

**Company Name** Grupo Mexico  
**Industry** Extractives  
**Overall Score (\*)** 34.0 out of 100

Theme Score	Out of	For Theme
3.0	10	A. Governance and Policies
4.1	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
6.3	20	D. Performance: Company Human Rights Practices
12.5	20	E. Performance: Responses to Serious Allegations
4.4	10	F. Transparency

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 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	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>Met: General HRs commitment: The Company indicates that 'at Grupo México, we promote and protect human rights as prescribed by the United Nations Universal Declaration on Human Rights'. Its Human Rights Policy also states: 'we respect and promote the human rights of all our collaborators and the communities where we operate, in adherence of the United Nations Universal Declaration on Human Rights and local laws'. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>Met: UDHR: The company indicates in the Code of Ethics that they promote HR as prescribed by the UN UDHR. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</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	2	<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: In its Human Rights Policy, the Company states: 'Respect the fundamental principles and rights at work, in adherence of International Labor Organization's Declaration, including: 'Promote freedom of association and the right to organize, and the effective recognition of the right to collective bargaining [...]; Elimination of forced labor [...]; Ensure effective abolition of child labor [...]; Reject all forms of discrimination in respect of employment, and promote equal</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>remuneration [...]'. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Explicitly list All four ILO apply to EX BPs: The Human rights policy extends 'to our suppliers of good and services, giving preferences to companies that shares our values'. In addition, in its Sustainability Report 2018, the Company states: 'We have contract clauses in place to ensure respect for human rights and personal dignity extends to our business partners and that our business partners adhere to the principles and values of Grupo México, as well as local legislation and regulations in the countries where we operate.' As indicated above, the Human rights policy includes adherence to ILO conventions, particularly in relation to freedom of association and collective bargaining: 'promote freedom of association and the right to organize, and the effective recognition of the right to collective bargaining. (ILO Convention 87 and 98)'. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: As indicated above, in its Human Rights Policy, the Company states: 'Respect the fundamental principles and rights at work, in adherence of International Labor Organization's Declaration, including: 'Promote freedom of association and the right to organize, and the effective recognition of the right to collective bargaining [...]; Elimination of forced labor [...]; Ensure effective abolition of child labor [...]; Reject all forms of discrimination in respect of employment, and promote equal remuneration [...]'. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In its Human Rights Policy the Company commits to 'Protect the right to health of our collaborators, providing safe and healthy work environments, and implementing processes and controls for the prevention of occupational risks.' [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: 'We require the total involvement of our collaborators, contractors and/or any other outside person involved in the activities of the Company, working only with persons who observe in full our codes and standards on safety, and also taking responsibility to care for and keep workplaces clean and safe'. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Based on UN Instruments: The Company indicates in its Human Rights Policy that it expects its 'contracted security services and personnel to meet strict compliance with local laws and regulations and to receive the training and skills necessary to ensure respect for human rights'. Also adheres to the Universal Declaration of Human Rights. However, no evidence found of a statement for security commitments based on relevant UN instrument. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Voluntary Principles (VPs) participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Met: Respecting indigenous rights: The Company states in its Human Rights Policy that it commits to 'respect the rights of indigenous peoples, in adherence of the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 [...]'. Its Code of Ethics also indicates: 'we include the rights of the indigenous communities where we have presence, through understanding and respect for their customs, traditions and spaces where we may carry out an activity, always within the framework of law.' [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a> &amp; Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: ILO 169: See above [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: UN Declaration on the Rights of Indigenous People (UNDRIP): See above [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Expects BPs to respect these rights: See above statements in relation to indigenous peoples from the Code and the Human rights policy. The code also states that 'The terms of this section [HR] apply to our people and representatives and we promote and expect the same respect for human rights from all members of our value chain and other stakeholders, such as suppliers, contractors, customers, security personnel and the authorities'. The Company indicates in its sustainability report that 'We have contract clauses in place to ensure respect for human rights and personal dignity extends to our business partners and that our business partners adhere to the principles and values of Grupo México'. However, no evidence found in relation to expecting respect for human rights in maintaining security based on UN instruments or the VPs or the International Code of Conduct of Private Security Providers Association, as the Human rights policy just states the following: 'expect our contracted security services and personnel to meet strict</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compliance with local laws and regulations and to receive the training and skills necessary to ensure respect for human rights'. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</p> <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>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states in its Sustainable Report 2018: 'To hear the concerns and expectations of our stakeholders, we have set up channels for dialog and communication, according to the needs of our communities, including them, directly or indirectly, in the decision-making for our Development with Purpose strategy. Through various channels and mechanisms, we seek open and transparent communication with our stakeholders, particularly those that are most vulnerable, building a culture of collaboration and sustainability in benefit of everyone.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul> </li></ul>
A.1.5	Commitment to remedy	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>• Met: Commits to remedy: The Company states in its Human Rights Policy that it is committed to 'implementing processes of due diligence to identify, prevent, mitigate and where necessary, remedy potentially adverse human rights impacts at all our business units.' [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>] <p>Score 2</p> <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> </li></ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): In its Human Rights Policy the Company commits to 'Foster an environment of confidence without fear of reprisal by the company against any person who presents a report or complaint in good faith and in an honest manner, involving compliance with this Policy or the Code of Ethics. [...] We also extend this Policy to our suppliers of goods and services, giving the preference to companies that shares our values.' However, it is not clear that human rights defender or people who oppose the Company's operation are included in the commitment (including beyond the scope of filing a complaint). [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects EX BPs to reflect company HRD commitments: See above. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> </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	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>• Met: CEO or Board approves policy: The Code of Ethics where they reaffirm their values and lay out their mission and vision, including human rights has been signed by the Vice-Chairman of the Board of Directors. In addition, its Human Rights Policy has been signed as well by its Vice-Chairman in representation of the Board of Directors. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: In its Sustainability Report 2018, the Company indicates: ' The Grupo México corporate governance structure has two committees: the Executive Committee and the Audit and Corporate Practices Committee. [...] The Audit and Corporate Practices Committee is comprised of independent board members. This committee monitors the internal control and audit systems, conducting regular reviews, and is also responsible for due diligence on the implementation of and compliance with the ethical guidelines laid out in the Code of Ethics'. The Code of ethics contains commitments to Universal Declaration of Human rights and the ILO Declaration of fundamental principles and rights at work (and expects respects from partners). [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO: The members of the board, through the letter at the beginning of the code of conduct, communicate their permanent commitment with the collaborators, the organization, the work culture, the environment and society, in which they promote honesty, responsibility and respect. However this letter do not include an approach to HR or discuss its business importance [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs: The audit committee ensures the implementation and compliance with the guidelines specified in the Code of Ethics, that includes the guidelines for human rights. However no evidence has been found of processes in place to discuss and address salient HR issues regularly. [Audit Committee And Corporate Practices Committee: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key EX RH risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## 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 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Senior responsibility for HR: The Audit Committee and Corporate Practices Committee of Grupo México, declares to take care of the implementation and compliance with the guidelines specified in the ethics code, such as human rights, among others. In addition, in its Code of Ethics, the Company indicates: ' Senior management is responsible for ensuring the Code of Ethics and other policies are available to and understood by all personnel under their charge, and to ensure compliance is met with this Code. Senior management will foster an environment of confidentiality that encourages our people to seek their support, and also to express, without fear of reprisals, their concerns, questions or complaints regarding compliance with the Code of Ethics and related issues. Senior management will also ensure there are mechanisms in place to channel and properly treat all reports and complaints made honestly and in good faith'. Although the code itself does not contain a commitment to all ILO core, the Company, through its Human Rights Policy and its reports (signed by the board) has committed to all ILO core areas. [Audit Committee And Corporate Practices Committee: <a href="http://gmexico.com">gmexico.com</a> &amp; Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights: In its Sustainability Development Report 2017, the Company indicates: 'The Audit and Corporate Practices Committee is comprised of independent board members. This committee</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>monitors the internal control and audit systems, conducting regular reviews, and is also responsible for due diligence on the implementation of and compliance with the ethical guidelines laid out in the Code of Ethics. This Committee also sets the fixed salary policies for senior management, and the variable portion of these salaries based on performance.' However, there is no further information on whether the performance is linked to aspects of its human rights policy commitments. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: At least one key EX HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	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>• Met: HR risks is integrated as part of enterprise risk system: The Sustainability report indicates that the Group's Risk Committee is responsible for central coordination and monitoring of risk management: 'this body is responsible for managing risks associated with social, labor, environmental, and health and safety related issues, and approves the Risk Management Strategic Plan, and Policy, overseeing its implementation'. The Sustainability report indicates that the Group's Risk Committee is responsible for central coordination and monitoring of risk management: 'this body is responsible for managing risks associated with social, labor, environmental, and health and safety related issues, and approves the Risk Management Strategic Plan, and Policy, overseeing its implementation'. In addition, the Audit and Corporate Practices committee monitors the internal control and audit systems, and is responsible for due diligence and implementation and compliance with the Code of ethics. No new relevant evidence found in last report. [Sustainable development report, 2017: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainable development report, 2016: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: In its Sustainable development report 2017, the Company indicates: 'At Grupo México, we not only work to ensure that respect for human rights is present in our decision making and in how we operate, we also promote awareness of these issues throughout our value chain, including customers, suppliers and contractors. Is important to note that our collaborators [employees] receive training on the Code of Ethics every two years, including human rights topics'. In addition, in its Code of Ethics, the Company indicates: 'The Code of Ethics is mandatory for all collaborators (regardless of their position with the Company), and also for representatives and any person acting on behalf and in representation of Grupo México and our subsidiaries in Mexico and overseas. [...] We share this Code with all members of our value chain and our stakeholders in general, to inform our community of our principles and also the manner in which we conduct our relationships.' Its Code of Ethics includes a commitment to respect 'the International Labor Organization Declaration on fundamental principles and rights at work'. [Sustainable development report, 2017: <a href="http://gmexico.com">gmexico.com</a> &amp; Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder: In its Code of Ethics, the Company states: 'We ask our suppliers and contractors to respect our Code of Ethics. Observance of this Code is part of the criteria for selection and contracting of those who provide us goods and services. We share this Code with all members of our value chain and our stakeholders in general, to inform our community of our principles and also the manner in which we conduct our relationships.' However, there is no description of how the company communicates its policy commitment to external stakeholders including communities. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> <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	2	<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: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Communicating policy to EX contractors and joint ventures: In its Code of Ethics, the Company states: 'We ask our suppliers and contractors to respect our Code of Ethics. Observance of this Code is part of the criteria for selection and contracting of those who provide us goods and services.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>We share this Code with all members of our value chain and our stakeholders in general, to inform our community of our principles and also the manner in which we conduct our relationships.' In addition, in its Sustainability Report 2018, the Company indicates: 'We have contract clauses in place to ensure respect for human rights and personal dignity extends to our business partners and that our business partners adhere to the principles and values of Grupo México, as well as local legislation and regulations in the countries where we operate'. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Including to EX BPs (removed)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As indicated above, the Company states that 'we have contract clauses in place to ensure respect for human rights and personal dignity extends to our business partners and that our business partners adhere to the principles and values of Grupo Mexico'. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Including on EX BPs: See above</li> </ul>
B.1.5	Training on Human Rights	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>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The Company indicates in its Sustainability Report 2018: 'Human Rights training: Our collaborators receive training on the Code of Ethics every two years, with particular focus on human rights. Awareness workshops are provided for our collaborators and we are continually developing content to promote knowledge, respect and observance of human rights. A total 40,082 training hours were provided in this area in 2018'. However, it is not clear whether all employees are trained. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Trains relevant EX managers including security personnel: The company indicates that its 'in-house security personnel are trained in the protection and defense of human rights and the employees of all the private security firms with which we have relations receive training and refresher training in this area.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: The Audit Committee and Corporate Practices Committee of Grupo México, declares to take care of the implementation and compliance with the guidelines specified in the ethics code. However no evidence has been found of a description of how they monitor the implementation of the HR section. [Audit Committee And Corporate Practices Committee: <a href="http://gmexico.com">gmexico.com</a> &amp; Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Monitoring EX BP's</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: In its Code of Ethics, the Company indicates: 'To maintain a high level of integrity, it is important that we uphold the values, principles, and expected conduct established in this Code of Ethics, as well as any other applicable policies, procedures and standards. Violations of these may result in various disciplinary consequences, from dismissal to pursuing the legal recourses available. The sanctions or disciplinary actions will be congruent with the policies, practices and principles established by Grupo México and will be applied by the Ethics and Discipline Committee consistently and proportionate to the seriousness of the violation, and in accordance with current laws.' However, there is no description of the corrective action process. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</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	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: HR affects selection EXs business partners: The Company states in its Human Rights Policy that it extends 'to suppliers of goods and services, giving preference to companies that shares our values'. In its Sustainability Report 2018, the Company indicates: 'We also extend the Code of Ethics to our board members, suppliers of goods and services, and contractors, with recommendation for its implementation and observance, actions that are part of the criteria for selection and continuance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>in our supply chain.' However, its Code of Ethics does not include all ILO core. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: HR affects on-going EX business partner relationships: The Company states that they require contractors to act according to its health and safety policies and procedures, and also the Code of Ethics. "The assessment of legal compliance during the provision of the service is strengthened with the requirement to act according to our health and safety policies and procedures, and also our Code of Ethics. Any breach may lead to our disassociation from the contractor". No new relevant evidence found in last report. [Sustainable development report, 2016: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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 affected stakeholders	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: The Company indicates: 'To hear the concerns and expectations of our stakeholders, we have set up channels for dialog and communication, according to the needs of our communities, including them, directly or indirectly, in the decision-making for our Development with Purpose strategy. Through various channels and mechanisms, we seek open and transparent communication with our stakeholders, particularly those that are most vulnerable, building a culture of collaboration and sustainability in benefit of everyone. [...] With our operation in 24 Mexican and two US states, we have identified four key stakeholder groups: customers, communities-society; public sector (federal, state and municipal authorities; legislative representatives) and workers. We have ongoing open dialog with all these groups to address different matters in relation to our operation, and also of interest or concern to the company and the communities through which we pass.' The Company also discloses information about the communication channels or mechanisms used to engaged with its stakeholders. However, no further details found including how affected stakeholders where identified and engaged in human rights. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <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: In its Sustainable development report 2018, the Company discloses information about its Community Development Model: Grupo México's Sustainable Development approach puts people at the center of decision-making to involve them in transforming their environment. The model prioritizes collaboration with the communities where the company operates through active listening tools and ongoing dialog, to understand the needs of the community for their development. The model operates by "stages", which are articulated as a process of linkage and inclusion for all members of our communities, including government and educational institutions. In this way, we build a structure based on shared responsibility and collaborative work to foster a vision of wellbeing for present and future generations'. No further details found, including engagement on labour issues/human rights. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <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	<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: Identifying risks in own operations: In its Human Rights Policy, the Company commits to 'implementing processes of due diligence to identify, prevent, mitigate and, where necessary, remedy potentially adverse human rights actions at all our business units.' However, CHRB could not find information describing these processes. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: identifying risks in EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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): In its Human Rights Policy, the Company commits to 'implementing processes of due diligence to identify, prevent, mitigate and, where necessary, remedy potentially adverse human rights actions at all our business units.' However, CHRB could not find information describing these processes. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</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: In its Human Rights Policy, the Company commits to 'implementing processes of due diligence to identify, prevent, mitigate and, where necessary, remedy potentially adverse human rights actions at all our business units.' However, CHRB could not find information describing these processes. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</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: In its Human Rights Policy, the Company commits to 'implementing processes of due diligence to identify, prevent, mitigate and, where necessary, remedy potentially adverse human rights actions at all our business units.' However, CHRB could not find information describing these processes. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: In its Sustainability Report 2018, the Company indicates: 'we have created a multichannel Reporting Line mechanism managed by a third party through a comprehensive reporting system to ensure objectivity. This system is available online to receive reports from both within and outside the company, respecting anonymity without fear of retribution. Any collaborator, supplier or interested party can file a report via the following: Reporting line and suggestion box; Email; Website.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a> &amp; Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved: In its Sustainable development report 2018, the Company indicates: 'We opened a reporting mechanism to the public in 2018 to present complaints and concerns regarding our industrial processes, making this a tool for transparency and effective response. By year close, we had received 2 complaints involving ethics issues.' However, it is not clear whether these are specific human rights related grievances. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>Not met: Channel is available in all appropriate languages: No evidence has been found that the report mechanism via website is available in other language but Spanish and partially in English. [Sistema integral de denuncia: <a href="http://lineadedenuncia.com">lineadedenuncia.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Opens own system to EX BPs workers: In the sustainability report the company indicates that the Ethics Reporting Line is open to any collaborator, supplier or interested party. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: Communities are not included in the group of stakeholders that can use the ethics reporting line. However, in its Sustainable Development Report 2018, the Company indicates: 'We have also designed communication channels for open, close and ongoing dialog with our communities. Our Code of Ethics, the guiding principles for our day- to-day actions, sets out our vision for social responsibility. We opened a reporting mechanism to the public in 2018 to present complaints and concerns regarding our industrial processes, making this a tool for transparency and effective response.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The Company provided evidence to this indicator. However, it is a social media website available in Spanish.</li> <li>• Met: EX BPs communities use global system: In its Sustainability Report 2018, the Company indicates: 'we have created a multichannel Reporting Line mechanism managed by a third party through a comprehensive reporting system to ensure objectivity. This system is available online to receive reports from both within and outside the company, respecting anonymity without fear of retribution. Any collaborator, supplier or interested party can file a report via the following: Reporting line and suggestion box; Email; Website.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system: In its Sustainable Development Report , the Company indicates: 'To hear the concerns and expectations of our stakeholders, we have set up channels for dialog and communication, according to the needs of our communities, including them, directly or indirectly, in the decision-making for our Development with Purpose strategy.' However, there is no specific information related to how the company engages with actual or potential users of the grievance channel on the design, implementation or performance of this grievance channel. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <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	<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: Response timescales: In its Sustainability Report 2018, the Company indicates: 'The independent administrator receives and assesses all reports, ensuring the necessary information has been provided for proper classification and response to then deliver the reports to the Ethics and Discipline Committee, which designates a team to follow up, investigate and notify the interested parties. The Ethics and Discipline Committee reports the management and results of the Reporting Line to the Audit Committee quarterly and the Committee Secretary notifies the parties involved of the process. The Ethics Committee also periodically shares the results of this mechanism with collaborators to promote its use.' However, no evidence found about the procedure related to the complaint mechanism: how will the complainant be informed, timescales or escalation. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: How complainants will be informed: As indicated above, CHRB could not find further information describing how complainants will be informed/notify. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level: As indicated above, CHRB could not find further information describing how complaints may be escalated to more senior levels or independent parties. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: In its Human Rights Policy the Company commits to 'Foster an environment of confidence, without fear or reprisal by the company against any person who presents a report or complaint in good faith and in an honest manner, involving compliance with this Policy or the Code of Ethics'. In addition, in its Code of Ethics the Company states: 'Under no circumstance will there be any form of reprisal against any person who, in good faith and honestly, seeks to raise, support or address a concern or complaint regarding compliance with this document and other Company policies. Any act of reprisal against these acts of good faith will receive every disciplinary action'. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a> &amp; Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The company indicates that the complaints made through the reporting line shall be confidential and dealt with by an agency independent of Grupo Mexico to guarantee its transparency and fairness. Its Sustainability Report 2018, the Company states that its Reporting Line mechanism managed by a third party through a comprehensive reporting system 'is available online to receive reports from both within and outside the company, respecting anonymity without fear of retribution.' [Sistema integral de denuncia: <a href="http://lineadedenuncia.com">lineadedenuncia.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Expects EX BPs to prohibit retaliation: Its Human Rights Policy which extends to its 'suppliers of goods and services' includes a provision to prohibit retaliation against any person, as indicated above. The Company indicates in its sustainability report that 'we have contract clauses in place to ensure respect for human rights and personal dignity extends to our business partners and that our business partners adhere to the principles and values of Grupo Mexico'. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <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	<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: Describes how remedy has been provided: The Company provided comments to CHRB regarding this indicator. However the source comes from 2014, which makes this evidence outdated. [Sustainability Report 2014, 2014: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a> &amp; Group Basic Procurement Policies, 2019: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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)	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: Living wage target timeframe or achieved: In its Sustainable Development Report 2018, the Company indicates: 'The average base salary in the Mining Division in 2018 was equal to 9 times the local minimum wage. The base salary includes the basic wage, productivity bonuses, cash benefits and profit sharing, where applicable. [...] It should be noted that the average base salary in the Transportation Division for the lowest level was equal to 3.75 times the minimum wage in 2018. [...] The salary package the Infrastructure Division offers includes the basic wage, productivity bonuses, cash benefits and profit sharing, where applicable. In 2018, the average in the Infrastructure Division was equal to more than 6.2 times the local minimum wage.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Describes how living wage determined: In its Sustainable Development Report 2018 the Company states it supports freedom of association and adhere to the terms agreed to in the collective bargaining agreements. Referring to each one of its divisions, the Company adds: 'At 2018 close, 12,420 of our collaborators were unionized, representing 75% of the division's workforce [Mining Division]', 'We have 8,022 unionized employees in the Transportation Division, representing 70% of the workforce.', 'We had 1,989 unionized employees in the Infrastructure Division in 2018, representing 59% of the workforce.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Pays living wages: In its Sustainable Development Report 2018, the Company indicates: 'The average base salary in the Mining Division in 2018 was equal to 9 times the local minimum wage. The base salary includes the basic wage, productivity bonuses, cash benefits and profit sharing, where applicable. [...] It should be noted that the average base salary in the Transportation Division for the lowest level was equal to 3.75 times the minimum wage in 2018. [...] The salary package the Infrastructure Division offers includes the basic wage, productivity bonuses, cash benefits and profit sharing, where applicable. In 2018, the average in the Infrastructure Division was equal to more than 6.2 times the local minimum wage.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Reviews livings wages definition with unions</li> </ul>
D.3.2	Transparency and accountability (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>• Met: Member of EITI: The Company quotes EITI website, where it is said: 'Southern Copper Corporation is a member of the multi-stakeholder group in Peru and has participating in the EITI reporting since 2007. The same process has been launched in Mexico since Mexico's acceptance to the EITI in October 2017'. On the website of EITI Mexico the Company appears as a Reporting Company. [EITI Mexico, 08/2019: <a href="http://eiti.org">eiti.org</a> &amp; EITI - Southern Copper: <a href="http://eiti.org">eiti.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Reports taxes and revenue by country: The Company provides different reports for different entities (some in Spanish). However, it is not clear whether these reports include all taxes and revenue payments by country covering the whole Group.</li> <li>• Not met: Steps taken re non EITI countries</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>

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	<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: In its Human Rights Policy the Company commits to 'Promote freedom of association and the right to organize, and effective recognition of the right to collective bargaining (ILO Convention 87 and 98). It also commits to the following: 'Foster an environment of confidence, without fear of reprisal by the company against any person who presents a report or complaint in good faith and in an honest manner, involving compliance with this Policy or the Code of Ethics'. In addition, in its Code of Ethics, the Company indicates: 'Under no circumstance will there be any form of reprisal against any person who, in good faith and honestly, seeks to raise, support or address a concern or complaint regarding compliance with this document and other Company policies. Any act of reprisal against these acts of good faith will receive severe disciplinary action.' However, no evidence found of commitment to not interfering with the right of workers to exercise their rights, and practical measures to prohibit intimidation or retaliation'. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining: The company discloses the percentage of its workforce covered by collective bargaining for each one of its Divisions: 'At 2018 close, 12,420 of our collaborators were unionized, representing 75% of the division's workforce [Mining Division]', 'We have 8,022 unionized employees in the Transportation Division, representing 70% of the workforce.', 'We had 1,989 unionized employees in the Infrastructure Division in 2018, representing 59% of the workforce.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.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 its Sustainability Report 2018, the Company discloses its 2018 Incident Rates (IR) per Division: Mining 0,72, Transportation 2,37, Infrastructure 0,29. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Lost days or near miss disclosures: In its Sustainability Report 2018, the Company discloses its 2018 Severity Rates (SR) per Division: Mining 0,28; Transportation 1,1; Infrastructure 0,027. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Met: Fatalities disclosures: In its Sustainability Report 2018, the Company indicates: 'There was one accident in 2018 at our Santa Barbara mine in Mexico, during which regrettably one contract worker lost their life.' (Mining), '[...] we deeply regret the loss of three collaborators and four contract workers in 2018 due to causes related to factors beyond the control of the company.' (Transportation), 'No fatalities were reported.' (Infrastructure) [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: In its Sustainable Development Report 2018, the Company discloses information about its health and safety targets per Division: Mining: 'Zero fatal accidents; Gradually reduce the frequency of incapacitating accidents by 25% among Mining Division employees and contractors; Have a Performance-Based Safety System in place at 75% of the Mining Division business units; Obtain ISO 45001 certification at 50% of the Mining Division business units.'; Transportation: 'Zero fatal accidents every year; Gradually reduce the frequency rate by 15% to reach below 1.0 (OSHA); Implement a Behavior-Based Safety System at 70% of Ferromex sites.' [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Met targets or explains why not: Although the Company makes some descriptions about performance, no evidence found in relation to targets. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (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: Process to identify indigenous rights holders: According to its Sustainability Report 2018, the Company is currently working in 'Institutionalize the process of identifying and responding to indigenous communities near our Mining Division operations.' However, the process is still not implemented. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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): In its Sustainable Development Report 2018, the Company indicates: 'our in-house security personnel are trained in the protection and defense of human rights and the employees of all the private security firms with which we have relations receive training and refresher training in this area.' However, there is no reference to the VPs or ICOC. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• Not met: Example of respecting HRs in security</li> <li>• Not met: Ensures Business Partners follow security approach: In its Human Rights Policy, which extends to its 'suppliers of goods and services', the Company says that it 'Expect our contracted security services and personnel to meet strict compliance with local laws and regulations and to receive the training and skills necessary to ensure respect for human rights.' In addition, in its Sustainability Report 2018, the Company indicates: 'We have contract clauses in place to ensure respect for human rights and personal dignity extends to our business partners and that our business partners adhere to the principles and values of Grupo México, as well as local legislation and regulations in the countries where we operate.', however there is no specific information related to security approach, Voluntary Principles or ICOC. [Human Rights Policy: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</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: In its Sustainable Development Report, the Company indicates: 'Water is the most important input in our extractive processes. The Mining Division installs the latest technologies to increase recovery and reuse in our processes. To ensure we are managing water properly, our mine operations incorporate the following actions to maximize the efficient use and reuse of water: Closed Circuits [...], Thickeners for water recovery [...], Wastewater treatment plants [...], Water consumption and recovery [...]'. In addition, the Company is being working in measures to further improve the security of tailings storage facilities. However, no reference found to actions to prevent water risks related to local communities' water use. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: The Company has set the following water goals: 'Revise the baseline analysis at all Mining Division business units; Implement a comprehensive water basin management system at all business units situated in high water stress areas.' However, it is not clear whether these targets take into consideration water use by local communities or other users in the vicinity of its operations. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.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		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Grupo Mexico failed to respect settlement with Mexican government over a sulphuric acid spillage in North-west Mexico</li> <li>• <b>Area:</b> Environment</li> <li>• <b>Story:</b> In July 2017, a new UN report announced that three years after a mine belonging to Grupo México caused the worst ecological disaster in Mexican history, the Company has failed to fulfil its obligations with the victims. The spill amounted to 10 million gallons (40,000 cubic meters) of copper sulphate and heavy metals into the Sonora and Bacanuchi rivers. This environmental disaster affected approximately 24,000 people directly and 250,000 people indirectly in seven municipalities on the banks of the Sonora River, 25 miles south of the Arizona border. Grupo Mexico was fined MXN 23 million (about USD 1.8 million) and agreed to contribute to a trust fund of MXN 2 billion pesos (about USD 154 million) for redress, reparation and compensation for economic and environmental damages and health problems caused in the communities affected by the spill. In addition, Grupo Mexico committed to take a number of measures, including installing 28 water treatment plants with technology to filter out heavy metals and building a clinic to treat those whose health was affected. However, three years after the tragedy, the UN report said only one of the promised 28 water treatment plants had been built and it was not fully functional. During its visit to the site, the UN Working Group also confirmed that the health clinic had never been completed although at least 360 people have been identified with health problems caused by the spill. The UN report stated that affected communities raised a number of concerns related to a lack of consultation about the use of the trust fund and lack of transparency about the level of contamination and plans for the recovery of the river.</li> <li>• <b>Sources:</b> [Forbes, 27/7/2017: <a href="http://forbes.com">forbes.com</a>][Business &amp; Human Rights Resource Center, 25/7/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>][Milenio, 08/05/18: <a href="http://milenio.com">milenio.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	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>• <b>Met:</b> Public response available: A month after the spill in 2014, Grupo Mexico stated the accident could be attributed to a defective pipe. The Company said it "regretted" the tragedy, and was fined 23 million pesos (about US\$ 1.8 million). The company also collaborated with the Government in establishing a trust fund of 2 billion pesos in order to ensure redress, reparation and compensation for economic and environmental damages and health problems caused in the communities affected by the spill. In addition, Grupo México committed to take a number of measures, including installing 28 water treatment plants with technology to filter out heavy metals and building a clinic to treat those whose health was affected. In 2017, Grupo Mexico told the UN Working Group that the construction of the treatment plants and the clinic had not been completed because the municipal authorities did not have the capacity to operate them, and to do so would have been irresponsible. [Forbes article, 07/2017: <a href="http://forbes.com">forbes.com</a> &amp; UN Working Group report on Mexican business enterprises, 27/04/2017: <a href="http://ohchr.org">ohchr.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Response goes into detail: While the company told the UN Working Group that the construction of the treatment plants and the clinic had not been completed because the municipal authorities did not have the capacity to operate them, and to do so would have been irresponsible, this is not sufficient detail. [UN Working Group report on Mexican business enterprises, 27/04/2017: <a href="http://ohchr.org">ohchr.org</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	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>• <b>Met:</b> Company policies address the general issues raised: The Company states that "At Grupo México, we minimize and compensate any potentially adverse impacts and ensure environmental management is an integral part of all our processes, covering each of the stages in the lifecycle of our operations." [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> <li>• <b>Met:</b> Policies apply to the type of business relationships involved: The policy also applies to the Company's suppliers. [Code of Ethics - Grupo México: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Policies address the specific rights in question: The Company monitors the level of harmful wastes and spills, and report on the number. However, it does not have a commitment the UN Global Compact CEO Water Mandate. [Sustainable development report, 2017: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The Company has taken appropriate action	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: Engages with affected stakeholders: Following the spill in 2014, the company released a series of statements outlining the engagement it had undertaken with the local communities, this included; The provision of \$3,500,000 pesos to the seven municipalities to support environmental services and to pay personnel for the distribution of water, fuels, and various other materials related to the filtration. The implementation of a coordinated plan to identify and verify the possible effects on farming and livestock in the region, that may have been caused by the filtration, to take subsequent action as necessary. Additionally the company also explained the steps that had been taken to provide communities with potable water. [UN Working Group report on Mexican business enterprises, 27/04/2017: <a href="http://ohchr.org">ohchr.org</a>]</li> <li>• Met: Provides remedies to affected stakeholders: The UN Working Group report noted that Grupo Mexico was fined 23 million pesos (about \$1.8 million) and agreed to contribute to a trust fund of 2 billion pesos (about \$154 million) for redress, reparation and compensation for economic and environmental damages and health problems caused in the communities affected by the spill. [Forbes article, 07/2017: <a href="http://forbes.com">forbes.com</a> &amp; UN Working Group report on Mexican business enterprises, 27/04/2017: <a href="http://ohchr.org">ohchr.org</a>]</li> <li>• Met: Has reviewed management systems to prevent recurrence: In a statement following the initial spill the company says "on learning of the incident, [the company] immediately proceeded to install a containment wall that would be sufficiently strong to prevent any further spillage and would also prevent this from happening again. The containment works were completed in less than 24 hour". The 2018 Sustainability report also says that "We strive for our operations to not only comply with, but to surpass local regulations and the recommendations of the International Commission on Large Dams (ICOLD). We have also set up a committee of in-house and independent specialists to regularly review the safety and operation of each dam. Additionally, and with the support of the best industry experts, we launched a monitoring program in 2018 for all tailings dams to ensure their stability". [Buenavista del Cobre reports on the copper solution spill., 12/08/2014: <a href="http://gmexico.com">gmexico.com</a> &amp; Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: In the report by the UN Working Group, it notes that "affected communities raised a number of concerns related to a lack of consultation about the use of the trust fund; a perception that compensation was determined arbitrarily, for example compensation was provided up to a maximum number of livestock, irrespective of the number of livestock affected; a lack of transparency about the level of contamination and plans for the recovery of the river; and the non-fulfilment of the company's commitments to build water treatment plants and a health clinic". Thus despite the conclusion of the Sonara river trust, documented as occurring prior to the release of the UN Working Group report, the remedy provided by the company cannot be considered satisfactory. [Forbes article, 07/2017: <a href="http://forbes.com">forbes.com</a> &amp; UN Working Group report on Mexican business enterprises, 27/04/2017: <a href="http://ohchr.org">ohchr.org</a>]</li> <li>• Met: Has improved systems and engaged affected stakeholders: The company in its 2018 Sustainability Report states that "We strive for our operations to not only comply with, but to surpass local regulations and the recommendations of the International Commission on Large Dams (ICOLD). We have also set up a committee of in-house and independent specialists to regularly review the safety and operation of each dam. Additionally, and with the support of the best industry experts, we launched a monitoring program in 2018 for all tailings dams to ensure their stability". It has also previously engaged with the affected communities and also with the UN Working Group. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</li> </ul>

## 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, Grupo Mexico 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company indicates in its Sustainability Report 2018: 'We offer our thirteenth Sustainable Development Report, affirming our commitment to transparency and disclosure. This report was prepared according to</li> </ul>

Indicator Code	Indicator name	Score	Explanation
			<p>the GRI Standards “Core” option. [...]. This report also applies the Principles of Inclusivity, Materiality and Responsiveness defined by AccountAbility AA1000APS (2008).<sup>1</sup> The document includes a GRI Content Index. [Sustainability Report 2018, 2019: <a href="http://gmexico.com">gmexico.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0.4 out of 4	<p>Grupo Mexico met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <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> <p>Discussing challenges openly</p> <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> <p>Demonstrating a forward focus</p> <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>• 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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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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.