

Company Name Repsol
Industry Extractives
Overall Score (*) 70.1 out of 100

Theme Score	Out of	For Theme
6.8	10	A. Governance and Policies
18.0	25	B. Embedding Respect and Human Rights Due Diligence
11.7	15	C. Remedies and Grievance Mechanisms
11.9	20	D. Performance: Company Human Rights Practices
14.4	20	E. Performance: Responses to Serious Allegations
7.4	10	F. Transparency

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

Please note 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: UNGC principles 1 & 2: Among its commitments, the Company indicates: 'Acting in accordance with international reference standards, but not limited, to United Nations Guiding Principles on Business and Human Rights, Organization for Economic Cooperation and Development (OECD) guidelines for Multinational Enterprises, International Finance Corporation (IFC) Performance Standards and The Ten Principles of the United Nations Global Compact. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: The Company states that it is committed to act 'in accordance with international reference standards, but not limited, to United Nations Guiding Principles on Business and Human Rights, [...]'. In addition, on its website section 'Our commitment to human rights', the Company indicates: 'We defend the international regulatory framework and ensure human rights. Therefore, we follow the principles set out in: [...] The UN Guiding Principles on Business and Human Rights; The OECD guidelines for multinational enterprises; The IFC performance standards.' [Human Rights and Community Relations Policy, 03/06/2019: repsol.com & Our commitment to human rights, Ap 2019: repsol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: OECD: As indicated above, the Company states that on the site 'our commitment to human rights' that 'we follow the principles set out in [...] the OECD guidelines for multinational enterprises'. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com & Our commitment to human rights, Ap 2019: repsol.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company indicates in its code of ethics and business conduct that 'Repsol is committed to respecting internationally recognized human rights, which include the rights set forth in the International Bill of Human Rights, and the principles concerning fundamental rights in the eight International Labour Organization (ILO) core conventions as set out in the Declaration on Fundamental Principles and rights at Work'. [Code of Ethics and Business Conduct, 04/2019: repsol.com] • Met: UNGC principles 3-6: The Company is signatory to the UN Global Compact [UNGC Website - Repsol, N/A: unglobalcompact.org] • Met: Explicitly list All four ILO apply to EX BPs: In its Ethics and Conduct Code for Suppliers, the Company states that suppliers must respect the 'principles concerning fundamental rights in the eight International Labour Organization (ILO) Core conventions as set out in the Declaration on Fundamental Principles and Rights at work' (and lists all eight). It also adds that 'the supplier's responsibility to ensure respect for human rights includes, but is not limited to:' 'Not using child labour; facilitating the freedom of association and collective bargaining of employees. Treating all employees with dignity and respect, refraining from any offensive conduct or that entails any kind of discrimination [...] not using forced labour'. The document states that the term 'supplier' refers to 'suppliers, contractors, sub suppliers and subcontractors, and other third party entities that provide goods and services to Repsol or who act on Repsol's behalf'. The Code of ethics, includes commitment to respect eight ILO core conventions and applies to business partners including, among others, non-operated joint ventures. [Ethics and Conduct Code for Suppliers: repsol.com & Code of Ethics and Business Conduct, 04/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Company states in its code that 'Repsol is committed to respecting internationally recognized human rights, which include the rights set forth in the International Bill of Human Rights, and the principles concerning fundamental rights in the eight International Labour Organization (ILO) core conventions as set out in the Declaration on Fundamental Principles and Rights at work. Although it doesn't mention each ILO core area, on its website 'our commitment to human rights', and that contains the human rights and community relations policy, states 'we defend the international regulatory framework and ensure human rights. Therefore we follow the principles set out in: The International Bill of Human Rights; The International Labor Organization Declaration, and the eight fundamental conventions that underpin them: 1) Freedom of association and protection of the right to organize; 2) Right to organize and right to collective bargaining; 3) Forced labor; 4) Abolition of forced labor; 5) minimum age; 6) worst forms of child labor; 7) Equal Pay; 8) Discrimination (Employment and occupation)'. [Our commitment to human rights, Ap 2019: repsol.com & Code of Ethics and Business Conduct, 04/2019: 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] • 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'. In addition, the Code of Ethics and Business Conduct, which indicates that 'Business partners, including non-operated joint ventures, contractors, suppliers and other third parties [...] should act consistently with the Code, as well as any applicable contractual provisions, when working on our behalf or in collaboration with us'. Also indicates that the Company 'is committed to providing a safe and healthy work environment for personnel and others who visit

Indicator Code	Indicator name	Score (out of 2)	Explanation
			or work at our facilities and job sites.' [Ethics and Conduct Code for Suppliers: repsol.com & Code of Ethics and Business Conduct, 04/2019: 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: Voluntary Principles (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' the following: 'In the specific case of relationships 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, 03/06/2019: repsol.com] • Met: Respecting indigenous rights: The Company states under 'our commitments' the following: 'Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respecting their rights, in accordance with existing legislation and with ILO Convention 169, whether or not incorporated into the national legislation of the countries in which we operate'. Although 'in accordance with' is not considered a formal statement of commitment to ILO 169, the Company commits to respect their rights. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] • Not met: ILO 169 [Human Rights and Community Relations Policy, 03/06/2019: 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 business relations: partners, suppliers, contractors, distributors, etc., as well as any other public or private entity, including those in the extractive sector and public security forces directly related to our operations, products or services.' [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment: The Company states under 'our commitments' the following: 'Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respecting their rights, in accordance with existing legislation and with ILO Convention 169, whether or not incorporated into the national legislation of the countries in which we operate. Their rights include, among others, rights to their lands, territories and resources, right to water, their organizational, economic and social structure and their right to free, prior and informed consultation [...]'. However, this indicator looks for explicit commitment to free, prior and informed consent, not just consultation. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] • Met: IFC performance standards: On its website section 'Our commitment to human rights', the Company indicates: 'We defend the international regulatory framework and ensure human rights. Therefore, we follow the principles set out in: [...] The IFC performance standards' [Delivering Value and Resilience through Sustainability, Nov 2017: repsol.com & Our commitment to human rights, Ap 2019: repsol.com] • Met: Respecting the right to water: The Company states under 'our commitments' the following: 'Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respecting their rights, in accordance with existing legislation and with ILO Convention 169, whether or not incorporated into the national legislation of the countries in which we operate. Their rights include, among others, rights to their lands, territories and resources, right to water, their organizational, economic and social structure and their right to free, prior and informed consultation [...]'. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] • Not met: Expects BPs to commit to 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 business relations: partners, suppliers, contractors, distributors, etc., as well as any other public or private entity, including those in the extractive sector and public security forces directly related to our operations, products or services.' However, the Company's commitment is to free prior and informed consultation, not consent. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com]
A.1.4	Commitment to engage with stakeholders	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: 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

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			<p>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, 03/06/2019: repsol.com]</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company discloses information on several engagement activities with communities, such as: Block 57 in Peru and the agreement reached with the native community of Nuevo Mundo as part of the sustainable coexistence project; Repsol Sinopec's Plataforma Educativa training program: 'On a mobile unit (platform truck), lectures are offered on environmental and safety education, as well as courses specifically aimed at the fishing community [...]'. [Block 57 and the sustainable coexistence project, 08/2019: repsol.com & Repsol Sinopec's Plataforma Educativa training program, 08/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Met: Regular stakeholder design engagement: In its Integrated Report 2018, the Company states that is conducting 'seventeen operations in eight countries (Bolivia, Canada, Colombia, Ecuador, Indonesia, Papua New Guinea, Peru and Russia) that are taking place near or are adjacent to the territories of indigenous communities. All the aforementioned operations have at least one of the following elements: public consultation and consultation plans; reference studies; social impact evaluations 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 location'. The Company also reports cases of communities being involved in the impact assessment. The Company also discloses some example of involvement in assessment and review, like the First Nations and Metis communities in Canada. [Integrated Management Report 2018, 2019: repsol.com & Canada - Repsol Community Report, 2017: repsol.ca]
A.1.5	Commitment to remedy	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 remedy: The Company states under the heading 'Our responsibility: to respect and remedy': 'Repsol 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, in case they are produced.' The Company states in its Human rights policy that 'Respect means that Repsol will make reasonable efforts to prevent our activities from causing negative impacts on human rights or communities and, if they occur, will endeavour to mitigate or repair the impact'. However, it is not clear if the company has a commitment to remedy HR impacts caused or contributed by company's operations. [Integrated Management Report 2018, 2019: repsol.com & Human Rights and Community Relations Policy, 03/06/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Company indicates in its Human Rights and Community Relations Policy that it is committed to establish 'grievance mechanisms at the operational level, from the start of our activities, so people directly affected by our assets and right holders (employees, suppliers, contractors, communities or whoever third party) can notify Repsol of any situation of possible impact on human rights. These mechanisms shall not be used to preclude access to judicial or other extrajudicial grievance mechanisms, as well as the legitimate and peaceful activities of human rights defenders.' [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] • Not met: Work with EX BPs to remedy impacts: Although the Company states in its Policy that it is committed to promote 'Promoting the knowledge and respect for the commitments in this policy among Repsol's business relations: partners, suppliers, contractors, distributors, etc., as well as any other public or private entity, including those in the extractive sector and public security forces directly related to our operations, products or services.', CHRB could not find further information about how it works with its extractive business partners to remedy impact, through business partners' mechanisms or through collaborating with them in the development of third party non-judicial remedies. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com]

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A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates that it is committed to establish 'grievance mechanisms at the operational level, from the start of our activities, so people directly affected by our assets and right holders (employees, suppliers, contractors, communities or whoever third party) can notify Repsol of any situation of possible impact on human rights. These mechanisms shall not be used to preclude access to judicial or other extrajudicial grievance mechanisms, as well as the legitimate and peaceful activities of human rights defenders'. However, no statement found of commitment to not tolerate nor contribute to threats and/or attacks against human rights defenders. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Expects EX BPs to reflect company HRD commitments: See above, no statement found. The Company also commits to promote 'the knowledge and respect for the commitments in this policy among Repsol's business relations: partners, suppliers, contractors, distributors, etc., as well as any other public or private entity, including those in the extractive sector and public security forces directly related to our operations, products or services.' [Human Rights and Community Relations Policy, 03/06/2019: repsol.com]

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 [...]' [Human Rights and Community Relations Policy, 03/06/2019: 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 Board of Directors and the Sustainability Committee play a critical role in the Sustainability Model. The Board approves, at the proposal of the Sustainability Committee, the Company's strategy and policy in sustainability and corporate governance, and the Committee, among other duties, knows and orients the policies, objectives and guidelines of environment, social and safety matters.' [Rules and regulations for the Board of Directors: repsol.com & Integrated Management Report 2018, 2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO: The Company provided sources to CHRB for this indicator, however these were not material.
A.2.2	Board discussions	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: Board/Committee review of salient HRs: In its Integrated management Report, the Company indicates: 'The Board of Directors and the Sustainability Committee play a critical role in the Sustainability Model. The Board approves, at the proposal of the Sustainability Committee, the Company's strategy and policy in sustainability and corporate governance, and the Committee, among other duties, knows and orients the policies, objectives and guidelines of environment, social and safety matters.' According to its Annual Corporate Governance Report, the Sustainability Committee 'is an internal body for information and advisory purposes created by the Board of Directors, without executive functions, but with information, advisory and proposal powers within its area of activity.' [Integrated Management Report 2018, 2019: repsol.com & 2018 Annual Corporate Governance Report, 31/12/2018: repsol.com] Met: Examples or trends re HR discussion: In its 2018 Integrated Management Report, the Company indicates: 'In 2018, the [Sustainability] Committee met four times and discussed the following matters, among others: [...] Supervision of Company sustainability strategy: proposal of 2018 targets and monitoring, evaluation and closure of 2017 targets; Global Sustainability Plan; [...] Sustainability communication plan; Safety culture in Repsol; [...] Strategic thinking

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			on safety and the environment for 2025; [...] Analysis and periodic monitoring of performance in: Safety scorecard and accidentability indicators, [...] Community Relations and Human Rights; Analysis of international sustainability standards'. [Integrated Management Report 2018, 2019: repsol.com] Score 2 • Met: Both examples and process
A.2.3	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 • 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%). The safety indicator cover own employees and contractors, however, it does not include the health and safety of local communities. [Remuneration of the Directors Report 2018, 27/02/2019: repsol.com & Safety, 08/2019: repsol.com] • Not met: At least one key EX RH risk, beyond employee H&S: The safety indicator cover own employees and contractors, however, it does not include the health and safety of local communities. [Remuneration of the Directors Report 2018, 27/02/2019: repsol.com & Safety, 08/2019: repsol.com] Score 2 • Not met: Performance criteria made public [Remuneration of the Directors Report 2018, 27/02/2019: repsol.com]

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: On its website, the Company describes the governance bodies of its Sustainability model: [The Executive Committee] is in charge of deploying the Sustainability Plan in all the countries where we operate. The business committees and the management committees of our industrial complexes also pitch in to accomplish this task. These are the governance functions that it assumes: Define the long-term objectives; Prepare the action plans, indicators, and road maps; Announce advances in objectives, indicators, and road maps; Analyze the impact on our stakeholders.' Human Rights is part of its Sustainability model. Luis Cabra is the Executive Committee person in charge of Sustainability. Sustainability includes human rights. [Governance bodies, 08/2019: repsol.com] Score 2 • Not met: Day-to-day responsibility: In its organizational chart, there is a EMD Technology Development, Resources, and Sustainability Division. The Company has provided to CHRB a number of sources where there are descriptions of specific activities related to human rights issues carried out. However no evidence found of how date to day responsibility is allocated within the Company. In its feedback to CHRB the Company has provided description of day-to-day responsibility, but that evidence has not been found in publicly available sources. [Organizational Chart, 08/2019: repsol.com] • 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 • Met: Senior manager incentives for human rights: The Company indicates in its Annual Remuneration Report 2018: '6: Repsol has implemented many long-term incentive plans for managers and other employees of the Group, including the CEO and the General Counsel [...]'. Sustainability targets represent 10% of the Long term incentive (LTI) (5% related to safety indicators and 5% related to CO2 emissions reduction). The integrated accident frequency rate includes employees and contractors. [Remuneration of the Directors Report 2018, 27/02/2019: repsol.com] • 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 also include the health and safety of local communities. [Remuneration of the Directors Report 2018, 27/02/2019: repsol.com] Score 2 • Not met: Performance criteria made public

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company 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.' In addition, in its website the Company indicates: 'Risks on human rights are integrated into corporate management as part of the Integrated Risk Management System (IRMS), both in the management of strategic risks (reputation and image) and operational risks (code of ethics and conduct). ' [Human Rights and Community Relations Policy, 03/06/2019: repsol.com & Assessing the impacts of our operations, 08/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Audit and Control Committee is responsible for 'Regularly check the effectiveness of the internal audit and internal control and risk management systems, including tax, ensuring that the major risks are being adequately identified, handled and reported'. However, this indicator looks for explicit evidence of how it assess the adequacy of the risk management systems in managing human rights during last reporting year, and how this assessment is either overseen by the Board Audit Committee or conducted by an independent third party. [Rules and regulations of the Board of Directors, 2016: repsol.com & Integrated Management Report 2018, 2019: repsol.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: The Company indicates in its Integrated Management Report that 'This year Repsol wished to go one step further by tabling a new Ethics and Conduct Code training scheme for all employees based on a dynamic game, the aim of which is to consolidate the knowledge already acquired in previous years and secure a greater comprehension of the expected patterns of behavior'. The Code of Conduct covers the company's human rights obligations. In sustainability report 2016 it stated that '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. The code is publishes in English and Spanish (training is assumed to take place in local language) [Integrated Management Report 2018, 2019: repsol.com & Sustainability Report, 2017: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • 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'. The Company publishes on its website its Sustainability Plans (Global and Local Plans), that disclose information about its activities and commitments. In its 2018 Local Sustainability Plan - People, the Company indicates that in Bolivia it has planned to 'Share, on an institutional level, the commitments and programs undertaken in human rights with trade groups and organizations.', and also as an achievement it indicates that it has 'held meetings with different management levels of unions and their members. We thus achieved a greater understanding of our commitments and programs we are running related to human rights'. Another example was included in its '2018 Local Sustainability Plans - Ethics and Transparency' document, were in Malaysia the Company indicates that 'We have distributed the Sustainability Plan to 40 main stakeholders in Peninsular & Sabah/Labuan from the governments, PETRONAS regulator, partners, state and local authorities and agencies, NGOs and also to 87 main Repsol contractors.' [Communication Policy: repsol.com & Environment - Local Sustainability Plans 2018, N/A: 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	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: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Communicating policy to EX contractors and joint ventures: The Company indicates (Integrated report 2017) 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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. In addition, the Company's 'General Terms and Conditions for Supply of Goods and/or Performance of Services' states: 'Contractor represents and warrants that it has read and understood the Ethics and Conduct Code for Suppliers [...] and shall adhere to and shall procure that all other members of Contractor Group shall act in a manner consistent with the same in connection with the Contract.' In addition, on its website section related to its relationship with its partners, the Company indicates that it has set a 'Human rights clause. We have a specific norm that expressly indicates that the operator must respect internationally recognized human rights. This means: human rights must not be infringed upon, and if they are, there will be consequences'. [General Terms and Conditions for Supply of Goods and/or Performance of Services, N/A: repsol.com & Our relationship with our partners, 08/2019: repsol.com]</p> <ul style="list-style-type: none"> • Met: Including to EX BPs (removed) <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above. [General Terms and Conditions for Supply of Goods and/or Performance of Services, N/A: repsol.com] • Met: Including on EX BPs: See above. The code for suppliers states that 'the term "supplier" is used in this document to refer to suppliers, contractors, sub suppliers and subcontractors, and other third party entities that provide goods and services to Repsol or who act on Repsol's behalf. Therefore, the obligations assumed by the supplier are required to its employees, sub suppliers and subcontractors'.
B.1.5	Training on 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: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company indicates in its Integrated Management Report 2018 that 'This year Repsol wished to go one step further by tabling a new Ethics and Conduct Code training scheme for all employees based on a dynamic game, the aim of which is to consolidate the knowledge already acquired in previous years and secure a greater comprehension of the expected patterns of behavior.' In 2018 it already trained in the Ethics and Conduct Code to 16,687 employees. [Integrated Management Report 2018, 2019: repsol.com] • Met: Trains relevant EX 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.' In addition, in its 2019 Global Sustainability Plan, the Company includes as a target for 2023: 'Train and raise awareness about safety among all parties involved in purchasing and procurement processes.' [Training - Human Rights: repsol.com & 2019 Global Sustainability Plan, N/A: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • 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"> • Met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company describes its management process of its potential impacts of its Hydrocarbon production activities, which includes monitoring actions 'to follow up on and control impacts with the aim to ensure compliance with the indications and mitigation measures undertaken.' However, furthermore from the grievance channel mechanism, no evidence found describing how the Company monitors the implementation of its human rights policy commitments in its operations globally. [Management process of our potential impacts, N/A: repsol.com] • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>relationship. [...] we assess the supplier's performance by analyzing 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 partners' website, the Company describes the steps taken to build responsible relationships with our partners: 'Before deciding to acquire an asset, we assess existing and potential risks that could arise during business operations, and we carry out a due diligence process; 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. This means: human rights must not be infringed upon, and if they are, there will be consequences; Audits. We conduct periodic controls to ensure the three previous points have been met'. [Suppliers and contractors, 08/2019: repsol.com & Suppliers and partners: repsol.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company reports that 'A total of 3,060 social issue evaluations were performed on 1,347 suppliers. Some 120 evaluations on 102 suppliers were found with a social issue performance score below 5 out of 10. The negative evaluations are associated with the Code of Ethics and Human Rights, among other things. After the negative evaluations were identified, improvements were agreed with 100% of the suppliers. No relationship with any supplier has ended due to social issues (human rights or labor matters, among other things)'. As indicated in previous indicators, the Company has a broad definition of suppliers that includes suppliers and other business partners. However, despite reporting numbers of incidence, no details found in relation to the corrective action process to be followed after a policy breach is identified. [Integrated Management Report 2018, 2019: repsol.com] • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored: The Company indicates that '42 supplier assessment audits were performed using the Repsol protocol, and among other aspects these carried out an in situ verification with respect to human rights. There is also access to 9 audits conducted by REPRO to analyze these issues, with a protocol convalidated by Repsol. 4 social audits were performed in 2018. [...] From the point of view of assessment of the tasks carried out by suppliers and contractors, 3,060 assessments were carried out in 2018 on 1,347 suppliers and contractors with respect to a range of environmental, employment, social and integrity issues.' [Integrated Management Report 2018, 2019: repsol.com]
B.1.7	Engaging business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection EXs 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 2018 Integrated Management Report. [Code of Ethics and Business Conduct, 04/2019: repsol.com & Integrated Management Report 2018, 2019: repsol.com] • Met: HR affects on-going EX 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Working with EX business partners to improve performance: The Company develops Sustainability Plans for each one of its operations, including some where joint ventures, such as the one in Libya. In the Libya - 2019 Sustainability Plan, the Company indicates: 'We will continue building the capacity in terms compliance to cover all of the current contracted local suppliers, by providing a series of presentations on Repsol's Code of Ethics and Business conduct, Repsol's Antibribery and Corruption Policy and Integrity Due Diligence'. In addition, on its website, the Company discloses information about non-operated assets, such as 'Block 88 Camisea -Peru: 'Repsol has a 10% stake in the consortium that operates this block in Peru, and from the very start of our participation we've worked intensely with our partners to improve our human rights performance, being a sensitive area located close to the Kugapakori-Nahua-Nanti Reservation (KNNR). Repsol has shared all its knowledge about the processes to follow in areas with indigenous presence — especially in the cases of communities in voluntary isolation or first contact'. [2019 Sustainability Plan Libya, N/A: repsol.com & Our relationship with our partners, 08/2019: repsol.com]
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 BHRRRC 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 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, 03/06/2019: repsol.com] • Not met: Frequency and triggers for engagement • Met: Engagement includes EX business partners communities: In its Integrated Management Report, the Company states: 'Repsol is currently conducting seventeen operations in eight countries (Bolivia, Canada, Colombia, Ecuador, Indonesia, Papua New Guinea, Peru and Russia) that are taking place near or are adjacent to the territories of indigenous communities. All the aforementioned operations have at least one of the following elements: public consultation and consultation plans; reference studies; social impact evaluations and action plans; relocation plans, community development plans; claim and complaint procedures; and other documents from community information centers.' In addition, the Company's website discloses information about several cases where the Company engaged with local communities, such as the exploratory project in Block RC 12 Occidental, in the region of La Guajira in northern Colombia, among other, including human right issues. [Integrated Management Report 2018, 2019: repsol.com & No-go decision after performing a human rights impact assessment in La Guajira, 08/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: 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.' In addition, on its website the Company describes its methodology for assessing human rights impacts. The first steps of this process are: preliminary analysis of the project's context; definition of the study's scope and information analysis and identification of potential impacts on human rights. An example of the implementation of the process is the case of the Block RC 12 Occidental, in the region of La Guajira in northern Colombia, used below. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com & Assessing the impacts of our operations, 08/2019: repsol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: identifying risks in EX business partners: The Company has a commitment in its Human Right sand Community relations Policy to: 'Conducting due diligence in human rights when establishing business relationships. Make reasonable efforts to prevent or mitigate negative impacts on human rights directly related to operations, products or services provided through our business relationships (which include 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 relationships 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 any negative impacts in which they have involvement'. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: As above. • Met: In consultation with stakeholders: In the case of the project in Block RC 12 Occidental, in the region of La Guajira in northern Colombia, 'The identification and assessment of impacts was carried out with a special focus on participation and respect for indigenous peoples and their cultures. Repsol's methodology was previously presented to the traditional authorities of the Wayuu ethnic group. The interviews were carried out between March–April 2018 in Alta Guajira, by a team with expert knowledge of the area and their customs. The interviews were carried out with a diverse group of participants, with the objective of guaranteeing the active and meaningful participation of the communities.' In addition, on its website 'Corporate Security', the Company indicates: 'We carry out human rights risk and impact assessments on Human Rights in our operations: all of them cover aspects of corporate security and human rights and risks and impacts are identified and assessed. Based on these assessments, we select and implement mitigation measures and monitor their effectiveness. These studies are carried out with the participation of the communities and on a regular basis, to ensure continuous improvement.' [No-go decision after performing a human rights impact assessment in La Guajira, 08/2019: repsol.com & Corporate Security, 08/2019: repsol.com] • Met: In consultation with HR experts: See example of application above. 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 its 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, 03/06/2019: repsol.com] • Met: Explains use of HRIAs or ESIA (inc HR): The Company indicates on its website the following: '[...] we perform Environmental, Social, and Health Impact Assessments (ESHIA). These assessments ensure that all potential impacts are identified as early as possible in the life cycle of a project, so that they're taken into account in the project's own design with the aim to prevent and mitigate its effects. We assess our own direct impacts and those indirect potentially caused by our business relations, included Extractive Business Partners. Social impact assessments are including the impacts on human rights'. [Assessing the impacts of our operations, 08/2019: 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 indicates on its website the following: 'we perform Environmental, Social, and Health Impact Assessments (ESHIA). These assessments ensure that all potential impacts are identified as early as possible in the life cycle of a project, so that they're taken into account in the project's own design with the aim to prevent and mitigate its effects. We assess our own direct impacts and those indirect potentially caused by our business relations, included Extractive Business Partners. Social impact assessments are including the impacts on human rights.'. It also indicates that it assesses its impact applying evaluation and prioritization criteria. 'Our potential impacts may mainly arise in refineries and chemical complexes or in our exploration and production operations.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Based on each context and local reality, through participatory, proactive and ongoing dialogue, we seek the appropriate solutions in each case'. [Sustainability Report 2017, 2018: repsol.com & Assessing the impacts of our operations, 08/2019: repsol.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of salient risks: In an assessment of material issues carried out in 2016, 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. As indicated above, impacts depend on context and local reality. It also describes some impacts by activity. Onshore exploration and production include overutilization of local services, temporary use of land for carrying out exploration activities, potential effects on the health of people in the local surrounding area due to inhalation of gases associated with exploration activity'. [Sustainability Report 2017, 2018: repsol.com & Identifying impacts according to area of activity., N/A: 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	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: Action Plans to mitigate risks: On its website the Company indicates: '[...] we perform Environmental, Social, and Health Impact Assessments (ESHIA). These assessments ensure that all potential impacts are identified as early as possible in the life cycle of a project, so that they're taken into account in the project's own design with the aim to prevent and mitigate its effects.' Human rights impact assessments are developed independently per operation, so each operation design an action plan adapted per each situation. For instance, in its 'Management process of our potential impacts' focused on hydrocarbon production activities, the Company indicates that it 'Designing and implementing mitigation and monitoring measures covering all phases of the project' after the identification of potential impacts. It also states in its website 'Corporate security' that 'We carry out human rights risk and impact assessments on Human Rights in our operations: all of them cover aspects of corporate security and human rights and risks and impacts are identified and assessed. Based on these assessments, we select and implement mitigation measures and monitor their effectiveness'. [Assessing the impacts of our operations, 08/2019: repsol.com & Management process of our potential impacts, N/A: repsol.com] • Met: Including amongst EX BPs: 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. [Our relationship with our partners, 08/2019: 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, flow back 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] <p>Score 2</p> <ul style="list-style-type: none"> • 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	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: System to check if Actions are effective: In its 'Management process of our potential impacts' focused on hydrocarbon production activities, the Company indicates that it after 'Designing and implementing mitigation and monitoring measures covering all phases of the project' ' Our management is complemented with monitoring to follow up on and control impacts with the aim to ensure compliance with the indications and mitigation measures undertaken.' It also states on its website 'Corporate security' that 'We carry out human rights risk and impact assessments on Human Rights in our operations: all of them cover aspects of corporate security and human rights and risks and impacts are identified and assessed. Based on these assessments, we select and implement mitigation measures and monitor their effectiveness'. [Management process of our potential impacts, N/A: repsol.com & Corporate security: repsol.com] • Not met: Lessons learnt from checking effectiveness

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 • 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) • 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) • 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. It also describes its global system to take plans against salient issues identified (See B.2.3) • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 • Not met: Responding to affected stakeholders concerns: On its website, the Company discloses information about how it reached an agreement with the Nuevo Mundo Community in Peru: 'After an initial controversy and through a process of transparent and participatory dialogue, Repsol and the Nuevo Mundo Community reached an agreement in February 2017. The General Assembly of the Nuevo Mundo Community endorsed this agreement, prior to the completion of the necessary activities for the development of the Sagari field and the Compression Plant. The agreement included aspects of interest in relation to local development projects, compensation for land use and hiring of local workers'. However, this indicator looks evidence to how the Company responded to specific concerns raised by a stakeholder to specific impacts. Evidence found refers to agreements reached with communities, but no details found about the issue that triggered concerns. [Block 57 and the sustainable coexistence project, 08/2019: repsol.com & No-go decision after performing a human rights impact assessment in La Guajira, 08/2019: 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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company indicates in its 2018 Integrated Management Report the following: '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 third party to report, with absolute confidentiality and in any language, queries and possible breaches of the Ethics and Conduct Code or the Crime Prevention Model.' The Code of Ethics and Business Conducts covers human rights. [Human rights: Incident Reporting Channels, 11/07/2018: repsol.com & Integrated Management Report 2018, 2019: repsol.com] Score 2 • 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. No new relevant evidence found. [Sustainability Report 2017, 2018: repsol.com] • Met: Channel is available in all appropriate languages: As indicated above, the Ethics and Compliance Channel allows reporting in any language. [Integrated Management Report 2018, 2019: repsol.com] • Met: Opens own system to EX BPs 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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Company indicates in its Integrated Report 2018 the following: 'The Company has an Ethics and Compliance

Indicator Code	Indicator name	Score (out of 2)	Explanation
	receive complaints or concerns from external individuals and communities		<p>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 third party to report, with absolute confidentiality and in any language, queries and possible breaches of the Ethics and Conduct Code or the Crime Prevention Model.' [Integrated Management Report 2018, 2019: repsol.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: As indicated above, the Company has an Ethics and Compliance channel accessible in any language. In addition, in its website: 'We set up operational-level grievance mechanisms to attend to information requests claims, concerns, and complaints from communities in the areas where we operate, adapted to and accessible in the appropriate languages for every context.' [Integrated Management Report 2018, 2019: repsol.com & Operational grievance mechanism, 08/2019: https://repsol.com/responses.docx#_Hlk17113201 1,100815,101030,0,, HYPERLINK "repsol"] • Not met: Expects EX BPs to have community grievance systems: The Company's Human Rights Policy include a provision to establish a 'grievance mechanisms at the operational level, from the start of our activities, so people directly affected by our assets and right holders (employees, suppliers, contractors, communities or whoever third party) can notify Repsol of any situation of possible impact on human rights.' In addition, the Company commits to 'Promoting the knowledge and respect for the commitments in this policy among Repsol's business relations: partners, suppliers, contractors, distributors, etc., as well as any other public or private entity, including those in the extractive sector and public security forces directly related to our operations, products or services.' However, its Supplier Code does not include such provision. In addition, the Company's 2019 Sustainability Plan for Sinopec Brasil (extractive business partner), includes actions related with the development of grievance mechanism, however it is a future action. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com & Ethics and Conduct Code for Suppliers: repsol.com] • Met: EX BPs communities use global system: In addition to the evidence above the Ethics and Compliance Channel, on its website section 'Dialogue with communities and indigenous peoples', the Company indicates: 'Our incident reporting channels are readily accessible in our operations to ensure dialogue and fluid communication with the different communities. With the aim to strengthen this commitment, we promote compliance with these channels among our suppliers wherever we operate.' [Dialogue with communities and indigenous peoples, Ap 2019: repsol.com]
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 consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/c	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: Response timescales: In relation to operational grievance mechanisms the Company states: 'From the moment reports and claims are received to when they

Indicator Code	Indicator name	Score (out of 2)	Explanation
	channel(s) are publicly available and explained		<p>are closed, the entire process can last at least a month, perhaps a little more or a little less depending on the complexity of the issue.' [Operational grievance mechanism, 08/2019: https://repsol.com/responses.docx#_Hlk171132011,100815,101030,0,, HYPERLINK "repsol"]</p> <ul style="list-style-type: none"> • 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 in its website 'Repsol Ethics': 'Personnel and third parties can report possible concerns in total confidence, because we will not tolerate any retaliation against anyone who in good faith asks questions, or communicates any breaches of the Code, policies, laws or regulations, or who assists in an investigation of a suspected wrongdoing.' [Repsol Ethics, 08/2019: 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 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>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BPs 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, 04/2019: repsol.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms: In its Human Rights and Community Relations Policy, the Company commits to establish 'grievance mechanisms at the operational level, from the start of our activities, so people directly affected by our assets and right holders (employees, suppliers, contractors, communities or whoever third party) can notify Repsol of any situation of possible impact on human rights. These mechanisms shall not be used to preclude access to judicial or other extrajudicial grievance mechanisms, as well as the legitimate and peaceful activities of human rights defenders.' [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] • 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	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: Describes how remedy has been provided: About the Block 57 operation and the Sustainable coexistence project, the Company indicates: 'After an initial controversy and through a process of transparent and participatory dialogue, Repsol and the Nuevo Mundo Community reached an agreement in February 2017. The General Assembly of the Nuevo Mundo Community endorsed this agreement, prior to the completion of the necessary activities for the development of the Sagari field and the Compression Plant. The agreement included aspects of interest in relation to local development projects, compensation for land use and hiring of local workers. The commitments have been implemented based on the Sustainable Coexistence Project, a model of social management with a systematic approach to continuous improvement, through the active participation of local stakeholders.' [Block 57 and the sustainable coexistence project, 08/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: In its Bolivia Sustainability Plan 2018, the Company indicates that it implement improvements to incident reporting

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>channels at an operational level to respond to the concerns and complaints of communities living in surrounding areas: 'Using the lessons learned since 2011, we will implement improvements in incident reporting channels at an operational level to respond to any potential damage caused by the company's activities.' [Bolivia Sustainability Plan 2018, N/A: https://repsol.com/responses.docx#_Hlk171132121,109405,109570,0,, HYPERLINK "repsol & Global Sustainability Plan, 2017: repsol.com]</p> <ul style="list-style-type: none"> • 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 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.' No new relevant evidence found in latest report. [Sustainability Report 2017, 2018: 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 or achieved: In its Integrated Management Report, the Company indicates that it 'has undertaken a commitment with its employees to provide them with total rewards schemes that ensure external competitiveness and internal fairness, based on meritocracy, and that assess individual performance, cooperation and teamwork. Repsol's total rewards model includes fixed compensation, benefits, and yearly and long-term variable compensation.' Furthermore, it discloses information about the ratios of standard entry level wage by gender compared to local minimum wage by countries: 'Repsol's fixed minimum wage is above the local minimum wage in all countries except Peru. Considering Repsol's total annual remuneration, Peru also exceeds the country's minimum wage.' However, no mention or definition of the living wage or a target timeframe to implement a living wage. [Integrated Management Report 2018, 2019: 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 living 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"> • 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'. [Ethics and Transparency, 11/07/2018: repsol.com] • Not met: Reports of taxes and revenues beyond legal minimums: Repsol publishes a breakdown of the taxes paid globally in 2018, by tax type including: tax on hydrocarbons, VAT, Corporate Income tax, among others. [Tax contribution per country: 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 paid globally in 2018, by country. [Tax contribution per country: repsol.com] • 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)	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: In its 2018 Integrated Management Report, the Company indicates: 'The company has channels of communication and dialogue with workers through their labor union representatives in negotiating committees to discuss issues of interest and reach agreements. Through meetings in committees and commissions, monitoring and compliance are ensured of collective bargaining agreements and pacts applicable in group companies'. The Company commits to respect the 'Right to organize and right to collective bargaining', and the percentage of employees covered by collective bargaining is over 60%. However no evidence found about commitment to not interfering with the rights of workers seeking to exercise these rights. [Integrated Management Report 2018, 2019: repsol.com & Our commitment to human rights, Ap 2019: repsol.com] • Met: Discloses % covered by collective bargaining: The Company provides data on the percentage of total employees covered by collective bargaining agreements: 'The countries in which Repsol has employees under a collective bargaining agreement are Spain, Brazil, Norway, Peru and Portugal. About 85% of the employees in these countries are covered by such an agreement.' Although 100% of Spanish Repsol workers are covered by collective bargaining agreements, the proportion varies among countries. Employees in Spain alone represent more than 60% of the Company's workforce (17.316 out of 25.288). [Integrated Management Report 2018, 2019: 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 incident 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 1.59 in 2018 and 1.43 in 2017. Repsol discloses that the Lost Time Injury Frequency rate (per million work hours) was 0.89 in 2018 and 0.71 in 2017. [Integrated Management Report 2018, 2019: repsol.com] • Met: Fatalities disclosures: Repsol reports 0 company employee and 2 contractor staff fatalities in 2018. [Integrated Management Report 2018, 2019: repsol.com] <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: The Company analyses its results on health and safety indicators: 'Regrettably we must report two fatalities this year among our contractors. The deceased were the drivers of tankers in two accidents on 25 and 29 September. In the first accident the tanker left the road and overturned while unloading, and in the second the tanker collided with a truck parked on the hard shoulder. Investigations are ongoing for both incidents to analyze the causes and establish the necessary measures to prevent any repetition of this type of accident. The Company has set TIR targets since 2014. This year, TIR rose by 11.2% compared to 2017 due to the two deaths, to 19.7% for incidents with day losses and a 1.9% reduction in hours worked, in spite of the 4.2% decrease in the number of incidents with no day losses. This has also had an impact on the 25.4% increase of the FR with respect to the previous year.' [Integrated Management Report 2018, 2019: repsol.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (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: Process to identify indigenous rights holders: On its website 'Dialogue with communities', the Company indicates: 'Through the social baseline studies carried out in our operations and with the participation of governments and local, regional, and national organizations that represent indigenous peoples, we identify those indigenous communities that are in different phases of contact with the majority culture and that may be affected by our operations'. Furthermore in a different website section, the Company states: 'The first thing we do prior to beginning our operations is to perform a social baseline to know and analyze the context as well as the area's specific social, economic, and cultural aspects. Similarly, and in collaboration with the local public authorities and social organizations, we identify the stakeholders to be aware of their expectations, needs, concerns, and aspirations. To that end, we perform Environmental, Social, and Health Impact Assessments (ESHIA).' [Dialogue with communities and indigenous peoples, Ap 2019: repsol.com & Assessing the impacts of our operations, 08/2019: repsol.com] • Met: How engages with communities in assessment: In its Integrated report, the Company indicates: 'Repsol is currently conducting seventeen operations in eight countries (Bolivia, Canada, Colombia, Ecuador, Indonesia, Papua New Guinea, Peru and Russia) that are taking place near or are adjacent to the territories of indigenous communities. All the aforementioned operations have at least one of the following elements: public consultation and consultation plans; reference studies; social impact evaluations and action plans; relocation plans, community development plans; claim and complaint procedures; and other documents from community information centers'. The Company also discloses the following example in Canada: '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...' [Integrated Management Report 2018, 2019: repsol.com & Canada - Repsol Community Report, 2017: repsol.ca] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM): Repsol is committed to recognize and respect 'the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respecting their rights, in accordance with existing legislation and with ILO Convention 169, whether or not incorporated into the national legislation of the countries in which we operate. Their rights include, among others, rights to their lands, territories and resources, right to water, their organizational, economic and social structure and their right to free, prior and informed consultation in good faith [...]'. However, this indicator requires free, prior and informed consent, not just consultation. [Human Rights and Community Relations Policy, 03/06/2019: repsol.com] • Met: Gives recent example FPIC or dropping deal: The Company gives the following example: 'Before initiating an exploratory project in Colombian territorial waters in the Caribbean Sea, in the region of La Guajira, Repsol carried out a human rights impact assessment that concluded with the Company's decision to not go through with the exploratory project'. The main outcome of this assessment revealed that the development project would impact the sacred areas of the Wayuu ethnic group without possible mitigation measures'. 'The Company provides additional details regarding the results of assessment and potential impacts. [No-go decision after performing a human rights impact assessment in La Guajira, 08/2019: repsol.com]
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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Describes approach to doing so if no recent deals: The Company describes its approach to land resettlement on its website: 'When resettlement is unavoidable and before proceeding with the project, the following measures will be taken: Ensure that public agencies have sufficiently complied with or sufficiently guaranteed compliance with obligations defined in their legal system; Carry out resettlement and land acquisitions through agreements negotiated through the consultation and participation of individuals or communities, even though they have the legal means for acquiring land without the community's consent. Avoid forced eviction; Plan the activities for physical or economic displacement, including the restoration of livelihood to compensate the affected people or communities, in case the land acquisitions or use restrictions involve a loss of goods or livelihood, regardless whether or not the affected people are physically relocated; Establish a formal mechanism for the constitution of easements or right of way and keep a record in a database.' However, no further evidence found, including how it identifies legitimate tenure rights holders, with particular attention to vulnerable tenure rights holders. [Assessing the impacts of our operations, 08/2019: repsol.com] <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)	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: How implements security (inc VPs or ICOC): Repsol is a signatory to the Voluntary Principles on Security and Human Rights (VPSHR) initiative. In its Voluntary Principles annual report, it summarizes its work to implement the Voluntary Principles in its operations: 'Those initiatives include: Evaluation of the risks of Human Rights violations in Security Plans of all countries; Knowledge of all the company's human rights regulations; Signing of understanding agreements with public Security Forces; Identification of key stakeholders in each country; Review that all contracts with private Security Forces include the Voluntary Principles clause; Establishment and communication of claims protocols; Training private and public Security Forces'. [Voluntary Principles on Security and Human Rights Initiative Annual Report 2018, 01/2019: docs.wixstatic.com] • Met: Example of respecting HRs in security: The Company indicates that in 2016 it carried out an internal audit to determine the degree of implementation of the VPs in Colombia, Bolivia, Peru, Ecuador and Venezuela: 'To this end, a tool was adapted based on the VPSHR implementation guide. Our country security managers arranged meetings with heads of business units and public and private security companies'. It measured the level of implementation of the VPSHR and developed an implementation plan. 'In 2018, the degree of implementation plan is 75%'. [Corporate Security, 08/2019: repsol.com & Voluntary Principles on Security and Human Rights Initiative Annual Report 2018, 01/2019: docs.wixstatic.com] • Met: Ensures Business Partners follow security approach: The Company indicates that 'the Corporate Security Department carries out security analysis of suppliers and contractors of the company, including private security providers'. 'All contractors signed with Private Security Forces include a clause of non-violation of Human Rights. They also receive annual training in this regard'. Also, as indicated above, as part of the internal audit, security managers arranged meetings with public and private security companies'. The supplier and contractor document also indicates that security forces go through qualification questionnaire, qualification audit and social audit. [Suppliers and contractors: How we monitor performance and compliance: repsol.com & Voluntary Principles on Security and Human Rights Initiative Annual Report 2018, 01/2019: docs.wixstatic.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities: The Company indicates in its 'VPSHR Annual Report 2018' that 'Corporate Security and the Area of Relations with Communities and Human Rights make periodic contact with security forces, communities and other interested parties in order to determine the evolution of the actions carried out for the implementation of the VPSHR.' However, no further details found. [Voluntary Principles on Security and Human Rights Initiative Annual Report 2018, 01/2019: docs.wixstatic.com] • 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)	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: 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) 'which gives us a comprehensive view of how we manage this resource, as well as the risks associated with each facility both internally (how this resource is used and consumed in different processes, treatment and quality of discharge, etc.) and externally (availability, quality, and ecosystems that provide us with water or that are affected by discharge, competition for the water resource, etc.). [...] With its results, our experts identify the aspects to be improved and design specific action plans for each installation, focusing on three lines of work: improving our understanding of the environment and of how water is used, efficient management of water resources, and improving water treatment technologies. The goals and steps included in the action plans are designed considering both the local environment and facility-specific aspects'. In Canada, for instance The Company's 'Good Neighbour program' 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, flow back recycling, treatment technologies, engaging in 'early and meaningful dialogue with communities and landowners to address concerns and share our water management plans'. [Environment: Water Management, 2018: repsol.com & Water Tool, 08/2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Water targets considering local factors: As indicated above, the Company design plans based on the assessments made with the RWT, 'The goals and steps included in the action plans are designed considering both the local environment and facility-specific aspects.' The water tool includes internal and external management parameters. External include, among other, Social risks (assets and centers that answer to other stakeholders), and future water availability (water demand for use in other activities in the area). Its Local Sustainability Plans 2018 includes some examples of targets related to water stewardship: [Peru] 'Reuse more than 80% of domestic wastewater in the Nuevo Mundo Operations Base Camp'. Also, in the Canada Community report, the Company discloses request licenses obtained to divert specific maximum volumes of water in different basins. It states that 'in 2018 Repsol connected with local communities through information sessions and open houses to explain water plans and related licence applications and respond to concerns'. [Water Tool, 08/2019: repsol.com & People - Sustainability Plans 2018, N/A: repsol.com] • Met: Reports progress in meeting targets and shows trends in progress made: In the context of Peru mentioned above, the Company states that 'we have reused more than 80% of the wastewater treated (annual average 98%) [...] As part of the process to obtain Blue Certification, in Lot 57 we have carried out initial field reconnaissance, arranged a workshop with the parties involved and compiled the necessary information to draw up the Water Footprint Report'. The Company also reports with qualitative information in relation to progress against action plans. In relation to Canada, it states that 'development plans are expected to begin in 2020'. [Canada Community Report 2018, 2019: repsol.ca & People - Sustainability Plans 2018, N/A: 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"> • Headline: Lack of FPIC at the Camisea gas project amongst Amazon isolated tribes in Peru • Area: Right to land • Story: 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> <ul style="list-style-type: none"> • Sources: [The Guardian, 02/06/2016 -: theguardian.com][Business and human rights resource centre: business-humanrights.org]
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 [Response to Camisea Project, 02/2015: business-humanrights.org] <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 [Response to Camisea Project, 02/2015: business-humanrights.org]
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: The company has a 'Human Rights and Community Relations' policy which states that it is committed to "Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respecting their rights, in accordance with existing legislation and with ILO Convention 169, whether or not incorporated into the national legislation of the countries in which we operate. [Human Rights and Community Relations Policy, Ap 2019: repsol.com] • Not met: Policies apply to the type of business relationships involved: The Human Rights and Community Relations policy says "All Repsol employees are responsible for complying with this policy". Additionally under the company Code of Conduct, which references Indigenous people, it says "Business partners, including non-operated joint ventures, contractors, suppliers and other third parties are an extension of Repsol, and for this reason they should act consistently with the Code". However it is not clear if the Human Rights and Community Relations policy also applies to non-operated joint ventures. [Human Rights and Community Relations Policy, Ap 2019: repsol.com & Code of Ethics and Business Conduct, 04/2019: repsol.com] <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 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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. This language differs slightly to their website, where they clearly state they respect the right to 'Free, Prior and Informed Consent'. Thus this is satisfactory to receive a point. [Human Rights and Community Relations Policy, Ap 2019: repsol.com]</p>
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: The company says in its 2018 Sustainability Report, "We have discussed y the Government in May 2014 to benefit the communities that live on the reserve). We have also discussed the continuity of the Plan for Communication and Information Exchange with the population that lives on the reserve (which is carried out by the government). Repsol has provided investors with periodically documentary evidence about these meetings". Additionally in a previous response to the BHRRC, Repsol said "Aware of the sensitivities in this location, an early action process was put in place with the stakeholders which was executed by the operating partner." [Annual ESG Engagement report, 2019: repsol.com & Response to Camisea Project, 02/2015: business-humanrights.org] • Met: Encourages linked business to engage affected stakeholders: The company says in its 2018 Sustainability Report, "Repsol has a 10% stake in the consortium that operates this block in Peru, and from the very start of our participation we've worked intensely with our partners to improve our human rights performance, being a sensitive area located close to the Kugapakori-Nahua-Nanti Reservation (KNNR). Repsol has shared all its knowledge about the processes to follow in areas with indigenous presence — especially in the cases of communities in voluntary isolation or first contact. Our norms dictate that in those operations where the Company does not have management control, we will inform our partners about these policies and put all our knowledge and strategies at their disposal for us to meet our objectives. In the first years of operations, we shared best practices in Biodiversity Monitoring Programs, Participatory Social-Environmental Monitoring Programs, Community Relations Programs, Anthropological Contingency Programs, and many others." [Annual ESG Engagement report, 2019: repsol.com] • Not met: Provides remedies to affected stakeholders: The company says in its 2018 Sustainability Report, "In February of 2017, the Camisea Consortium communicated its decision to free all the areas inside Block 88 that are not in production or development. This implies the return to the Government of approximately 60,000 Ha over an initial Block extension of 143,500 Ha. Approximately 50,000 Ha of the 60,000 freed are found within the Kugapakori Nahua Nanti Territorial Reserve, therefore this greatly reduces the likelihood of sightings of voluntarily isolated indigenous communities". However this is not sufficient provision of remedy to those individuals in areas which are already subject to production and development. [Annual ESG Engagement report, 2019: repsol.com & Peru (Block 88 in Camsea) statement, 2019: repsol.com] • Not met: Has reviewed management systems to prevent recurrence: In a response to the BHRRC in 2015, the company said "Repsol is in permanent contact with the operating partner in its capacity as non-block operator and minority partner in the Consortium. It has also shared its corporate responsibility standards as part of its due diligence efforts". Additionally in its 2018 Sustainability Report the company says "In February of 2017, the Camisea Consortium communicated its decision to free all the areas inside Block 88 that are not in production or development...therefore this greatly reduces the likelihood of sightings of voluntarily isolated indigenous communities. It is worth mentioning that Repsol has played a key role in this decision, opposing to any other alternative rather than the liberalisation of those areas". However this is not sufficient evidence to demonstrate how the company has reviewed its management system in relation to consortium relationships to prevent similar occurrences in the future. [Response to Camisea Project, 02/2015: business-humanrights.org & Annual ESG Engagement report, 2019: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: While the company says that "In February of 2017, the Camisea Consortium communicated its decision to free all the areas inside Block 88 that are not in production or development...therefore this greatly reduces the likelihood of sightings of voluntarily isolated indigenous communities". This is not evidence of providing remedy to those individuals already affected, nor that it is considered satisfactory to those victims. [Annual

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>ESG Engagement report, 2019: repsol.com & Peru (Block 88 in Camsea) statement, 2019: repsol.com</p> <ul style="list-style-type: none"> • Not met: Has improved systems and engaged affected stakeholders: The company has said that it engaged with the affected stakeholders through the government, in addition to the early action process that was put in place by the consortium to deal with stakeholders that was executed by the operating partner [Annual ESG Engagement report, 2019: repsol.com & Peru (Block 88 in Camsea) statement, 2019: repsol.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: An indigenous community stops the construction of a Repsol/Petrobras plant in Peru (Lot 57) • Area: Right to land • Story: 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. • Sources: [El Mundo 17/01/2017 -: eleconomistaamerica.com][Energia16: energia16.com][Company's website: repsol.com]
E(2).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: The company says in its 2017 Integrate Management Report that, " 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." [Integrated management Report, 2017: repsol.com & Block 57 & Sustainable Coexistence project, 2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company provides significant detail on the development and progress of the project, spread across three documents, the 2017 Integrated Management Report, an explanation of the Block 57 and the sustainable coexistence project on its website, and the 2018 Integrated Management Report, outlining the engagement that has been undertaken with the Nuevo Mundo people and the agreement that was signed following a period of consultation and dialogue. [Integrated Management Report 2018, 2019: repsol.com & Integrated management Report, 2017: repsol.com]
E(2).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The company has a 'Human Rights and Community Relations' policy which states that it is committed to "Recognizing and respecting the unique nature of indigenous, tribal and aboriginal peoples. Recognizing and respecting their rights, in accordance with existing legislation and with ILO Convention 169, whether or not incorporated into the national legislation of the countries in which we operate. [Human Rights and Community Relations Policy, Ap 2019: repsol.com] • Met: Policies apply to the type of business relationships involved: The location Block 57 is operated by Repsol and thus the 'Human Rights and Community Relations' policy is applicable to the operations. [Block 57 & Sustainable Coexistence project, 2018: repsol.com] <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			agreement or achieve consent in relation to the measures proposed. The company also states on their website a commitment to "Recognizing and respecting the right to prior, free and informed consent (PFIC) of indigenous peoples through their representative institutions." [Human Rights and Community Relations Policy, Ap 2019: repsol.com & Dialogue with communities and indigenous peoples, 2019: repsol.com]
E(2).3	The Company has taken appropriate action	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: 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 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.' [Block 57 & Sustainable Coexistence project, 2018: repsol.com & Integrated Management Report 2018, 2019: repsol.com] • 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.' [Block 57 & Sustainable Coexistence project, 2018: repsol.com & Integrated Management Report 2018, 2019: repsol.com] • 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 after reaching an agreement with the Nuevo Mundo General Assembly. Repsol says that, "The agreement included aspects of interest in relation to local development projects, compensation for land use and hiring of local workers. The commitments have been implemented based on the Sustainable Coexistence Project, a model of social management with a systematic approach to continuous improvement, through the active participation of local stakeholders." [Integrated Management Report 2018, 2019: repsol.com & Block 57 & Sustainable Coexistence project, 2018: repsol.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: The company says "After an initial controversy and through a process of transparent and participatory dialogue, Repsol and the Nuevo Mundo Community reached an agreement in February 2017. The General Assembly of the Nuevo Mundo Community endorsed this agreement, prior to the completion of the necessary activities for the development of the Sagari field and the Compression Plant." Endorsement by the Nuevo Mundo General Assembly can be considered sufficient evidence of satisfactory remedy. [Integrated Management Report 2018, 2019: repsol.com & Block 57 & Sustainable Coexistence project, 2018: repsol.com] • Met: Has improved systems and engaged affected stakeholders: The company says "The Sustainable Coexistence Project already has tangible results in the social performance of Block 57, carried out in the diagnosis and change management process. This process involved all the functions of the Company, which has allowed the fulfilment of all agreements with the community, as well as creating an atmosphere of dialogue that promotes good neighbourly relations with the community and the sustainability of our operations...In compliance with the commitments of the Agreement of February 27th, 2017, the Nuevo Mundo Community has electric power, the improvement of the Community's streets has been completed, and the basis has been laid for the implementation of the Development Plan drawn up by the community. This has been done through capacity-building on issues of public management and negotiation for development, as well as technical advice and support for initiatives prioritized by the same community for productive projects, crafts, scholarships, and the development of projects with the local government". [Block 57 & Sustainable Coexistence project, 2018: repsol.com & Integrated Management Report 2018, 2019: repsol.com]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.79 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 36 cases, leading to a disclosure score of 3.79 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 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company reports on the GRI in its Integrated Management Report. Appendix IV contains GRI Index. [Integrated Management Report 2018, 2019: repsol.com]
F.3	Key, High Quality Disclosures	1.6 out of 4	Repsol met 4 of the 10 thresholds listed below and therefore gets 1.6 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • 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 • 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 2019 Key Findings report and technical annex for more details of the research process.

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and Wales.

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.