

Company Name Rosneft Oil
Industry Extractives
Overall Score (*) 32.7 out of 100

Theme Score	Out of	For Theme
1.8	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
2.9	15	C. Remedies and Grievance Mechanisms
6.9	20	D. Performance: Company Human Rights Practices
17.5	20	E. Performance: Responses to Serious Allegations
3.2	10	F. Transparency

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

Please note 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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: UDHR: The company states that it 'operates in full conformity with the Universal Declaration of Human Rights.' [Code of business and corporate ethics, 2015: rosneft.com] Score 2 <ul style="list-style-type: none"> Not met: OECD: The company indicates that 'it shares and observes the (...) OECD Guidelines for Multinational Enterprises'. However, the use of the wording 'sharing and observing' does not qualify as a formal commitment to the initiative following CHRB Criteria. [Sustainability Report 2018, 2019: rosneft.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: ILO Core: On its website, the Company indicates that 'The Company is also supportive of general principles and values of the Universal Declaration of Human Rights, and the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work. [Press Release - Public Commitment SDG, 20/12/2018: rosneft.com] Met: UNGC principles 3-6: The Sustainable development policy states that the Company operates in strict compliance with the Global Compact, and commits to the initiative in different parts of its sustainability report (signed by the Chairman of

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			<p>the Board and the CEO), including listing the 10 principles in its report. [Policy on sustainable development, 2017: rosneft.com]</p> <ul style="list-style-type: none"> • Not met: Explicitly list All four ILO apply to EX BPs: The company indicates that 'The UN Global Compact principles are taken into account both at the strategic and operational management levels. These principles are integrated into the Rosneft-2022 Strategy and incorporated into the system of local regulations that directly set the functioning of the Company's major business processes'. All four ILO core labour standards are explicitly listed, however, it is not clear that this commitment also expects its extractive business partners to respect each of them. The Company indicates that incorporates HSE requirements in contractors. However, no further detail found on whether this also includes human rights covered by the Company's policies. [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The code of business and corporate ethics states that 'the Company does not tolerate any forms of oppression or discrimination. It respects the right of each employee to collective representation of interests including trade union organisations'. The annual report states that it has a 'Model of Collective Bargaining Agreement for Group Entities', and that 'the principle of freedom of association is a core value for Rosneft, which also recognizes workers' right to collective bargaining'. The Sustainable development report also contains commitments on child and forced labour: 'Rosneft's HR management complies with Russian and international law and makes no use of forced, compulsory or child labor in any form, nor does it discriminate n the bases of gender, age, nationality, race, religion, etc.' [Code of business and corporate ethics, 2015: rosneft.com] • Met: Respect H&S of workers: The Code also covers health and safety. H&S policy applies to the Company's own operations as well as local communities and extractive business partners. [Code of business and corporate ethics, 2015: rosneft.com] • Met: H&S applies to EX BPs: The Company states that it 'pays particular attention to compliance with health and safety requirements. The Company extends qualifications HSE requirements to almost all parties involved in the production procurements (contractor's compliance with HSE requirements). Compliance with the requirements shows clearly whether the procurement parties have an HSE system and whether their HSE-related employees are sufficiently qualified, including involved in high-risk operations'. [Sustainability Report 2018, 2019: rosneft.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments: The company indicates that 'Rosneft has been a party to the United Nations Global Compact. However, no committing found stating that the company respects human rights in maintaining the safety and security of operations based on relevant UN instruments or is a participant in the Voluntary Principles on Security and Human Rights (VPs) or only uses security providers who are members of the International Code of Conduct of Private Security Providers Association (ICoCA). [Sustainability Report 2018, 2019: rosneft.com] • Not met: Voluntary Principles (VPs) participant • Not met: Uses only ICoCA members • Met: ILO 169: The company indicates that 'Rosneft respects the cultural heritage, traditions, and rights of the indigenous minorities whose areas of habitation fall within the Company's area of operation. When interacting with the indigenous minorities of the North, the Company follows the provisions of International Labour Organization Convention 169 and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)'. [Sustainability Report 2018, 2019: rosneft.com] • Met: UN Declaration on the Rights of Indigenous People (UNDRIP): The company indicates that 'Rosneft respects the cultural heritage, traditions, and rights of the indigenous minorities whose areas of habitation fall within the Company's area of operation. When interacting with the indigenous minorities of the North, the Company follows the provisions of International Labour Organization Convention 169 and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)'. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards • Not met: Zero tolerance for land grabs

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Respecting the right to water: The Company indicates that it has identified no significant impacts of water withdrawal on water resources. Also, The volume of water withdrawn from surface and ground sources is within the allowable level'. However, no evidence found of a formal commitment to respect the right to water and/or safe water access. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Expects BPs to commit to all these rights: No evidence found that the company's policy commitment also expects its extractive business partners to make a commitment to applying free, prior and informed consent (FPIC) in line with international law and standards on indigenous peoples, to recognising and respecting legitimate tenure rights related to the ownership and use of land and natural resources as set out in the Voluntary Guidelines on Responsible Governance of Tenure or the IFC Performance Standards or to a zero tolerance for land grabbing and to respecting the right to water. [Sustainability Report 2018, 2019: rosneft.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company indicates on its website section 'Interaction with interested parties', that it engages with different stakeholders, defined as 'legal entities and individuals that may be significantly affected by the Company's operations and may, in their turn, affect Rosneft's operations and implementation of its business strategy.' Among its stakeholders: workers, trade unions, suppliers and local communities. In addition, in its Sustainability Report 2018, it reports different engagement actions with these stakeholders. [Interaction with interested parties: rosneft.com & Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The company indicates that 'Rosneft engages all stakeholders in discussing the Company's performance at the planning stage. In 2018, it held over 220 public discussions with representatives of the local population in many regions with the cooperation of both state and municipal bodies. Rosneft reviewed various issues at the initiative of both the Company and the stakeholders'. However, no evidence found of evidence of regular engagement in the development or monitoring of the human rights approach. [Sustainability Report 2018, 2019: rosneft.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts: The company indicates that 'during interaction with its suppliers and contractors in Russia, Rosneft requires the observance of Russian labor laws, including meeting health and safety requirements'. However, no commitment found that also includes working with its extractive business partners to remedy impacts caused. [Sustainability Report 2018, 2019: rosneft.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The code of business and corporate ethics which includes human rights policy has been signed by the CEO. [Code of business and corporate ethics, 2015: rosneft.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Board level responsibility for HRs: The company indicates that the HR and Remuneration Committee 'reviews the drafts of the Code of Business and Corporate Ethics, and internal policy documents on HR and social areas, including human rights'. However, it is not clear that apart from reviewing the drafts of the human rights policy, the committee also tasked with specific governance oversight of one or more areas of respect for human rights. [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: In the introduction to the Sustainability Report 2018, there is a message from Rosneft's Chief Executive Officer, Igor Sechin, in which states he that 'Rosneft remains committed to the UN Global Compact and its core principles. It takes into account the sustainable development challenges that the global community is facing, including human rights, climate change, prevention of corruption, environmental impact mitigation, etc. These priorities will enhance the Company's investment potential'. However, CHRB is looking for Board members' or the CEO's speeches, presentations or other communications setting out the Company's approach to human rights or discussing its business importance other than in its own reports. [Sustainability Report 2018, 2019: rosneft.com]
A.2.2	Board discussions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs: The company indicates that 'The General Shareholders Meeting is the Company's supreme governing body. It is competent to decide on matters that are fundamental to Rosneft's business, including the approval and introduction of changes to the Charter and internal documents regulating the activities of the Company's governing and control bodies, approval of annual reports and financial statements, net profit distribution and dividend payments, election of the Audit Commission, and approval of the Auditor and major transactions'. However, it is not clear the process it has in place to discuss and address human rights issues at Board level or how the Board or a Board committee regularly reviews the Company's salient human rights issues. [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: The company indicates the remuneration of Board members, which includes the remuneration of a Chairman of the HR and Remuneration Committee. However, it is not clear that at least one Board member has an incentive or performance management scheme linked to an aspect of the Company's human rights policy commitment(s). [Annual Report 2018, 04/06/2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: At least one key EX RH risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions • Met: Senior responsibility for HR: According to the Sustainable development policy, 'management of the Company's sustainable development activities is performed within the framework of the general corporate governance system, Rosneft Vice President of Human Resources'. [Policy on sustainable development, 2017: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: Although the sustainable development policy indicates that management of the activity in the area of sustainable development is implemented within the frame of operation of specialised subdivisions and business segments, no further details found. [Policy on sustainable development, 2017: rosneft.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Day-to-day responsibility for EX BRs: No information found about how day-to-day responsibility for managing human rights issues with its extractive business partners is allocated. [Sustainability Report 2018, 2019: rosneft.com]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights: The company indicates that its incentive system includes Monetary Remuneration, Social Package and Non-financial Incentives. 'The remuneration to top managers depends on the Company's performances and implementation of key projects. It is based on the team and individual KPIs achieved. The KPIs, their implementation and annual bonuses are approved every year by the Board of Directors, with due account to the recommendations of the HR and Remuneration Committee'. However, it is not clear that it has an incentive or performance management scheme linked to aspects of its human rights policy commitment(s) for at least one senior manager. [Annual Report 2018, 04/06/2019: rosneft.com] • Not met: At least one key EX HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: The company discloses some Health, Safety, and Environment was found among the company's Risk Appetite. No evidence found in public sources of a clear inclusion of human rights-related issues beyond safety in the general risk management system. [Annual Report 2018, 04/06/2019: rosneft.com & Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Communicates its policy to all workers in own operations: The company indicates that 'Principles of the Company relating to observing human rights are described in Rosneft's Code of Business and Corporate Ethics and the Sustainable Development Policy of the Company. All employees of Rosneft and the Group Subsidiaries are aware of the content of the Code of Business and Corporate Ethics, including information on human rights'. Moreover, 'Training on issues relating to human rights is integrated into Company training courses. 3,092 persons completed training in diversity and equal opportunities and discrimination prevention in 2018 at Rosneft (35,373 hours)'. However, it is not clear all workers receive the human rights training and also no evidence found in public sources of the Company communicating policies to all employees (and these communications covering all ILO core, as the code of ethics contains a general commitment to human rights and discrimination and union rights). [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<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 • Not met: Communicating policy to EX contractors and joint ventures: The company indicates that 'Principles of the Company relating to observing human rights are described in Rosneft's Code of Business and Corporate Ethics and the Sustainable Development Policy of the Company. All employees of Rosneft and the Group Subsidiaries are aware of the content of the Code of Business and Corporate Ethics, including information on human rights.(...) In addition, during interaction with its suppliers and contractors in Russia, Rosneft requires the observance of Russian labor laws, including meeting health and safety requirements. For foreign assets, standard approaches of the Company are taken as a basis, while local procedures are developed in order to comply with local laws'. However, it is not clear the steps it takes to communicate its human rights policy commitment(s) to its business relationships. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Including to EX BPs (removed) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • Not met: Including on EX BPs

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: The company indicates that 'Training on issues relating to human rights is integrated into Company training courses. 3,092 persons completed training in diversity and equal opportunities and discrimination prevention in 2018 at Rosneft (35,373 hours)'. However, no evidence found in public sources of human rights training provided to all employees. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Trains relevant EX managers including security personnel <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	<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 • Not met: Monitoring implementation of HR policy commitments: The company indicates that 'The Company has a Council for Business Ethics, a permanent body composed of ethics leaders and other executives. The Council is a collective body responsible for considering ethics, human rights, conflict of interest issues, monitoring the enforcement procedures for the Code, and ensuring compliance with corporate regulations'. Also, 'Rosneft pays particular attention to compliance with health and safety requirements'. However, it is not clear how it monitors its implementation of its human rights policy commitment(s). [Sustainability Report 2018, 2019: rosneft.com] • Not met: Monitoring EX BP's <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects selection EXs business partners • Not met: HR affects on-going EX business partner relationships: The Company only indicates that it 'has no business units or suppliers that may violate these rule'. This statement is in reference to freedom of association and collective bargaining. [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with EX business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: 'The Company aims to develop partnership, sustainable, profitable, trusting and mutually beneficial relations with stakeholders – shareholders, investors, authorities, employees, the public, suppliers and contractors, clients, and the business community as a whole. (...) The Company uses various forms of communication with stakeholders, depending on the targets set and most effective ways of interaction'. The communication tools then are detailed. However, although it shows evidence of stakeholder engagement in the last two years, no evidence found in relation to how it has identified relevant stakeholders, nor how engagement processes included human rights (mostly focused in environmental impacts, industrial activity and regional development). [Sustainability Report 2018, 2019: rosneft.com] • Not met: Frequency and triggers for engagement: The Company states that it uses various ways to engage with its stakeholders. The most important mechanisms are public consultations on 'the findings of environmental impact assessments or its planned operations' and regular roundtables in each key region where it has a presence, focusing on: group subsidiaries' development strategy, health, safety, and the environment, contribution to the development of the regional economy and infrastructure, social responsibility and charity and education. However, no evidence found of engagement on human rights issues. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Engagement includes EX business partners workers • Not met: Engagement includes EX business partners communities: No evidence found in the context of human rights. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The Company describes its general Risk Management and Internal Control System (RM&ICS) to provide reasonable assurance that the Company obtains its goals while maintaining compliance with laws and regulations. The Company describes the key risks identified. It adds that 'should any risks relating to human rights be identified by management, they will be assessed as part of the Company's risk management and internal control system and relevant mitigation measures will be put in place'. However, no evidence found of a description of a system to identify which are the Company's human rights risks and impacts including both own operations and business relationships (extractive business partners). [Sustainability Report 2018, 2019: rosneft.com] • Not met: identifying risks in EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): Although the Company describes its general Risk Management and Internal Control System (RM&ICS) no evidence found of description of processes to assess human rights risks and impacts identified and what considers to be its salient human rights risks (although Health and safety are one of the risks considered in the risk management system). No further information found in the Sustainability Report 2018. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: Although the Company describes its general risk management system, no evidence found of processes or systems to prevent, mitigate or remediate specific human rights risks. No further information found in the Sustainability Report 2018. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Including amongst EX BPs • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: Although the Company describes its general risk management system, no evidence found of a system for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<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: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<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 code states that 'Every staff member and any interested person having questions about the application of and compliance with this Code may seek answers to them at code@rosneft.ru. If you have doubts about the legality of any action done by Company employees or business partners, you should email them at sec_hotline@rosneft.ru or share them by phone at 8 800 500 25 45'. [Code of business and corporate ethics, 2015: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: The company indicates that it 'continued to run the ethics hotline, which is designed to obtain feedback on ethics issues. A total of 88 queries were received in 2018, relating mostly to compliance with labor laws (26%), ethics breaches including human rights matters (17%), requests for additional information about business ethics, and other questions. All queries were duly handled by the relevant departments. There is an ongoing exchange of information with the Security Service that supervises the Company's Security Hotline'. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Channel is available in all appropriate languages: The company also indicates that it 'has required processes in force aimed at prompt responses to human rights complaints. The Security Hotline and Ethics Hotline are the key tools in this area. These hotlines are available both for the Company's employees and for any other stakeholders' representatives (written messages are accepted in all local languages used in the countries and regions where the Company operates)'. However, it is not clear that the channel is available in all appropriate languages. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Expect EX BPs to have equivalent grievance system • Met: Opens own system to EX BPs workers: As indicated above, in relation to human rights complaints, the Company states that 'the Security Hotline and Ethics Hotline are the key tools in this area. These hotlines are available both for the Company's employees and for any other stakeholders' representatives'. [Sustainability Report 2018, 2019: rosneft.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 company also indicates that it 'has required processes in force aimed at prompt responses to human rights complaints. The Security Hotline and Ethics Hotline are the key tools in this area. These hotlines are available both for the Company's employees and for any other stakeholders' representatives'. [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The company's hotline is available online, and 'written messages are accepted in all local languages used in the countries and regions where the Company operates'. [Sustainability Report 2018, 2019: rosneft.com] • Not met: Expects EX BPs to have community grievance systems • Met: EX BPs communities use global system: The code states that 'Every staff member and any interested person having questions about the application of and compliance with this Code may seek answers to them at code@rosneft.ru. If you have doubts about the legality of any action done by Company employees or business partners, you should email them at sec_hotline@rosneft.ru or share them by phone at 8 800 500 25 45'. [Code of business and corporate ethics, 2015: rosneft.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales: The company indicates that 'all queries of the Ethics Hotline 'were duly handled by the relevant departments. There is an ongoing exchange of information with the Security Service that supervises the Company's Security Hotline'. No further information found on the procedures for managing

Indicator Code	Indicator name	Score (out of 2)	Explanation
	available and explained		the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant. [Sustainability Report 2018, 2019: rosneft.com] <ul style="list-style-type: none"> • Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: The Company has a commitment against sanctions, but in the context of the policy against fraud and corruption and its specific security line. [Policy on combating corporate fraud, 06/2018: rosneft.com] • Not met: Practical measures to prevent retaliation: The company indicates that it 'guarantees confidentiality and security in relation to messages transmission'. However, it is not clear the specific measures in place to prevent retaliation. [Sustainability Report 2018, 2019: rosneft.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms: The company indicates that 'operating in Russia and other countries, the Company liaises with local government authorities on a continuous basis and builds constructive relations with them, guided by the provisions of applicable laws and high corporate and business ethics standards'. However, no public commitment found to not impeding access to state-based judicial or non-judicial mechanisms or other available mechanisms for persons who make allegations of adverse human rights impacts. [Code of business and corporate ethics, 2015: rosneft.com] Score 2 <ul style="list-style-type: none"> • Not met: Complainants not asked to waive rights • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved: The company indicates that 'with regards to personnel remuneration, Rosneft adheres to the principles of high social responsibility and providing decent standards of living for its employees. Thus, the Company aims to maintain a job compensation level exceeding the average salary in the regions, for which reason it indexes salaries annually. Moreover, the Company annually monitors the regional labor markets and additionally raises salaries for separate personnel groups if any lagging is detected'. However, it is not clear if it has a timeframe for paying a living wage (basic needs plus discretionary income for employee and his or her family) or if it already achieved paying a living wage to all workers. [Sustainability Report 2018, 2019: rosneft.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes how living wage determined: The company indicates that it 'uses transparent approaches to the remuneration, assessment, incentive, and employee promotion system (...). The average monthly salary for all Group Subsidiaries was RUB 84,000 in 2018, and the great majority of these subsidiaries have traditionally paid salaries that exceed both the minimum wage established by law and the average salary in the respective regions, which is on average 2.6 times higher than the minimum wage rate'. However, it is not clear how it determines a living wage for the regions where it operates, which includes involvement of relevant trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). [Sustainability Report 2018, 2019: rosneft.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Member of EITI • Met: Reports of taxes and revenues beyond legal minimums: The Company reports taxes, royalties, licences and other fees and infrastructure improvements by country and type of project. [Report on payment to governments, 2016: rosneft.com] Score 2 <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: The Company reports taxes, royalties, licences and other fees and infrastructure improvements by country and type of project. [Report on payment to governments, 2016: rosneft.com] • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company has 76% of its employees covered by collective bargaining agreement (proxy for measures to prohibit intimidation or retaliation), and describes activities carried out with trade unions in the last reporting year. It states that 'as many as 180 trade unions of the Rosneft Interregional Trade Union Organization operated at the Group Subsidiaries at the end of 2018'. Also, in its Code the Company states that 'it respects the right of each employee to collective representation of interests including trade union organisations and rules out any possibility of the emergence of an atmosphere that would be hostile, humiliating and offensive to human dignity'. [Sustainability Report 2018, 2019: rosneft.com & Sustainability report, 2017: rosneft.com] • Met: Discloses % covered by collective bargaining: The Company indicates that 76% of its employees are covered by collective bargaining agreements. [Sustainability Report 2018, 2019: rosneft.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The company's Incidence rate of non-fatal injuries among Company employees, per million hours worked in 2018 was 0.34. [Sustainability Report 2018, 2019: rosneft.com] • Met: Lost days or near miss disclosures: The Lost Time Injury Frequency Rate in 2018 was 23.08. [Sustainability Report 2018, 2019: rosneft.com] • Met: Fatalities disclosures: The fatalities in 2018 were 18. [Sustainability Report 2018, 2019: rosneft.com] Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company set the strategic objectives such as no occupational injuries or diseases; and no emergencies or fires. No further information found in the Sustainability Report 2018. [Sustainability Report, 2016: rosneft.com & Sustainability Report 2018, 2019: rosneft.com] • Not met: Met targets or explains why not
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to identify indigenous rights holders: The company indicates that 'in some regions, the Company carries out oil and gas production operations in the areas where indigenous communities are present. In all these regions, the Company has programs to engage with, and provide support to, such communities'. Also, 'when interacting with the indigenous minorities of the North, the Company follows the provisions of International Labour Organization Convention 169 and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)'. Finally, 'roundtable participants acknowledged Rosneft's role as an active contributor to building a more sustainable local community by helping indigenous peoples, organizing sports and fun events, and undertaking a wide range of charity projects and socially responsible activities. However, no evidence found in relation to the specific processes to identify and recognise potentially affected indigenous peoples. [Sustainability Report 2018, 2019: rosneft.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How engages with communities in assessment: As indicated above, although the Company indicates that there were no violations involving the rights of indigenous peoples in last reporting year and describes activities carried out to improve and support indigenous communities lifestyle, no evidence found in relation to engagement with these communities in carrying out the assessments. [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal: The company indicates that 'Chief Executive Officer of Rosneft Oil Company Igor Sechin has held a working meeting with Acting Governor of Tyumen Region Alexander Moor in the headquarters of the Company in Moscow. The parties discussed matters related to the Company's operations in Tyumen Region and to implementation of social projects'. However, no example found of where it has obtained free prior and informed consent (FPIC) or where it decided not to pursue the land or resources impacting on indigenous peoples. [Igor Sechin Holds Working Meeting, 04/07/2018: rosneft.com]
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders: The company indicates that 'RN-Yuganskneftegaz LLC, a Subsidiary of Rosneft Oil Company, and representatives of indigenous minorities of the North have signed economic agreements on the use of land plots within the areas of the traditional use of natural resources. The signed agreement states that heads of native lands can coordinate the location of oil production facilities depending on the location of farm buildings, places of worship, field sites, hunting areas, and places for gathering wild plants'. However, it is clear how the company identifies legitimate tenure rights holders, including through engagement with the affected or potentially affected communities in the process. In addition, evidence, unless referring to policies or strategy documents, needs to refer to the last three years. [Rosneft Supports Indigenous Minorities of the North, 17/03/2015: rosneft.com] • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works: Also, 'as part of fulfilling the terms of its license agreements, Rosneft OJSC puts significant effort in supporting the indigenous minorities of the North: the Company pays compensation for the use of land plots within the areas of the traditional use of natural resources, and purchases fuel and equipment for conducting commercial farming. Many years of Yuganskneftegaz' experience of interaction with indigenous peoples is based on trust, respect, and preservation of their identity. The native lands include 13 license areas of Rosneft located in five regions: Yugansky, Pravdinsky, Maysky, Salymsky, and Priobsky. As of today, 130 families of Khanty are under the care of RN-Yuganskneftegaz, that is, more than 400 representatives of the Northern minorities'. However, it is not clear how it plans to or provides financial compensation or other compensation alternatives, including its valuation methods and how legitimate tenure rights holders were involved in the determining the valuation. In addition, evidence, unless referring to policies or strategy documents, needs to refer to the last three years. [Rosneft Supports Indigenous Minorities of the North, 17/03/2015: rosneft.com] • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks: Key environmental protection priorities include 'Increasing water recycling and reuse, sustainably managing produced water and installing up-to-date water treatment systems'. The Company discloses figures in relation to water and describes projects that include water treatment. The company indicates that it 'implements an Environmental Efficiency Improvement Program, the objectives of which are increased water recycling and reuse, sustainable management of produced water, and the installation of advanced water treatment systems. (...) The Company continuously monitors environmental conditions, allowing it to take timely measures that mitigate the environmental impact. (...) The Company does not infringe on water rights or water access rights of stakeholders, including local communities'. However, no evidence found of how these actions are presented in the context of right to water / access to water of local communities. [Sustainability Report 2018, 2019: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Two engineers of company's Achinsk NPZ plant each sentenced to 2.5 years in prison for explosion at Achinsk Oil Refinery on June 15, 2014 that killed 8 workers and injured 30 • Area: Health and safety • Story: In June 2014 an explosion at Rosneft's Achinsk Oil Refinery VNK in Eastern Siberia killed eight people. As a result of the explosion and the subsequent fire, the plant, which supplies oil products for Siberia and the Far East, stopped production for several months. The operator of technological installations of the refinery Yuri Vdovenko and the leading engineer of the department of technical supervision of the plant Oleg Dumchev were put on trial over the incident. Both were given a two and a half year sentences, but subject to an amnesty adopted by the state parliament to mark the 70th Anniversary of victory in 1945. • Sources: [Kommersant, 16/06/2016 -: kommersant.ru][Oil and Gas Journal, 16/06/14 -: ogj.com][Company's website: rosneft.com]
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available [sustainability Report, 2014: rosneft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company's detailed response in its sustainability report 2014: 'There was an accident classified as an emergency situation at Achinsk refinery VNK OJSC on June 15, 2014 . Depressurization of an overhead gas line during the startup works after overhaul resulted in an uncontrolled release and distribution of the gaseous phase of petroleum products, followed by a fire and explosion of a fuel-air mixture with a subsequent fire that spread over an area of 400 m2 . The explosion and fire killed 8 people, with 29 people receiving injuries of varying severity . Achinsk Refinery VNK OJSC industrial buildings were completely destroyed, and equipment of one of the sections was damaged . As demonstrated by expertise, the accident was caused by depressurization of horizontal pipelines as a result of corrosive wear caused by low-temperature hydrogen-sulphide corrosion when exposed to hydrogen chloride; poor control over pipeline operation safety; as well as the lack of production control over necessary tests and technical examinations'. [sustainability Report, 2014: rosneft.com]
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved: The Code of business and corporate ethics covers health and safety. H&S policy applies to the Company's own operations as well as local communities and extractive business partners. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company provides qualitative information on fatalities, injury rates and occupational illnesses. [Sustainability Report 2018, 2019: rosneft.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: The company reports in the 2014 and the 2015 sustainability reports that it engaged with the families of those who died and the injured personnel. This qualifies as engagement with stakeholders. [sustainability Report, 2014: rosneft.com] • Not met: Encourages linked business to engage affected stakeholders • Met: Provides remedies to affected stakeholders: In its 2014 Sustainability report, the company stated that 'Rosneft President personally controlled provision of assistance and social support to the families of the employees who died and were injured in the accident. Each family left without a breadwinner received personal subsistence and guarantees, which in addition to monthly subsistence payments, included payments for children's education in pre-schools, free vouchers for health resort treatment, vacation in summer camps, assistance with debt repayment, and other support. Today, the Company made all necessary payments to the suffered.' • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: According to the 2015 company's report, it has settled all insurance claims related to the accident which indicate that the stakeholders are satisfied with the remedies. This along with the decryption above meet the CHRB criteria. • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.16 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Rosneft Oil made data public that met one or more elements of the methodology in 11 cases, leading to a disclosure score of 1.16 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: Its Sustainability Report has a GRI Content Index. [Sustainability Report 2018, 2019: rosneft.com]
F.3	Key, High Quality Disclosures	0 out of 4	<p>Rosneft Oil met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

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

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

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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.