurable and auditable guidelines which include: Context assessment; social impact assessment and management; resettlement; community Response System (grievance mechanism); stakeholder identification and engagement; community and stakeholder agreements; local employment and procurement and community contributions. In addition to our Social Performance Standards, the core SEMS standards (applicable across all departments and disciplines) include Stakeholder Management, Event Management, Human Rights, and Risk Management, which are key standards for interactions with stakeholders'. [Sustainability Excellence Management System (SEMS) framework, June 2018: csr.goldcorp.com] • Met: Monitoring EX BP's: Regarding business relationships, the Sustainability report indicates that: 'Out of the 320 contracts reported by our sites that were entered into with third parties, 96% were screened for human rights compliance. No contractors or suppliers were found in violation of human rights from these screenings, and as a result, there were no contractors or suppliers declined or removed. Our approach to risk management and impact assessment also includes reviews of significant investments against numerous criteria, including human rights risks. In this report, we define "significant investments" as those that either moved the organization into a position of ownership of another entity or initiated a capital investment project that was material to financial accounts. There were 81 such investments and contracts reported at our sites in 2016. Of those agreements, 80 had human rights clauses, and two were screened for human rights compliance'. [2016 Sustainability Report, December 2016] Score 2 • Not met: Describes corrective action process: The Company also reports in this document having grievance mechanisms, and reports the number of complaints received providing details. However, it does not disclose the corrective action processes in place for non-compliances found during the regular monitoring/auditing cycle, nor provides examples of these processes in practice, including necessary changes to policies/processes. It also does not report on the number of incidences found (although it does report that no violation of human rights was found regarding its business partners), nor whether it uses third party/external monitors or community monitors. [2016 Sustainability Report, December 2016] • 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 in the Sustainability report that it screens its business relationships: 'Out of the 320 contracts reported by our sites, 96% were screened for human rights compliance. The Company also assesses 'significant investments against numerous criteria, including human rights risks'. Regarding these investment the report indicates that: 'There were 81 of such investments and contracts reported at our sites in 2016. Of those agreements, 80 had human rights clauses and two were screened for human rights compliance'. However, despite this screening, the Company does not disclose documents indicating how human rights performance is taken into account and how can affect the selection of business relationships nor how performance on human rights interacts with decisions to renew, expand or terminate business relationships. The Company's human rights policy indicates that 'for contractors, non-compliance may be grounds for contract termination'. However, no further details are provided. [2016 Sustainability Report, December 2016] • Not met: HR affects on-going business partner relationships

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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: Regarding approaches to stakeholder engagement, the Sustainability report indicates the following: 'Local site management, along with corporate and regional management, are responsible for identifying, mapping, prioritizing and engaging with a variety of local, national and international stakeholders on topics related to our operations. This is a continuous process, and regular monitoring for effectiveness is required by the SEMS [Sustainability Excellence Management System]. Key components of our stakeholder engagement process are: Relevant, accessible, culturally appropriate and timely information; safe channels for stakeholders to express their views; mechanisms for incorporating relevant feedback into our decision-making processes. At all our operations, we use a variety of formal and informal mechanisms to engage with communities to contribute to their sustainable development. 100% of our operations had stakeholder identification maps to help identify who we should engage with on specific topics. In addition to this, a number of sites had formal engagement plans based on these maps and other inputs, such as impact studies. For example, in 2016, five of our operating mines (Cerro Negro, Los Filos, Penasquito, Eleonore and Porcupine) and our Borden project completed formal social area of influence maps to better define their Social Area of Influence (SAI), also called the "local area". The Company also indicates that: 'Whether through formal or informal channels, representatives from all our operations meet regularly with local stakeholders and have programs to contribute to community development through mechanisms such as community investments and local hiring and procurement initiatives'. However, the Company does not disclose information clarifying how it identifies those at heightened risk of vulnerability or marginalisation. The company describes the frequency of engagement by stakeholder groups, however, it does not clarify which are the triggers for engagement [2016 Sustainability Report, December 2016] • 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's enterprise risk management process is responsible for the identification of risks. The process includes top-down and bottom-up risk identification and assessment from operations, projects, subject matter experts, management and functional leads; application of standardized risk assessment criteria in terms of likelihood and consequence; as well as development of risk treatment strategies. On a quarterly basis, significant risk information from these and other sources is consolidated and reviewed by the Canada and Latin America Risk Committees, which involves an assessment and discussion of internal and external risks. Internal risks are identified primarily by operations management during the planning and forecasting process and also through risk workshops and SEMS (Sustainability Excellence Management System) audits. External risks emerging from environmental, social, political and economic issues where we operate are identified primarily through a country-level risk assessment process. Human rights issues are included under the SEMS process, however it is not clear which human rights issues are identified in the risk management process, and whether this includes risks related to business partners, or whether the ERM is carried out in consultation with stakeholders. [2016 Sustainability Report, December 2016] • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including amongst EX BRs Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX BRs Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company publishes in its Code of Conduct telephone, email and website ethics reporting channels accessible to all workers, including employees and contractors. These "Ethics from the Ground Up" reporting channels are managed by the Ethics and Compliance Department. The Code of Conduct covers human rights. [Goldcorp Code of Conduct, June 2018: s22.q4cdn.com] Score 2 • Met: Number grievances filed, addressed or resolved: The Company states in its Sustainability report that 'in 2016, our Ethics from the Ground Up channels received 46 complaints and/or inquiries regarding alleged discrimination, harassment and other issues that could relate to human rights, compared to 39 complaints in the previous year. All reports were investigated and 41 were resolved or closed during 2016. For the remaining five, the resolution process was ongoing at the end of the reporting period.' [2016 Sustainability Report, December 2016] • Not met: Channel is available in all appropriate languages: The Code of Conduct shows telephone numbers for grievances for each countries of operation, but it is not clear whether the details for how to report are made available in all languages. [Goldcorp Code of Conduct, June 2018: s22.q4cdn.com] • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BP workers

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Sustainability report indicates that there is a 'Community Response mechanism' and that its purpose is to 'provide an easily accessible site-level process for community stakeholders to provide feedback to us'. The Communication channels of this mechanism 'varies by site: examples include a dedicated website, community drop boxes, offices, telephone lines, email addresses and text message systems'. [2016 Sustainability Report, December 2016] Score 2 • Met: Describes accessibility and local languages: It also indicates that 'Our Community Response mechanisms are intended to meet the needs of local communities and other external stakeholders. Each Community Response mechanism at our operating sites is tailored to the local context, but they are designed to comply with the Goldcorp Grievance Mechanism Framework'. [2016 Sustainability Report, December 2016] • Not met: Expects EX BP to have community grievance systems: The Company, however, does not clarify whether it expects its extractive business partners to establish similar channels for their external individuals and communities (and convey the same expectations to their extractive business partners) or whether those workers have access to the Company's own channels to raise complaints. Also, it does not clarify how it ensures that channels are accessible to all potentially affected stakeholders, including in local languages. [2016 Sustainability Report, December 2016] • 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 • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Response timescales: The Company indicates in the code of conduct that, it (Management and/or the Ethics Committee) will take the following steps: 'Report received and preliminary accessed, including report receipt notification; notify applicable members of senior management or audit committee; scoping of investigation plan; assessment/investigation is conducted followed by validation of assessment/investigation results; implementation of corrective action if required, and follow up on implementation of corrective actions if recommended', including a notification of case closure. However, the Company does not disclose timescales for responses at each stage and whether those making complaints are informed in local languages (they receive a notification at the beginning and at the end). In addition, the Company discloses other communication channels and mechanisms in the Sustainability report specifically for local communities and external stakeholders and there is no information available in disclosed documents on whether these procedures also affect to these channels. [Goldcorp Code of Conduct, June 2018: s22.q4cdn.com] • Not met: How complainants will be informed 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: The Company indicates in the Code of Conduct that it will not tolerate any form of retaliation against a party who, in good faith, made a report of a Code of Conduct violation or assisted in the investigation of a report. It is not clear, however, if this commitment covers all channels for complaints and grievances described by the Company in the Sustainability report and also complaints made by any stakeholder raising human rights concern. [Goldcorp Code of Conduct, June 2018: s22.q4cdn.com & 2016 Sustainability Report, December 2016] • Not met: Practical measures to prevent retaliation Score 2 • Not met: Has not retaliated in practice • Not met: Expects EX BRs to prohibit retaliation

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: In the Grievance mechanisms section of the Sustainability report, the Company states that there were no significant disputes related to land use or customary rights of local or Indigenous Peoples, however the Company has not provided a description of how remedies have been put into place or the steps it would take to remedy issues, introduce changes to prevent issues or its approach to learning from its impacts. [Sustainability Policy, February 2018: s22.q4cdn.com] • 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: Regarding wages the Company indicates the following in the Sustainability report: 'We routinely pay entry-level wages that are significantly higher than those in the local community. In 2016, we paid an average annual wage of approximately USD$35,600.' The Company, however, does not describe whether it has target timeframes for paying all workers a living wage, nor indicates how it determines a living wage for the regions where it operates, including involving relevant trade unions. [2016 Sustainability Report, December 2016] • Not met: Describes how living wage determined Score 2 • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Member of EITI: The Company states in the Sustainability report that 'We actively support the objectives of the Extractive Industries Transparency Initiative (EITI)'. In addition, it reports the following: 'Goldcorp has mining operations in Canada, Mexico, Guatemala, Argentina and the Dominican Republic. Of these countries, Guatemala has adopted the EITI. Montana Exploradora de Guatemala, S.A., a subsidiary of Goldcorp, operates the Marlin mine in Guatemala, which is designated an EITI-compliant country. We continue to record payments according to the EITI standards and reporting country requirements and are engaging directly with EITI in Guatemala and are one of the industry representatives on the EITI National Working Group in Guatemala'. The Company, however, does not indicate whether in countries that are non-EITI member it takes steps to be active participants in the process to promote transparency around revenue and tax payments and licensing/contracting/agreements or to become a member of EITI. It has not published documents providing a public disclosure of contracts/agreements or licenses that provide the terms attached to the exploitation of minerals in countries for which there are no such disclosure requirements. [2016 Sustainability Report, December 2016] • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	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 Human Rights Policy expresses the following commitment: 'Goldcorp respects workers' rights, including freedom of peaceful assembly and association, and engagement in collective bargaining consistent with the relevant International Labor Organization (ILO) conventions on that subject'. The Company also adds in the Sustainability report that: 'We also support the right of our employees to not join a union or other work-related cooperative and to be free from coercion to join'. The Company, however, does not disclose documents indicating whether it puts in place measures to prohibit intimidation or retaliation against workers seeking to exercise these rights. [2016 Sustainability Report, December 2016] • Met: Discloses % covered by collective bargaining: The Company discloses in the Sustainability report the percentage of workers covered by collective bargaining agreements: 'Of Goldcorp's direct employee base, 48% of our total employees were represented by a collective bargaining agreement in 2016. The percentage of our contractor workforce covered by similar agreements is unknown'. [2016 Sustainability Report, December 2016] Score 2 • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Injury Rate disclosures: The Company's injury frequency rate in 2016 was 1.12, normalised by 200,000 working hours. The Company states 'we reduced our injury frequency rate (AIFR) by 11%, from 282 reported injuries in 2015 to 221 in 2016.' [2016 Sustainability Report, December 2016] • Met: Lost days or near miss disclosures: The Company's lost time injury frequency rate in 2016 was 0.24, normalised by 200,000 working hours. The Company states 'we reduced our Lost Time Injury Frequency Rate (LTIFR) by 4%, from 55 reported lost time injuries in 2015 to 47 in 2016.' [2016 Sustainability Report, December 2016] • Met: Fatalities disclosures: The Company states there was one worker fatality in 2016. Contractor fatalities are reported in parentheses, there were no incidences in 2016. [2016 Sustainability Report, December 2016] Score 2 • Not met: Set targets for H&S performance: The Company has a Zero fatalities objective, but it does not set targets for any additional indicators. [2016 Sustainability Report, December 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)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment Score 2 • Met: Commits to FPIC (or ICMM): The Company states it is a member of the International Council on Mining and Metals (ICMM), and states that it 'supports the ICMM Position Statement on Mining and Indigenous Peoples', however it does not describe its approach to identifying legitimate tenure rights holders. [2016 Sustainability Report, December 2016] • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals Score 2 • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: How implements security (inc VPs or ICOC): The Company states 'in 2016, after years of preparation, we signed on to the UN's Voluntary Principles on Human Rights and Security, and we are working to ensure that these principles are implemented consistently throughout our operations'. 'Our security teams conduct in-depth analysis to determine threats to our workforce within their area of operation and influence. Our sites are required to develop security plans in accordance with all applicable laws and regulations as well as with our Human Rights Policy and Security Policy. When local conditions require us to deploy armed staff, careful consideration is given to this deployment and additional safety measures and training are implemented as necessary'. 'We have designed training programs for security providers at sites in Mexico and Guatemala based on international best practices. 100% of our security personnel in our Latin America region underwent training on the use of force and the Voluntary Principles on Security and Human Rights; 98% of our security personnel in Canada received this training'. [2016 Sustainability Report, December 2016] • Met: Example of respecting HRs in security: On its website, the company provides an example in the case of Security personnel training at Marlin: 'All security staff are required to undergo annual training on the Universal Declaration on Human Rights and to sign a form indicating that they have received the requisite training and will comply with the Company's human rights requirements. The security contractors include human rights training in their new employee orientation. All security staff receive at least one pre-shift briefing per month on the use of force and firearms. These issues are also reinforced as part of the bi-annual firearms training. Company security supervisors provide ongoing training and refresher classes'. The example also discloses the following: 'All Marlin security staff are screened on a regular basis and are subject to polygraph testing that includes questions regarding the candidate's involvement in human rights offences. The new contract terms with Marlin's security providers indicate that the contractors will ensure that they vet prospective security staff for human rights abuses before they are presented to the Company. Goldcorp's Office of the Security Director performs additional enquiries as well. Regularly-scheduled Voluntary Principles reviews conducted by third-party experts include assessments of the background checks, training and interviews with the security contractors'. [Closed sites - Marlin, June 2018: goldcorp.com] • Met: Ensures Business Partners follow security approach [2016 Sustainability Report, December 2016 & Closed sites - Marlin, June 2018: goldcorp.com] Score 2 • Not met: Assesses and involves communities • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Action to prevent water and sanitation risks: The Company indicates in the Sustainability Report that it has a goal related to water: 'Ensure access to water and sanitation. Mining generally uses significant quantities of water. The mining industry can ensure adequate access to clean water and sanitation by reducing its water footprint, ensuring quality of water discharges and sharing water monitoring data and expertise with partners'. It also indicates that it has a 'Water Stewardship Strategy, which requires that every Goldcorp site must establish water milestones for their local environment. The process is underway and is on track for achievement by the end of 2017. Water recycling has improved as each site has made progress on their water stewardship strategies'. In this same report the Company indicates that 'The milestones include: Water audit and corrective action plan; hydrogeological model; site-wide water balance; water footprint; water management plan; site-specific water targets; stakeholder collaboration plan'. The Company however does not disclose documents indicating whether it has specific targets that take into consideration water use by local communities and other users in the vicinity of its operations, nor reports on its progress in meeting the targets. [2016 Sustainability Report, December 2016] Score 2 • Not met: Water targets considering local factors: The Company does not disclose documents indicating whether it has specific targets that take into consideration water use by local communities and other users in the vicinity of its operations, nor reports on its progress in meeting the targets. • 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 19.87 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.97 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	2 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Goldcorp made data public that met one or more elements of the methodology in 19 cases, leading to a disclosure score of 2 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 • Met: Company reports on GRI: The Company's Sustainability Report is independently assured and follows the requirements of the Global Reporting Initiative. [2016 Sustainability Report, December 2016]
F.3	Key, High Quality Disclosures	0 out of 4	Goldcorp 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 • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

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.