

Company Name Marathon Petroleum
Industry Extractives
Overall Score (*) 24.3 out of 100

Theme Score	Out of	For Theme
2.4	10	A. Governance and Policies
1.1	25	B. Embedding Respect and Human Rights Due Diligence
3.3	15	C. Remedies and Grievance Mechanisms
1.3	20	D. Performance: Company Human Rights Practices
15.0	20	E. Performance: Responses to Serious Allegations
1.2	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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: UDHR: The code of conduct states that: 'The Company respects the human, cultural and legal rights of individuals and communities and promotes, within its sphere of influence and legitimate business role, the goals and principles of the United Nations Universal Declaration of Human Rights'. [Code of Conduct, May 2019: marathonpetroleum.com] Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: ILO Core Not met: UNGC principles 3-6 Not met: Explicitly list All four ILO apply to EX BPs [Code of Conduct, May 2019: marathonpetroleum.com] Score 2 <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core: Although the Code of business conduct contains a commitment against discrimination, the company does not presents its commitment to other ILO core areas. [Code of Conduct, May 2019: marathonpetroleum.com] Met: Respect H&S of workers: The Code contains health and safety commitments in its code of conduct, including the following: 'we are committed to providing a safe and healthy workplace. Each of us is responsible for observing all of the safety

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			and health rules that apply to our jobs'. [Code of Conduct, May 2019: marathonpetroleum.com] <ul style="list-style-type: none"> • Met: H&S applies to EX BPs: See above. The Code states that 'business partners, including suppliers, consultants and contract workers, have an impact on our reputation. For this reason we work with business partners that share our commitment to quality, safety, ethics and compliance, and we expect them and their employees to act in a way consistent with our Code'. [Code of Conduct, May 2019: marathonpetroleum.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Based on UN Instruments • Not met: Voluntary Principles (VPs) participant • Not met: Uses only ICoCA members • Not met: Respecting indigenous rights • Not met: ILO 169 • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) • Not met: Expects BPs to respect these rights Score 2 <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement • Not met: Regular stakeholder engagement Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Code of conduct containing the Company's human rights commitment is signed by the CEO. [Code of Conduct, May 2019: marathonpetroleum.com] • Met: Board level responsibility for HRs: The Company indicates on its website that the 'MPC Board of Directors oversees MPC's safety and environmental performance in multiple ways. Responsibility for enterprise risk oversight, including health, environmental, safety and security risk oversight rests with our board and its committees'. [Health environment, Safety and Security on website, 2018: marathonpetroleum.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process

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A.2.3	Incentives and performance 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"> Met: Incentives for at least one board member: The Company's proxy statement discloses annual cash bonuses for Named Executive Officers (including the Chairman & CEO). 70% of the bonus is based in financial and operational performance metrics. One of these performance metrics is called 'responsible care' and defined as follows: 'The metrics below measure our success in meeting our goals for the health and safety of our employees, contractors and neighbouring communities, while continuously improving on our environmental stewardship commitment by minimizing our environmental impact'. [Proxy statement, 2018] Met: At least one key EX RH risk, beyond employee H&S: As mentioned above, the proxy statement states that health and safety metrics 'measure our success in meeting our goals for the health and safety of our employees, contractors and neighbouring communities'. [Proxy statement, 2018] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Commits to ILO core conventions Not met: Senior responsibility for HR: The Code of conduct states that 'To oversee the Company's ethics and compliance efforts, the Company has designated a senior officer as the Chief Compliance Officer and has established the Business Integrity Committee, comprised of several members of senior management, to enhance the Company's business integrity efforts'. However, the Company's commitments to human right don't include the ILO declaration or each of the ILO core areas. [Code of Conduct, May 2019: marathonpetroleum.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Day-to-day responsibility: The Company indicates in the Citizenship report that 'MPC's Business Integrity and Compliance office implements the Code of Business Conduct through various programs, as well as administering an Integrity Helpline' [Citizenship report 2018, 2018: marathonpetroleum.com & Code of Conduct, May 2019: marathonpetroleum.com] Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance 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"> Met: Senior manager incentives for human rights: The Company's proxy statement discloses annual cash bonuses for Named Executive Officers (including the Chairman & CEO and senior executive officers). 70% of the bonus is based in financial and operational performance metrics. One of these performance metrics is called 'responsible care' and defined as follows: 'The metrics below measure our success in meeting our goals for the health and safety of our employees, contractors and neighbouring communities, while continuously improving on our environmental stewardship commitment by minimizing our environmental impact'. [Proxy statement, 2018] Met: At least one key EX HR risk, beyond employee H&S: As stated by the proxy statement, health and safety metrics 'measure our success in meeting our goals for the health and safety of our employees, contractors and neighbouring communities'. [Proxy statement, 2018] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public
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"> Met: HR risks is integrated as part of enterprise risk system: The Company indicates in the proxy statement that 'MPC's mature company practices, developed through our ERM process, promote effective decision-making, including with regard to environmental, social and reputational risks. The Company is committed to human rights and corporate citizenship as evidenced by our commitment to the fair treatment and meaningful involvement of all people, regardless of race, colour, national origin or income level. Our ERM process continually identifies, evaluates and monitors social, political and environmental trends, issues and concerns that could affect MPC's business activities and performance. These are all

Indicator Code	Indicator name	Score (out of 2)	Explanation
			considerations in strategy setting, business planning and risk management'. [Proxy statement, 2018] Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy to EX contractors and joint ventures • Not met: Including to EX BPs (removed) Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on EX BPs
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant EX managers including security personnel Score 2 • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring EX BP's Score 2 • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR affects selection EXs business partners • Not met: HR affects on-going EX business partner relationships Score 2 • Not met: Both requirement under score 1 met • Not met: Working with EX business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Engagement includes EX business partners workers • Not met: Engagement includes EX business partners communities Score 2 • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifying risks in own operations • Not met: identifying risks in EX business partners Score 2 • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)

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"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Code applies to every employee at all levels, and includes information and instructions to report non-compliances with the code (which contains, among other commitments, the ones related to human rights). It provides phone number and websites. [Code of Conduct, May 2019: marathonpetroleum.com & Helpline website: app.convercent.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: The helpline website is available in more than 40 languages. [Helpline website: app.convercent.com] • Met: Opens own system to EX BPs workers: The Company states in the Citizenship report that the helpline 'gives employees, business partners and others an anonymous means of reporting suspected violations of the code'. [Citizenship report 2018, 2018: marathonpetroleum.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states in the Citizenship report that the helpline 'gives employees, business partners and others an anonymous means of reporting suspected violations of the code'. The code of conduct also states that employees, vendors, contractors and customers can use the helpline. [Code of Conduct, May 2019: marathonpetroleum.com & Citizenship report 2018, 2018: marathonpetroleum.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The channel is available on the website and translated to more than 40 languages. [Helpline website: app.convercent.com & Code of Conduct, May 2019: marathonpetroleum.com] • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
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"> • Not met: Response timescales • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Code states that 'the Company will not allow retaliation against any individual. We consider acts of retaliation to be misconduct and a violation of this code. Filing a good faith report will never be a cause for disciplinary action. Retaliation can take many forms, such as threats, intimidation, exclusion and otherwise unwarranted discipline'. [Code of Conduct, May 2019: marathonpetroleum.com] • Met: Practical measures to prevent retaliation: Reports can be anonymous. Also, the helpline is operated by Convercent, an independent third party. [Helpline website: app.convercent.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation
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"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews living wages definition with unions

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Member of EITI • Not met: Reports of taxes and revenues beyond legal minimums Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation • Not met: Discloses % covered by collective bargaining: Although the Company indicates that 'approximately 37 per cent of our refining employees are covered by collective bargaining agreements', no further details found. [Annual report, 2017: marathonpetroleum.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company provides a chart showing performance for the last 15 years. It includes Recordable Incident rates, Days away rates and fatality rate. Figures include both employees and contractors. [Citizenship report 2018, 2018: marathonpetroleum.com] • Met: Lost days or near miss disclosures: See above [Citizenship report 2018, 2018: marathonpetroleum.com] • Met: Fatalities disclosures: See above [Citizenship report 2018, 2018: marathonpetroleum.com] Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: No evidence found of specific targets in relation to the metrics measured above. [Citizenship report 2018, 2018: marathonpetroleum.com & Health, Environment, Safety & Security policy: marathonpetroleum.com] • Not met: Met targets or explains why not
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment Score 2 <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach Score 2 <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks Score 2 <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Regulators confirms fine against Tesoro over 2010 explosion in Anacortes • Area: H&S • Story: On August 31, 2017, the Washington Department of Labor and Industries asked the State Board of Industrial Insurance Appeals to review the legal case relating to the 2010 deadly explosion at the Tesoro Anacortes refinery and to re-affirm the USD 2.39 million penalties. The case concerns the explosion of the Tesoro oil refinery, which caused the deaths of seven workers who were fatally burned in the incident. In 2018 Marathon Petroleum acquired the factory after it merged with Andeavor (formerly Tesoro Corporation). Its believed a row of boilers were being re-started after undergoing routine maintenance checks when they exploded. Media reports say it took about 90 minutes for the fire to be extinguished. Regulators undertook a six-month investigation into the incident and determined it had been preventable. The agency said investigators found that a heat exchanger device blew apart along cracks in welded areas, which caused the explosion. Regulators claimed the company did not properly inspect or test equipment at the refinery. Tesoro disputed the state's characterisation of its safety procedures and inspections, and contended the conclusions of the state's investigation were mistaken. <p>In June 2017, the judge hearing the case said the department failed to show that Tesoro committed any of the alleged violations. Judge Mark Jaffe said in his June 8 ruling that he did not find the department, which has the burden of proof, showed that Tesoro was responsible for the explosion. The state authorities subsequently filed a petition on August 31, 2017, contending that the judge didn't allow the department to present its case to the board.</p> <ul style="list-style-type: none"> • Sources: [Portside - 10/07/2014: portside.org][Komo News - 01/09/2017: komonews.com][The Washington Times - 1/09/2017: washingtontimes.com][Spokesman - 01/09/2017: spokesman.com]
E(1).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: A spokeswoman for the company Andeavor (formerly Tesoro and now owned by Marathon Petroleum) said in an email that "as a matter of policy, we do not provide comment on legal matters" in response to questions about the Washington Department of Labor and Industries request to the state Board of Industrial Insurance Appeals to review the case against Tesoro and affirm the penalties. Previously in statements to media outlets in June, Tesoro called the accident a tragedy and supported the judge's decision to dismiss the claims in their entirety. The company also said that focusing on personal and process safety at the core of what it does at the refinery. However these [Spokesman article, 01/09/2017: spokesman.com & Komo News article, 01/09/2017: komonews.com] Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail: The response provided by the company in June doesn't provide sufficient detail on the case. [Spokesman article, 01/09/2017: spokesman.com & Komo News article, 01/09/2017: komonews.com]
E(1).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: In its 'Code of Conduct' the company says "We are committed to providing a safe and healthy workplace. Each of us is responsible for observing all of the safety and health rules that apply to our jobs." [Code of business conduct: marathonpetroleum.com] • Met: Policies apply to the type of business relationships involved: The company says "Our Code applies to every employee at all levels of Marathon Petroleum Corporation and all consolidated subsidiaries, including those providing services to MPLX LP and Andeavor Logistics LP. Business partners, including suppliers, consultants and contract workers, have an impact on our reputation. For this reason, we work with business partners that share our commitment to quality,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>safety, ethics and compliance, and we expect them and their employees to act in a way that is consistent with our Code". This is evidence the company's policies also apply to Andeavor. [Code of business conduct: marathonpetroleum.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company discloses injury rates and fatalities in its 'Citizenship Report 2017'. [Citizenship report, 2017: marathonpetroleum.com]
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"> • Met: Engages with affected stakeholders: According to media reports the company (Tesoro) reached a settlement with the affected families and paid millions of dollars in compensation whilst simultaneously denying allegations by state authorities that it placed the workers in harms way. [Portside article, 10/07/2014: https://portside.org/2014-07-10/four-years-after-deadly-blast-tesoro-mostly-uncscathed#portside.org] • Not met: Encourages linked business to engage affected stakeholders: Marathon Petroleum merged with Andeavor (formerly Tesoro) in 2018. The families of the deceased reportedly also sued Lloyd's Register Energy Americas, a company that advised Tesoro on how to inspect the refinery's maze of high-temperature, high-pressure machinery to engage with the affected families. However there is no public evidence of Marathon Petroleum encouraging Lloyd's to engage with the affected families. [Portside article, 10/07/2014: https://portside.org/2014-07-10/four-years-after-deadly-blast-tesoro-mostly-uncscathed#portside.org] • Met: Provides remedies to affected stakeholders: According to media reports the company has paid out an estimated \$39million in settlement payments to families of the individuals killed in the explosion. [Portside article, 10/07/2014: https://portside.org/2014-07-10/four-years-after-deadly-blast-tesoro-mostly-uncscathed#portside.org] • Not met: Has reviewed management systems to prevent recurrence: The State of Washington had originally sought to impose substantial fines on Tesoro following an investigation into the disaster, however, the company disputed the state's characterization of its safety procedures and inspections and contends the conclusions of the state's investigation were mistaken. In previous statements the company has also said that focusing on personal and process safety is at the core of what it does at the refinery. However there is no public evidence of how the company has reviewed safety procedures. [Spokesman article, 01/09/2017: spokesman.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: The company has reached out of court settlements with the families of the victims killed in the explosion. [Portside article, 10/07/2014: https://portside.org/2014-07-10/four-years-after-deadly-blast-tesoro-mostly-uncscathed#portside.org] • Not met: Has improved systems and engaged affected stakeholders: Steve Garey, a Tesoro machinist and president of United Steel Workers Local 12-591, said in 2014 that his employer (Tesoro) is doing much better at inspecting and fixing old equipment than before the explosion. "With regulators looking over their shoulder as they are now, that's a good thing for us, a safer situation for us right now...We're concerned the employer may begin to go back to their old ways once the oversight ends". However this is only anecdotal evidence and not public information provided by the company. [Portside article, 10/07/2014: https://portside.org/2014-07-10/four-years-after-deadly-blast-tesoro-mostly-uncscathed#portside.org]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.16 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Marathon Petroleum made data public that met one or more elements of the methodology in 11 cases, leading to a disclosure score of 1.16 out of 4 points.
F.2	Recognised Reporting Initiatives	0 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"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Marathon Petroleum met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.