

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Repsol
Industry Extractives
Overall Score (*) 45.8 out of 100

Theme Score	Out of	For Theme
3.9	10	A. Governance and Policies
12.4	25	B. Embedding Respect and Human Rights Due Diligence
7.1	15	C. Remedies and Grievance Mechanisms
9.4	20	D. Performance: Company Human Rights Practices
7.5	20	E. Performance: Responses to Serious Allegations
5.6	10	F. Transparency

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

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

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company states that it 'respect internationally recognized human rights'. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Met: International Bill of Rights: The Company states that their aim 'to respect internally recognized human rights. These rights include those set out in the International Bill of Human Rights...' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] Score 2 • Not met: UNGPs: The Company states that their policy on respect for human rights is based on the UN Guiding Principles on Business and Human Rights "Protect, Respect and Remedy". However, 'based on' is not the same as a commitment. • Not met: OECD: The Company states that their policy on respect for human rights is 'based on' leading international standards, including the OECD Guidelines. However, 'based on' is not the same as a commitment.
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Company states their aim is to 'To respect internationally recognized human rights. These rights include those set out in the International Bill of Human Rights and those established in the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the eight

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Fundamental Conventions that comprise them.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com]</p> <ul style="list-style-type: none"> • Met: All four ILO apply to EX BPs: The Company states that it commits to 'promoting the knowledge and respect for the commitments in this policy among Repsol's contractors and other persons and entities with whom we conduct business.' This is assumed to also cover joint ventures. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: All four ILO Core: The Company explicitly states that they commit to respecting the ILO standards, which ' and the eight Fundamental Conventions that comprise them.', which covers the 4 core ILO. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Met: Respect H&S of workers: The Company has a health, safety and environment policy. The Company states that their aim is 'To carry out all the activities of the Company considering the health of people, safety, and protection of the environment as essential values'. [Health, Safety and Environment Policy, 11/07/2018: repsol.com] • Not met: H&S applies to Ex BPs: In its Ethics and Code of Conduct for Suppliers, the Company indicates: 'Suppliers must perform their activities in order to minimize negative environmental impacts according to the applicable legislation in the host country and Repsol corporate regulations, and reaching a high level of safety in its facilities, products and services, with particular attention to protecting employees, contractors, customers and the local environment. Particularly, when these are carried out at Repsol facilities, the Supplier shall understand and enforce among its employees and subcontractors, all Company Health, Safety and Environment norms applicable to them.' Although, in other policies, the Company states that it applies to 'contractors and other persons and entities with whom we conduct business' (See Human Rights and Community Relations Policy), in this policy it is not clear, that these requirements apply also for extractive business partners (including Joint Ventures). [Ethics and Conduct Code for Suppliers: repsol.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: VPs participant: The Company is a signatory to the Voluntary principles on Security and Human Rights. The Company states in their Human Rights and Community Relations Policy under 'our commitments', 'In the specific case of relations established with public or private security forces, Repsol will act in accordance with the recommendations of the Voluntary Principles on Security and Human Rights.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Met: ILO 169: The Company states under 'our commitments', 'Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respect their rights, in accordance with existing legislation and with International Labor Organization (ILO) Convention 169, whether incorporated into the national legislation of the countries in which we operate or not.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Met: Expects BPs to respect these rights: The Company states that it commits to 'promoting the knowledge and respect for the commitments in this policy among Repsol's contractors and other persons and entities with whom we conduct business.' This is assumed to also cover joint ventures. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: The Company states under 'our commitments' that they recognise and respect the unique nature of indigenous tribal and aboriginal peoples. The Company states 'Their rights include, among others, rights to their lands, territories and resources, their organizational, economic and social structure and their right to free, prior and informed consultation through appropriate procedures and in particular through their representative institutions, with consideration is being given to legislative or administrative measures which may affect them directly, in good faith and with the objective of procuring understanding and helping reaching consent in relation to any proposed mitigation measures. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Not met: Vol Guidelines on Tenure • Not met: IFC performance standards: In a presentation named 'Delivering Value and Resilience through Sustainability' , the Company reported the 'Development of a NEW Global Framework and management system as a result of the integration between Repsol and Talisman, based on leading International Standards (IFC,

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			<p>UNGP, OECD guidelines)'. However, there are no further information, and 'based on' the standard is not sufficient to get the score. [Delivering Value and Resilience through Sustainability, Nov 2017: repsol.com]</p> <ul style="list-style-type: none"> • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water: On its website section 'Good neighbour', the Company indicates: 'Repsol works diligently to mitigate any impacts to water in the areas in which we operate and we do so by committing to a responsible and sustainable water management strategy: Commitment to reducing the amount of fresh water used in our developments; Proper disposal of any non-reused flowback water in a responsible and safe manner and in compliance with provincial regulations; Continual investigation of alternative water sourcing options including deeper groundwater source identification, wastewater water reuse, flowback recycling, and treatment technologies; Where possible, Repsol transports water to its development areas via above ground pipeline to reduce environmental impact and trucking activity in the community; Repsol is committed to engaging in early and meaningful dialogue with communities and landowners to address concerns and share our water management plans.' However, there is no clear commitment to respect the right to water. [Good neighbor program (Canada): repsol.ca] • Met: Expects BPs to respect all these rights: The Company states in their Human Rights and Community Relations Policy 'Promoting the knowledge and respect for the commitments in this policy among Repsol's contractors and other persons and entities with whom we conduct business.' This covers the Company's commitment to FPIC, but the Company has not got a commitment to respecting the right to water. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company states that they have a commitment to 'Promoting transparent and proactive engagement with communities in a timely, honest and culturally appropriate manner at appropriate stages throughout the life-cycle of projects and assets on the basis of an open exchange of information.' The Company also states that their aim is to 'To achieve and maintain strong relationships with communities where the company has presence, based on recognition, trust, mutual respect and shared-value, through proactive engagement and responsible and transparent management of social impacts and opportunities.' In their response to the BHRRC the Company states 'The corporate ESHIA Standard establishes a continuous process of communication with affected stakeholders to ensure that impacts are identified and properly managed.' [Repsol: Business and Human Rights Resource Centre, 10/07/2018: business-humanrights.org & Human Rights and Community Relations Policy, 11/07/2018: repsol.com] <p>Score 2</p> <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	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states under the heading 'our responsibility: respect and remedy' the Company states 'We use all available means to ensure that our activities and decisions will not have negative consequences on human rights, and we do everything possible to address the damage of any such impacts that do occur.' <p>The Company states in its Human rights policy that 'as part of Repsol's commitment to respecting internationally recognised human rights, the Company will prevent its activities from causing negative consequences for human rights and will endeavour to repair the damage...If Repsol determines that it has caused or contributed to causing negative consequences for the human rights of local communities, it undertakes to repair them or contribute to their repair by legitimate means'. [Sustainability Report, 2016: repsol.com]</p> <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: 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	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: CEO or Board approves policy: The Human Rights and Community Relations Policy states 'This policy was approved by Repsol's Corporate Executive Committee on March 21st, 2017.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Met: Board level responsibility for HRs: In its 'Regulation of the Board of Directors of Repsol S.A.', the Company sets out the duties of the Sustainability Committee: 'Be familiar with, promote, steer, and oversee the Company's objectives, action plans, and practices in the areas of corporate social responsibility and sustainability, including human rights, health, safety and occupational risk prevention, employment, diversity and inclusion, equal opportunity and reconciliation, ethics and conduct, environment, biodiversity, climate change measures, emissions reduction, community relations, as well as the efficient and responsible use of resources. The evaluation of compliance therewith shall also correspond to it'. In addition, in its Integrated management Report, the Company indicates: 'The Repsol Sustainability model identifies, systematizes and launches actions which contribute to sustainability development, where the Board of Directors and the Sustainability Committee play a key role. The Board approves the Company's strategy and policy on sustainability and corporate governance, while the Committee is aware of and orients the Company's policy, objectives and guidelines with respect to environmental, social and safety matters. In 2017, this Committee held four meetings and addressed the following: <ul style="list-style-type: none"> • Sustainability Policy and Global Sustainability Plan. • Risk Map. • Sustainability Report 2016 and Sustainability Website. • Scorecard, indicators and fulfilment of Safety and Environment targets. • Energy and climate change: progress and commitments of OGCI and OGCI-Climate Investment, E&P emission reduction target, challenges of energy transition and Company's position in carbon capture, use and storage. • Progress on Circular Economy Strategy. • Progress and significant issues in Community Relations and Human Rights. • Self-assessment of the Sustainability Committee.' [Rules and regulations for the Board of Directors: repsol.com & Integrated management Report, 2017: repsol.com] <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: In its Integrated management Report, the Company indicates: 'The Repsol Sustainability model identifies, systematizes and launches actions which contribute to sustainability development, where the Board of Directors and the Sustainability Committee play a key role. The Board approves the Company's strategy and policy on sustainability and corporate governance, while the Committee is aware of and orients the Company's policy, objectives and guidelines with respect to environmental, social and safety matters. In 2017, it addressed, among other topics: Sustainability Policy and Global Sustainability Plan; Risk Map; Scorecard, indicators and fulfilment of Safety and Environment targets; Progress and significant issues in Community Relations and Human Rights; Self-assessment of the Sustainability Committee.' [Integrated management Report, 2017: repsol.com] • Not met: Examples or trends re HR discussion: See above. However, no specific discussion found on the topics mentioned. The Company also indicates that 'As part of the process of integration with Talisman, we reviewed and strengthened the framework to manage community relations and human rights.' However, it is not clear whether this review was conducted by the board or a committee. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	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: Incentives for at least one board member: In its 'Annual report on the remuneration of Directors', the Company indicates that the AVR of the CEO considers, among its different targets, 'Sustainability objectives, with a global weight of 5% and metrics linked to the accident frequency rate and fatalities (5%)'

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			, however, it is not clear if these health and safety targets include the health and safety of local communities and workers of extractive business partners. [Annual Report on the Remuneration of Directors, 2017: repsol.energy] <ul style="list-style-type: none"> • Not met: At least one key EX RH risk, beyond employee H&S: See above [Annual Report on the Remuneration of Directors, 2017: repsol.energy] Score 2 <ul style="list-style-type: none"> • Met: Performance criteria made public: See above [Annual Report on the Remuneration of Directors, 2017: repsol.energy]

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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior responsibility for HR (inc ILO): The Company explains in a presentation some responsibilities from its senior management related with its Sustainability Strategy: 'Participation of the Senior Management in setting strategic objectives for social, safety and environmental, 2020. [...] Periodic review of the Company's' Sustainability performance by senior Management.' However, there is no further information on how specific responsibilities for human rights issues is assigned within the Company. [Delivering Value and Resilience through Sustainability, Nov 2017: repsol.com] Score 2 <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: The Company states in a presentation that one of its commitments to Sustainability is the 'Establishment of objectives linked to social, safety and environmental targets, for all employees with variable remuneration (global weight of 10%)'. In addition, in its Integrated Management Report, the Company indicates: 'Further, senior management, defines the Company's objectives, action plans and practices with respect to sustainability. To ensure the deployment of sustainability policies, targets and guidelines, sustainability targets account for up to 5% of the CEO's annual variable remuneration, and up to 10% of the multi-year variable remuneration implemented through long-term incentive plans for executives and other employees, including the CEO and General Counsel Secretary'. [Delivering Value and Resilience through Sustainability, Nov 2017: repsol.com] <ul style="list-style-type: none"> • Not met: At least one key EX HR risk, beyond employee H&S: See above. In case if health and safety is the only issue for which there is a performance incentive, it should include the health and safety of local communities and workers of extractive business partners. Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR part of enterprise risk system: The Company states 'Conducting continuous human rights due diligence in our activities. This means: identify and assess potential impacts of our activities on human rights before undertaking a new activity or business relationship, and when relevant operational changes occur; integrate the conclusions in Repsol's internal processes; take appropriate prevention and mitigation measures; monitor the effectiveness of the measures adopted; and externally communicate the measures adopted.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Communicates its policy to all workers in own operations: The Company states 'in order to properly disseminate the content of the new Code of Ethics and Conduct, we have worked on developing mandatory training actions for all employees, which are to take place throughout 2017. In 2016, the Ethics and Conduct course was completed by 2,483 employees. The Code of Conduct covers the company's human rights obligations. The code is published in English and Spanish. [Sustainability Report, 2016: repsol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Communication of policy commitments to stakeholder: In its Communication Policy, the Company commits to follow a principle of 'Proactive and planned communication management with our stakeholders'. However there is no further information on how it communicates its human rights policy commitments to stakeholders including local communities and potentially affected stakeholders. [Communication Policy: repsol.com] • 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: Steps to communicate policy commitments to BRs: Although in the context of explaining anti-corruption measures, the Company indicates that the Suppliers' code of ethics is provided to 'all suppliers through the General Conditions for Purchasing and Contracts in the bidding processes and tenders in which they take part, and it is required from suppliers in rating and audit questionnaires'. This code contains commitment to human rights and particularly to respect the Principles concerning fundamental rights as set out in the ILO Declaration. [Integrated management Report, 2017: repsol.com & Ethics and conduct code for suppliers: repsol.com] • Not met: Including to EX BPs: As indicated above, the communication explained focuses in suppliers, and it is not clear how the code is communicated to extractive business partners. [Integrated management Report, 2017: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above. [Integrated management Report, 2017: repsol.com & Ethics and conduct code for suppliers: repsol.com] • Not met: Including on EX BPs
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Trains all workers on HR policy commitments: The Company has an objective for 2017 to train all workers on the Company's Code of Ethics. Furthermore the Company states 'In order to properly disseminate the content of the new Code of Ethics and Conduct, we have worked on developing mandatory training actions for all employees, which are to take place throughout 2017. In 2016, the Ethics and Conduct course was completed by 2,483 employees.' In addition, in its Integrated Management Report 2017 the Company provides information about the number different human rights training actions, such as the Number of employees trained in human rights (online) : 519. However, it is not clear whether all employees were trained or are actually being trained. [Sustainability Report, 2016: repsol.com & Integrated management Report, 2017: repsol.com] • Met: Trains relevant managers including security personnel: On its website section 'Training - Human Rights', the Company indicates: 'We pay attention to corporate security and support training in human rights, which we believe is essential for ensuring that external security staff comply with the national and international laws in force. Training helps to prevent arbitrary or discriminatory behaviour that results in physical or moral violence against people. We design internal training plans to instil knowledge about human rights in the private security teams, and we give them the tools they need to carry out the plans. These training sessions cover topics such as the constitutional principles that uphold the rule of law, the importance that each individual fulfils his or her responsibilities, regulations about forced labor and coercion, child labor, discrimination, and constitutional rights, such as the right of assembly or the freedom of association.' [Training - Human Rights: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Monitoring implementation of HR policy commitments: In its Integrated Management Report, the Company indicates: 'Repsol has procedures and a global framework in place to ensure the appropriateness and observance of all its obligations, whether internal or external, in every regulatory area. The Company's Compliance function helped strengthen the global compliance culture and improve identification, monitoring and support in management of ethics and conduct risks. [...] The Company has an Ethics and Compliance Channel (ethicscompliancechannel.repsol.com) that is accessible 24 hours a day, 7 days a week and is managed by an external supplier. The channel allows employees or any

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			<p>third party to report, with absolute confidentiality, queries and possible breaches of the Ethics and Conduct Code or the Crime Prevention Model.' However there is no further information about its procedures and a global framework put in place to ensure compliance beyond its Ethics and Compliance Channel. [Integrated management Report, 2017: repsol.com]</p> <ul style="list-style-type: none"> • Not met: Monitoring EX BP's: On its website section 'Suppliers and contractors', the Company indicates: 'We assess our suppliers to identify the economic, technical, social, ethical, and environmental risks in the various phases of our business relationship. [...] we assess the supplier's performance by analysing their compliance with the required aspects related to management, quality, safety, environment, labor, ethics, and human rights. This assessment also helps to complete the information on the supplier or contractor during the re-rating process and serves to establish a systematic, documented process to follow in the assessment of suppliers and contractors.' In addition, in its 'Suppliers and contractors: How we monitor performance and compliance' document, it states: 'At least one annual performance evaluation is mandatory for all high criticality suppliers who have provided some good or service in the past year. [...] All the various audits allow us to identify and assess the impact of suppliers on work practices, human rights and corruption, as well as health, safety, and environment. Our analyses of various issues are more detailed when the criticality of the supplier is greater due to the nature of the good or service provided, or the place of manufacture or provision.' However, it is not clear if extractive business partners are included in the monitoring process. [Suppliers and contractors: repsol.energy & Suppliers and contractors: How we monitor performance and compliance: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection extractives business partners: The Company states in their Code of Ethics and Business Conduct 'Our suppliers and business partners are essential to our ability to do business and meet our high standards and expectations - that is why we choose them carefully, perform, as appropriate, due diligence on financial and non-financial aspects such as HSE, Human Rights or Anti-Corruption, among others, and use an objective and impartial selection process. ' The Company also discloses that 100% of new suppliers were examined in accordance with human rights social, labour and environmental criteria in the 2017 Sustainability Report. [Code of Ethics and Business Conduct, 27/07/2016: repsol.com & Sustainability Report, 2017: repsol.com] • Met: HR affects on-going business partner relationships: The Company indicates: 'Through qualification, suppliers are granted approval to provide their goods or services for a maximum of four years, although proof of qualification must be presented continually (specific for each activity) for validation and verification.[...] Our performance evaluations establish a systematic evaluation process documenting the most relevant aspects of our relationships with our current suppliers.[...] With this evaluation, we aim to: [...] Have a tool with which to maintain or modify supplier qualification status; Consider additional criteria to be taken into account when choosing suppliers to participate in calls for tender.[...] Suppliers or contractors that fail to meet our standards and requirements are not authorised to participate in calls for tender, nor can they be awarded orders or contracts.' [Suppliers and contractors: How we monitor performance and compliance: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<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: Stakeholder process or systems: The Company has a commitment in their human rights policy to 'Assessing and understanding the social and economic context where we operate in order to identify all groups within the communities in our area of influence, especially vulnerable groups.' In its Submission to the BHRRC Company Action Platform, the Company describes its approach to the engagement to stakeholders on human rights issues. It discloses who are their global, national and centre of operations level stakeholders, and within the latter group, their stakeholders are 'local communities and their institutions, and the organisations of the local civil society. Their concerns include all the above ['workplace safety, job

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			<p>creation, the diversity of the workforce, the integration of people with disabilities, the work-life balance and the payment terms for purchases and contracts', as well as local jobs, the company's participation in community initiatives and monitoring environmental micro-impacts, among others'. [Repsol: Business and Human Rights Resource Centre, 10/07/2018: business-humanrights.org & Human Rights and Community Relations Policy, 11/07/2018: repsol.com]</p> <ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement • Met: communities in the SC engaged: In its Integrated Management Report, the Company states: 'Repsol is currently conducting seventeen operations in seven countries (Bolivia, Canada, Colombia, Ecuador, Papua New Guinea, Peru and Russia) that are taking place near or are adjacent to the territories of indigenous communities. <p>All the aforementioned operations have at least one of the following elements: public consultation and consultation plans; reference studies; social impact assessments and action plans; relocation plans, community development plans; claim and complaint procedures; and other documents from community information centers. 100% of significant assets have development programs for local communities based on the needs of the latter and participation plans for stakeholders based on their geographic distribution' [Integrated management Report, 2017: repsol.com]</p> <p>Score 2</p> • Not met: Analysis of stakeholder views and company's actions on them

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

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B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The Company has a commitment in their Human Rights and Community Relations Policy to conduct continuous human rights due diligence in their activities. The Company states that 'This means: identify and assess potential impacts of our activities on human rights before undertaking a new activity or business relationship.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Met: identifying risks in EX business partners: The Company has a commitment in their Human Right sand Community relations Policy to: " Acting with due diligence in human rights when establishing business relationships. Make all reasonable efforts to prevent or mitigate negative impacts on human rights directly related to operations, products or services provided through our business relationships (which includes relations with partners, suppliers, contractors, including private security contractors, commercial distributors, as well as any other private or public entities, including public security forces, directly related to our operations, products or services). In the specific case of relations established with public or private security forces, Repsol will act in accordance with the recommendations of the Voluntary Principles on Security and Human Rights. Repsol expects our business relationships to respect human rights when conducting their activities anywhere in the world, and, accordingly, address the negative impacts in which they have involvement.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: As above. • Not met: In consultation with stakeholders: However, communities evaluate actions carried out by the Company following a HRIA. [Success Stories: Human Rights Impact Assessment in Alta Guajira: repsol.com] • Met: In consultation with HR experts: In its 'Human Rights Impact Assessment: Peru BU Division' document, the Company indicates that its Human Rights Impact assessment in Block 109 was conducted by a crosscutting and multidisciplinary team which included local and international consultants (human rights experts and ESHIA expert). [Human Rights Impact Assessment. Walking the talk - Community Relations – Peru BU Division: repsol.com] • Met: Triggered by new circumstances: The Company states in their Human Rights and Community Relations Policy that they have a commitment to 'Conducting continuous human rights due diligence in our activities. This means: identify and assess potential impacts of our activities on human rights before undertaking a new activity or business relationship, and when relevant operational changes occur...' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Explains use of HRIAs or ESIA (inc HR): The Company states that '100% of significant operations manage opportunities and risks by taking into account at least one of the following mechanisms: development mechanisms, impact assessments, or the participation of stakeholders. All the impact assessments performed in 2017 included social and human rights issues.' [Sustainability Report, 2017: repsol.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context): The Company conducted a materiality study in 2016, in line with GRI indicators, and included an updated version in their 2017 Sustainability report. The study is based on 'online surveys for stakeholders to identify and prioritize economic, social and environmental issues that are deemed to have a high impact and importance. This year, the consultation was expanded, including customers within the groups consulted in the previous study: employees, suppliers and contractors, investors, international bodies and representatives of civil society. [Sustainability Report, 2017: repsol.com] • Met: Public disclosure of salient risks: In the assessment described above, issues relating to Human Rights due diligence, and human rights in the supply chain, and non-discrimination were considered 'high importance' and labour relations and indigenous peoples rights were considered of 'medium importance'. The Company then notes where they discuss these risks earlier in the report. [Sustainability Report, 2017: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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"> • Not met: Action Plans to mitigate risks: However, the Company discloses the human rights impact assessment in the Context of its operations in Peru, which includes a process to identify actions following impact assessments, and the definition of monitoring actions. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com & Global Sustainability Plan, 2017: repsol.com] • Met: Example of Actions decided: The Company's 'Good Neighbour program' in Canada includes water management commitment on actions to 'mitigate any impacts to the water areas in which we operate'. It includes continual investigation of alternative water sourcing options including deeper groundwater source identification, wastewater water reuse, flowback recycling, treatment technologies, engaging in 'early and meaningful dialogue with communities and landowners to address concerns and share our water management plans'. [Global Sustainability Plan, 2017: repsol.com] • Met: Including amongst EX BRs: The Company indicates that before acquiring an asset, it assess existing and potential risks and carry out a due diligence process. Following the assessment, 'we generally use a joint operating agreement (JOA) model that define the responsibilities and limits each partner has in the operation and management of an asset. We have a specific norm that expressly indicates that the operator must respect internationally recognized human rights. Human rights must not be infringed upon, and if they are, there will be consequences. We conduct periodic controls to ensure the [three] previous points have been met'. <p>Score 2</p> <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	<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: System to check if Actions are effective: The Company has a commitment in their human rights policy to 'monitor the effectiveness of the measures adopted' as part of their human rights diligence process. However, the Company does not describe its global system to take action to prevent, mitigate or remediate it's salient human rights issues. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <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	0.5	<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: Comms plan re identifying risks: The Company describes its process to identify its human rights risks and impacts in specific locations or activities and its global system in place to identify its human rights risks and impacts on a regular basis across activities. (See B.2.1)

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Comms plan re assessing risks: The Company describes its process for assessing its human rights risks and what it considers to be its salient human rights issues, including how factors are taken into account. (See B.2.2) • Not met: Comms plan re action plans for risks: The Company provides an example mitigate or remediate its salient human rights issues, and how it engages with business partners following due diligence assessments. However, not clear how the global system works to take plans against salient issues identified in general (See B.2.3) • Not met: Comms plan re reviewing action plans • Not met: Including EX BRs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: In its Integrated Management Report, the Company indicates: 'Answering the grievances, concerns and complaints of local communities helps anticipate and respond to potential disagreements that may affect the activities of the Company. The nature of such mechanisms is special and unique in each setting. In 2017, the Company received 82 grievances related to human rights through 14 grievance mechanisms in 7 countries. Some 68 were resolved and 14 are still being handled.' However, there is no information about how the Company responded to specifics human rights concerns raised by, or on behalf of, affected stakeholders. [Integrated management Report, 2017: repsol.com] • 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	<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: Channel accessible to all workers: The Company has an Ethics and Compliance Channel, which is a confidential channel to ask questions and raise concerns about possible breaches of Repsol's Code of Ethics and Business Conduct. The service is available via web and phone and is available 24 hours a day, seven days a week. The Channel is for 'company employees and any third party to ask questions about or confidentially report potential breaches of the Code of Ethics and Business Conducts, which covers human rights. [Human rights: Incident Reporting Channels, 11/07/2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: The Company reports that In 2017, the Company received 82 grievances related to human rights through 14 grievance mechanisms in 7 countries. Some 68 were resolved and 14 are still being handled. [Sustainability Report, 2017: repsol.com] • Not met: Channel is available in all appropriate languages • Not met: Expect EX BPs to have equivalent grievance system • Met: Opens own system to EX BP workers: On its website section 'Ethics and transparency', the Company indicates: 'The Repsol Ethics & Compliance Channel is a confidential means for company employees and any third party to ask questions about or confidentially report potential breaches of the Code of Ethics and Business Conduct or the Crime Prevention Model without fearing reprisals. It is run by the independent company Navex, and the hotline is available 24/7.' [Ethics and Transparency, 11/07/2018: repsol.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company has a third-party operated grievance mechanism 'Ethicspoint' which can be accessed by third-parties. In addition, the Company states that they have a commitment to 'Establishing grievance mechanisms at the operational level, from the start of our activities, so people directly affected by our assets can notify Repsol of any situation of possible impact on human rights.' The Company states 'As of today, there is a reporting channel for most of our operations to handle claims mainly from local communities but also from suppliers, contractors, and other organizations.' [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Company states that they implement incident reporting channels through following an extensive process based on the following system: 1. Establish Operational Grievance Mechanisms on Site, 2. Follow IPIECA Project Methodology, 3. Develop a guide on how to efficiently implement grievance mechanisms, 4. Implement new projects and improve existing ones, 5. Monitor and control. However, the Company does not disclose the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>accessibility and local languages of the grievance mechanism. [Human rights: Incident Reporting Channels, 11/07/2018: repsol.com]</p> <ul style="list-style-type: none"> • Not met: Expects EX BP to have community grievance systems • Not met: EX BP communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system: Regarding its grievance procedure, the Company discloses in its Submission to the BHRRC Company Action Platform that 'Whenever possible, Repsol will continue consulting those affected, at whom these mechanisms on its design and operation are aimed' and that in 2013, it developed a pilot project to enhance the effectiveness of the procedure. This pilot project 'ran throughout the year, working with indigenous communities. Throughout the duration, we reviewed the mechanism together with local communities to enhance its effectiveness. Given that a grievance mechanism only works if the people it is designed for have faith in it and know how it works, the mechanisms had to be adapted to the logistical context and local culture, in collaboration with local communities. We held meetings with indigenous federations in the area, community authorities, socio-environmental monitoring teams and other groups representing local communities. At these meetings, we addressed issues such as submitting grievances, the investigation process, the concept of a grievance, fairness, timetables and the best way of promoting the mechanism to ensure that local communities are aware of it'. This document gives some examples of grievance channels adapted to the local environment and context: in Bolivia, in Ecuador and Peru (the Xprésate channel), in Brazil (the Fale Repsol), in Colombia, in Ecuador and in Australia. [Repsol: Business and Human Rights Resource Centre, 10/07/2018: business-humanrights.org] • Met: Description of how they do this: As above. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Engages with users on system performance: As above. • Met: Provides user engagement example on performance: As above. • Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Ethicspoint line is managed by third-party provider Navitex. The Company discloses 'Whenever a concern is raised regarding any potential breaches through this channel, this is then reported to the company departments in charge of managing such matters and carrying out the corresponding investigations.' The Ethicspoint website discloses 'Repsol uses NAVEX Global's case management application called EthicsPoint to support the administration of the Repsol Ethics & Compliance Channel. EthicsPoint is hosted on NAVEX Global's secure servers to prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within Repsol who are responsible for evaluating the reports. Any report you make will be kept confidential to the fullest extent possible consistent with the law and good business practices.' [Repsol Ethics Point, 11/07/2018: secure.ethicspoint.eu] • Met: How complainants will be informed: The Ethicspoint website states 'Once you submit a question or concern via phone or web, you will receive a report key and password which can be used to follow up on your case. Then, an electronic summary is sent to a Case Manager within Repsol's Ethics and Compliance team for review and to determine next steps.' [Repsol Ethics Point, 11/07/2018: secure.ethicspoint.eu] <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	1.5	<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: Public statement prohibiting retaliation: The Company states its leaderships responsibility to 'Make sure that no one who speaks up suffers retaliation.' Furthermore the Company states 'Personnel can report possible concerns in confidence and without fear of retaliation. We will not tolerate any retaliation against anyone who in good faith asks questions, makes a report of actions that may be inconsistent with our Code, policies, laws or regulations, or who assists in an investigation of suspected wrongdoing.' [Code of Ethics and Business Conduct, 27/07/2016: repsol.com] • Met: Practical measures to prevent retaliation: The Ethics point reporting mechanism is managed by an independent third party and reports are kept secure and confidential. The website states 'Repsol uses NAVEX Global's case management application called EthicsPoint to support the administration of the Repsol Ethics & Compliance Channel. EthicsPoint is hosted on NAVEX Global's secure servers to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within Repsol who are responsible for evaluating the reports. Any report you make will be kept confidential to the fullest extent possible consistent with the law and good business practice' [Repsol Ethics Point, 11/07/2018: secure.ethicspoint.eu]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BRs to prohibit retaliation: The Code of Ethics and Business Conduct, which covers provisions of non-retaliation, applies to contractors and non-operated joint venture business partners. [Code of Ethics and Business Conduct, 27/07/2016: repsol.com]
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: In its Code of Ethics, the Company indicates: ' in the course of business you may receive inquiries or requests for information from government officials or regulatory agencies. If you learn of a potential government investigation or inquiry, immediately notify your direct supervisor and Legal, prior to taking or promising any action. You are expected to fully cooperate and ensure that any information you provide is true, clear and complete. <p>With respect to all audits, investigations, and inquiries, you must NOT:</p> <ul style="list-style-type: none"> • Destroy, alter, or conceal any document in anticipation of or in response to a request for these documents. • Provide or attempt to influence others to provide incomplete, false, or misleading statements to a company or government investigator. • Conduct an investigation yourself; appropriate resources will be assigned to conduct the investigation. <p>However, there is no commitment not to impede access to state-based judicial or non-judicial mechanisms or other available mechanisms for persons who make allegations of adverse human rights impact. [Code of Ethics and Business Conduct, 27/07/2016: repsol.com]</p> <ul style="list-style-type: none"> • 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	0.5	<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: Describes how remedy has been provided: The Company states 'The Company uses all the means at its disposal to prevent its activities or decisions from having adverse impacts on human rights, and will do all it can to repair the damage when such impacts occur.' The Company describes how they have been reviewing their remedy process, and have a commitment to maintain sound relations with 100% of the communities in the area of influence of its projects and assets. However, the Company does not describe how they provide for remedy. [Sustainability Report, 2017: repsol.com] • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: In its Global Sustainability Plan 2016, the Company implemented some actions in order to improve its performance on human rights, such as: 'In order to integrate the assessment and management of social risks in project risk assessment processes, we will design a specific methodology that will address social and human rights risks in depth. We will also develop pilot workshops in countries where social risks have been identified.[...] • We will conduct internal audits to analyse the degree of implementation of the Voluntary Principles on Security and Human Rights in the business units that we consider most sensitive to security and human rights-related risks. [...] We will develop the lines of work for implementing the Security and Human Rights Voluntary Principles in 2016, both at corporate and country level, under the implementation plan designed for the period 2016-2018.' [Global Sustainability Plan, 2016: repsol.com] • Not met: Approach to learning from incident to prevent future impacts • Met: Evaluation of the channel/mechanism: The Company describes how they have been reviewing their remedy process. As part of this process the Company states that 'In 2017, the Company defined this vision as the starting point for its roadmap. It has conveyed this commitment by reviewing the internal rules that regulate its processes and activities as the first phase of this transition from reactive strategies of conflict resolution to preventive management based on risks, impacts and opportunities. For this reason, in 11 especially important countries

Indicator Code	Indicator name	Score (out of 2)	Explanation
			in social matters, 11 workshops were conducted, with the participation of nearly 200 people, to shore up the management of risks, impacts and social opportunities, and to consolidate a network of professionals who manage these relations with communities. ' [Sustainability Report, 2017: repsol.com]

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: The Company's 2017 sustainability Report states that "wages are established for a position without taking into account the gender of the person holding the position, including entry-level wages." Furthermore, it states that "entry-level wages are above the local minimum wage." In its Integrated Management Report, the Company discloses the minimum wage paid per country and although in many countries Repsol wage is above national minimum wage (in some cases being almost 6 times minimum wage as in Bolivia), there are some cases where Repsol wage is equal or almost equal to minimum wage (Peru or Portugal). In addition, no mention or definition of the living wage or a target timeframe to implement a living wage. [Sustainability Report, 2017: repsol.com & Integrated management Report, 2017: repsol.com] • 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 livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	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"> • Not met: Member of EITI: On its website, 'responsible tax policy', the Company states that 'our membership to the EITI voluntarily commits us to publishing what we pay in each country where we operate, it also commits governments to disclose what they receive'. However, Repsol does not appear on the EITI members' registry document. [Ethics and Transparency, 11/07/2018: repsol.com] • Met: Reports of taxes beyond legal minimums: Repsol states in its Sustainability Report 2018 that the Company is subject to additional taxes such hydrocarbon production royalties, local taxes and fees, employment taxes and social security contributions. [Sustainability Report, 2016: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: Repsol publishes a breakdown of the "taxes effectively paid in 2017 , by country" [Sustainability Report, 2017: repsol.com & Tax contribution per country: repsol.com] • 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)	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"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Although the Company commits to respect the 'Right to organize and right to collective bargaining', there is no information about the steps put in place to avoid intimidation or retaliation against workers seeking to exercise these rights. [Human Rights: Our commitment: repsol.com] • Met: Discloses % covered by collective bargaining: The Company provides data on the "percentage of total employees covered by collective bargaining agreements." Although 100% of Spanish Repsol workers are covered by collective bargaining agreements, the proportion varies among countries. [Sustainability Report, 2017: repsol.com] <p>Score 2</p> <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)	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: Injury Rate disclosures: Repsol discloses that the Total Recordable Injury Rate (which measures the total number of injuries including fatalities, lost time injuries, medical treatment and restricted work accumulated within the period per million hours worked) was 1.43 in 2017 and 1.46 in 2016.Repsol discloses that the Lost Time Injury Frequency rate (per million work hours) was 0.71 in 2017 and 0.69 in 2016. [Sustainability Report, 2017: repsol.com] • Met: Fatalities disclosures: Repsol reports 0 company employee and contractor staff fatalities in 2017. [Sustainability Report, 2017: repsol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company's 2018 Sustainability Presentation states that Repsol "have established targets to reduce PSIR (process safety injury rate) and occupational safety (lost time injury frequency rate and total recordable injury rate)." [Delivering Value and Resilience through Sustainability, 03/2018] • Met: Met targets or explains why not: According to data from the Company's 2017 Sustainability Report Healthy and Safety Goals are being met. This is represented visually on the occupational safety chart displayed in the Company's 2018 Sustainability presentation. The Company explains that safety targets are being achieved due to "systematic risk management" and a "focus on process safety." [Sustainability Report, 2017: repsol.com & Delivering Value and Resilience through Sustainability, 03/2018]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (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: Process to identify indigenous rights holders: Repsol's Human Rights and Community Relations Policy states the following "Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respect their rights, in accordance with existing legislation and with International Labour Organization (ILO) Convention 169, whether incorporated into the national legislation of the countries in which we operate or not." However, the Company has not published any public document that describes its process to identify and recognise affected or potentially affected indigenous peoples to be awarded this score. [Human Rights and Community Relations Policy, 11/07/2018: repsol.com] • Met: How engages with communities in assessment: Repsol is currently conducting 17 operations in 7 countries that are taking place near or next to the territories of indigenous communities. All operations have at least one of the following elements: public consultation and consultation plans; reference studies; social impact assessments and action plans; relocation plans, community development plans; claim and compliant procedures; and other documents from the community information centres. [Sustainability Report, 2017: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to FPIC (or ICMM): Repsol "recognises indigenous peoples right to free prior and information consultation in accordance with Article 169 of the International Labour Organisation." [Annual Report on Engagement with Socially Responsible Investors, 2016/2017: repsol.com] • Met: Gives recent example FPIC or dropping deal: In its 'Repsol ensures First Nations and Métis communities have the opportunity to review our proposed development activities and identify any potential impacts. We conduct field site visits where community Elders and monitors appraise the proposed development project area for potential impacts to their treaty rights and traditional uses prior to proceeding with surface land acquisition and regulatory approval phases.[...] The First Nations community engaged Alberta Culture and Tourism (ACT) to review these findings as it is their duty to designate Aboriginal historical and cultural sites throughout Alberta under the Historical Resources Act. The First Nations community requested that this site be protected and avoided. ACT acknowledged the identified sites and all parties discussed the need to maintain a buffer from these sites. Repsol agreed to move the compressor to a new location and maintain a safe buffer from the traditional sites.' [Canada - Repsol Community Report, 2017: repsol.ca]
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: Although the Company reports the 'Development of a NEW Global Framework and management system as a result of the integration between Repsol and Talisman, based on leading International Standards (IFC, UNGP, OECD guidelines)', there is no further information on how it identifies legitimate tenure rights holders, or on its approach to identifying legitimate tenure rights holders generally. [Delivering Value and Resilience through Sustainability, Nov 2017: repsol.com] • Not met: Describes approach to doing so if no recent deals: See above <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (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"> • Met: How implements security (inc VPs or ICOC): Repsol is a signatory to the Voluntary Principles on Security and Human Rights (VPSHR) initiative." Repsol demands from private security firms that employees rendering services in its facilities should have training or take courses in human rights. In addition, in some countries like Columbia and Peru, the public security forces receives specific training in human rights. [Sustainability Report, 2017: repsol.com] • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach: In its 'Suppliers and contractors: How we monitor performance and compliance' document, the Company indicates that it evaluates the management of security forces and training' in its regular supplier evaluation process. However, it is not clear if extractive business partners are included in this evaluation process. [Suppliers and contractors: How we monitor performance and compliance: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities: Under the section for "Security and Human Rights" in the Company's 2017 Sustainability Report it is stated that "there have been no incidents related to violations of indigenous people rights reported to the whistle-blower channel" and that there have been no involuntary resettlements. However, there is no information to indicate that Repsol have assessed and involved the local community in the course of maintaining human rights security. [Sustainability Report, 2017: repsol.com] • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action to prevent water and sanitation risks: Repsol has defined a water management improvement action plan for 2015-2020 that is specific to each installation. In addition, the Company carries out assessment using the Repsol Water Tool (RWT) and includes parameters that look at the internal management within a facility (e.g. future water availability, social risks and regulatory risks) as well as external ones (e.g. water use indicators and water treatment technology). [Environment: Water Management, 2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors: Repsol states in its Sustainability Report for 2017 "target: develop initiatives that optimize the use of fresh water that reduce the impact on the effluent." However, there is no consideration of the local community within this target explicitly to be awarded this indicator. [Sustainability Report, 2017: repsol.com] • Met: Reports progress in meeting targets and shows trends in progress made: The Company discloses water use indicators for 2017 and 2016 such as fresh water withdraw, recycled water, water discharged, hydrocarbons in water discharged and water withdrawn in refining/processing crude oil. Analysis has also been conducted on the trend direction for 3 of these water use indicators. [Sustainability Report, 2017: repsol.com]

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"> • Area: Right to land • Headline: Lack of FPIC at the Camisea gas project amongst Amazon isolated tribes in Peru • Sources: The Guardian, 02/06/2016 - theguardian.com and business-humanrights.org • Allegation: Since 2013, there have been ongoing allegations that the Camisea gas project's planned expansion into indigenous reserves has not involved any prior consultation with affected indigenous peoples and could be life threatening for uncontacted tribes living in the reserve. The Camisea consortium's Lots 56 and 88 are owned by Repsol (10%), as well as Hunt Oil (25.2%), SK Group (17.6%), Pluspetrol (27.2%), Sonatrach (10%) and Tecpetrol (10%). <p>In January 2014, a Forest Peoples Programme report alleged the planned expansion of the Camisea's gas project would have a severe impact on indigenous peoples in 'voluntary isolation' in the area. According to the report, 'the expansion plans are liable to result in a range of impacts including further undesired contacts, increased epidemics and death rates, and reduced access to game, fish stocks, gardens and the forest for vital subsistence activities'.</p> <p>The isolated indigenous peoples reportedly live within a 450,000ha Reserve overlapped by the Camisea Project. The report also claims the expansion of the gas project 'constitute illegal acts under international law'.</p> <p>In March 2014, James Anaya, the UN's special rapporteur on indigenous rights, issued a report on the expansion project. He also referred to the need to consult with communities prior to the project and states that 'even though national law on consultation does not require it, the government should have gone through a consultation process in relation to the expansion of the Camisea project in Block 88' as recommended by ILO Convention 169 on indigenous peoples' rights'.</p> <p>In May 2015, Survival International stated that 'a recently contacted Amazon tribe has been struck down by an epidemic that has left several children dead, and infected dozens more. Four children of the isolated Nanti tribe are confirmed dead, and reports indicate that the entire Nanti population could be infected. (...) Their land has been overrun by oil and gas prospectors since the development of the massive Camisea gas project in their territory'.</p>
E(1).1	The Company has responded publicly to the allegation	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: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: In its response to the allegations, the company explains its position in detail and describes its actions
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised • Not met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has an indigenous rights policy on its website that states it is 'committed to respecting and observing the rights of indigenous peoples in accordance with its values and commitments and the voluntary principles it subscribes to, as well as current international legislation, treaties and agreements, whether or not they are incorporated into the legislation of the countries in which we carry out operations, and in particular the obligations established by the states signing the International Labour Organization's Convention No. 169 on Indigenous and Tribal Peoples (1989): (...) the right to ownership and possession of the lands which they traditionally occupy and which have been recognized as belonging to them by the current applicable regulations; the right to free, prior and informed consultation in good faith and in a manner appropriate to the circumstances, in order to reach agreement or achieve consent in relation to the measures proposed; (...) the right to fair compensation for any harm that may be done to them as a result of those activities; the right to choose their own model of development, in accordance with the current legal framework in each country'.
E(1).3	The Company has taken appropriate action	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: Engages with affected stakeholders: In its response the company states that 'early action process was put in place with the stakeholders which was executed by the operating partner.' • Not met: Provides remedies to affected stakeholders • Not met: Has improved systems and engaged affected stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Right to land • Headline: An indigenous community stops the construction of a Repsol/Petrobras plant in Peru (Lot 57) • Sources: El Mundo 17/01/2017 - eleconomistaamerica.com and energia16.com and repsol.com • Allegation: Indigenous communities in the Peruvian Amazon have protested against the construction of a gas compressor plant at 'Lot 57' in the southern region of Cuzco saying they had not been adequately consulted ahead of construction on land over which they have rights. The plant is operated by Repsol with participation from Petrobras. The Nuevo Mundo community, located in the jungle basin of the Urubamba River, argued construction of the facility had begun without prior consultation with the community, as stipulated in Peruvian legislation. Work was halted in 2017, but commenced in November 2017.
E(2).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public response available Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
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 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Not met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has an indigenous rights policy on its website that states it is 'committed to respecting and observing the rights of indigenous peoples in accordance with its values and commitments and the voluntary principles it subscribes to, as well as current international legislation, treaties and agreements, whether or not they are incorporated into the legislation of the countries in which we carry out operations, and in particular the obligations established by the states signing the International Labour Organization's Convention No. 169 on Indigenous and Tribal Peoples (1989): (...) the right to ownership and possession of the lands which they traditionally occupy and which have been recognized as belonging to them by the current applicable regulations; the right to free, prior and informed consultation in good faith and in a manner appropriate to the circumstances, in order to reach agreement or achieve consent in relation to the measures proposed; (...) the right to fair compensation for any harm that may be done to them as a result of those activities; the right to choose their own model of development, in accordance with the current legal framework in each country'.
E(2).3	The Company has taken appropriate action	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: according to the company ' In our continuous process of relating with local communities, in early 2017 members of the Nuevo Mundo community mobilized in the proximity of Repsol facilities to demand larger compensation for the easement rights associated with the compression project. After some weeks of participative and transparent dialog, a longterm agreement was reached with the community. It was signed in the community assembly of February 28 pursuant to the laws of the indigenous community and the requirements of the law.' • Met: Provides remedies to affected stakeholders: according to the company ' In our continuous process of relating with local communities, in early 2017 members of the Nuevo Mundo community mobilized in the proximity of Repsol facilities to demand larger compensation for the easement rights associated with the compression project. After some weeks of participative and transparent dialog, a long-term agreement was reached with the community. It was signed in the community assembly of February 28 pursuant to the laws of the indigenous community and the requirements of the law.' • Not met: Has reviewed management systems to prevent recurrence: Following the protests, the company has stopped the work for a few months before resuming them in 2017. Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.16 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Repsol made data public that met one or more elements of the methodology in 30 cases, leading to a disclosure score of 3.16 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 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company reports on the GRI in their Sustainability Report. [Sustainability Report, 2017: repsol.com]
F.3	Key, High Quality Disclosures	0.4 out of 4	Repsol met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • 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 <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 Demonstrating a forward focus <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) • 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 2018 Key Findings report 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.