

CHRB response to the destruction of a 46,000-year-old Aboriginal heritage site by Rio Tinto at Juukan Gorge in Western Australia on 24 May 2020

Date: 09 July 2020

Overview

Due to the destruction of a 46,000-year-old Aboriginal heritage site by Rio Tinto at Juukan Gorge in Western Australia on 24 May 2020, the Corporate Human Rights Benchmark (CHRB) and the World Benchmarking Alliance (WBA) have decided to append this statement to Rio Tinto's latest CHRB results.

CHRB and WBA condemn the destruction of invaluable cultural heritage at Juukan Gorge. This incident is a severe adverse impact on cultural rights that has engendered extreme concern and outrage among the Puutu Kuntji Kurrama and Pinikura traditional owners of the site as well as Aboriginal and Torres Strait Islander communities and their allies. CHRB and WBA call on Rio Tinto to take appropriate action to carry out an independent investigation of the incident, involving affected stakeholders, to provide effective remedy and to prevent similar impacts in the future, in Australia and elsewhere.

It would be inappropriate for CHRB to continue to assess and rank Rio Tinto in one of the highest-scoring bands and as the top mining company without reference to this incident. The CHRB seeks to provide robust and credible information on companies' actions to respect human rights across their business, and it would be misleading not to reference this severe impact as a complement to the latest results.

The CHRB assessment provides a snapshot in time, looking at a company's human rights performance over the course of an entire year. However, this incident highlights the need for CHRB to be able to respond to exceptional circumstances connected to benchmarked companies that occur between the yearly scoring periods. CHRB did so in 2019 when it suspended Vale as a consequence of the devastating Brumadinho dam collapse, which caused the death of more than 270 persons, extensive and long-term environmental and health impacts, and massive disruptions to communities.

This incident also highlights the need for a discussion on how such impacts should and could be captured by CHRB going forward. This topic is currently being explored in the context of the methodology review that CHRB is undertaking this year.

Detail

Since the publication of the first Benchmark in 2017, Rio Tinto has consistently ranked amongst the top scoring companies, with an initial score of 63% which went up to 76% in 2018 and was subsequently maintained in 2019. The destruction of the Aboriginal heritage site is in stark contradiction with these high scores and is an extremely concerning departure from the company's public commitment to respect human rights (indicator A.1.1), including

to free, prior and informed consent (indicator A.1.3), its commitment to engage with (potentially affected) stakeholders (indicator A.1.4) and its statements that it undertakes due diligence in line with the UN Guiding Principles on Business and Human Rights (indicators B.2.1-B.2.5). The incident at Juukan Gorge also highlights the possibility of a concerning disconnect between a company's commitments and procedures as described in public disclosures on the one hand, and its actual decisions and impacts on the other hand.

The severity of the impact and the context in which it took place, including the process that led to it and allegations of other similar impacts involving the company, raise concerns that go beyond this specific incident and point to possibly more systemic weaknesses in the company's approach to human rights.¹

The CHRB is undertaking a major review of its methodology this year. This incident emphasises the limitations that come with assessing the human rights performance of companies based on their policies and procedures with reference to corporate statements. CHRB does take into account third-party information on allegations of human rights abuses and assesses how companies respond to these allegations, but the methodology review invites stakeholder to discuss whether this is sufficient. In addition, the current static nature of the benchmark involving a once-a-year review, does not accommodate incorporating real-time impacts into the framework as a measure of assessing actual corporate performance.

To some extent, CHRB will always be a proxy measurement for corporate human rights performance. However, this latest incident confirms that these are questions that should be addressed for CHRB to remain a robust and credible source of data. We would like to invite stakeholders with suggestions to participate in the methodology review consultations (more information is available [here](#)).

Following the destruction at Juukan Gorge, CHRB understands that Rio Tinto has launched a board-led review of its heritage management processes.² For the review to be fair and credible, it will be crucial for it to be transparent, co-designed with the affected communities and independent, to avoid conflicts of interest. The review should look at systemic and structural issues to avoid repetition and should be made public to build trust in the results and as a measure of respect for the communities affected.³ Rio Tinto's response to the incident will also be assessed in the context of the CHRB's 2021 assessment, along with any other allegations involving the company that meet the CHRB severity threshold.

For responses from Rio Tinto and regular updates, WBA and CHRB would like to point users of the Benchmark results to the Business and Human Rights Resource Centre's dedicated page (accessible [here](#)).

¹ See e.g. [After the Mine, Living with Rio Tinto's deadly legacy](#), 1 March 2020.

² [Rio Tinto announces details of board-led heritage process review](#), 19 June 2020.

³ For more detailed recommendations, see [How Rio Tinto can ensure its Aboriginal heritage review is transparent and independent](#), 22 June 2020.

Company Name Rio Tinto
Industry Extractives
Overall Score (*) 76.0 out of 100

Theme Score	Out of	For Theme
7.7	10	A. Governance and Policies
20.5	25	B. Embedding Respect and Human Rights Due Diligence
10.8	15	C. Remedies and Grievance Mechanisms
14.4	20	D. Performance: Company Human Rights Practices
15.2	20	E. Performance: Responses to Serious Allegations
7.5	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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Human rights policy 'Rio Tinto respects and supports the dignity, well-being and human rights of our employees, the communities in which we live and those affected by our operations'. [Human rights policy, 2015: riotinto.com] Score 2 <ul style="list-style-type: none"> Met: OECD: The Company states that it has 'made voluntary commitments to leading international standards and initiatives such as the OECD Guidelines for Multinational Enterprises' [Human rights on website: riotinto.com]
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: UNGC principles 3-6: The Company is a signatory to the UN Global Compact [UNGC Website - Participant Company, N/A: unglobalcompact.org] Not met: Explicitly list All four ILO apply to EX BPs: The supplier code of conduct contains explicit commitments to each ILO core area. With respect freedom of association and collective bargaining, the Code indicates: 'Respecting workers' rights to lawfully and peacefully form or join trade unions of their choosing and to bargain collectively.' The code includes business partners. 'The Way we work' also contains commitments to all ILO core and applies to consultants, agents, contractors and suppliers. In this case, the Company states with respect freedom of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>association and collective bargaining: 'We are committed to meeting local laws and international agreements about workforce labour. We recognise that people have the right to choose whether to belong to a union and to seek to bargain collectively.' It also indicates that it wants 'these principles to be respected by our joint venture partners and non-controlled companies'. However, CHRB could not find alternative measures to support the rights to freedom of association and collective bargaining when they are restricted by law. [Supplier code of conduct, 2016: riotinto.com & The way we work, 2017: riotinto.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Human rights policy contains explicit commitment against forced and child labour. The 'way we work' document contains the code of conduct which includes explicit commitment to diversity (non-discrimination) and Freedom of Association and collective bargaining: 'We are committed to meeting local laws and international agreements about workforce labour. We recognise that people have the right to choose whether to belong to a union and to seek to bargain collectively'. However, CHRB could not find alternative measures to support the rights to freedom of association and collective bargaining when they are restricted by law. [The way we work, 2017: riotinto.com & Human rights policy, 2015: riotinto.com] • Met: Respect H&S of workers: The 'way we work' document contains the Company's position in relation health and safety: 'we make the safety and wellbeing of our employees, contractors and communities our priority number one'. [The way we work, 2017: riotinto.com] • Met: H&S applies to EX BPs: Health and safety performance is included within the supplier code. [Supplier code of conduct, 2016: riotinto.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 participant in the Voluntary Principles and its human rights policy states that 'we support and implement the Voluntary Principles on Security and Human Rights and ensure relevant employees and contractors are trained in accordance with these principles'. [Human rights policy, 2015: riotinto.com] • Met: ILO 169: The Human rights matters guide indicates that 'Rio Tinto has also publicly expressed support for the 'International Labour Organization Convention 169: Concerning indigenous and Tribal Peoples in Independent Countries'. In addition, the Company has endorsed the Uluru Statement from the Heart. [Why human rights matter guide, 2013: riotinto.com & BHP and Rio Tinto endorse Uluru Statement from the Heart, 31/01/2019: https://riotinto.com companies list of Disclosure - Easy format.docx#_Hlk5097256_1,24118,24178,0,,riotinto.com] • Met: Expects BPs to respect these rights: The Human rights policy contains a commitment to the Voluntary principles as stated above. In relation to this policy's scope, it says that 'through appropriate contractual arrangements and procurement principles, we make our consultants, agents, contractors and suppliers aware of and expect their compliance with our human rights commitments. We strive to ensure our joint venture partners and non-controlled companies in which we participate also to respect our commitments to uphold human rights. In relation to indigenous rights, 'the way we work' document, which also applies to business partners, the Company states that 'we operate in a manner consistent with the UN Declaration on the Rights of Indigenous Peoples in those jurisdictions that have signed the Declaration, and elsewhere in accordance with the Declaration's principles'. [The way we work, 2017: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: The 'way we work' document states that 'we strive to achieve free, prior and informed consent of Indigenous communities as described in the 2012 International Finance Corporation Performance Standard 7 and supporting guidance, and consistent with the law'. The Company is also member of the ICMM and refers to the ICMM statement on indigenous peoples as member company. [The way we work, 2017: riotinto.com & Sustainable Development Report 2018, 2019: riotinto.com] • Met: IFC performance standards: The 'Approach to communities and social performance' policy states that 'Ensuring that resettlement is avoided where possible, and where unavoidable proceeds in compliance with the IFC Performance Standard 5 on "Land Acquisition and involuntary Resettlement" so that resettled people and communities have their standard of living and livelihood sustainable restored or improved over the long term as a result of the resettlement'. [Approach to communities and social performance: riotinto.com] • Not met: Respecting the right to water: In its Sustainable Development Report 2018, the Company states: 'We balance our operational needs with those of local

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>communities, Traditional Owners, ecosystems and regulatory requirements. And we are continuing to strengthen our water governance and planning processes to improve water management across the business. In the 'why gender matters' document water is treated in the context of women, however no evidence is found of a formal commitment to respecting the right to water company-wide. The company state that they support the ICMM position statement on water stewardship, however, this indicator looks for a direct commitment from the company on its commitment to water rights. [Sustainable Development Report 2018, 2019: riotinto.com & ICMM Position Statement on Water Stewardship, 01/2017: icmm.com]</p> <ul style="list-style-type: none"> • Not met: Expects BPs to commit to all these rights: 'The way we work' document applies to business partners and contains a commitment to FPIC. It also indicates: "through appropriate contractual arrangements and procurement principles, we make our consultants, agents, contractors and suppliers aware of and expect their compliance with our human rights commitments. We strive to ensure our joint venture partners and non-controlled companies in which we participate also to respect our commitments to uphold human rights.' It also indicates that it In its Sustainable Development Report, the Company has communicated that it supports the new ICMM position statement on water stewardship, which covers right to water. However, it is not clear if it expects business partners to respect right to water and land rights. [The way we work, 2017: riotinto.com & Sustainable Development Report 2018, 2019: riotinto.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: Regular stakeholder engagement: In its Sustainability Report 2018, the Company indicates: 'Our stakeholders are vital to our success. What we learn from them helps us to create value for everyone. We consider any person or organisation with an interest in our activities a Rio Tinto stakeholder. This includes people potentially affected by our activities and those who influence our business decisions. We work with customers, suppliers, investors, governments, civil society and workers' organisations and local communities to understand stakeholders' concerns, stay competitive, manage the unique risk profiles of our businesses and secure access to new sources of essential materials.' The Company reports engagement with affected stakeholders. [Sustainable Development Report 2018, 2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: On pages 16-17 of Why human rights matter, the company describes how it engages with affected stakeholders in its human rights due diligence process. [Why human rights matter guide, 2013: riotinto.com]
A.1.5	Commitment to remedy	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 remedy: The Company states in its 'why human rights matter' guide that 'as part of our responsibility to respect human rights we actively engage and cooperate in remediating any adverse impacts that we have caused or contributed to. Rio Tinto may do this alone or in conjunction with others'. [Why human rights matter guide, 2013: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The 'why human rights matter' referencing the Guiding principles indicates that 'a site-level process must not inhibit any individual or group's access to judicial recourse, nor put them at undue risk'. [Why human rights matter guide, 2013: riotinto.com] • Met: Work with EX BPs to remedy impacts: The Company indicates that it has worked through a complaints process with the IFC's Compliance Advisory Ombudsman (CAO) at our Oyu Tolgoi site (Oyu Tolgoi is jointly owned by the Government of Mongolia (34 per cent) and Turquoise Hill Resources (66 per cent, of which Rio Tinto owns 51 per cent). According to CAO website: 'In February 2013, a complaint was filed by a local nomadic herders and community members who reside and conduct livelihood activities close to the project site. The complainants' main concern is the Undai River diversion component of the project. The complainants contend that the river diversion jeopardizes their traditional nomadic lifestyle and livelihood. [...] After several joint meetings, the parties reached comprehensive agreements on the issues raised in the complaints, and developed detailed action plans for implementation.' On the Oyu Tolgoi website, the Company states: 'While at the time OT had (and continues to have) a robust complaints and grievance process which can be activated in these circumstances, the herders preferred to go through an externally mediated process. OT respected this choice, recognising that it was crucial to use a process that the herders felt would be the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			most legitimate in this situation'. The CAO website contains the Complaint resolution agreement from 2017. [CAO Case: Mongolia / Oyu Tolgoi-02/Southern Gobi, 17/05/2019: cao-ombudsman.org & Oyu Tolgoi: Partnering for progress: Bridging the divide, 25/06/2019: ot.mn]
A.1.6	Commitment to respect the rights of human rights defenders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates in its 'Role of civil society organisations' document that: 'We recognise the particular risks faced by human rights and environmental defenders, respect their human rights and make it clear that attacks on them will not be accepted, including when we engage with our business partners.' [Role of civil society organisations, 08/2018: https://riotinto.com companies list of Disclosure - Easy format.docx#1,22332,22409,0,,riotinto.com] Score 2 <ul style="list-style-type: none"> Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: CEO or Board approves policy: The Human rights policy has been approved by Rio Tinto Executive Committee. [Human rights policy, 2015: riotinto.com] Met: Board level responsibility for HRs: The Company indicates in the 'slavery and human trafficking statement' that 'our board Sustainability Committee monitors compliance with our human rights-related policies and standards'. [Slavery and human trafficking statement, 2017: riotinto.com] Score 2 <ul style="list-style-type: none"> Met: Speeches/letters by Board members or CEO: In 2018 the CEO spoke publicly about ESG (Environment, Social and Governance), including topics related with human rights (communities, safety, wellbeing and engagement of our employees). The Chairman, Simon Thompson also gave a speech, where it presented an update on the Company's ESG strategy and priorities, including different human rights matters (Voluntary Principles on Security, EITI Initiative, etc.). [ESG Roundtable -J-S Jacques, Chief Executive Officer, 11/2018: riotinto.com & ESG Roundtable - Simon Thompson, Chairman, 11/2018: riotinto.com]
A.2.2	Board discussions	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board/Committee review of salient HRs: The Sustainability Committee terms of reference indicates that this Committee has oversight on 'relationships with and resettlement of communities, human rights of communities, employees, and contractors, and sustainable development issues as they relate to suppliers and supply chains'. The committee meets at least four times a year. The document details the responsibilities of the Committee which include whistleblowing, risk management, management report reviews, oversee management processes designed to ensure compliance with policies, etc. [Sustainability Committee terms of reference, 26/02/2019: riotinto.com] Met: Examples or trends re HR discussion: The Company discloses in the Annual report the activities carried out by the Sustainability Committee, which met 5 times during 2018. The Committee cover diverse human rights issues, such as: 'Carried out deep dives into the risks and controls for the Group's process safety programmes, and its controls on toxic and asphyxiant gases; Reviewed the outcomes of the Group's 2017 short term incentive plan in relation to safety, and the 2018 safety targets for fatalities, all injury frequency rates, and critical risk management; we also reviewed the design for the 2019 targets; Assessed Rio Tinto's safety and health performance compared with peers from mining and other industries, as represented in the ICMM, and found that Rio Tinto's safety strategy is aligned with industry best practice. Our performance on occupational illness rates matches ICMM peers. [...] We continued to provide oversight of the Group's communities and social performance strategy, with a particular focus on relationships with communities and human rights, including in our supply chains.' [Annual Report 2018, 02/2019: riotinto.com] Score 2 <ul style="list-style-type: none"> Met: Both examples and process: See above
A.2.3	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Incentives for at least one board member: According to its Annual Report 2018 'Safety KPIs comprise a significant portion of the STIP [short-term incentive plan] for executives, and any fatality will have a material impact on the STIP result

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>for all executives. Safety KPI include all injury frequency rate. [Annual Report 2018, 02/2019: riotinto.com]</p> <ul style="list-style-type: none"> • Not met: At least one key EX RH risk, beyond employee H&S: The all injury frequency rate (Safety KPI) refers to 'The number of injuries per 200,000 hours worked by employees and contractors at operations that we manage. AIFR includes medical treatment cases, restricted workday and lost-day injuries. [...]. This indicator is linked to the short-term incentive plans. Although the Company indicates that 'Associated risks [to this indicator, are]: Health, safety, environment and communities (HSE&C) risks, as our operations are inherently hazardous', the definition of the indicator does not include explicitly communities. Although the Company has provided comments to CHRB in relation to this indicator, it is not clear, based on publicly available sources, that safety incidents/performance in communities can affect board member remuneration. [Annual Report 2018, 02/2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: Indicators included in the short-term incentive plan are described, and the level of compliance determined by the Sustainability Committee. The remuneration report discloses the specific results obtained. [Annual Report 2018, 02/2019: riotinto.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	1.5	<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: Senior responsibility for HR: The 'Statement on modern slavery 2018' indicates that 'Executive Committee accountability for the area is cross-functional and includes leaders responsible for our human rights approach (Group Executive, Corporate Relations), third party due diligence and broader business integrity work (Group Executive, Group General Counsel) and procurement (Group Executive, Chief Commercial Officer).' [Statement on modern slavery 2018, 03/2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The 'slavery and human trafficking statement' indicates that a cross-functional human rights working group helps implement a coordinated human rights approach at an operational level. The Sustainable development report (2016) indicates that it includes human rights considerations in processes like social risk analysis, environmental and social impact assessments, incident reporting procedures and studies and programmes at high-risk sites when required. No new relevant evidence found in latest year statement. [Slavery and human trafficking statement, 2017: riotinto.com] • Not met: Day-to-day responsibility for EX BRs: Although the Company discloses information in different reports about how it works in Joint Ventures with respect the Voluntary Principles through its Group Security team (2018 VPSHR Report), that it has personnel present in Joint Ventures, and how it works on suppliers' awareness and procurement practices (Statement on modern slavery 2018 and Sustainable Development Report 2018), is not clear how day to day responsibility for managing human rights for extractive business partners is allocated.. [Sustainable Development Report 2018, 2019: riotinto.com & 2018 Voluntary Principles on Security and Human Rights Report, 2019: riotinto.com]
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: Following indicator A.1.3, other executive directors and Group executives besides the CEO and board are covered by the same incentives related to safety performance: 'Safety KPIs comprise a significant portion of the STIP [short-term incentive plan] for executives, and any fatality will have a material impact on the STIP result for all executives. Safety KPI include all injury frequency rate. [Annual Report 2018, 02/2019: riotinto.com] • Not met: At least one key EX HR risk, beyond employee H&S: The all injury frequency rate (Safety KPI) refers to 'The number of injuries per 200,000 hours worked by employees and contractors at operations that we manage. AIFR includes medical treatment cases, restricted workday and lost-day injuries. [...] Associated risks: Health, safety, environment and communities (HSE&C) risks, as our operations are inherently hazardous'. Although the Company indicates that 'Associated risks [to this indicator, are]: Health, safety, environment and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>communities (HSE&C) risks, as our operations are inherently hazardous', the definition of the indicator does not include explicitly communities. Although the Company has provided comments to CHRB in relation to this indicator, it is not clear, based on publicly available sources, that safety incidents/performance in communities can affect senior executives remuneration. [Annual Report 2018, 02/2019: riotinto.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: As noted above, indicator A.1.3 indicates the performance criteria, which covers short term incentives for other group executives. [Annual Report 2018, 02/2019: riotinto.com]
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 explains in the annual report its risk management framework and the risks that it faces. Among these there are risks related to health, safety, environment, communities (maintain access to land, resources, people and capital), and stakeholders risks (engagement with communities and other stakeholders and comply with group policies and standards including human rights). [Annual Report 2018, 02/2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Sustainability Committee terms of reference indicates that the responsibilities of the committee include 'assess the adequacy of the Group's Health, Safety, Security, Environment and Communities framework'. Also, the Company indicates in previous sustainability report that 2015 'In 2015, our Group Audit & Assurance team completed a Group-level review of security and human rights. The review considered the design and effectiveness of governance and internal controls supporting the Group security and human rights framework. Overall, the findings indicate that most elements of the security and human rights framework were operating effectively. The report noted minor control weaknesses existed in certain areas'. No new relevant evidence found, however, in latest reports, or on whether this assessment is carried out on annual basis. [Sustainability Committee terms of reference, 2017 & Sustainable development report, 2016: riotinto.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 the Sustainable development report that in 2017 'we rolled out our human rights training for all employees. The introductory module is compulsory for all employees'. Function specific modules around communities, procurement, security and inclusion and diversity are also available'. [Sustainable development report 2017, 2018: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Met: Communication of policy commitments to stakeholder: In the 'inclusive engagement' section, explaining the context of engagement in agreement negotiation, the document 'Why agreements matter' states that 'it's important to understand appropriate ways to acknowledge and express commitment to non-negotiable principles, policies or standards of the parties – notably in Rio Tinto's case, The way we work Principles [Company's code containing human rights] should be kept to a minimum and be high level so they are not mistaken for an articulation of non-negotiable positions'. [Why agreements matter, 03/2016: riotinto.com] • Met: How policy commitments are made accessible to audience: In the 'inclusive engagement' section of the 'Why agreements matter document', the Company states that 'tailoring engagement processes for different groups can reduce the risk of reinforcing existing barriers to participation, or creating new ones. Working with other parties on the agreement [as noted above, agreements should include as non-negotiable part the document 'The way we work', containing company's commitments on human rights], Rio Tinto aims to explore various ways to improve opportunities for different community groups to engage with agreement processes. This might include, for example, holding multiple and diverse forums, using participatory approaches and making information available through diverse media and in multiple languages, where necessary'. [Why agreements matter, 03/2016: riotinto.com]
B.1.4.b	Communication /dissemination of policy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
	commitment(s) to business relationships		<ul style="list-style-type: none"> • Met: Communicating policy to EX contractors and joint ventures: The Company states that 'In 2018, we continued to make our expectations of suppliers clear through our Supplier code of conduct which is also available on our website, and provided in bilateral discussions and contractual terms. The Supplier code of conduct sets out our expectations of suppliers and their subsidiaries and subcontractors with respect to key issues, including human rights'. In addition, the Human rights policy states that 'through appropriate contractual arrangements and procurement principles, we make our consultants, agents, contractors and suppliers aware of and expect their compliance with our human rights commitments. We strive to ensure joint venture partners and non-controlled companies in which we participate also respect our commitments to uphold human rights'. The Supplier Code of Conduct states that 'This supplier code of conduct, which draws upon internationally recognised standards and Rio Tinto's The way we work, sets our expectations of you, your subsidiaries and subcontractors. We may not elect to not work with or cease to work with suppliers who do not meet our expectations'. [Statement on modern slavery 2018, 03/2019: riotinto.com & Human rights policy, 2015: riotinto.com] • Met: Including to EX BPs (removed): (Removed) <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: In its Slavery and human trafficking statement 2017, which applies to the global operations, suppliers, subsidiaries and Joint Venture managed by the Company, it indicated: 'Rio Tinto has also updated its standard contractual terms to include a requirement to comply with the Supplier code of conduct for new or renewed supply agreements'. Also, Human rights policy states that 'through appropriate contractual arrangements and procurement principles, we make our consultants, agents, contractors and suppliers aware of and expect their compliance with our human rights commitments. No new relevant evidence found in last year statement. [Slavery and human trafficking statement, 2017: riotinto.com & Human rights policy, 2015: riotinto.com] • Met: Including on EX BPs: 'Through appropriate contractual arrangements and procurement principles, we make our consultants, agents, contractors and suppliers aware of and expect their compliance with our human rights commitments. We strive to ensure joint venture partners and non-controlled companies in which we participate also respect our commitments to uphold human rights'. The Sustainable development report indicates that 'we endeavour to ensure that the principles in 'The way we work' are applied and we encourage our partners to embed a strong safety, security and human rights culture in their workforces'. [Human rights policy, 2015: riotinto.com & Slavery and human trafficking statement, 2017: riotinto.com]
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company indicates in its Sustainable development report 2018: '[...] we require all our sites to provide human rights training to staff, contractors and visitors – tailored to local contexts. We also offer specific online modules to teams on issues affecting communities, procurement, security and inclusion and diversity'. [Sustainable Development Report 2018, 2019: riotinto.com] • Met: Trains relevant EX managers including security personnel: It also indicates: 'Our online VPSHR training is mandatory for all security personnel at high risk sites and is strongly recommended elsewhere.' In addition, in its 2018 VPSHR Report, the Company states: 'we ensure relevant employees and contractors are trained in accordance with these principles. We provide practical guidelines, toolkits, and training on implementing the VPSHR. Our online VPSHR training is also mandatory for all security personnel at high-risk sites, and is strongly recommended for all other Rio Tinto businesses. Security and human rights training is also included in our Human Rights Training Programme for our business leaders and managers'. [Sustainable Development Report 2018, 2019: riotinto.com & 2018 Voluntary Principles on Security and Human Rights Report, 2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not 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 • Met: Monitoring implementation of HR policy commitments: The Company indicates has a business integrity compliance programme: 'The programme meets

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Group-wide and business specific requirements and aims to address concerns in our host communities. We conduct quarterly audit forums to monitor and oversee the implementation and effectiveness of the business integrity compliance programmes across our business'. The Company also indicates that part of its due diligence activities include prevent and mitigate human rights impacts for its operations. [Sustainable development report 2017, 2018: riotinto.com]</p> <ul style="list-style-type: none"> • Not met: Monitoring EX BP's: Regarding non-managed operations and joint arrangements, the Company indicates (supplier code of conduct) that 'we endeavour to ensure that the principles in The way we work [Company policy] are applied and we encourage our partners to embed a strong safety, security and human rights culture in their workforces'. Also, the Company indicates in its VPSHR Report 2018 that 'Since February 2018, our Group-wide HSEC Business Conformance Audits (BCAs) includes assessing site compliance on implementing Rio Tinto's Security standard (inclusive of security and human rights requirements) at selected sites. Any security and human rights non-conformances or gaps identified during the audit are now automatically addressed as part of the resulting audit improvement actions.' However, CHRB could not find further information about this human rights monitoring process, if this framework is implemented across extractive business partners generally or if it includes active monitoring of compliance with Rio's human rights-related policies. Furthermore, the Modern slavery statement 2018 indicates: 'Structured programmes already exist in some high-risk jurisdictions, including site visits for all new suppliers, audits of contractors regarding wage payments and inspecting workers' conditions. However, we are seeking to drive a more consistent Group-wide approach to monitoring. We also recognise that these practices are often best combined with awareness-raising and other capacity building activities to ensure meaningful change in the practices of suppliers that may be more at risk of involvement in modern slavery. We are planning to review our risk assessment and mitigation actions for modern slavery in 2019, with increased monitoring, including independent auditing, being one potential action'. [Statement on modern slavery2018, 03/2019: riotinto.com & 2018 Voluntary Principles on Security and Human Rights Report, 2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process: Although the Company describes its grievance mechanisms, no evidence found of the corrective action process that the Company implements following breaches found during monitoring process. • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored
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 indicates that 'When conducting due diligence on suppliers, we apply a range of steps including pre-qualification checks, contractual arrangements and ongoing monitoring. For example, suppliers in China managed by our China Sourcing team must complete a pre-qualification questionnaire explicitly asking about the supplier's policies and practices on preventing child, forced and bonded labour.' Applies to goods and services (business partners) [Statement on modern slavery2018, 03/2019: riotinto.com] • Met: HR affects on-going EX business partner relationships: 'In 2018, we continued to implement our "Know your supplier" procedure, our standardised integrity due diligence process designed to identify, for each supplier, the potential legal, ethical or reputational risks of engaging or renewing that supplier, including around human rights.' It applies to goods and services. [Statement on modern slavery2018, 03/2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Met: Working with EX business partners to improve performance: The Company indicates in that it engages with partners in larger joint ventures 'through formal governance structures and technical exchanges to learn and improve performance. We endeavour to ensure that the principles in 'The way we work' are applied and we encourage our partners to embed strong safety, security and human rights culture in their workforces'. The annual report states that 'we continue to work with our partners to share fatality prevention initiatives, including CRM and learning critical lessons, to ensure the circumstances leading to incidents are not repeated. The Company provides some examples of work carried out, such as in PT Freeport Indonesia, where the 'multidisciplinary Technical Committee' enables discussion on worker health and safety and communities among other topics. A Rio

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Tinto senior safety professional based in Indonesia works with PTFI on issues such as fatality prevention programs. No new relevant evidence found in the latest statement. [Slavery and human trafficking statement, 2017: riotinto.com]
B.1.8	Approach to engagement with potentially affected stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems: The Company indicates in its Sustainable development report 2018: 'Our stakeholders are vital to our success. What we learn from them helps us to create value for everyone. We consider any person or organisation with an interest in our activities a Rio Tinto stakeholder. This includes people potentially affected by our activities and those who influence our business decisions. We work with customers, suppliers, investors, governments, civil society and workers' organisations and local communities to understand stakeholders' concerns, stay competitive, manage the unique risk profiles of our businesses and secure access to new sources of essential materials. These engagements and partnerships affect every stage of our value chain and mining life cycle.' Its report include a section where the Company presents its engagements activities per stakeholder group, the areas of interest, the mode of engagement and the frequency. In addition, the Company has a Communities and social performance (CSP) standard which helps it to engage with its communities. [Sustainable Development Report 2018, 2019: riotinto.com] • Met: Frequency and triggers for engagement: As indicated above the Company discloses in its Sustainable development report its engagement activities by stakeholder group, describing the frequency, areas of interest and mode of engagement. In addition, the Company states: 'to understand stakeholders' concerns, stay competitive, manage the unique risk profiles of our businesses and secure access to new sources of essential materials.' [Sustainable Development Report 2018, 2019: riotinto.com] • Met: Engagement includes EX business partners communities: In addition to the evidence above, the Company's continuous engagement with communities is made through the framework described in 'why agreements matter' which describes the approach that the Company follows to engage with communities in its operations. In addition, the Company discloses information of specific engagement initiatives with communities of some of its extractive business partners, such as the operational level community engagement system from Queensland Alumina Limited (QAL) (owned by Rio Tinto Alcan (80%) and Rusal (20%)) with its real-time online community system (ROC), or the CSIRO local voices partnership which highlights its efforts to listen to and engage with local community members across a range of issues in the Pilbara region in Australia. [QAL - Community engagement procedure, 24/09/2014: gal.com.au & CSIRO Local Voices - Pulse Survey, 11/08/19: research.csiro.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: Although the Company discloses information on stakeholder engagement summarizing the areas of interest of each stakeholder group, no evidence found of analysis and inputs on specific input provided by stakeholders on human rights issues and how it took those views into account within the last reporting years. [Sustainable Development Report 2018, 2019: riotinto.com & Why agreements matter, 03/2016: riotinto.com]

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 states that 'We use integrated Group-wide processes such as social and environmental impact assessments as well as targeted studies such as human rights impact assessments to assess human rights risks across our business.' Additional details can be found in sub indicators below. [Statement on modern slavery 2018, 03/2019: riotinto.com] • Met: identifying risks in EX business partners: The Company has a procedure called 'know your supplier' (includes services): 'our standardised integrity due diligence process designed to identify, for each supplier, the potential legal, ethical or reputational risks of engaging or renewing that supplier, including around human rights.' It takes a risk based approach, considering factors such as the goods or services, country of origin, vendor and spend level'. [Statement on modern slavery 2018, 03/2019: riotinto.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company indicates that it integrates 'human rights considerations, including modern slavery, into our own operations' risk management processes. These include site-based social risk analysis and impact assessment. [...] This work forms part of our commitment to implement human rights due diligence in line with the UN Guiding Principles on Business and Human rights'. Rio Tinto's 'why human rights matter' document provides guidance to employees on how to undertake human rights due diligence. [Statement on modern slavery2018, 03/2019: riotinto.com & Why human rights matter guide, 2013: riotinto.com] • Met: In consultation with stakeholders: The Company states: 'our Communities and social performance (CSP) standard requires sites to include human rights issues in social risk analyses and impact assessments, and to commission specific human rights risk and impact assessments in high risk contexts; [...]' [Statement on modern slavery2018, 03/2019: riotinto.com] • Met: In consultation with HR experts: The Company indicates that 'to improve our understanding of local human rights contexts, as well as exposure to related issues such as corruption, we use tools including [...] Global slavery Index and Verisk Maplecroft Human Rights Index. When we are seeking more in-depth information on identified risks, country industry and company-specific resources such as the US Department of State's Trafficking in persons report and country narratives [...]. On its website, it also indicates that it has worked with the Danish Institute for Human rights to co-created the Human rights and business country guide, a tool for international business to better understand human rights risks in different contexts. [Statement on modern slavery2018, 03/2019: riotinto.com & Human rights on website: riotinto.com] • Met: Triggered by new circumstances: The due diligence process is implemented to 'identify and taking appropriate action regarding adverse human rights impacts in which we may be involved [...] 'Some goods and services we procure may be higher risk than others. We have assessed construction, shipping, cleaning, catering and other transport services to be among these because of a variety of factors including the use of sub-contracting, migrant workers and lower-skilled labour. In addition to identifying these sectors as higher risk as part of our initial supply chain risk mapping, we monitor expert analysis – such as research from governments, international institutions and think tanks – to ensure an up-to-date understanding of high-risk sectors. We also recognise that increased due diligence may be needed when suppliers bring employees or contractors to Rio Tinto locations.' The 'why human rights matter' guide indicates that there is a 'new country entry' procedure. [Statement on modern slavery2018, 03/2019: riotinto.com & Why human rights matter guide, 2013: riotinto.com] • Met: Explains use of HRIAs or ESIA (inc HR): The Company states that 'we undertake social and economic impact assessments to understand the implications of our activities and reduce any negative impacts throughout the life cycle of our operations'. In the 'why human rights matter' guide the Company indicates that it 'expects its business to undertake social risk analysis (SRA) and social impact assessments (SIA)'. 'SIA focuses on the risk to communities arising from the activities of the proposed project and is generally carried out at feasibility stage, often as a regulatory requirement'. 'Human rights considerations should be integrated in both SRA and SIA'. No new relevant evidence found in latest report. [Sustainable development report 2017, 2018: riotinto.com & Why human rights matter guide, 2013: riotinto.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 has human rights considerations through the life of the projects, including risk assessments in the first stages: When it enters in a new country or identifies terrains with geological potential it takes the following considerations: 'identify key human rights exposures based on the political, cultural and social context. Identify vulnerable and 'at risk' groups. Engage with them inclusively at all stages'. Then, it develops and 'early stage business case' including the following considerations: 'review knowledge base on human rights-related country risk and apply recommendations. In carrying out the analysis, consider the need for a dedicated human rights risk analysis. [...] Ensure the project is compliant with the VPSHR and other relevant voluntary commitments including those related to resettlement plans and free, prior and informed consent of Indigenous peoples'. Assessments also included in the other stages of the project. [Why human rights matter guide, 2013: riotinto.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Public disclosure of salient risks: The Company states that its most salient human rights issues include those relating to 'operational security, land access and resettlement, Indigenous people's rights, environmental issues such as access to water, labour rights, and issues related to migration such as access to local health services.' [Sustainable Development Report 2018, 2019: riotinto.com] Score 2
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: The Company indicates that it undertakes due diligence in line with the UNGPs which includes 'identifying and taking appropriate action regarding adverse human rights impacts in which we may be involved'. The 'Communities and Social Performance Standard' (CSP standard) explains human rights requirements in the Company's business and managed operations, including human rights risk concerns in social risk analyses and impact assessments. The social risk analysis must be maintained at operations and the CSP plan must integrate with business planning processes and must have targets and performance indicators and be developed in collaboration across the business departments. It also must be reviewed and updated consistent with the business planning cycle. The Social risk analysis guidance note indicates that some issues will be seen and categorised as human rights risks because the very nature of the risk is our potential involvement in human rights and issues in other areas may have implications for human rights if expected or required outcomes are not secured. [Further CHRB Disclosure, 24/08/2018: business-humanrights.org & Statement on modern slavery2018, 03/2019: riotinto.com] • Met: Including amongst EX BPs: The Company has a due diligence process to identify and assess human rights risks in its supply chain. It describes how has specific measures for some operations: 'Some of our functions and sites have initiated their own supplier risk assessment and mitigation processes alongside those of the Group. For example, our Marine team implements its chartering and due diligence processes to respond to third-party risks, which help ensure that all vessels arriving at our ports can provide assurance of compliance with the Maritime Labour Convention. [...] Our China Sourcing team is largely focused on suppliers from China and South East Asia. They use a supplier self-assessment that covers a range of issues, including several potential indicators of modern slavery, such as the use of prison labour, retention of identity documents and payment of recruitment fees.' [Statement on modern slavery2018, 03/2019: riotinto.com] • Met: Example of Actions decided: To face modern slavery issues in vessels: 'Rio Tinto's Marine team recently revised standard agreements for ship owners requiring compliance with applicable modern slavery laws. Ship owners will be notified of this new modern slavery clause as the new agreements are rolled out. The Marine team also takes part in internal audits to track compliance of their procedures with key policies and standards, including our Human rights policy.' [Statement on modern slavery2018, 03/2019: riotinto.com] Score 2
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to 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: System to check if Actions are effective: In the 'why human rights matter' guide the Company devotes a section to monitoring and evaluation of actions. It indicates that evaluation is essential in order to identify whether plans are achieving objectives, whether risk mitigation measures are effective and determine cause and provide basis for corrective actions if procedures and plans are ineffective. The Company does this through 'Speak-OUT, the Rio Tinto business solution (RTBS) Incident reporting system [...] technical Evaluation Group reviews and the monitoring undertaking through annual compliance reports and compliance audit forums'. Also, CSP site managed assessments have a diagnostic with a specific key performance area on human rights. 'The findings of each SMA [site managed assessments] are owned by the business unit concerned and the recommendations go to the CEO of that business. Aggregate results are shared throughout Rio Tinto to ensure all business and divisions are aware and learn from them'. The Company also discloses its management system documents which includes the specific rules for 'performance assessment and auditing' of the risk management system (including health, safety, environment and communities), and incident and action management procedure with the intent to ensure that all incidents and lessons learnt are recorded and corrective and preventive actions are identified and communicated. [Why human rights matter guide, 2013: riotinto.com & Rio Tinto management system standard, 04/2015: riotinto.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Lessons learnt from checking effectiveness: The Company describes the learnings from the implementation of the 'Know your supplier' procedure in how to best identify and act on modern slavery risks. Challenges included lack of publicly available information on suppliers' commercial backgrounds; Reluctance of suppliers to share relevant policies and processes (or lack of awareness of which information should be shared); and deciding which mitigation options may be the most effective in the operating context. The Company addressed these challenges through: targeted training for the Due Diligence team about the types of adverse findings, based on publicly available information that may suggest a risk of modern slavery; engagement with procurement staff to facilitate more effective discussions with suppliers about their approach to modern slavery and cross-functional coordination to discuss mitigation options. No new relevant evidence found in latest report. [Slavery and human trafficking statement, 2017: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above.
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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: Comms plan re identifying risks: The Company discloses in its public reports the process to identify human rights risks. Its guides also disclose the process by which affected stakeholders are included in the process and participate. More details can be found in B.2.1 [Statement on modern slavery2018, 03/2019: riotinto.com & Why human rights matter guide, 2013: riotinto.com] • Met: Comms plan re assessing risks: See B.2.2 [Why human rights matter guide, 2013: riotinto.com & Statement on modern slavery2018, 03/2019: riotinto.com] • Met: Comms plan re action plans for risks: See B.2.3 [Further CHRB Disclosure, 24/08/2018: business-humanrights.org & Statement on modern slavery2018, 03/2019: riotinto.com] • Met: Comms plan re reviewing action plans: See B.2.4 [Why human rights matter guide, 2013: riotinto.com & Statement on modern slavery2018, 03/2019: riotinto.com] • Met: Including EX business partners: In the 'slavery and human trafficking statement' the Company indicates: 'In 2018, we continued to implement our "Know your supplier" procedure, our standardised integrity due diligence process designed to identify, for each supplier, the potential legal, ethical or reputational risks of engaging or renewing that supplier, including around human rights. The decision to conduct detailed due diligence on a supplier takes a risk-based approach, considering factors such as the goods or services, country of origin, vendor and spend level. The Third Party Due Diligence team is responsible for administering the "Know your supplier" procedure and is provided with specialist internal support to assess identified human rights risks, including modern slavery, and to recommend mitigation actions.' [Statement on modern slavery2018, 03/2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Responding to affected stakeholders concerns: The Company indicates that it has work through a complaints process with the IFC's Compliance Advisory Ombudsman (CAO) at our Oyu Tolgoi site (Oyu Tolgoi is jointly owned by the Government of Mongolia (34 per cent) and Turquoise Hill Resources (66 per cent, of which Rio Tinto owns 51 per cent). Since 2010, Rio Tinto has been the manager of Oyu Tolgoi project. According to CAO website: 'In February 2013, a complaint was filed by a local nomadic herders and community members who reside and conduct livelihood activities close to the project site. The complainants' main concern is the Undai River diversion component of the project. The complainants contend that the river diversion jeopardizes their traditional nomadic lifestyle and livelihood. They are specifically worried that the diversion will lead to several water systems drying up, deteriorated pastureland yields, diminished water supply to forests and a cultural impact to what they view as a sacred river. [...] After several joint meetings, the parties reached comprehensive agreements on the issues raised in the complaints, and developed detailed action plans for implementation.' In addition, in Oyu Tolgoi website the Company states: 'Four years of negotiation included OT designating adequate resources to prepare for, attend and report on meetings. Support from Rio Tinto's global team was continuously available for the local site-based team. [...] Agreed milestones were devised to ensure a common understanding was reached on key issues and included the completion of independent studies on water impacts and herder compensation. The CAO also provided conflict resolution training to all parties participating in the mediation process, which helped to upskill and build trust between participants. The 2017 agreements included commitments from OT, as well as local governments, to construct new water wells and upgrade existing ones, develop a pasture

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>management plan, and conduct regular participatory monitoring of the project's environmental impacts. OT also committed to review compensation outcomes and agreed to undertake further initiatives to boost the livelihood sustainability of all local herders, including enhanced training and employment initiatives. The CAO's administrated process formally closed in March 2019 – seven years after the complaint was lodged and six years after the mediation started.' [CAO Case: Mongolia / Oyu Tolgoi-02/Southern Gobi, 17/05/2019: cao-ombudsman.org & Oyu Tolgoi: Partnering for progress: Bridging the divide, 25/06/2019: ot.mn]</p> <ul style="list-style-type: none"> • Met: Ensuring affected stakeholders can access communications: The 'why human rights matter' guide contains guidelines on this: 'Our reporting needs to be clear and easily accessible to local communities, our workforce and other interested stakeholders'. 'For human right issues and allegations at site-level, the focus should be on a local-level communication with stakeholders. Human rights performance can be reported through the 'social management and performance' section of our local, business unit and corporate sustainable development reports. It may also be appropriate to include it in newsletter or at community meetings. Reporting on human rights risk management as well as incidents and performance is important for transparent communication with our stakeholders and to build trust'. 'Where we are reporting on our performance at a specific project or site, efforts should be made to write documents in local languages and communicate them through various means to ensure all stakeholders have equal access to the information. For instance, plain language summaries or oral presentations can be used in communities where there is limited literacy'. Also, the 'approach to communities and social performance' standards establishes the framework for engagement and the priorities for effective performance with communities. [Why human rights matter guide, 2013: riotinto.com & Approach to communities and social performance: riotinto.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in the Annual report: 'we have had in place a confidential and independently operated whistleblowing programme, re-launched as Talk to Peggy in 2017. This is available to all employees and their families, contractors, business partners and community members.' In addition, in its website it says: 'Talk to Peggy, Rio Tinto's confidential and independently operated multilingual whistleblowing service, is available to employees, contractors, suppliers and customers of Rio Tinto. It offers an avenue for sharing your concerns about the business or individual's behaviour. This can include suspicion of violations of Rio Tinto's policies and procedures, human rights, safety, environmental, [...] or business integrity issues in general. You may contact Talk to Peggy anonymously although the content of what may be shared and the right to anonymity may be subject to local laws.' [Sustainable Development Report 2018, 2019: riotinto.com & Talk to Peggy (Hotline)- website, 08/2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: In its Annual Report 2018, it indicates: 'This year, for example, 679 incidents were reported either through Talk to Peggy, compliance managers or team leaders. Of these, 53% related to human resource issues; 23% to business integrity matters; and 7% to health, safety or environmental matters.' 'We substantiated or took corrective action for 34% of reported incidents.' In addition, the sustainable development report provides information about community complaints: 'In 2018 we reported 10 significant community incidents through our CSP complaints and incidents management system, none of which related to cultural heritage impacts of Indigenous communities.' However, it is not clear how many complaints / report were related with human rights issues (i.e labour right, indigenous, land, water, etc.) [Annual Report 2018, 02/2019: riotinto.com & Sustainable Development Report 2018, 2019: riotinto.com] • Met: Channel is available in all appropriate languages: The Talk to Peggy website indicates that the channel is 'confidential and independently operated multilingual whistleblowing service'. It discloses on this website a document with all countries available. Also, in the 'approach to communities and social performance' document, the Company states that it establishes a 'complaints, disputes and grievance process that local communities can understand and access easily, so as to resolve complaints and disputes proactively before they escalate into grievances'. [Approach to communities and social performance: riotinto.com & Talk to Peggy (Hotline)- website, 08/2019: riotinto.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Opens own system to EX BPs workers: The Company's system is available to 'all employees and their families, contractors, business partners and community members'. [Sustainable Development Report 2018, 2019: riotinto.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Sustainable development report indicates, in the context of community relationships that 'All of our sites must have a complaints, disputes and grievance mechanism in line with the UNGPs Criteria of Effectiveness for Non-Judicial Grievance Mechanisms'. The confidential and independently operated whistleblowing programme, re-launched as Talk to Peggy in 2017, is 'available to all employees and their families, contractors, business partners and community members.' Finally, the 'Approach to communities and social performance' document specifies that it establishes a 'complaints, disputes and grievance process that local communities can understand and access easily, so as to resolve complaints and disputes proactively before they can escalate into grievances'. [Sustainable Development Report 2018, 2019: riotinto.com & Approach to communities and social performance: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Describes accessibility and local languages: In addition to the requirements for the mechanism for communities mentioned above, the Talk to Peggy line is available on website. It indicates that the line is confidential 'confidential and independently operated multilingual whistleblowing service', and discloses a document with all countries available. [Approach to communities and social performance: riotinto.com & Talk to Peggy (Hotline)- website, 08/2019: riotinto.com] Met: EX BPs communities use global system: As indicated in the sustainable development report, 'Talk to Peggy' is a confidential and independently operated whistleblowing programme [...] available to all employees and their families, contractors, business partners and community members.' [Sustainable Development Report 2018, 2019: riotinto.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: In the 'why human rights matter' guide the Company indicates that 'Complaints, disputes and grievance processes provide data for management decision-making. The scope and scale of the process will vary according to the community context; nevertheless, they should all include consultation with stakeholder groups to ensure that it meets their needs and that they will use it in practice'. The 'why agreements matter' guide includes description of elements for complaints, disputes and grievance process and also how the agreement should include agreement-related complaints. [Why human rights matter guide, 2013: riotinto.com & Why agreements matter, 03/2016: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Engages with users on system performance: In addition to the mentioned above, the guide indicates that consultation to stakeholders to ensure that channel meets their needs includes 'facilitating community participation in resolution process, where appropriate'. [Why human rights matter guide, 2013: riotinto.com] Met: Provides user engagement example on performance: The Company discloses how in Richard Bay Minerals shares with the Community the Grievance Handling Protocol, a procedure that 'determines how each complaint is dealt with: how it is recorded, evaluated, investigated and auctioned, and how feedback is made to the community. Ultimately it offers an opportunity for the company and the community to work together to find solutions to community problems and resolve community grievances'. [RBM News, 10/2015: riotinto.com] Not met: EX BPs consult users in creation or assessment: In order to get this indicator, evidence is needed that the Company engages with potential users of the mechanism in relation to its business partners. The Company provided sources to CHRB, however, these were not sufficient for this indicator.
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Response timescales: In the 'why agreements matter' guide the Company discloses a chart indicating 'essential elements for an effective complaints, disputes and grievance process'. It includes a column with the 'typical level of business accountability and time for resolution', which can vary from 1-2 days if it is an 'officer' level, to 6/12 months if it reaches the President. [Why agreements matter, 03/2016: riotinto.com] Not met: How complainants will be informed: Although the Company discloses information of how the complaints will be informed in Operational level grievance

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>mechanism, such as in Queensland Alumina Limited (Joint Venture), CHRB could not find this information for the Company's general grievance channel 'Talk to Peggy'. [How to lodge a concern about QAL in ROCS (Video), 12/02/2015: youtube.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: In the context of community grievances, the Company discloses a Diagram explaining how a good grievance process should look like. According to this diagram if disputes are not resolved at managerial level, it can be escalated to General Managers/VP level or independent experts, and if not, to the President and independent tribunal. In addition, the Company discloses as an example a document where an Operational level grievance mechanism for Richards May Minerals. In this document, the Company presents a diagram where the escalation process and stages are represented: CR Specialist -CR Superintendent - GHC - Board of Appeal - Legal Court / RBM Legal. In addition, in the Company's Management System Standard: 'Any incident with an impact type that has an actual consequence of major or catastrophic (using the defined consequence descriptors) must be reported to the chief executive of Rio Tinto, the product group head and copied to the global head of HSEC and global head of Security as soon as practicable within 24 hours of the incident occurring.' However, CHRB could not find further information about the escalation process of the Company's general grievance channel 'Talk to Peggy'. [Further CHRB Disclosure, 24/08/2018: business-humanrights.org & Operational level grievance mechanism for Richards May Minerals, 2015: riotinto.com]
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 way we work document states that 'any form of retaliation against a person using Speak-OUT [re-launched as 'Talk to Peggy'] in good faith will not be tolerated'. As indicated in the sustainable development report, Talk to Peggy is available for 'to all employees and their families, contractors, business partners and community members'. [The way we work, 2017: riotinto.com & Sustainable Development Report 2018, 2019: riotinto.com] • Met: Practical measures to prevent retaliation: 'Talk to Peggy' is a 'confidential and independently operated multilingual whistleblowing service'. Also, it allow to report anonymously. [Talk to Peggy (Hotline)- website, 08/2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BPs to prohibit retaliation: Although the Code for suppliers only requires policies and practices to allow workers report grievances without fear of retaliation, it does not cover external stakeholders. Anyone can, however, report through the Company's mechanisms. [Supplier code of conduct, 2016: riotinto.com & Sustainable Development Report 2018, 2019: riotinto.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: The 'why human rights matter' guide states that 'The Company's internal processes should not undermine legal processes nor attempt to supplant criminal law, labour law or commercial matters'. 'A site-level process must not inhibit any individual or group's access to judicial recourse, nor put them at undue risk'. It also indicates that, 'in addition to project-level procedures, external non-judicial and/or customary processes are also available, such as national human rights commissions, national ombudsman offices and/or a council of elders (or similar) in indigenous communities'. [Why human rights matter guide, 2013: riotinto.com] • Not met: Complainants not asked to waive rights: The Company explains the requirements for the community complaints, disputes and grievance mechanisms must be, including to meet the intent of the UNGPs. However, no evidence found of the Company communicating that complainants that it does not require to waive their legal rights to bring a claim through a judicial process as a condition of participating in the grievance process. [Further CHRB Disclosure, 24/08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Will work with state based or non judicial mechanisms: The 'why human rights matter' guide states that 'Rio Tinto is committed to a number of international conventions that provide for or require formal complaints, disputes and grievance processes [...] The Guidelines [OECD Guidelines] are supported by national contact points (NCPs) which provide a mediation and conciliation platform for resolving practical issues or 'specific instances' that may arise'. It also states that 'we should not impede or discourage stakeholders from accessing other

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>judicial and non-judicial processes, if so they wish. If this occurs, the legal department or Rio Tinto Global External Affairs can work with the team concerned on a response'. [Why human rights matter guide, 2013: riotinto.com]</p> <ul style="list-style-type: none"> • Met: Example of issue resolved (if applicable): The Company indicates that it has work through a complaints process with the IFC's Compliance Advisory Ombudsman (CAO) at our Oyu Tolgoi site (Oyu Tolgoi is jointly owned by the Government of Mongolia (34 per cent) and Turquoise Hill Resources (66 per cent, of which Rio Tinto owns 51 per cent)). Since 2010, Rio Tinto has been the manager of Oyu Tolgoi project. According to CAO website: 'In February 2013, a complaint was filed by a local nomadic herders and community members who reside and conduct livelihood activities close to the project site. The complainants' main concern is the Undai River diversion component of the project. The complainants contend that the river diversion jeopardizes their traditional nomadic lifestyle and livelihood. They are specifically worried that the diversion will lead to several water systems drying up, deteriorated pastureland yields, diminished water supply to forests and a cultural impact to what they view as a sacred river. [...] After several joint meetings, the parties reached comprehensive agreements on the issues raised in the complaints, and developed detailed action plans for implementation.' [CAO Case: Mongolia / Oyu Tolgoi-02/Southern Gobi, 17/05/2019: cao-ombudsman.org & Oyu Tolgoi, 08/2019: riotinto.com]
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: The Company states on its website 'In July 2015 it was alleged that the crew of a ship, chartered by Rio Tinto from a commercial operator, were underpaid and forced to live and work in poor conditions [...] Once the allegation was confirmed, we requested the ship's head owner address the incident with immediate and adequate remedy. Rio Tinto also provided funds to immediately improve the poor work conditions. Rio Tinto has taken a number of measures to mitigate the risk of future incidents. In addition to blacklisting the head owner and commercial operator, Rio Tinto Marine has reviewed its time chartering and due diligence processes leading to an improved approach to time charter vessels'. [Case study: Managing human rights risks in our maritime supply chain, 2015: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: The Company indicates (Modern slavery statement for FY 2018 that 'responding to identified risks around payment of wages and working conditions on chartered ships, in 2016 Rio Tinto Marine (RTM) implemented initiatives to help ensure all vessels arriving at Rio Tinto ports provided a Maritime Labour Certificate and/or associated declaration of maritime labour compliance. <p>In its Statement in modern slavery 2018, the Company indicates: 'our Marine team implements its chartering and due diligence processes to respond to third-party risks, which help ensure that all vessels arriving at our ports can provide assurance of compliance with the Maritime Labour Convention. This includes boarding chartered ships to inspect workers' conditions. Our Marine team has a procedure to record all incidents involving actual or suspected human rights impacts, including modern slavery. Rio Tinto's Marine team recently revised standard agreements for ship owners requiring compliance with applicable modern slavery laws. Ship owners will be notified of this new modern slavery clause as the new agreements are rolled out. The Marine team also takes part in internal audits to track compliance of their procedures with key policies and standards, including our Human rights policy.' [Statement on modern slavery 2018, 03/2019: riotinto.com & Slavery and human trafficking statement, 03/2017: riotinto.com]</p> <ul style="list-style-type: none"> • Met: Evaluation of the channel/mechanism: The Company indicates that 'we are aware of one incident in 2016 of failure to pay wages on a ship chartered by a subsidiary. When concerns were raised RTM immediately asked the ship owner and manager to resolve any wages and working conditions matters. RTM will continue to review its chartering and due diligence processes to further respond to third-party risks, including non-payment of wages'. [Slavery and human trafficking statement, 03/2017: riotinto.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 • Not met: Describes how living wage determined: In its Employment Policy, the Company indicates: 'The Group implements equitable and transparent remuneration and incentive systems.' However, CHRB could not find further information about how the Company determines the wages or a reference to paying living wages. [Employment policy: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Member of EITI: The Company states: 'We are a founding member of the EITI and have played an active role in this global standard since 2003. The EITI promotes open and accountable management of natural resources to make sure our activities benefit the many, not the few. We're transparent about the taxes and royalties we pay publishing an annual Taxes paid report since 2010. [Sustainable Development Report 2018, 2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: In its tax report the Company discloses a table with all tax payments. The table 'shows the total of all tax payments for each of the main countries where the Rio Tinto Group has revenue-generating operations or projects. The Group does not earn any significant amount of profit in countries not listed in this table. Within each country, total tax payments are reported by the national, regional or local government to which they are paid. The table includes 32 countries. [Taxes paid Report 2018, 2019: riotinto.com]
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: The Company indicates in 'The way we work' that 'we are committed to meeting local laws and international agreements about workforce labour. We recognise that people have the right to choose whether to belong to a union and to seek to bargain collectively'. The employment policy recognises everyone's right to choose whether or not they wish to be represented collectively. The Supplier code of conduct also requires commitment to respect the workers' rights to 'lawfully and peacefully form or join trade unions of their choosing and to bargain collectively' (given the reference to laws, it is not clear whether the Company supports alternative mechanisms or equivalent worker bodies where these rights are restricted under law). However, no evidence found in public sources of a specific commitment to not interfere with this right and put in place measures to prohibit any form of retaliation. [The way we work, 2017: riotinto.com & Employment policy: riotinto.com] • Met: Discloses % covered by collective bargaining: The Company indicates that in 2018 approximately 45% of Rio Tinto employees 'are covered by collective bargaining agreements'. In addition, the Company indicates: 'During 2018, we successfully negotiated: Official Collective Labour Agreement (CLA) at our Alma Smelter in Quebec; Collective Bargain Agreements at Iron Ore Company of Canada, Escondida (non-managed), Richards Bay Minerals in South Africa and Oyu Tolgio in Mongolia' [Sustainable Development Report 2018, 2019: riotinto.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: The Company discloses ratios for the last five years on 'all injury frequency rate'. [Sustainable Development Report 2018, 2019: riotinto.com] • Met: Fatalities disclosures: The Company discloses figures on fatalities for the last five years. [Sustainable Development Report 2018, 2019: riotinto.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Set targets for H&S performance: The Company set the following H&S targets in its 2018 Sustainable development Report: 'To reach zero fatalities, and to eliminate workplace injuries and catastrophic events; To minimise exposure to critical fatality health risks by verifying that effective controls are in place at all managed operations by the end of 2018; To reduce the rate of new occupational illnesses (per 10,000 employees) each year.' [Sustainable Development Report 2018, 2019: riotinto.com] Met: Met targets or explains why not: The Company discloses information of its performance against the targets set: [Target 1] 'Two safety fatalities and one security fatality at managed operations; All injury frequency rate (AIFR) of 0.44, up 5% on 2017 (target 0.38); 1.45 million Critical Risk Management (CRM) verifications (target 1.2 million). [Target 2] 77% of managed operations achieved this target. [Target 3] 15% increase in rate of new cases of occupational illness since 2017.' In addition, it indicates: 'Our goal is to improve our all injury frequency rate (AIFR) every year. Over the past ten years, both our AIFR and the severity of injuries have reduced (from 0.94 in 2008 to 0.44 in 2018). However, as this year's performance shows, we still have work to do.' [Sustainable Development Report 2018, 2019: riotinto.com]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (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: Process to identify indigenous rights holders: In the 'why agreements matter' guide the Company describes how to identify communities to engage with (including indigenous communities with customary land connections and historic connections) representative institutions. It indicates that identifying the primary parties requires an understanding of the local community and context, and that agreement-makers need to consider all people with land-use interests in the impact area and recognise the diverse socioeconomic and socio-political situations of these groups (In India for instance lower castes may not be recognised since they do not have formalised legal land titles). [Why agreements matter, 03/2016: riotinto.com] Met: How engages with communities in assessment: The Company indicates in the 'why agreements matter' document that it seeks broad-based community support based on principles that include 'community participation in social and environmental assessment'. The Company states that 'communities themselves are valuable sources of knowledge and strong community involvement in knowledge base studies are essential. Social and economic impact assessments and anthropological studies benefit from communities having significant input into design and the content'. 'Specific techniques can be used to tap into the wealth and diversity of community knowledge. These include a Participatory Rural Appraisal or Rapid Rural Appraisal, which can be used to collect and analyse data in close cooperation with local people'. Agreement-related activities across life cycle include 'environmental and social knowledge base and impact assessments'. The 'why cultural heritage matters' document indicates that 'we work hard to manage cultural heritage by engaging with relevant communities and stakeholders. This includes working with communities to identify, assess and manage places, objects and practices of cultural significance. Information on cultural heritage 'feed into our Social Impact Assessment'. [Why agreements matter, 03/2016: riotinto.com & Why cultural heritage matters: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commits to FPIC (or ICMM): The 'why human rights matter' guide states that 'Rio Tinto seeks to operate in a manner that is consistent with the UNDRIP. In particular, we strive to achieve the Free, Prior, and Informed Consent (FPIC) of affected Indigenous communities as defined in International Finance Corporation Performance Standard 7 (IFC PS 7) and its supporting guidance'. Also, the Company states in the Annual report 2017 that 'we have incorporated the requirements of the ten principles of the ICMM and the mandatory requirements set out in the ICMM position statements into our own policies, strategies and standards'. Finally, in 2018 sustainable development report: 'We strive for the free, prior and informed consent of Indigenous communities as defined in the 2012 International Finance Corporation Performance Standard 7 and the ICMM position statement on Indigenous Peoples and Mining. We were the first to create land agreements with Indigenous people in Australia in the 1980s, and we were the first mining company in Madagascar to recognise land ownership rights of Indigenous people. We continue to develop our approach to make sure we are respecting the rights, culture and traditions of the communities where we operate'. [Why human rights matter guide, 2013: riotinto.com & Sustainable Development Report 2018, 2019: riotinto.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Gives recent example FPIC or dropping deal: The Company indicates in the Sustainable development report: This year, we continued to meet with the Cheslatta First Nation, in British Columbia, Canada, to work towards an agreement that will define our relationship for years to come, while acknowledging our Kemano T2 project in the Nechako watershed. We also held workshops with Cheslatta, Haisla and other concerned First Nations to present opportunities for jobs and contracts related to the project.' In the 'why agreements matter' the Company discloses the case of Eagle mine in the United States, where the Company had disputes with local communities and tribes. Although the Company had the permits, it sold 100% of its interest in July 2013. [Sustainable Development Report 2018, 2019: riotinto.com & Why agreements matter, 03/2016: riotinto.com]
D.3.6	Land rights (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: Approach to identification of land tenure rights holders: The 'why agreements matter' guide states that 'Agreement-makers need to consider all people with land-use interests in the impact area, and recognise the diverse socioeconomic and socio-political situations of these different groups'. 'Identifying relevant parties for agreement-making is more than a social mapping exercise. It involves engaging with land-connected groups and their chosen representatives. These include: Indigenous peoples with customary land connections in the area, Indigenous peoples with historic connections to the area; [...] all land owners and claimants, especially those who are likely to be affected by activities; those whose land rights, interests and formal claims may be impacted'. It also mentions how some people might be excluded of the process (are more vulnerable). The guide provides an example on how it identified the relevant parties in the past. In the sustainable development report it states: We work in line with the IFC's Land Acquisition and Involuntary Resettlement Performance Standard and our CSP standard. This year, we have been monitoring outcomes from community resettlement at our Oyu Tolgoi operations in Mongolia and have almost finished resettling communities near our Richards Bay Minerals operation in South Africa'. [Why agreements matter, 03/2016: riotinto.com & Sustainable Development Report 2018, 2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works: In its Sustainable development report the Company states that when a resettlement is unavoidable 'We work hard to help to preserve the social harmony of resettled people and to make sure their standard of living and livelihood is sustainably restored or improved over the long term. We work in line with the IFC's Land Acquisition and Involuntary Resettlement Performance Standard and our CSP standard'. Also, in 'why agreements matter' guide the Company explains how obligations, compensation and benefits work. Finally, in its public disclosure to CHRB the Company describes how plan financial compensation or other compensation alternatives, including in-kind compensation and describes the references to follow as valuation methods. However, although compensation packages and payments needs to be signed by all relevant parties in the appropriate language, no details found on how legitimate tenure rights holders are involved in determining the valuation (although there is a mention about women participating in the process). [Further CHRB Disclosure, 24/08/2018: business-humanrights.org & Sustainable Development Report 2018, 2019: riotinto.com] • Met: Steps to meet IFC PS 5 in state deals: The Company states that it should consider itself responsible for the resettlement process, even when it is government-run. 'Working alongside the relevant government authorities and highlighting Rio Tinto's approach and expectations regarding resettlement outcomes is a particularly important when government capacity is limited and/or the national resettlement legislation lags behind International best practice (as captured within IFC PS 5). It has a resettlement and guidance note which includes description of key principles such as resettlement action plan, legibility, compensation framework, etc. [Further CHRB Disclosure, 24/08/2018: business-humanrights.org] • Not met: Describes approach if no recent deals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (in own extractive operations, which includes JVs)	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: How implements security (inc VPs or ICOC): The Sustainable Development report indicates: 'Our online VPSHR training is mandatory for all security personnel at high risk sites and is strongly recommended elsewhere.' In addition, in its 2018 VPSHR Report, the Company discloses information about its approach to respecting human rights through security arrangements, including the following: 'Ongoing site visits and engagement with high-risk sites on security and human rights issues by our Group Security team; Supporting priority sites with security risks analysis and management (inclusive of security and human rights risks); Delivering and maintaining VPSHR training for business leaders, persons responsible for security, private security personnel, and public security forces; Providing guidance to sites and business resilience teams (BRTs) on conflict prevention and mitigating security and human rights risks (e.g. South Africa, Guinea, Peru, Jamaica, Indonesia); Supporting sites with due diligence checks, contracting, and training of private security providers; Training our internal auditors to assess site compliance on Rio Tinto Security standard implementation (inclusive of security and human rights requirements)' [Sustainable Development Report 2018, 2019: riotinto.com & 2018 Voluntary Principles on Security and Human Rights Report, 2019: riotinto.com] • Met: Example of respecting HRs in security: In its 2018 VPSHR Report, the Company indicates: 'Peru, Rio Tinto Exploration (RTX) Office: In March 2018, Group Security trained senior leaders and the business resilience team on Rio Tinto security and human rights guidelines and VPSHR implementation. A table top exercise was used exercise and test team response to risk scenarios with potential security and human rights impact. A VPSHR briefing and training pack were also developed to support future stakeholder engagement and training initiatives with local security providers.' [2018 Voluntary Principles on Security and Human Rights Report, 2019: riotinto.com] • Met: Ensures Business Partners follow security approach: The Human rights policy states that 'we support and implement the Voluntary Principles on Security and Human Rights and ensure relevant employees and contractors are trained with these principles'. Policy applies to business partners and the company expects to be respected by joint venture and non-controlled companies. In the VPSHR Report, the Company discloses information about its 'Efforts to promote awareness of the Voluntary Principles throughout the organisation, including within the value chain' and about 'Relevant policies, procedures and standards'. Among these standards: 'The Rio Tinto Security standard: Outlining the Group-wide requirements to protect our people, assets, information (non-digital) and reputation in line with the VPSHR and respecting the rights of those affected by our security arrangements; The Rio Tinto Security and safety weapons and firearms Group procedure: Specifying the site requirements for authorisation, management, strict control, and mitigation of the risks of the presence and use of weapons and firearms for security and/or safety purposes; The Rio Tinto Security and human rights guidance notes: Providing guidance on effective and risk-based implementation of the security and human rights principles (VPSHR and use of force, weapons and firearms) wherever Rio Tinto operates. Specifically, our Security and human rights guidance notes oblige our sites to implement the performance objectives and key performance indicators relevant to their security arrangements; Our Communities and social performance (CSP) standard: Guidance and processes on social risk analysis and environmental and social impact assessment make it clear that security and human rights risks should be included as part of community and social performance practices.' [Human rights policy, 2015: riotinto.com & 2018 Voluntary Principles on Security and Human Rights Report, 2019: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assesses and involves communities: The Communities and social performance (CSP) standard, in its human rights clauses states that business must ensure site security and CSP functions collaborate to implement the Voluntary Principles as they relate to local communities, relevant to local and operational context. Being security and use of force one of the risks, the social risk analysis should be explicit and cover community and stakeholders considerations. The group procedures to conduct security and human rights assessments includes interviews with key external stakeholders such as local government officials, local police and military commanders, local community leaders, NGOs and others. [Further CHR Disclosure, 24/08/2018: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Working with local community: In its 2018 Voluntary Principles on Security and Human Rights report, the Company discloses information about its procedure to conduct security and human rights risk assessments, which includes: 'A combination of security and human rights reviews, firearm decision reviews, business risk analyses and business impact analyses, incident reporting and analysis, and annual security risk analysis and management is used to identify and assess potential security and human rights issues. [...] Doing so occurs through a range of actions, from looking at security staff's readiness to respond to a security and human rights incident, to interviews with key external stakeholders, such as local government officials, local police, and military commanders, our private security suppliers, and local community leaders.' [2018 Voluntary Principles on Security and Human Rights Report, 2019: riotinto.com]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Action to prevent water and sanitation risks: The Sustainable development report states: 'We balance our operational needs with those of local communities, Traditional Owners, ecosystems and regulatory requirements. And we are continuing to strengthen our water governance and planning processes to improve water management across the business. [...] Each of our operations has its own water context: while some operations are located in water-scarce environments, others have to manage intense rainfall. [...] Based on the World Business Council Global Water Assessment Tool, 43% of our managed sites are assessed as operating in a "water stressed" environment. [...] To ensure we focus on the right issues and with appropriate resources, we have committed to establishing new site-specific targets for the period 2019-23 at operational sites where water is a recognised risk.' The Company discloses the example of Oyu Tolgoi in Mongolia 'the mine is located in the South Gobi, an arid region that receives little rainfall. Local herders rely on shallow sources of groundwater from springs and wells for their animals. We needed a sustainable water supply that didn't conflict with the local population's needs'. The Company surveyed the area and uncovered an aquifer that holds 6.8 billion litres of non-drinkable saline water. 'Oyu Tolgoi is allowed to use 20 per cent of this, sufficient for 40 years'. [Sustainable Development Report 2018, 2019: riotinto.com & Water on website: riotinto.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Water targets considering local factors: The Company has the following target in relation to water: 'To achieve approved local water targets in all managed operations with material water risk'. In the 2015 'sustainable development' report the Company indicates that target for 2014 to 2018 'is that managed operations with material risk will achieve a tailored, locally relevant water target by 2018'. In the context of local water performance targets, the only evidence found relating to communities refers to changes in local targets may be considered when a substantial change in production, compliance, reputation community or environment circumstances occur that was not planned. However no clear was evidence found that specific targets take into consideration water use by local communities and other users in the vicinity. [Sustainable Development Report 2018, 2019: riotinto.com & Sustainable development report, 2016: riotinto.com] Not met: Reports progress in meeting targets and shows trends in progress made: In relation to water target, the Company states that '79% of our operations met their local targets this year – the final year of our current water target programme (target 100%)'. However, as indicated above, it is not clear to what extent do these targets take into consideration water use by local communities and other users in the vicinity of its operations. [Sustainable Development Report 2018, 2019: riotinto.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		No allegations meeting the CHRB severity threshold were found, and so the score of 60.81 out of 80 points scored in themes A-D & F has been applied to produce a score of 15.20 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.89 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Rio Tinto made data public that met one or more elements of the methodology in 37 cases, leading to a disclosure score of 3.89 out of 4 points.

Indicator Code	Indicator name	Score	Explanation
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Met: Company reports on GRI: The Sustainable Development report includes a GRI index [Sustainable Development Report 2018, 2019: riotinto.com & GRI Index 2018, 2019: riotinto.com]
F.3	Key, High Quality Disclosures	1.6 out of 4	Rio Tinto 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 Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> 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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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.