

Company Name Suncor Energy
Industry Extractives
Overall Score (*) 20.7 out of 100

Theme Score	Out of	For Theme
3.4	10	A. Governance and Policies
1.1	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
6.3	20	D. Performance: Company Human Rights Practices
4.1	20	E. Performance: Responses to Serious Allegations
3.7	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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Human rights policy states the following: 'Suncor has a corporate responsibility to respect human rights and to ensure that we are not complicit in human rights abuses. We seek to avoid infringing on the rights of others and strive to remedy harms that occur as a result of our activities. Our responsibility to respect human rights applies to all of our activities and to our business relationships with others. [Human rights policy: sustainability-prd-cdn.suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: Although the Company states in its human rights policy that it's commitment to respect human rights is informed by, among other standards, the 'Guiding Principles on Business and Human Rights: Implementing the UN "Protect, Respect, and Remedy" Framework'. However, the commitment is 'informed by', which is not considered a formal statement of commitment following CHRB wording criteria. [Human rights policy: sustainability-prd-cdn.suncor.com] Not met: OECD

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company supports the ten principles of the Global Compact with respect to human rights. [UNGC Commitment letter: s3-us-west-2.amazonaws.com] • Not met: Explicitly list All four ILO apply to EX BPs: The Code for suppliers states that 'Suncor respects human rights and we have processes in place to ensure that we are not complicit in human rights abuses. Our commitment to respect human rights applies to all of our activities and to our business relationships with others'. 'We expect that our business associates will abide by the laws of the countries in which they operate while also respecting human rights principles.' However, the Supplier Code does not explicitly list all ILO Core and there is no reference to alternative measures to support human rights (freedom of association and collective bargaining) where they are restricted by law. [Supplier code of conduct: suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: Human Rights policy states that employment policies adhere to all applicable domestic laws and honour internationally accepted labour standards including those concerning freedom of association and collective bargaining, non-discrimination, forced labour, and underage workers in the workplace [Human rights policy: sustainability-prd-cdn.suncor.com] • Met: Respect H&S of workers: Through the 'Journey to zero' program the Company establishes its commitments to prevent incidents, leadership being accountable for safety performance, management systems that promote safety excellence and 'fully engaging all employees in safety and providing a safe work environment for all employees and contractors'. • Met: H&S applies to EX BPs: The code for suppliers states that 'we expect that our business associates will share Suncor's commitment to safety and promote the health and well-being of their personnel and others affected by their operations. [Supplier code of conduct: suncor.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 [2018 Report on Sustainability, 2018: sustainability.suncor.com] • Not met: Voluntary Principles (VPs) participant • Not met: Uses only ICoCA members • Not met: Respecting indigenous rights: The Company states that 'Suncor recognizes the unique legal and constitutional rights of Aboriginal peoples and seeks to understand and respect their history, customs, beliefs and traditions. This recognition and respect should be integrated into our business approach and the way we operate'. Also, 'we continue work to ensure that the policies reflect evolving societal expectations and external context, like the government's commitment to adopt the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). We continue work to ensure that the policies reflect evolving societal expectations and external context, like the government's commitment to adopt the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)'. However, no publicly available statement of policy found committing it to respecting indigenous peoples rights (it 'recognizes' their rights) or references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No.169 or of the UN Declaration on the Rights of Indigenous ('works to ensure policies reflect'). [Aboriginal relations policy: sustainability-prd-cdn.suncor.com & 2018 Report on Sustainability, 2018: sustainability.suncor.com] • Not met: ILO 169 • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP): In its 2018 Report on Sustainability, the Company indicates: 'Suncor supports the Truth and Reconciliation Commission's call to action for the corporate sector to adopt UNDRIP as a reconciliation framework for its relationship with the Aboriginal Peoples of Canada. To implement this framework, Suncor is committed to meaningfully engage with communities, listen, have open dialogue about our historical relationships, and to continue to enhance relationships and achieve broad support for our projects. Suncor also continues to engage with Aboriginal thought leaders, to continue to build our knowledge and understanding on UNDRIP. However, there is no direct commitment to respect indigenous peoples rights or references relevant parts of UNDRIP. [2018 Report on Sustainability, 2018: sustainability.suncor.com] • Not met: Expects BPs to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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 • Met: Respecting the right to water: The Company's water stewardship position in the sustainability report states that: 'All water use must be managed wisely. Responsible energy development means ensuring industry's water use does not compromise the availability of clean, safe and plentiful supply of this important resource for current and future generations. We advocate and support policy development that strives to balance social, environmental and economic consideration'. [Report on sustainability, 2017] • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The stakeholder relations policy states that 'Mutual respect is the keystone around which productive stakeholder relations must be constructed. Suncor respects the values and cultures of our stakeholders, as well as those of their communities and countries'. 'Suncor acknowledges and accepts its responsibility to engage our stakeholders wherever they are affected by our operations. Suncor encourages stakeholders to define how they wish to be consulted and will strive to meet their needs'. [Stakeholder relations policy: sustainability-prd-cdn.suncor.com] • Not met: Regular stakeholder engagement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states in its Human rights policy that 'Suncor has a corporate responsibility to respect human rights and to ensure that we are not complicit in human rights abuses. We seek to avoid infringing on the rights of others and strive to remedy harms that occur as a result of our activities. Our responsibility to respect human rights applies to all of our activities and to our business relationships with others'. [Human rights policy: sustainability-prd-cdn.suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The CEO is the owner of the Human Rights policy. The policy also states that 'The President and Chief Executive Officer of Suncor is accountable to the Board of Directors for ensuring this policy is effectively implemented'. [Human rights policy: sustainability-prd-cdn.suncor.com] • Met: Board level responsibility for HRs: The Human Rights policy states that 'the President and Chief Executive Officer of Suncor is accountable to the Board of Directors for ensuring this policy is effectively implemented'. [Human rights policy: sustainability-prd-cdn.suncor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: The Company's CEO states in its introduction to the Report on Sustainability 2018 that ' We work collaboratively with several other companies as members of the United Nations Global Compact (UNGC) Local Network in Canada to promote action in support of broader UN goals. Throughout this report, we share our efforts to support and uphold the UNGC's Ten Principles, which also guide our approach to human rights, labour, environment and anti-corruption for all our operations'. The Company also discloses some press material where it states its approach to aboriginal peoples. However, it fails to demonstrate the Company's approach to human rights or discuss its business importance. [2018 Report on Sustainability, 2018: sustainability.suncor.com & Annual General Meeting - Video, 02/05/2018: cc.callinfo.com]
A.2.2	Board discussions	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: Board/Committee review of salient HRs: The Environmental, Health, safety & Sustainable development Committee assists the board by monitoring the effectiveness and integrity of the Corporation's internal controls as they relate to operational risks including health and safety (and sustainable development), and reviews and formulates recommendations to the board with respect to strategies and policies related to health and safety (and sustainable development). It also reviews trends and issues related to health, safety and sustainable development relevant to stakeholders and assess stakeholders issues and risks. [EH&S Committee mandate: suncor.com] • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key EX RH risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<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: Senior responsibility for HR: The Company states in its human rights policy that 'The President and Chief Executive Officer of Suncor is accountable to the Board of Directors for ensuring this policy is effectively implemented'. However the Company has not published any documents describing how day-to-day responsibility, resources and decision making process are allocated across the range of relevant functions of the Company, including the senior manager directly responsible for human rights issues. [Human rights policy: sustainability-prd-cdn.suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0.5	<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: In its Management Proxy Circular 2017, the Company describes its incentive scheme for Senior Executives in its Annual Incentive Plan Performance (AIP) system. One of the AIP components is Business Unit, which includes Safety and Sustainability. However, although no evidence found on 'sustainability' including human rights issues in this context, Safety is considered a key industry risk. [Management Proxy Circular 2017, Apr 2018: https://sustainability.suncor.com/en/downloads#Old companies list of Disclosure - Easy format.docx#_Hlk3803920 1,25112,25221,0,, HYPERLINK "sustainabi"] • Not met: At least one key EX HR risk, beyond employee H&S: No evidence found of safety-related indicators including health and safety of local communities and extractive business partners. [Management Proxy Circular 2017, Apr 2018:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>ttps://sustainability.suncor.com/en/downloads#Old companies list of Disclosure - Easy format.docx#_Hlk3803920 1,25112,25221,0,, HYPERLINK "sustainabi"</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
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 indicates that it is 'committed to proactive program of enterprise risk management intended to enable decision making through consistent identification and assessment of risks inherent to its assets, activities and operations'. Safety, labour relations (employees represented by labour unions or employee associations), land claims and aboriginal consultation are included in the system's risk factors. [Annual report, 2017: suncor.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 in its human rights policy (the document that contains commitments to all ILO core) that 'awareness among Suncor's employees is key to ensuring that we meet the goals of this policy and we are committed to training and communicating our approach to human rights, as part of the implementation of this policy'. However, no evidence found of details on the communication of this policy among the Company's employees. [Human rights policy: sustainability-prd-cdn.suncor.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 • Not met: Communicating policy to EX contractors and joint ventures • 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
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's human rights policy states that 'awareness among Suncor's employees is key to ensuring that we meet the goals of this Policy and we are committed to training and communicating our approach to human rights, as part of the implementation of this policy'. However, no evidence found of details on actual training on the policy. The sustainability report indicates that 'under the code, every Suncor director, officer, employee and contract worker is required annually take an online training course and review the code'. However, the code does not contain the human rights policy. [Human rights policy: sustainability-prd-cdn.suncor.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 • 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: Although there is a qualification process to be a contractor, no evidence found in relation to how

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			<p>human rights affects the selection of potential business partners. [Qualify to be a contractor: suncor.com]</p> <ul style="list-style-type: none"> • Not met: HR affects on-going EX business partner relationships <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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems: The Company has continuous engagement with Canadian Aboriginal communities and has developed a specific policy: 'Suncor commits itself to listening and communicating with Aboriginal peoples directly and openly about events, issues, and ideas. We seek to consult in a timely, interactive and culturally appropriate manner'. It has a sustainability goal consisting in strengthening relations and workforce development. [Aboriginal relations policy: sustainability-prd-cdn.suncor.com & Sustainability goals on website: suncor.com] • Not met: Frequency and triggers for engagement • Not met: Engagement includes EX business partners workers • Met: Engagement includes EX business partners communities: As indicated above, the relationship is whit Canadian Aboriginal communities [Aboriginal relations policy: sustainability-prd-cdn.suncor.com & Sustainability goals on website: suncor.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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 indicates that 'Principal risks are generally considered those that have the potential to materially impact our ability to meet or support our business strategy. In the constantly evolving energy business, new risks can emerge and established risks can take on new forms or orders of magnitude. We manage identification of new Principal risks through our Critical and Principal Risk processes'. In its Sustainability Report 2018, the Company discloses risk matrix, however there is no clear reference to human rights risks, only to health and safety. No evidence found, however, of a description of the process to identify these risks. [Human rights policy: sustainability-prd-cdn.suncor.com & 2018 Report on Sustainability, 2018: sustainability.suncor.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): The Company indicates that 'Once identified, risks are assessed and evaluated in terms of magnitude of impact and likelihood using an internal risk-matrix tool. A single risk matrix tool allows employees to consistently assess risks and evaluate the consequence and likelihood of risk events. It also helps to assign responsibility for different levels of residual risk. The consequence is based on the following five receptors on the risk matrix: Health and safety; Environmental; Regulatory; Reputation; Financial impact'. However, no evidence found of a description of a process to identify its human rights risks and impacts in specific locations or activities, covering its own operations. [2018 Report on Sustainability, 2018: sustainability.suncor.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	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 states that 'We make risk-informed decisions that reflect our triple bottom line responsibilities. This requires ongoing identification, assessment, treatment and monitoring of risks inherent to our assets, activities and operations', no evidence found of a global system to take action to prevent, mitigate or remediate its salient human rights issues. [2018 Report on Sustainability, 2018: sustainability.suncor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<ul style="list-style-type: none"> • Not met: Including amongst EX BPs • Not met: Example of Actions decided Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: No description 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. [2018 Report on Sustainability, 2018: sustainability.suncor.com] • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • 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 Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Code of conduct describes the integrity hotline. It includes online access and phone contacts for different countries. It is operated by an external third party. The code covers all employees and states that 'we all share a responsibility to report potential violations of our code'. The integrity hotline website indicates that some of the topics to report about are violation of policy, misconduct or inappropriate behaviour, discrimination, harassment or workplace violence. [Standards of business conduct: suncor.com & Suncor Ethics Point: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Met: Opens own system to EX BPs workers: The code for suppliers contains guidelines for them to use the Suncor Integrity Hotline including website and phone access. [Supplier code of conduct: suncor.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: Although the 'Harassment and violence free working environment' policy contains guidelines for this specific area of reporting. [Harassment and violence free working environment, 02/2017: suncor.com] • Not met: How complainants will be informed: Although the 'Harassment and violence free working environment' policy contains guidelines for this specific area

Indicator Code	Indicator name	Score (out of 2)	Explanation
	available and explained		of reporting. [Harassment and violence free working environment, 02/2017: suncor.com] Score 2 • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public statement prohibiting retaliation: The Code of conduct contains a no retaliation commitment: 'Suncor will not penalize or discriminate against anyone who provides information in good faith relating to an activity they believe is illegal or contrary to Suncor policy'. [Standards of business conduct: suncor.com & Suncor Ethics Point: secure.ethicspoint.com] • Met: Practical measures to prevent retaliation: The Channel is handled by an external provider, and the service 'is anonymous and confidential'. [Standards of business conduct: suncor.com & Suncor Ethics Point: secure.ethicspoint.com] Score 2 • 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 • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 • 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 • Not met: Describes how remedy has been provided: The Company indicates that 'We work to continuously learn, share and improve safety efforts by embedding safety leadership into our culture, fully engaging all employees in safety and providing a safe work environment for all employees and contractors'. However, it is not clear the approach it took to provide or enable a timely remedy for victims of adverse human rights impacts which it has caused or to which it has contributed. [Personal and process safety _ Report on Sustainability, 21/08/2019: sustainability.suncor.com] • Not met: Says how it would remedy key sector risks Score 2 • 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 • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined: In the engagement with CHRB, the Company makes reference to the webpage Living Wage Canada, which discloses the situation of living wages in Alberta. However, it is not clear the connection between Living Wage Canada and Suncor Energy. Also, it mentions the webpage por de Canadian Government where information about the federal minimum wage. Nevertheless, the Company's approach to living wages is not clear. [Living Wage Canada __ Alberta, 21/08/2019: livingwagecanada.ca & Federal minimum wage, 21/08/2019: canada.ca] Score 2 • 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 • Not met: Member of EITI

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Reports of taxes and revenues beyond legal minimums: The Company annually reports payments according to Canada's Extractive Sector Transparency Measures Act (ESTMA) (equivalent level of reporting to the EITI Standard). According to the Company's website the Extractive Sector Transparency Measures Act 'requires entities that are subject to Canadian law and engaged in the extraction of oil, natural gas or minerals to report payments, on an annual basis, made to all governments in Canada and abroad.' [Extractive Sector Transparency Measures Act (ESTMA): suncor.com] Score 2 <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: The Company reports taxes and revenue by country. [Extractive Sector Transparency Measures Act - Annual Report, 2017] • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation • Met: Discloses % covered by collective bargaining: The Company reports the percentage of workforce unionized for the last five years. In 2016, it was the 34.6% of the workforce. [Sustainability performance data, 2017] Score 2 <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)	1	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 discloses on its sustainability report website the recordable injury frequency for the last five years for both own employees and contractors. [Personal safety: sustainability.suncor.com] • Met: Lost days or near miss disclosures: The Company discloses on its sustainability report website the recordable the lost time injury frequency for the last five years for both own employees and contractors. [Personal safety: sustainability.suncor.com] • Met: Fatalities disclosures: The Company discloses fatalities for the last five years. Zero fatalities in the last two years. Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: The Company indicates that 'Our Journey to Zero program asks all employees and contractors to honour our beliefs and commitments: all incidents can be prevented; to work here you must be committed to working safely; leadership is accountable for environment, health and safety performance; we deliver on our commitments; our Operational Excellence Management System enables environmental, health and safety excellence'. However, the targets related to rates of injury, lost days and fatalities for the reporting period are not clear. [Journey to Zero Harm, 22/08/2019: suncor.com] • Not met: Met targets or explains why not: Although the Company states that 'our 2016 combined employee and contractor recordable injury frequency (RIF) performance of 0.33 was favourable to the 2016 target of 0.44. [Personal safety: sustainability.suncor.com]
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 has a policy on Canadian Aboriginal relations where it recognises 'the unique legal and constitutional rights of Aboriginal peoples'. 'This recognition and respect should be integrated into our business approach and the way we operate'. Also, for the Company 'stakeholders and Indigenous communities are the individuals and groups who could be affected by our operations or who could, through their actions, affect our business. Examples include: landowners and community residents; trappers; governments; regulators; non-government organizations and environmental groups; community investment partners; business groups; customers and suppliers; employees. However, no evidence found in relation to the process to identify and recognise affected or potentially affected indigenous peoples in Canadian or other operations. [Canadian aboriginal Policy 2016, 10/2016: sustainability-prd-cdn.suncor.com & Stakeholder and Indigenous relations, 22/08/2019: sustainability.suncor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How engages with communities in assessment: The Company indicates that 'relationship building and authentic discussion are essential, as well as more formal engagement or consultation processes. For example, we regularly take part in community advisory meetings with several Indigenous communities. [...] We also contribute to Canada's Eco-fiscal Commission which aims to shape policy to encourage economic activities that support mutual benefits such as job creation, investment and innovation. As part of Suncor's Operational Excellence Management System (OEMS), we have tools and frameworks to align us in using a consistent approach to relationships with stakeholders and Indigenous communities, whether it is local engagement or involvement in national forums. These tools and frameworks outline Suncor's responsibilities and commitments, and provide a mechanism for us to consider the needs, interests and concerns of stakeholders and Indigenous communities, and to incorporate them into our business decisions. They are implemented via standards and guidelines and are supported by procedures, practices and tools'. However, it is not clear whether the Company engages with indigenous communities in carrying out the assessment of operations/proposed operations generally (evidence seems to refer to national context). [Stakeholder and Indigenous relations, 22/08/2019: sustainability.suncor.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
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: How implements security (inc VPs or ICOC): Although the Human rights policy states that 'our security policies and guidelines should be consistent with international standards, including the Voluntary Principles on Security and Human Rights, and the laws of the jurisdictions in which we operate', no further details found on how the Company implements its security approach. [Human rights policy: sustainability-prd-cdn.suncor.com] • 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
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action to prevent water and sanitation risks: The Company reports in relation to lack of full development of regulation to 'effectively support sustainable operation or final closure of tailings management facilities within the Athabasca watershed'. 'Suncor's water strategy for oil sands operations is based around reducing water use and reusing water optimized against a deterioration of circulating water quality'. The primary response includes to 'adopt water efficiency, water reuse, recycling and conservation practices. Engage with local communities engage with NGOs/Special interest groups and engage with regulators/policymakers to improve aligning of our public policy influencing activity with our water stewardship commitments. Increase investment in new technology and establish site-specific targets'. The Company reports description of actions for other risks and impacts including stakeholder concerns about water allocation in a river during low flow periods. [Suncor's CDP Water Response, Nov 2018: sustainability.suncor.com & About our report, 22/08/2019: sustainability.suncor.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors: The Company indicates that 'In 2007 Suncor established a publicly disclosed sustainability water goal for the corporation. Publicly stated goals are intended to drive changes in work place culture and behaviors when combined with processes for goal translation, goal stewardship, development of water risk assessments and tools; and asset development execution models that include environmental net effect evaluation prior to concept selection. Suncor is currently working to establish a new water goal that builds on our ambition to use water more effectively. We anticipate this to be a multi-year, iterative and collaborative process with indigenous and non-indigenous communities close to our operations. Suncor has a publicly available Environment, Health and Safety policy statement. Suncor also uses four principles to guide our integrated water management approach: 1. Shared value of water 2. Watershed management 3. Reduce-Reuse-Return 4. Integrated options analysis'. Not clear that the target has already been established. [Suncor's CDP Water Response, Nov 2018: sustainability.suncor.com] • 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		No allegations meeting the CHRB severity threshold were found, and so the score of 16.54 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.13 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	1.68 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Suncor Energy made data public that met one or more elements of the methodology in 16 cases, leading to a disclosure score of 1.68 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: The Company has an online sustainability report that includes a GRI index. [GRI Content Index: sustainability.suncor.com]
F.3	Key, High Quality Disclosures	0 out of 4	<p>Suncor Energy 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.