

Company Name Surgutneftegas
Industry Extractives
Overall Score (*) 3.1 out of 100

Theme Score	Out of	For Theme
0.3	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
2.5	20	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations
0.3	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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: General HRs commitment Not met: UNGC principles 1 & 2 Not met: UDHR Not met: International Bill of Rights Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: ILO Core Not met: UNGC principles 3-6 Not met: Explicitly list All four ILO apply to EX BPs Score 2 <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core: On its website, section 'Manpower Policy-Human Resources', the Company states: 'In order to follow its personnel policy, the Company applies corporate statutes, regulations and rules which are developed and implemented in strict compliance with the Russian law and the principles of equal opportunities and inadmissibility of any possible

Indicator Code	Indicator name	Score (out of 2)	Explanation
			discrimination.', however there is no reference to the other ILO core. [Human Resources: surgutneftegas.ru] <ul style="list-style-type: none"> • Not met: Respect H&S of workers • Not met: H&S applies to EX BPs
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Based on UN Instruments • Not met: Voluntary Principles (VPs) participant • Not met: Uses only ICoCA members • Met: Respecting indigenous rights: On its website, section 'Ecology - Interaction with small numbered indigenous people of the north', the Company states: 'Basic principles of the Company's policy on interaction with the small-numbered indigenous peoples of the North are as follows: [...] Maximum preservation of the primordial environment, traditional way of life, business activities and industries of the indigenous population; Recognition of the importance of land and other natural resources, preservation of the environment as the basis of the traditional way of life and traditional business activities of the small-numbered peoples; Rational use of land and natural resources in places of traditional residence and traditional business activities of the small-numbered peoples; Obligation to respect the ethnic identity, culture and local customs and of the indigenous people. [...]; Ensuring participation of representatives of the small-numbered indigenous peoples of the North in decision-making on placement of business assets in the territory of their living and traditional farming. [...]' [Interaction with small numbered indigenous people of the north: surgutneftegas.ru] <ul style="list-style-type: none"> • Not met: ILO 169 • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) • Not met: Expects BPs to respect these rights Score 2 <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 • Not met: Respecting the right to water: On its website, section 'Ecology - Measures for protection of Water Resources', the Company describes different actions it has implemented in order to prevent 'water bodies and gathering grounds from sewage, industrial waters, production and consumption waste discharge as well as at rational water resources management'. However, there is no commitment statement respecting the right to water and sanitation. [Measures and protection of water resources: surgutneftegas.ru] <ul style="list-style-type: none"> • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement • Not met: Regular stakeholder engagement Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key EX RH risk, beyond employee H&S Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Not met: Senior responsibility for HR Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key EX HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR risks is integrated as part of enterprise risk system: In its Annual Report, the Company resume its key risks. Among its reputation risks, the Company indicates: 'Reputation risk is related to the loss of trust and less positive perception of the Company by the stakeholders due to the decline of products quality as well as non compliance with contractual obligations, business customs and principles of professional ethics'. However, its Corporate Ethics Regulation document does not refer to human rights issues (no ILO core). [Annual Report 2018, 2019: surgutneftegas.ru & Corporate Ethics Regulation, 2013] Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Commits to all 4 ILO core conventions • 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	The individual elements of the assessment are met or not as follows: Score 1 • 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) Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on EX BPs
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant EX managers including security personnel Score 2 • Not met: Score of 2 on A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: 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 • 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	<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 • Not met: Frequency and triggers for engagement • Not met: Engagement includes EX business partners workers • Not met: Engagement includes EX business partners communities <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 • 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) • 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 • 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 • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Channel accessible to all workers: In its 'Corporate Ethics Regulation' document, the Company indicates: 'The Company Employees must report any situations connected with corruption to their direct supervisors. Should any individual report about any corruption activity connected with operations of the Company, the Company for its part shall indemnify such individual from any sanctions'. No evidence found of channel accessible to all workers to report human rights issues. [Corporate Ethics Regulation, 2013] 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 • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BPs workers
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 available and explained	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 • 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 • Not met: Practical measures to prevent retaliation 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	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 • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		
C.7	Remediating 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 • Not met: Describes how living wage determined 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)	0	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 • Not met: Reports of taxes and revenues beyond legal minimums [Annual Report 2016, 2016 & Annual Report 2015, 2015] Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country [Annual Report 2016, 2016 & Annual Report 2015, 2015] • 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)	0	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: The Company has not published any public policy or other document stating its commitment not to interfere with the right of workers to form or join trade unions and to bargain collectively. However the Company indicates in its website section 'Social Policy' that: 'The employees social guarantees and benefits provision is a characteristic of enterprises work stability. The level of social benefits, guarantees and compensations is stipulated in the collective agreement'. [Social Policy: surgutneftegas.ru] Score 2 <ul style="list-style-type: none"> • Not met: Discloses % covered by collective bargaining • 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)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Injury Rate disclosures: In its Annual Report, the Company indicates: 'Much attention is paid to prevention and decline of occupational injuries'. However no figures were disclosed. [Annual Report 2018, 2019: surgutneftegas.ru] Score 2 <ul style="list-style-type: none"> • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures • Not met: Set targets for H&S performance • 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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Process to identify indigenous rights holders: The Company indicates in its website section about 'Interaction with small numbered indigenous people from the north': 'In an effort to maintain a stable cooperation relationship with the small-numbered indigenous population, the following actions are taken: departments and services dedicated to work with the small-numbered indigenous peoples of the North have been set up and now operate in the Company's headquarters and business units; [...] the experience of other subsoil using companies, is analysed to improve the system of relationship with the small-numbered indigenous peoples of the North in whose territory the Company operates', among others. [Interaction with small numbered indigenous people of the north: surgutneftegas.ru]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How engages with communities in assessment: It also indicates that 'while developing project documentation for operations and implementation of projects the following is ensured: agreement with the indigenous peoples about production facilities layout schemes based on the principles of free, prior and informed consent; allocation of transportation routes with the minimum number of crossing over the watercourses; construction of barriers (corrals) around production and related facilities chosen in cooperation with the indigenous peoples; providing the representatives of the small-numbered indigenous peoples of the North with plans of environmental projects and their performance reports on their demand; compensation payments to the indigenous peoples for restriction of their traditional business activities and traditional way of life; [...]' [Interaction with small numbered indigenous people of the north: surgutneftegas.ru] <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) • 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: On its website section 'Measures and protection of water resources', the Company describes different actions implemented to prevent water and sanitation risks, such as: 'There are sanitary protection zones developed for all drinking water intake points and having a positive sanitary-epidemiological conclusion. The Company evaluated groundwater reserves on the basis of which appropriate additions to the license agreements for subsoil use are made. [...] In 2017, the Company will continue to monitor surface and ground waters and soils surrounding well pads being drilled to determine how construction of wells and oil production influence the quality of natural environment components and take timely measures to reduce negative environmental impacts. All new oil field facilities incorporate water disposal facilities. In 2017, the Company plans to spend RUB 16.714 million on implementation of program on construction of water protection facilities[...]' [Measures and protection of water resources: surgutneftegas.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors [Environmental Report 2018, 2019: surgutneftegas.ru] • Not met: Reports progress in meeting targets and shows trends in progress made: The Company discloses information about water consumption and wastewater in its Sustainability Report 2017 in a specific chapter named 'Protection and Rational Use of Water Resources', showing some trends. However there is no information reporting against targets on water stewardship that takes into consideration water used by local/other users. [Sustainability Report 2017, June 2018: surgutneftegas.ru & Environmental Report 2018, 2019: surgutneftegas.ru]

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: Indigenous communities oppose plans to develop oil fields in National Park in Yugra Region as it will destroy holy Lake Numto. Indigenous protesters have been harassed and threatened, passports of activists confiscated, many have left country for fear • Area: land rights • Story: 17 March 2017, An article in the Guardian alleges that development of oil reserves in the Khanty-Mansi autonomous region, has severely damaged the local ecosystems and affected the livelihoods of the local indigenous population. A major complaint from the indigenous groups is that Surgutneftegas access roads have severed rivers and streams, ruining fish stocks, killing off trees, constricting reindeers' movements and contaminating their food. The also allege the company has also let overindulgent hunters and fishermen use the land, who overtax the resources the natives depend on. Local reindeer herder Sergei Kechimov claims there have been at least four spills over the past year and a large leak in 2013 just north of the lake that was covered with sand rather than cleaned up. According to state environmental monitoring service data, the Khanty-Mansi region suffered 2,538 oil pipeline accidents in 2014, and 4,668 hectares of land were contaminated. The article claims that Surgutneftegas offers money and items such as snowmobiles and mobile generators to try to persuade the Khanty residents to agree to new oil projects. For the latest oil well being built near his home, Kechimov said, each of the 10 families in the area would receive about £2,200. National legislation passed in December 2013 also removed the protected status from lands where indigenous people hunt, fish and herd, meaning oil companies no longer need to get a state environmental impact assessment, which includes public feedback, before drilling there. • Sources: [URA Russia, 06/10/2017: ura.news][The Guardian, 17/03/2017: theguardian.com]
E(1).1	The Company has responded publicly to the allegation	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: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: As far as CHRB was able to ascertain, the Company does not have a public policy related to land. • Not met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(1).3	The Company has taken 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: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence • Not met: Denies allegations, but has engaged affected stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.32 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Surgutneftegas made data public that met one or more elements of the methodology in 3 cases, leading to a disclosure score of 0.32 out of 4 points.
F.2	Recognised Reporting Initiatives	0 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"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Surgutneftegas met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • 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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