

**Company Name** JXTG Holdings  
**Industry** Extractive  
**Overall Score (\*)** 16.2 out of 100

Theme Score	Out of	For Theme
3.2	10	A. Governance and Policies
0.9	25	B. Embedding Respect and Human Rights Due Diligence
0.8	15	C. Remedies and Grievance Mechanisms
4.4	20	D. Performance: Company Human Rights Practices
3.2	20	E. Performance: Responses to Serious Allegations
3.7	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	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: General HRs commitment: According to the CSR Report, the Company states that "The JXTG Group is committed to upholding human rights. If it is determined that our business activities cause or have caused adverse impacts on human rights, we will take appropriate action to remedy such impacts in accordance with our responsibility to respect human rights." The CSR report is prefaced and signed by the Chairman and the Representative Director and is externally assured. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Met: UNGC principles 1 &amp; 2: JXTG Holdings is a member of United Nations Global Compact, respecting the ten principles of the UN Global Compact. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Met: UDHR: According to the CSR Report, the Company states that "We support international norms such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Fundamental Principles and Rights at Work of the International Labor Organization, among others." The CSR report is prefaced and signed by the Chairman and the Representative Director and is externally assured. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Met: International Bill of Rights: According to the CSR Report, the Company states that "The JXTG Group supports and respects the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights)" [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: According to the CSR Report, the Company states that "We support international norms such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Fundamental Principles and Rights at Work of the International Labor Organization, among others." The CSR report is prefaced and signed by the Chairman and the Representative Director and is externally assured. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: ILO Core: According to the CSR Report, the Company states that " We support international norms such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Fundamental Principles and Rights at Work of the International Labour Organization, among others". [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Explicitly list All four ILO apply to EX BPs: The JXTG Group states that has established basic principles on respect for human rights under its Code of Conduct. The Company discloses that 'have requested cooperation with these efforts not only from Group companies but also other companies across our value chain'. In addition, on its Code of Conduct, the Company describes that its basic principles on respect for human rights are to 'not infringe on human rights through our business activities. We respect internationally-accepted human rights standards and diversity, acknowledging differences pertaining to gender, age, nationality, race, ethnicity, skin color, culture, thought, religion, belief, political opinions, sexual orientation, and the presence or absence of disability. We shall not engage in any type of discrimination or harassment. We shall not engage in any forms of forced labor or child labor. We shall not engage in business transactions which may lead to the prolongation of conflicts, human rights violations, or inhumane acts'. Although the Company mentions discrimination, forced and child labor , there is no explicit mention to the right of freedom of association and collective bargaining, which is also a requirement. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> &amp; Code of Conduct, Not mentioned: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: According to the CSR Report, the Company states that "We support international norms such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Fundamental Principles and Rights at Work of the International Labor Organization, among others. More specifically, we strictly prohibit forced labor and child labor, work to eliminate discrimination in employment and the workplace, and maintain communication with labor unions and employees. Through these and other efforts, we work to identify and resolve human rights issues". However, to maintain communication with labor unions and employees does not imply in commitment to the right of freedom of association and collective bargaining. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> &amp; CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: Respect H&amp;S of workers: According to the Code of business conduct the Company states that " We regard safety and security as the foundation of our business activities, set high safety and security standards, always ensure safety and security, and take appropriate measures to prevent any incidents and injuries." Moreover, regarding health commitments the Company states that " Health is the core element of our business continuity and development. We take active measures to maintain and enhance the mental and physical health of individuals employed by our group companies." [Code of Conduct, Not mentioned: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: H&amp;S applies to EX BPs: According to CSR Report, the Company states that the JX Nippon Mining &amp; Metals Group Policy for Selecting Procurement Partners "comply with laws, regulations, and social norms, such as those below, and place priority on human rights and environmental impact" and "Abide by laws and regulations related to safety and health and develop a proper labor environment." [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Based on UN Instruments</li> <li>• Not met: Voluntary Principles (VPs) participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Met: Respecting indigenous rights: In the CSR Report, the Company commits to supports and respects the Declaration on the Rights of Indigenous Peoples. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: ILO 169</li> <li>• Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)</li> <li>• Not met: Expects BPs to respect these rights</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: In its CSR Report, the Company commits to " The JXTG Group conducts in earnest dialogue and discussions with relevant stakeholders to ensure that it comprehends and addresses the impacts it has on human rights from the perspective of those affected." [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	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 remedy: The Company states in its CSR Report that " The JXTG Group is committed to upholding human rights. If it is determined that our business activities cause or have caused adverse impacts on human rights, we will take appropriate action to remedy such impacts in accordance with our responsibility to respect human rights" [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects EX BPs to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The board of directors approved its human rights policy commitments. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Met: Board level responsibility for HRs: The Company indicates in its CSR Report that they " have established the JXTG Group CSR Council, which is chaired by the representative director and president of JXTG Holdings, as the body for promoting CSR activities in priority fields throughout the JXTG Group. ", those CSR activities include human rights. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Speeches/letters by Board members or CEO: According to the CSR Report, "The JXTG Group participated in the 2018 Global Conference on Business and Human Rights in Tokyo, hosted by Crux Round Table Japan (CRT), on September 13 and 14, 2018. Through discussions with human rights experts from overseas, human rights NGOs/NPOs, and the many companies in attendance, we shared and exchanged information on the latest worldwide trends and viewpoints on business and human rights, along with best practices in human rights due diligence used by other companies." However, no evidence was found that the CEO or other board member made the speech. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</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: According to the Company's CSR Report, "The Human Rights Promotion and Human Resource Development Committee is chaired by the officer (director) responsible for the Human Resources Department of JXTG Holdings, and has been established under the JXTG Group CSR Council, which is chaired by the president of JXTG Holdings. The committee is responsible for deliberation on Group-wide policies and approaches to human rights. It confirms and evaluates the activities of each Group company and shares information." However, it is not clear whether the Committee is a board level body. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</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 [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Met: Senior responsibility for HR: According to the CSR Report, the Company states that "The Human Rights Promotion and Human Resource Development Committee is chaired by the officer (director) responsible for the Human Resources Department of JXTG Holdings, and has been established under the JXTG Group CSR Council, which is chaired by the president of JXTG Holdings. The committee is responsible for deliberation on Group-wide policies and approaches to human rights. It confirms and evaluates the activities of each Group company and shares information." [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</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</li> <li>Not met: At least one key EX HR 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.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <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)	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 [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	within Company's own operations		<ul style="list-style-type: none"> <li>• Met: Communicates its policy to all workers in own operations: The Company states that 'We are now implementing various measures to raise awareness of the Group Philosophy and the JXTG Group Code of Conduct among the JXTG Group's officers and employees, and to foster understanding and cooperation among everyone involved in the JXTG Group's business activities', and the measures to taken to communicate its policy are to distribute Code of Conduct handbook, use of digital signage in company workplaces, display posters, hold briefings nationwide and translate into 9 languages (English, Chinese, Korean, Spanish, Portuguese, Vietnamese, Thai, Indonesian) and distribution its policy [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> &amp; CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Communication of policy commitments to stakeholder: The Company states that its 'basic policy is published on the JXTG Holdings website as our commitment to all stakeholders, including shareholders of JXTG Holdings along with JXTG Group customers, business partners and employees, and the local communities where we operate'. However, it is not clear the steps taken to communicate the policy to affected stakeholders. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: How policy commitments are made accessible to audience [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: Communicating policy to EX contractors and joint ventures: The JXTG Group states in its CSR report that 'asks the suppliers [...] to cooperate with the JXTG Group Code of Conduct'. However, to ask for suppliers to cooperate with Company's Code of Conduct does not describe the process the takes to communicate its human rights policy commitment(s) to its business relationships. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Including to EX BPs (removed)</li> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on EX BPs</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The Company states that "The JXTG Group will provide appropriate training to its officers and employees to ensure that this policy is incorporated into the business activities of all companies belonging to the JXTG Group." Also, JXTG discloses that one of its targets for the exercise of 2018 is to have 100% participation rate in human rights training from its employees. However, to state that will provide training and that the goal is to have 100% of its employees does not imply that the process is already in practice. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> &amp; CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Trains relevant EX managers including security personnel</li> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Not met: Monitoring EX BP's: The Company states that it has "established a policy on CSR procurement for purchasing the materials and equipment needed for our business activities. We regularly conduct supplier surveys to monitor the status of compliance regarding respect for human rights across the entire supply chain" However, no further information was found regarding how it uses third party external monitors auditors to monitor extractive business partners. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: The Company only states that "To detect legal violations in the early stages and take prompt corrective actions,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>principal Group companies have set up whistle-blowing systems (compliance hotlines) for their employees and those of our contractors as well. In addition to reporting within Group companies, whistle-blowers, who may elect to remain anonymous, can also make reports to designated external attorneys-at-law "</p> <p>However, it does not disclose the number of incidences. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of EX supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects selection EXs business partners: Although the Company describes its CSR procurement policy and how suppliers representing 69% of purchases accepted and attended a training session, not clear whether this is taken into account in the selection process, not only for purchasing materials but also for contractors and other extractive business partners. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>• Not met: HR affects on-going EX business partner relationships: Although the Company carries out risk surveys concerning policy, not clear how this might affect decisions to renew, expand or terminate business relationships, including extractive business partners. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with EX business partners to improve performance: Although the Company describes its CSR procurement policy and how suppliers representing 69% of purchases accepted and attended a training session, not clear how it specifically works on human rights performance improvement, including not only material and equipment provides but also extractive business partners. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</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</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</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</li> <li>• Not met: identifying risks in EX business partners: The Company states that " We have established a policy on CSR procurement for purchasing the materials and equipment needed for our business activities. We regularly conduct supplier surveys to monitor the status of compliance regarding respect for human rights across the entire supply chain". However, there is not enough evidence about identifying risks. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</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>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <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	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 Plans to mitigate risks</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	findings internally and taking appropriate action		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 business partners 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	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company states in its CSR Report that "To enable us to quickly identify human rights issues and take prompt action, we have established human rights and compliance hotlines inside and outside the company (run by an external law office) for consultation and reporting by employees of the company and its contractor companies. In addressing inquiries, we maintain the privacy of the individual (reports may be filed anonymously) to ensure that those who contact the hotlines are not subject to unfavourable treatment as a result." [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> ] Score 2 • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BPs workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Grievance mechanism for community: The Company states that "To enable us to quickly identify human rights issues and take prompt action, we have established human rights and compliance hotlines inside and outside the company (run by an external law office) for consultation and reporting by employees of the company and its contractor companies". However, with current evidence it is not clear whether communities or other external stakeholders are allowed to file complaints. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a> ] Score 2 • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs 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 consult users in creation or assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Response timescales</li> <li>Not met: How complainants will be informed</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Public statement prohibiting retaliation</li> <li>Not met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Has not retaliated in practice</li> <li>Not met: Expects EX BPs to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Won't impede state based mechanisms</li> <li>Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Will work with state based or non judicial mechanisms</li> <li>Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes how remedy has been provided [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Changes introduced to stop repetition</li> <li>Not met: Approach to learning from incident to prevent future impacts</li> <li>Not met: Evaluation of the channel/mechanism</li> </ul>

#### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Living wage target timeframe or achieved: The Company only states about minimum wage, as it can be seen at "Employees are compensated following rules established based on relevant laws and regulations concerning minimum wage, legal benefits, etc., in each country and region." [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Describes how living wage determined</li> <li>Not met: Pays living wages</li> <li>Not met: Reviews living wages definition with unions</li> </ul>
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 <ul style="list-style-type: none"> <li>Met: Member of EITI: According to the Company's CSR Report, it is a member of EITI. [Code of Conduct, Not mentioned: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Not met: Reports of taxes and revenues beyond legal minimums</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Reports taxes and revenue by country</li> <li>Not met: Steps taken re non EITI countries</li> <li>Not met: Disclosures contract terms where not a requirement</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation</li> <li>Not met: Discloses % covered by collective bargaining</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Injury Rate disclosures: The Company discloses quantitative information regarding occupational injuries, injury frequency rate and occupational injury severity rate. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Met: Lost days or near miss disclosures: The Company discloses quantitative information regarding lost work days due to occupational injury. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Met: Fatalities disclosures: According to the CSR Report, the Company states that " Nine regular employees suffered occupational injuries, a decrease of seven from the previous fiscal year. There were no fatalities among regular employees." [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Set targets for H&amp;S performance: The Company indicated the aim to reduce the occupational injuries which target was zero occupational fatalities. According to the CSR Report, the target was achieved in 2018. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Met: Met targets or explains why not: See above</li> </ul>
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Process to identify indigenous rights holders</li> <li>Not met: How engages with communities in assessment [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commits to FPIC (or ICMM): As it is indicated in the CSR Report, the Company states commits and supports the ICMM. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.jxtg-group.co.jp">hd.jxtg-group.co.jp</a>]</li> <li>Not met: Gives recent example FPIC or dropping deal</li> </ul>
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: How implements security (inc VPs or ICOC)</li> <li>Not met: Example of respecting HRs in security</li> <li>Not met: Ensures Business Partners follow security approach</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Action to prevent water and sanitation risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Water targets considering local factors</li> <li>Not met: Reports progress in meeting targets and shows trends in progress made</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 12.95 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.24 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	1.26 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, JXTG Holdings made data public that met one or more elements of the methodology in 12 cases, leading to a disclosure score of 1.26 out of 4 points.

Indicator Code	Indicator name	Score	Explanation
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company reports using Comparative Table with GRI Standards. [CSR Report for a Sustainable Future, 2018: <a href="http://hd.ixtg-group.co.jp">hd.ixtg-group.co.jp</a>]</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0.4 out of 4	JXTG Holdings met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)</li> <li>• 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.