

Company Name POSCO
Industry Extractive
Overall Score (*) 17.0 out of 100

Theme Score	Out of	For Theme
2.4	10	A. Governance and Policies
2.0	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
1.9	20	D. Performance: Company Human Rights Practices
3.1	20	E. Performance: Responses to Serious Allegations
3.8	10	F. Transparency

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

Please note that Occidental Petroleum and Anadarko Petroleum merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Occidental Petroleum.

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"> Met: General HRs commitment: The Company states that it will support and respect internationally recognized standards on human rights, such as Universal Declaration of Human Rights, Guiding Principles on Business and Human Rights, UN Global Compact, OECD Guidelines for Multinational Enterprises, and ISO 26000. [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr & Sustainability Report 2017, 06/04/2019: posco.co.kr] Met: UNGC principles 1 & 2 [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr & Sustainability Report 2017, 06/04/2019: posco.co.kr] Met: UDHR [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr & Sustainability Report 2017, 06/04/2019: posco.co.kr] Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr & Sustainability Report 2017, 06/04/2019: posco.co.kr] Met: OECD [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr & Sustainability Report 2017, 06/04/2019: posco.co.kr]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not met: ILO Core: The Company states that it prohibits child labour and forced labour in both domestic and overseas business sites based on the code of conduct and aforementioned global standards. It also established anti-discrimination policy. However, the Code does not include explicit commitment to respect the freedom of association and the right of collective bargaining. [Sustainability Report 2017, 06/04/2019: posco.co.kr & Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr] • Met: UNGC principles 3-6: The Company states that it supports the Ten Principles of the UN Global Compact in labour, human rights, environment and anti-corruption as a member. [Global Initiatives, 07/04/2019: posco.co.kr] • Not met: Explicitly list All four ILO apply to EX BPs: The Company only states about prohibition of child labour and forced labour, and anti-discrimination in the Code of Conduct for Supplier. The Supplier Code of Conduct 'states fundamental principles which suppliers who supply goods and services to POSCO Group including POSCO, its affiliates and joint venture companies.' [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr & Posco Group Supplier Code of Conduct: steel-n.com:8080] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company states that it prohibits child labour and forced labour in both domestic and overseas business sites based on the code of conduct and aforementioned global standards. It also established anti-discrimination policy. However, the Code does not include explicit commitment to respect the freedom of association and the right of collective bargaining. [Sustainability Report 2017, 06/04/2019: posco.co.kr & Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr] • Met: Respect H&S of workers: The Company states that it considers safety a top-priority value of management and strives to create the safety culture with self-directed safety activities led by the employees. It makes efforts to create a work environment that can more scientifically and effectively protect employees' safety and health. [Safety & Health Management, 07/04/2019: posco.co.kr] • Met: H&S applies to EX BPs: The Company states in the Code of Conduct for Supplier that suppliers shall provide safe and healthy working environment to employees and take proper measures to prevent employees from being exposed to potential safety hazards. In addition, the Supplier Code of Conduct applies to 'suppliers who supply goods and services to POSCO Group including POSCO, its affiliates and joint venture companies.' [Sustainability Report 2017, 06/04/2019: posco.co.kr & Posco Group Supplier Code of Conduct: steel-n.com:8080]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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 <p>Score 2</p> <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: The Company states that recognizing water shortage as a critical global issue, it strives to increase water recycling and develop replacement water sources with the goal of reducing water consumption and increasing co-prosperity with local communities. However, no specific commitment found to respect the right to water and safe access to this resource. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Expects BPs to commit to all these rights
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"> • Met: Regular stakeholder engagement: The Company reports that it expended the frequency of its questionnaire survey to expose violations of human rights to three times a year. The questionnaire survey target was expended to all group affiliate staff, and also included the local employment workforce located overseas in countries, including China and Vietnam. Moreover, it conducted a questionnaire twice a year aimed at eradicating abuses of power by employees towards outsourcing partners. [Sustainability Report 2017, 06/04/2019: posco.co.kr]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: Commits to engage stakeholders in design: The Company states that it has been implementing the improvement in terms of human rights by the reflection of stakeholders' voice into the management through various channels. It operates the grievance mechanism on its website to receive and address stakeholders' questions and grievances. However, evidence seems to be related to accepting and addressing stakeholders' grievances. No evidence found of active participation of affected stakeholders in the development or monitoring of the Company's human rights approach. [Sustainability Report 2017, 06/04/2019: posco.co.kr] Not met: Regular stakeholder design engagement
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"> Met: Commits to remedy: The Company states that the Ethics counselling centre and sexual harassment counselling centre provide counselling services on human rights. It will take prompt actions for human rights issues raised by executives and employees through the company grievance procedure. However, no specific evidence found of a commitment to remedy any adverse impact that it has caused or contributed to. [Sustainability Report 2017, 06/04/2019: posco.co.kr & Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr] <p>Score 2</p> <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	<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: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <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	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"> Met: CEO or Board approves policy: The Code of Ethics is comprised of a message from the CEO on ethical management. The code covers human rights issues. [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr] Not met: Board level responsibility for HRs <p>Score 2</p> <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	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: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	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: Incentives for at least one board member Not met: At least one key EX RH risk, beyond employee H&S <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"> Met: Commits to ILO core conventions: See indicator A.1.2 [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr & Sustainability Report 2017, 06/04/2019: posco.co.kr] Not met: Senior responsibility for HR [Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company states that the ethics counselling centre and sexual harassment counselling centre provide counselling services on human rights. For serious cases, it investigates and takes action promptly. The Company states that the compliance department will handle overall management of the Code of Ethics, which covers human right issues, while operation of the detailed terms will be managed by the relevant department responsible therefor. Executives and department heads should frequently provide education and advice to employees under their control to help them fully understand the Code. [Sustainability Report 2017, 06/04/2019: posco.co.kr & Business Ethic: Code of Ethics, 07/04/2019: posco.co.kr] • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights • Not met: At least one key EX HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: In its website section 'Risk Management', the Company presents a scheme explaining its risk management system which 'is designed for each relevant department to manage different matters and issues' and 'categorizes risks into business risks, non-business risks and disasters/crises'. The Company indicates that 'non-business risks such as the company's ethics, law abidingness and reputation are managed by the Righteous Management Office with the risk self-prevention system'. However, it is not clear whether human rights risks are included in the system. [Risk Management, 07/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
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"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: In its Sustainability Report 2017, the Company states: 'In January every year, a message from the CEO for ethical management is sent out to all employees. At the same time, a pledge is conducted expressing resolve to uphold the Code of Ethics for improving the ethical mindset of employees. In addition, we [...] continuously develop and operate online and offline education programs for our employees. In particular, we have made the business ethics and sexual harassment prevention training offered as online lectures mandatory. We are encouraging all employees to complete a compulsory course within the respective year. In addition to online training, we also providing offline lectures matching each employee level and situation.' [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • 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	0.5	<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 all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Communicating policy to EX contractors and joint ventures: In its Sustainability Report 2017, the Company indicates: 'For our outsourcing partners and suppliers, we offer online education annually on the theory and practice of the Code of Ethics, which serves as a basis for ethical management. For new partners, we hold related briefing sessions for the Pohang and Gwangyang regions together with education and ethical pledges.' In addition, it states: 'All suppliers wanting to conduct trade with POSCO are required to comply with the POSCO Group Supplier Code of Conduct. A digital signature on the e-procurement(steeln.com) website is a prerequisite to transactions with POSCO.' [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Including to EX BPs (removed): See above. In addition, its Supplier Code of Conduct applies to 'suppliers who supply goods and services to POSCO Group including POSCO, its affiliates and joint venture companies.' [Posco Group Supplier Code of Conduct: steel-n.com:8080]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Met: Including on EX BPs: See above
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Trains all workers on HR policy commitments: In its Sustainability Report 2017, the Company states: 'In January every year, a message from the CEO for ethical management is sent out to all employees. At the same time, a pledge is conducted expressing resolve to uphold the Code of Ethics for improving the ethical mindset of employees. In addition, we [...] continuously develop and operate online and offline education programs for our employees. In particular, we have made the business ethics and sexual harassment prevention training offered as online lectures mandatory. We are encouraging all employees to complete a compulsory course within the respective year. In addition to online training, we also providing offline lectures matching each employee level and situation.' [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Trains relevant EX managers including security personnel: See above. In addition, the Company indicates: 'Following the introduction of the Fair Trade Compliance Program in 2002, the CEO affirmed the commitment to fair trade with the declaration of the Code of Ethics in 2003. [...] We have also published fair trade guidebooks for different fields, such as procurement, sales, and conglomerate, to encourage employees to autonomously check legal risks and abide by relevant regulations. Field operations division fair trade consultations amounted to a total of 201 cases in 2017.' However, it is not clear whether training for procurement teams included explicitly human rights. [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Monitoring implementation of HR policy commitments: In its Sustainability Report 2017, the Company indicates: ' POSCO is striving to enable the real practice of the philosophy in everyday life by connecting it to effective systems rather than regarding it only as an ideological declaration. The Ethics Counseling Center and Sexual Harassment Counseling Center provide counseling services on human rights. For serious cases, we investigate and take action promptly. [...] We are putting forth efforts to prevent the infringement of human rights of each employee by exposing the violation such as sexual harassment and abuse of power by the questionnaire survey on human rights. This year, in particular, we conducted another respect for humans questionnaire survey concerning abuses of power towards outsourcing partners with so as to-protect and respect the human rights of our external stakeholders as well. We are also actively preventing the sexual harassment by revising the clause for the protection of victims in the sexual harassment prevention guidelines.' [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Monitoring EX BP's: It adds: 'The suppliers' track record is analyzed and evaluated quarterly by sourcing group and published into a report. The report is then distributed to the suppliers so that they can voluntarily analyze and improve on their strengths and weaknesses. POSCO Group's SRM(Supplier Relationship Management) is comprised of seven categories that include credit, price, quality, delivery, cooperation, safety and the environment to increase or deduct points. The CSR evaluation, covers all aspects of the economy, society, and the environment.' However, it is not clear whether it includes human rights and whether extractive business partners are included in the monitoring process. [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Describes corrective action process: In addition, the Company indicates: 'The ratings of our suppliers designated in the reports are classified into excellent, good, and poor. Suppliers who received a poor rating for a long period of time are restricted in bidding. Upon receiving a poor rating in the annual evaluation report, the supplier is suspended for participating in business for one year and the membership to the sourcing group is also cancelled. Suppliers wishing to re-join the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>sourcing group are required to go through the same procedure for new registration. Meanwhile, suppliers with an excellent rating are named as a POSCO Honored Partner and receive benefits such as primary negotiation rights and exemption from deposits in major contracts.' However, no evidence found on the specific corrective action process that business partners have to carry out in case non-compliances are found. [Sustainability Report 2017, 06/04/2019: posco.co.kr]</p> <ul style="list-style-type: none"> • Not met: Example of corrective action: Although the Company describes ratings, no evidence found on examples of corrective actions carried out. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Discloses % of EX supply chain monitored: The Company states that it examines 'the financial conditions, facility capacity, and other fundamental qualifications of suppliers who wish to engage in business with POSCO, and then register the certified suppliers to each sourcing group to provide them with opportunities for bidding or negotiation. The suppliers' track record is analyzed and evaluated quarterly by sourcing group and published into a report.' However, it is not clear whether human rights are included, and whether extractive business partners are included in the process. [Sustainability Report 2017, 06/04/2019: posco.co.kr]
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"> • Not met: HR affects selection EXs business partners: The supplier code of conduct consists of 21 clauses in 7 categories containing fair trade, quality management, and shared growth related items as well as the basic principles stated in the UN Global Compact such as human rights, labor, the environment, and anti-corruption. All suppliers wanting to conduct trade with POSCO are required to comply with the POSCO Group Supplier Code of Conduct. A digital signature on the e-procurement website is a prerequisite to transactions with POSCO. However, it is not clear whether contractors and extractive business partners are included in this process or only suppliers. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: HR affects on-going EX business partner relationships: In addition, the Company states: 'POSCO Group's SRM(Supplier Relationship Management) is comprised of seven categories that include credit, price, quality, delivery, cooperation, safety and the environment to increase or deduct points. [...] The ratings of our suppliers designated in the reports are classified into excellent, good, and poor. Suppliers who received a poor rating for a long period of time are restricted in bidding. Upon receiving a poor rating in the annual evaluation report, the supplier is suspended for participating in business for one year and the membership to the sourcing group is also cancelled. Suppliers wishing to re-join the sourcing group are required to go through the same procedure for new registration. Meanwhile, suppliers with an excellent rating are named as a POSCO Honored Partner and receive benefits such as primary negotiation rights and exemption from deposits in major contracts.' However, no evidence found of the complete suppliers code and/or human rights performance being included in this process. [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: See above • Not met: Working with EX business partners to improve performance
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"> • Not met: Stakeholder process or systems: In its Sustainability Report 2017, the Company presents a table summarizing its stakeholder engagement activities including Key Issues, Communication channels and objectives per stakeholder group (including local communities). However, CHRB could not find information describing how the Company has identified its affected stakeholders. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Frequency and triggers for engagement [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Engagement includes EX business partners workers [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Engagement includes EX business partners communities: See above. However, the engagement activities with local communities are not related to human rights issues but to: 'Fulfilling social responsibilities to support the development of local communities; Leading the way toward a fair society in cooperation with civic groups and the government; Contributing to creating social value and culture as a corporate citizen' [Sustainability Report 2017, 06/04/2019: posco.co.kr]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: In its Sustainability Report 2017, the Company indicates: 'We not only conduct stakeholder interviews but also listen to the opinions of Social Responsible Investment(SRI) experts, NGOs, sustainability ratings agencies, and academia regarding our major sustainability issues. Accordingly, their opinions are reflected in the sustainability report.' However, no specific evidence found on human rights and how they are taken into account. [Sustainability Report 2017, 06/04/2019: posco.co.kr]

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	0.5	<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: Identifying risks in own operations: The Company states that it 'implements due-diligence to identify, prevent, alleviate and assign due responsibilities for negative impacts on human rights. This includes the assessment of the real and potential impacts on human rights, recording the responses taken to the discovered facts and communication with stakeholders on how the impacts were handled.' The due diligence process presented includes the following steps: Status diagnosis (self-diagnosis at each business site using self-assessment checklist); Overall Organization (organize human rights management diagnosis result and identify the situation); Inspection visit (visit the business site concerned when serious human rights-related risks are perceived) and follow-up action (analyze the situation through investigation, derive improvement plants and implement the related action). [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: identifying risks in EX business partners: See above. It is not clear whether the due diligence process covers relevant business relationships. [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Met: In consultation with stakeholders: See above. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<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: Salient risk assessment (and context): The Company states that it 'implements due-diligence to identify, prevent, alleviate and assign due responsibilities for negative impacts on human rights. This includes the assessment of the real and potential impacts on human rights, recording the responses taken to the discovered facts and communication with stakeholders on how the impacts were handled.' The due diligence process presented includes the following steps: Status diagnosis (self-diagnosis at each business site using self-assessment checklist); Overall Organization (organize human rights management diagnosis result and identify the situation); Inspection visit (visit the business site concerned when serious human rights-related risks are perceived) and follow-up action (analyze the situation through investigation, derive improvement plants and implement the related action). However, CHRB could not find information describing the process for assessing its human rights risks and what it considers to be its salient human rights issues. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Public disclosure of salient risks <p>Score 2</p> <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	<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: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: See indicator B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks: See indicator B.2.3 • Not met: Comms plan re reviewing action plans: See indicator B.2.4 • 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: In its Sustainability Report, the Company states: 'POSCO has been implementing the improvement in terms of human rights by the reflection of stakeholders voice into the management through various channels. The "Sinmungo," or grievance mechanism, which is currently operated on our website(posco.com) and the e-commerce website(steeln.com) has been developed to receive and address stakeholders' questions and grievances. It serves as an online channel to connect between the company and our stakeholders. Through this mechanism, we can receive reports on human rights abuses and ethical violations as well as requests for improvement of unfair practices and consultation in regards to business-related difficulties.' [Sustainability Report 2017, 06/04/2019: posco.co.kr & Report and Counseling center - Sinmungo, Ap 2019: poscoenc.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 Company indicates that the 'reporting/consultation services' are available in 'six languages including English, Chinese, Vietnamese, Iranian, Thai and Indonesian' [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Expect EX BPs to have equivalent grievance system • Met: Opens own system to EX BPs workers: See above.
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	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: In its Sustainability Report, the Company states: 'POSCO has been implementing the improvement in terms of human rights by the reflection of stakeholders voice into the management through various channels. The "Sinmungo," or grievance mechanism, which is currently operated on our website(posco.com) and the e-commerce website(steeln.com) has been developed to receive and address stakeholders' questions and grievances. It serves as an online channel to connect between the company and our stakeholders. Through this mechanism, we can receive reports on human rights abuses and ethical violations as well as requests for improvement of unfair practices and consultation in regards to business-related difficulties.' [Sustainability Report 2017, 06/04/2019: posco.co.kr & Report and Counseling center - Sinmungo, Ap 2019: poscoenc.com] Score 2 <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company indicates that the 'reporting/consultation services' are available in 'six languages including English, Chinese, Vietnamese, Iranian, Thai and Indonesian'. The channel is available online. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Expects EX BPs to have community grievance systems • Met: EX BPs communities use global system: See above. [Sustainability Report 2017, 06/04/2019: posco.co.kr]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales • Met: How complainants will be informed: The Company indicates that 'results [are] sent to applicant's e-mail or via feedback provided through the system'. [Sustainability Report 2017, 06/04/2019: posco.co.kr] Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: The Company sets penalties 'If one takes retaliatory action against other employees who reported an issue regarding ethical management', however CHRB could not find a statement prohibiting retaliation. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Met: Practical measures to prevent retaliation: In its Sustainability Report 2017, the Company indicates: We prohibit all acts that can lead to exposing the identity of informants for this system to work properly. Also we make a stipulation to punish the cases of violation of this prohibition. We ensure the protection of human rights of the informant through holding of 'Informant Identity Protection Pledge Ceremony' by the Corporate Audit Department employee on an annual basis.' [Sustainability Report 2017, 06/04/2019: posco.co.kr] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews living wages definition with unions
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

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)	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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Sustainability Report 2017, the Company states: 'POSCO, as a member of the UN Global Compact, respects the freedom of association and the right of collective bargaining specified in the international guidelines and complies with international standards that are related to the labor acts of each country where we operate our business.' However, no evidence found of commitment and measures put in place to prohibit any form of intimidation or retaliation against workers seeking to exercise these rights. [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses % covered by collective bargaining • 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)	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: Injury Rate disclosures: In its Sustainability Report 2017, the Company discloses information about the number of accidents, lost time injury frequency rate and fatalities in its own operations and in those of its subcontractors. However, it is not clear whether this figures include extractive business partners (suppliers and joint ventures). [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Lost days or near miss disclosures: See above • Not met: Fatalities disclosures: See above <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company has set targets for health and safety: Zero serious accident victims and Accident rate = 0.02. [Sustainability Report 2017, 06/04/2019: posco.co.kr] • 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	<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: Process to identify indigenous rights holders • Not met: How engages with communities in assessment <p>Score 2</p> <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	<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: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <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	<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: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach <p>Score 2</p> <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)	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: Action to prevent water and sanitation risks: The Company states that it 'strives to increase water recycling and develop replacement water sources with the goal of reducing water consumption and increasing co-prosperity with local communities. Considering that steel production uses a large amount of water, POSCO has invested considerable effort into the reuse of water consumed in the process of steelmaking. As a result, in 2017, we recycled 41% of rainwater and wastewater generated from our worksites rather than directly discharging it, and thus contributed to securing water resources for the country.' In addition, the Company states: 'POSCO signed an MOU with Pohang City in 2008 to reuse water treated by the local sewage treatment facilities as a solution to water shortages in local communities. Since 2015, POSCO has been steadily receiving 80,000 tons of treated water a day and using it for industrial use. Moreover, we take 30,000 tons of underground water a day instead of dam water, contributing to solving water shortage in local communities.' [Sustainability Report 2017, 06/04/2019: posco.co.kr] <p>Score 2</p> <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: Posco accused of slash and burn practices and conflict with the local community by Greenpeace • Area: Land rights and FPIC • Story: In a report published on 17 January 2017, Greenpeace, the environmental group, said HSBC, the UK-based bank, had extended financial support to companies "associated with the most unsustainable aspects of palm oil development" Among the controversial companies HSBC is accused of financing, is Posco Daewoo. Greenpeace accuses Posco Daewoo through its subsidiary PT Bio Inti Agrindo of carrying out actions in Papua New Guinea and Indonesia which include deforestation for plantation development, clearance of HCV forest, apparent use of fire for land clearance and violation of the rights of local communities through failure to abide by the principles of "Free prior and informed consent" (FPIC). <p>According to Greenpeace, the company's sole palm oil plantation, of which POSCO Daewoo owns an 85% stake in, is located in the Merauke district of Papua New Guinea. Greenpeace says that PT BIA is one of six large oil palm plantations in this part of Papua that have started clearing forest since 2011, causing a major upheaval in the lives of the indigenous Marind community in the area. This has also caused conflict between the community and the companies. There have been allegations that PT BIA did not obtain the free, prior and informed consent of the entire community before starting work, sacred places have also reportedly been cleared and conflict has broken out between different clans. The 31,406ha concession was expected to start producing palm oil in 2015-2016. According to the report, POSCO Daewoo stated to the Council on Ethics for the Norwegian Government Pension Fund Global in 2015 that it planned to obtain Indonesian Sustainable Palm Oil (ISPO) certification by 2016 and RSPO certification thereafter. However, as of December 2016 it was still not a member of the RSPO. Greenpeace notes this is a breach of HSBC's policy deadline of RSPO membership by June 2014.</p> <ul style="list-style-type: none"> • Sources: [Greenpeace report - 17/01/2017: greenpeace.org][Financial Times - 17/01/2017: ft.com][HSBC response - 20/02/2017: hsbc.com][Greenpeace press release - 21/02/2017: greenpeace.org.uk]
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"> • Met: Public response available: The company said Greenpeace's details of loans from HSBC were inaccurate and it also refuted claims of slash and burn practices and conflict with the local community. [Financial Times article: ft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company's response given to the Financial Times doesn't provide sufficient detail.
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The company says "POSCO respects and supports globally recognized sustainability standards such as the UN Global Compact, OECD Guidelines for Multinational Enterprises, and ISO26000." Under its 'Business Ethics' it says "We will endeavour to listen to the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>opinions of the community and resolve issues of violation of human rights caused by our management activities in the community." However there is no clear commitment to respecting ownership of land. [Code of Conduct: steel-n.com & Business Ethics Practice Guidelines, 07/04/2019: posco.co.kr]</p> <ul style="list-style-type: none"> • Not met: Policies apply to the type of business relationships involved: The company's 'Supplier Code of Conduct' says "Suppliers shall follow laws and regulations related to protection of the environment and understand that protection of the environment is the fundamental social responsibility of enterprises. They also comply with public health and safety in the course of manufacturing process, and minimize negative effects on the environment of the local community and natural resources." However the company doesn't have a clear commitment to respecting ownership of land. [Posco Group Supplier Code of Conduct: steel-n.com:8080] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company doesn't have a commitment to respecting FPIC, nor does it describe how it identifies the legitimate rights of tenure
E(1).3	The Company has taken appropriate action	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: Denies allegations, but has engaged affected stakeholders: The company denies being in conflict with the local community but fails to provide any evidence of engagement with local community members and stakeholders in Indonesia or Papua New Guinea. [Financial Times article: ft.com] • Not met: Denies allegations, but reviewed systems to prevent such impacts: The company denies the allegations against it, however it does not provide any evidence of having reviewed its systems to ensure its sourcing practices and development of palm oil plantations are effective and ensure the respect of local land ownership. [Financial Times article: ft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: The company denies the allegations against it, however it hasn't provided any public information of having reviewed its systems for sourcing palm, nor that it has implemented any recommendations from a review. [Financial Times article: ft.com] • Not met: Denies allegations, and ensures systems prevent such impacts: The company denies the allegations against it, however it hasn't provided any public information about how it ensures its systems will prevent future impacts of its palm oil sourcing on local communities. [Financial Times article: ft.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: 80 workers fired from Posco Assan steel plant for joining union in Turkey, 40 detained after a march • Area: FoA&CB - Sacking union workers • Story: On December 26th, 2017, around 40 workers of Posco Assan in Turkey and leaders of IndustriALL's affiliate Birlesik Metal-Is were detained after they had started a march to demand that the Ministry of Labour issue a legal certificate that the union had already waited 42 days for, contrary to the usual practice of a couple of days. <p>IndustriALL Global Union affiliate Birlesik Metal has applied to the Ministry of Labour for a majority certificate that would give them the legal right to represent the 420 workers. After being beaten by security forces, the marchers were taken to hospital, and eventually to the Security Department at the Kocaeli Governorship. They were all released later the same evening and started again to march the following morning. As the Ministry of Labour and Social security then promised to issue the certificate by December 29th, the union has temporarily halted the march,</p> <p>80 union members have been fired over the previous months. Company managers were allegedly attempting to intimidate workers by telling workers on the factory floor they will never accept or meet with the union.</p> <ul style="list-style-type: none"> • Sources: [IndustriALL Global Union - 27/12/2017: industrial-union.org][IndustriALL Global Union - 06/12/2017: industrial-union.org][BHRRC - 05/01/2018: business-humanrights.org]
E(2).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"> • Met: Public response available: The company provides a response on the BHRRC website denying that the dismissals of workers were related to union activity. In its response the company says "The [Labor] Ministry of Turkey concluded that it was righteous to dismiss workers who harmed the company's operation and work peace by persuading other workers to join the illegal actions such as stopping

Indicator Code	Indicator name	Score (out of 2)	Explanation
			work, slow down etc. The dismissals of employees are not based on union reasons. In fact, it is not technically possible for company to know which employees are unionists. The reasons for the dismissals are violation of the discipline of the workplace with threats and pressures towards our employees." Score 2 • Not met: Response goes into detail: The company does not provide sufficient detail on the details surrounding the dismissal of the employees.
E(2).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised: The company in its '2017 Sustainability Report' says "POSCO, as a member of the UN Global Compact, respects the freedom of association and the right of collective bargaining specified in the international guidelines and complies with international standards that are related to the labor acts of each country where we operate our business." [Sustainability Report 2017, 06/04/2019: posco.co.kr] • Not met: Policies apply to the type of business relationships involved: The company in its '2017 Sustainability Report' says "POSCO Assan TST, located in Turkey, is also operated in compliance with local laws, and the case of dismissal that took place last November was legitimately handled in compliance with labor laws of Turkey. As for the lawsuit on the case of dismissal currently under way, we are waiting for the court's final decision". However this only specifies POSCO Assan TST's (Turkey) compliance with local laws, not with international standards. [Sustainability Report 2017, 06/04/2019: posco.co.kr] Score 2 • Not met: Policies address the specific rights in question: The company doesn't have any publicly identifiable measures in place prohibiting intimidation or retaliation against trade unionists.
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Denies allegations, but has engaged affected stakeholders: The company (POSCO Assan TST) says in response to the BHRRC, "We certainly conducted an investigation into this issue. The Labor Ministry of Turkey also visited POSCO ASSAN TST and investigated the case by meeting the employees who were involved". However there is no details provided as to which employees were met with or what the purpose of the meeting was. [Posco Assan TST response (BHRRC): business-humanrights.org] • Not met: Denies allegations, but reviewed systems to prevent such impacts: The company says "The Ministry concluded that it was righteous to dismiss workers who harmed the company's operation and work peace by persuading other workers to join the illegal actions such as stopping work, slow down etc...We already secured the evidences and testimonies about such illegal activities like threats, prosecution of Kocaeli/Turkey District Attorney's investigation is now opened". There is no information or evidence available of the review. [Posco Assan TST response (BHRRC): business-humanrights.org] Score 2 • Not met: Denies allegations, but implements review recommendations: There is no publicly available evidence of the findings of the review that was conducted by either POSCO Assan TST or the Labor Ministry of Turkey. [Posco Assan TST response (BHRRC): business-humanrights.org] • Not met: Denies allegations, and ensures systems prevent such impacts: There is no publicly available evidence of the findings of the review that was conducted by either POSCO Assan TST or the Labor Ministry of Turkey, nor that the current system will prevent the same impacts occurring in the future. [Posco Assan TST response (BHRRC): business-humanrights.org]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.79 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, POSCO made data public that met one or more elements of the methodology in 17 cases, leading to a disclosure score of 1.79 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 • Met: Company reports on GRI: The Sustainability Report 2017 include a GRI Index. [Sustainability Report 2017, 06/04/2019: posco.co.kr]

Indicator Code	Indicator name	Score	Explanation
F.3	Key, High Quality Disclosures	0 out of 4	<p>POSCO met 0 of the 10 thresholds listed below and therefore gets 0 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"> • 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) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • 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 <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • 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.

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.

