

**Company Name** Total  
**Industry** Extractives  
**Overall Score (\*)** 51.3 out of 100

Theme Score	Out of	For Theme
7.0	10	A. Governance and Policies
15.7	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
10.0	20	D. Performance: Company Human Rights Practices
7.5	20	E. Performance: Responses to Serious Allegations
5.7	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	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The company is a member of the United Nations Global Compact and has made a commitment to 'respecting internationally recognised Human Rights standards within its operations'. In addition, in its Registration Document 2018, the Company states: 'TOTAL is committed to respecting internationally recognized human rights wherever the Group operates, in particular the Universal Declaration of Human Rights, the Fundamental Conventions of the International Labor Organization, the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights (VPSHR)'. The Registration Document is the company's official report approved by the Board. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> <li>Met: UNGC principles 1 &amp; 2: The company is a member of the United Nations Global. [Code of Conduct, Dec 2018: <a href="http://total.com">total.com</a>]</li> <li>Met: UDHR: See above. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: As indicated above, the Registration document states that 'TOTAL is committed to respecting internationally recognized human rights wherever the Group operates, in particular [...] the UN Guiding Principles on Business and Human Rights'. [Code of Conduct, Dec 2018: <a href="#">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> <li>• Met: OECD: The Company states in its Code of Conduct the following: 'We abide by the OECD Guidelines for Multinational Enterprises as well as the principles of the United Nations Global Compact.' [Code of Conduct, Dec 2018: <a href="#">total.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: UNGC principles 3-6: The company is a member of the UNGC since 2002. [Code of Conduct, Dec 2018: <a href="#">total.com</a>]</li> <li>• Met: Explicitly list All four ILO apply to EX BPs: See above. In addition, the Company states in its Code of Conduct: 'Our Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings. [...] We apply the Code of Conduct in all joint ventures we control. Otherwise, we do our utmost to ensure that the partner who controls the joint venture adheres to principles that are equivalent to those set out in our Code of Conduct.' Moreover, Total's Principles of Purchasing Policy outlines the standards for respecting fundamental principles of the International Labour Organisation stating, "In particular with rules relating to the prohibition of forced labour and child labour...treatment of discrimination...freedom of association and collective bargaining." The Human rights briefing update also states that our policies and strategies help to underscore our commitment to our stakeholders including contractors, suppliers and joint venture partners, and what we expect in return. They also provide guidance to our employees and everyone who works on our behalf. [Code of Conduct, Dec 2018: <a href="#">total.com</a> &amp; Fundamental Principles of Purchasing, n/a: <a href="#">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: The Code of Conduct indicates that it takes necessary steps to ensure decent working conditions, including: 'prohibition on forced labor and child labor, a commitment to non-discrimination and freedom of association, and a guarantee that any problems that arise can be reported to human resources staff. [...] We are careful to create working conditions that show respect for people and that allow for freedom of association and collective bargaining. Harassment in any form is not tolerated'. [Code of Conduct, Dec 2018: <a href="#">total.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company Code of Conduct states that its 'Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings. [...] We apply the Code of Conduct in all joint ventures we control. Otherwise, we do our utmost to ensure that the partner who controls the joint venture adheres to principles that are equivalent to those set out in our Code of Conduct.' [Code of Conduct, Dec 2018: <a href="#">total.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: The Company's Code of Conduct states that 'suppliers, contractors and business partners are expected to apply these standards that are equivalent to ours [the Company's]'. Therefore, respect for health and safety extends to business partners. [Code of Conduct, Dec 2018: <a href="#">total.com</a>]</li> </ul>
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"> <li>• Met: Voluntary Principles (VPs) participant: In its Code of Conduct, the Company states that it 'complies with the Voluntary Principles on Security and Human Rights'. Furthermore, it indicates that it adheres to the Voluntary Principles on Security and Human Rights and that it 'take all necessary steps to ensure compliance with the Voluntary Principles on Security and Human Rights' [Code of Conduct, Dec 2018: <a href="#">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> <li>• Not met: Respecting indigenous rights: The Company's Human Rights Internal Guide states that "the group recognizes indigenous peoples traditional attachment and close proximity to land and natural resources such as rivers, trees and forests." However, this does not meet the criteria for this indicator because Total does not commit to respecting indigenous land rights. [Human Rights Internal Guide, 2015: <a href="#">total.com</a>]</li> <li>• Not met: ILO 169: The Company acknowledge that Indigenous people's specific rights are recognised in particular by the ILO Convention No. 169. Following this</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Total states that "in accordance with these documents [ILO Convention No. 169] indigenous people have the right to Free Prior and Informed Consent for developments affecting them. However, from this it is not clear If the Company has made a commitment to respect these rights or is merely just stated what is outlined in the document itself. [Human Rights Internal Guide, 2015: <a href="#">total.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)</li> <li>• Met: Expects BPs to respect these rights: The Company states in its Code of Conduct: 'Our Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings. [...] We apply the Code of Conduct in all joint ventures we control. Otherwise, we do our utmost to ensure that the partner who controls the joint venture adheres to principles that are equivalent to those set out in our Code of Conduct.' In addition, in its Registration Document 2018, the Company indicates: ' [Code of Conduct, Dec 2018: <a href="#">total.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment</li> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC performance standards</li> <li>• Not met: Zero tolerance for land grabs: No evidence found in the sources provided in relation to this indicator. [Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expects BPs to commit to all these rights</li> </ul> </li></ul>
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: Total's Human Rights Internal Guide states that "The Group has developed internal guidance and a set of principles to support staff participating in stakeholder engagement." In addition, the company also has a Human Rights Impact Assessment Document with details the step of engagement with stakeholders. This document, also makes the distinction between actually and potentially affected stakeholders. [Human Rights Internal Guide, 2015: <a href="#">total.com</a> &amp; Human Rights Impact Assessment (HRIA), 2015: <a href="#">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Met: Regular stakeholder design engagement: The Company's updated Human Rights Briefing Paper 2018, states that Total works with the Danish Institute for Human Rights (DIHR). In 2017, the Company conducted a dedicated human rights impact assessment in Papua New Guinea focusing on gender, security and conflict. Furthermore, the Company requires its business units to engage with their stakeholders on a regular basis and to avoid, minimize, mitigate and remedy negative impacts on local communities related to their activities. The Company has also issued a stakeholder engagement guide and manual for exploration and production business segments. In addition, in its Registration Document 2018, the Company reports: 'Since 2002, the Group has engaged GoodCorporation, a company specialized in ethical assessments, to verify the proper application of the principles set out in the Code of Conduct at the Subsidiary level. These assessments include criteria relating to human rights and fundamental freedoms, and corruption. As part of the process, a selection of employees and external stakeholders of the Subsidiary are questioned to understand how their Activities are perceived locally. Following the assessment, the Subsidiary in question defines and implements an action plan and a monitoring procedure'. [Human Rights Briefing Update Paper 2018, April 2018: <a href="#">sustainable-performance.total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> </ul>
A.1.5	Commitment to remedy	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"> <li>• Met: Commits to remedy: The Company's Human rights Internal Guide states that [Total] business units should "avoid, minimize, mitigate and remedy negative impacts on local communities related to their [business unit] operations." [Human Rights Internal Guide, 2015: <a href="#">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Not obstructing access to other remedies: The Company's Human Rights Internal Guide states that "the Group respects the rights of communities by identifying and addressing impacts...and where appropriate by providing remedy for adverse impacts that could not be avoided." Further this guide also states that "access to these mechanisms [remediation] for vulnerable individuals and groups should be ensured." [Human Rights Internal Guide, 2015: <a href="#">total.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>
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"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company provided sources to CHRB in relation to this indicator. However, these were not material.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects EX BPs to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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"> <li>• Met: CEO or Board approves policy: The Company's Human Rights Internal Guide, which contains Total's human rights commitments, contains a message from the CEO (Patrick Pouyanne) which states that "the Group is committed to respect internationally recognized Human Rights standards in the countries where we work." Furthermore, the Company's Safety Health Environment Quality Charter, which outlines a commitment to comply with Voluntary Principles on Security and Human Rights is signed off by the CEO (Patrick Pouyanne). [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a> &amp; Safety Health Environment Quality Charter, 2014: <a href="http://total.com">total.com</a>]</li> <li>• Met: Board level responsibility for HRs: The Human Rights Coordination Committee coordinates the initiatives and action taken by the various Total business units relating to Human Rights. It is led by the Ethics Committee chair. The Ethics Committee's mission is to ensure the Code of Conduct (which contains Human Rights policy commitments) is shared, understood and implemented across the Company. The chair of the Ethics committee reports regularly to the Executive Committee and to the Governance &amp; Ethics Committee of the Board of Directors on the implementation of the Code of Conduct which includes Human Rights policy commitments.</li> </ul> <p>Its Chairman reports directly to Total's CEO and presents an annual report to Total's executive commitment and Board of Directors. [Human Rights Briefing Paper, 2016: <a href="http://total.com">total.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Speeches/letters by Board members or CEO: The Company's CEO has participated in the UN Forum on Business and Human Rights discussing the Company's approach to human rights and discussing its business importance. The CEO also participated in UNGC CEO Roundtable — Closing the Inequality Gap: Human Rights as a Driver for Successful Business'. In addition, the CEO signed the WBCSD CEO Guide to Human Rights. [UN - Forum on Business and Human Rights - Conversation with Business Leaders (1:30:00), Nov 2018: <a href="http://webtv.un.org">webtv.un.org</a> &amp; CEO Roundtable - Closing the Inequality Gap- Human Rights as a drive for successful business, Sep 2018: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> </ul>
A.2.2	Board discussions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: The Company's Human Rights Briefing Paper states that consultation with internal and external stakeholders, the Code of Conduct and Human rights Guide identified "three broad and important focal (salient) Human Rights areas." These include Human Rights in the Workplace, Human rights and Local Communities and Human Rights and Security. The Human Rights Coordination Committee coordinates the initiatives and action taken by the various Total business units relating to Human Rights. It is led by the Ethics Committee chair. The Ethics Committee's mission is to ensure the Code of Conduct (which contains Human Rights policy commitments) is shared, understood and implemented across the Company. Its Chairman reports directly to Total's CEO and presents an annual report to Total's executive commitment and Board of Directors. [Video on the Human Rights Briefing Paper, 2018: <a href="http://total.com">total.com</a> &amp; Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Met: Examples or trends re HR discussion: The Company's Human Rights Briefing Paper Update 2018 states, that in July 2017 the Board Committee on Ethics and Governance examined some of the Company's salient human rights issues. These included labour conditions, discrimination and harassment as well as relations with local communities. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Met: Both examples and process
A.2.3	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Incentives for at least one board member: In its 2018 Registration Document, the Company discloses information about its Chairman/CEO compensation. Its Annual variable compensation includes quantifiable targets where Safety is included (20%) and qualitative criteria which includes Corporate Social Responsibility (CSR) performance (15%): 'The safety criterion was assessed for a maximum of 20% of the base salary through (i) the achievement of the annual TRIR (Total Recordable Injury Rate) target, (ii) the number of accidental deaths per million hours worked, FIR (Fatality Incident Rate) compared to those of the four large competitor oil companies (ExxonMobil, Royal Dutch Shell, BP and Chevron), as well as (iii) through change in the Tier 1 + Tier 2 indicator (2). [...] CSR performance, notably taking into account the climate into the Group's Strategy, the Group's reputation in the domain of Corporate Social Responsibility as well as the policy concerning all aspects of diversity, for a maximum of 15%: The Board of Directors has set the result of this criterion at its maximum i.e. 15%'. [Registration Document 2018, Mar 2019: <a href="#">total.com</a> ] • Not met: At least one key EX RH risk, beyond employee H&S: See above, it includes safety (although not clear if covers communities and partners) and diversity, although not clear the specific objectives related this one. [Registration Document 2018, Mar 2019: <a href="#">total.com</a> ] Score 2 • Met: Performance criteria made public: See above(S1.i). In addition, the Company indicates: 'Concerning the 2018 fiscal year, the following elements were noted: the TRIR was 0.91, which is above the target of 0.9. The result of this criterion was thus set at 11.80%; the FIR rate is 0.88, the last of the majors' panel. The result of this criterion was thus fixed at 0%; the number of Tier 1 + Tier 2 incidents was 103, which is above the target of 100. The result of this criterion was set at 3.88%. The result of the criterion related to the safety performance was thus set at 15.68%.' [Registration Document 2018, Mar 2019: <a href="#">total.com</a> ]

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: In its 2018 Registration Document, the Company indicates: 'The Group's Human Rights Department provides advice and support to employees and operational divisions and supervises efforts made to promote respect for human rights in close collaboration with the Ethics Committee. In particular, it runs a Human Rights Committee which coordinates the actions taken internally and externally by the various Group entities. [...] The Human Rights Department and the Ethics Committee rely on a network of "ethics officers" in charge of promoting the values set out in the Code of Conduct among employees working in the Group's subsidiaries and ensuring that the Group's commitments are correctly implemented at the local level.' In addition, the Company stated in its Human Rights Briefing Paper 2016 and its Human Rights Internal Guide that the Human Rights Coordination Committee coordinates the initiatives and action taken by the various Total business units relating to Human Rights. It is led by the Ethics Committee chair. The Ethics Committee's is a 7 member body of senior managers who's mission is to ensure the Code of Conduct (which contains Human Rights policy commitments and details the scope of work of the committee including day-to-day responsibility) is shared, understood and implemented across the Company. Its Chairman reports directly to Total's CEO and the Board Level Ethics and Governance Committee. No new relevant information in the Briefing Paper Update 2018. [Registration Document 2018, Mar 2019: <a href="#">total.com</a> & Human Rights Briefing Paper, 2016: <a href="#">total.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: Its Code of Conduct sets the responsibilities of the Ethics Committee, which 'ensures compliance with the Code of Conduct and verifies that it is properly applied.' For example, some of its responsibilities are: 'Ensuring that the Code of Conduct is widely communicated and proposing any changes it deems necessary; Receiving reports from whistleblowers in connection with the Code of Conduct and ensuring they are addressed; Submitting recommendations to the executive team on all ethics-related issues and drawing its attention to potential challenges to our activities on ethical grounds; Advising Total's training departments on incorporating a presentation on the Code of Conduct into training programs, in particular those intended for new hires and managers.' In addition it indicates: 'The Ethics Committee is backed by an international network of Ethics Officers, who report to the Country Chairs and serve as a liaison in their respective countries for matters relating to ethics and the Code of Conduct.' [Code of Conduct, Dec 2018: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>
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"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key EX HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	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"> <li>• Met: HR risks is integrated as part of enterprise risk system: In Registration Document 2018, the Company explains its enterprise risk factors. One of these risk factors is Ethical misconduct and non-compliance risks. Specifically, the Company states, 'Ethical misconduct or non-compliance of the Group or its employees with applicable laws could expose TOTAL to criminal and civil penalties and be damaging to TOTAL's reputation and shareholder value. The Group's Code of Conduct, which applies to all of its employees, defines TOTAL's commitment to ethical standards, business integrity, human rights and compliance with applicable legal requirements.' [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Audit Ctte or independent risk assessment: The Company uses independent ethics organisations including GoodCorporation and the Danish Institute of Human Rights to conduct ethical assessments of its business units. Findings from these assessments are shared with the management of the business units, the Ethics Committee, the Executive Committee and the Ethics and Governance Committee. The Company states that these assessments provide an opportunity to identify good ethical and human rights practises and share them with other business segments. For example, one of the findings of the assessment relates to the sometimes inadequate level of awareness of Total's human rights policies locally. In response to this the Company has scaled up awareness of human rights policies through business units globally. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: The Company's Human rights Briefing Paper states that Total's commitment to Human Rights are articulated in its core document - Code of Conduct. In addition to this, it is stated that the "Code of Conduct serves as a Group-wide primary document for all employees as well as for its stakeholders...to further enshrine Human Rights into [the Company's] principles." Total's Code of Conduct is available in 19 languages and distributed to employees and available on the Company's website. In addition, in its Registration Document 2018, the Company indicates: 'To ensure that employees understand the Group's commitments, TOTAL raises their awareness via internal communication channels, such as its Ethics and Human Rights intranet websites or by means of events such as the annual Business Ethics Day. [...] Since 2011, the Group has issued and made available to its employees and other stakeholders a Human Rights Guide which comes as complement to the Group's Code of Conduct. It aims to raise the Group's employee's awareness on issues relating to human rights in their industry [...].' [Human Rights Briefing Paper, 2016: <a href="http://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions: See indicator A1.2</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder: In its Code of Conduct the Company states: 'this document is publicly communicated to all of our external stakeholders: host countries, local communities, customers, suppliers and contractors, business partners, and shareholders. It engages Total with regard to all of those stakeholders.' However, there is no further information describing how it communicates its policy commitments to stakeholders, including local communities and potentially affected stakeholders. [Code of Conduct, Dec 2018: <a href="http://total.com">total.com</a>]</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> <li>• Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Communicating policy to EX contractors and joint ventures: The Company indicates that it 'expects its suppliers to: adhere to the Fundamental Principles of Purchasing and ensure that they are adhered to in their activities, [...] ensure that their own suppliers and subcontractors adhere to these Fundamental Principles of Purchasing, [...]'. It also reports in its Human Rights Briefing Paper Update 2018 that 'In October 2017, we held our Suppliers Day 2017. The event brought together 110 strategic suppliers from all of Total's business segments. It provided an opportunity to highlight our values and our suppliers' responsibility to respect human rights. We also disseminated our Fundamental Principles of Purchasing (FPP) guidance leaflet to our suppliers during the event.' The Company's Code of conduct, which is embedded with the Groups Human Rights Commitment and polices, applies 'to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings. [...] We apply the Code of Conduct in all joint ventures we control. Otherwise, we do our utmost to ensure that the partner who controls the joint venture adheres to principles that are equivalent to those set out in our Code of Conduct.' The Human rights briefing update also states that our policies and strategies help to underscore our commitment to our stakeholders including contractors, suppliers and joint venture partners, and what we expect in return. They also provide guidance to our employees and everyone who works on our behalf. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a> &amp; Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>• Met: Including to EX BPs (removed)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: In its Registration Document 2018, the Company indicates: 'The rules set out in these [Fundamental] Principles [of Purchasing] must be included or transposed into the agreements concluded with suppliers. To this end, these Principles are available for consultation by all suppliers in both French and English on TOTAL's website (under "Suppliers").' [Fundamental Principles of Purchasing, n/a: <a href="http://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Including on EX BPs: Not clear if the above also includes extractive business partners.</li> </ul>
B.1.5	Training on 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"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: In its Registration Document 2018, the Company indicates: 'Dedicated human rights and fundamental freedoms training programs have been set up for senior executives, site directors and the employees most exposed to these issues. Awareness- raising sessions on these subjects are organised regularly for employees, as is the case at the time of ethical assessments of Subsidiaries. In the field of procurement, training modules explaining the Group's ethical commitments and the Fundamental Principles of Purchasing have also been developed for the Group's purchasers.'</li> </ul> <p>The Company's Human Rights Internal Guide has a section called "training programmes". According to the Company "Dedicated communication channel, e-learning and training session on Ethics and Human rights are available for the Group's employees and managers. Awareness-raising session for external stakeholders are also available in some contexts for specific issues, such as responsible security." However, as the policy merely states that Human rights training resources are available we cannot assume that All workers receive training. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Trains relevant EX managers including security personnel: The Company also reports that it 'organizes special trainings tailored to the challenges faced on the field by employees who are particularly exposed to such issues such as human</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>rights training sessions for HSE experts and Community Liaison Officers (CLO) organized with the Danish Institute for Human Rights (DIHR) or sessions designed to raise awareness of the Group's Ethics Officers. Actions intended to raise awareness of the Group's external stakeholders, such as specific VPSHR trainings for the private security providers, are also organized.' In addition, in its Human Rights Briefing Paper Update 2018 states that 'Over the past two years, we organized dedicated VPSHR awareness/training sessions with a focus on the risk of misuse of force for our managers, employees, contractor personnel, public security forces and private security providers in various countries where Total is present including Nigeria, the Democratic Republic of the Congo, France, Papua New Guinea, Bolivia, China, Venezuela, Myanmar, Uganda, Jamaica.' [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a> &amp; Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2: See Indicator A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: The Company has set up two committees and a dedicated service to advise employees and other stakeholders and monitor efforts to promote respect of Human Rights within operations. These include the Ethics Committee, The Human Rights Coordination Committee and the Human rights Legal Department. The Ethics Committees job is to ensure the code of conduct (which outlines Human Rights policies for the Group) is shared implemented and understood. The Human Rights Coordination Committee coordinates the initiatives and actions taken by various Total business units relating to human rights. Finally the Human Rights Legal Department specialises in Ethics and Human Rights to provide expertise to business units and anticipate emerging trends on Human Rights. Furthermore, Total states in its Code of Conduct that 'to ensure that our Code of Conduct is applied correctly, we ask independent third parties to perform ethical assessments of our activities.' In addition, according to its Registration Document 2018: 'The practices of the Group's entities and the risks to which they may be exposed are regularly evaluated when it comes to human rights issues. The Group works with independent third parties and qualified experts to conduct these assessments. Since 2002, the British company GoodCorporation has assessed the policies and practices of more than 120 entities with regard to the principles and values enshrined in the Group's Code of Conduct. During these evaluations, the working conditions in the Group's activities and service stations are assessed, among other things. In 2018, seven entities were assessed'. [Human Rights Briefing Paper, 2016: <a href="http://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Monitoring EX BP's: In its Registration Documentation 2018, the Company indicates: 'the Group has set up a supplier assessment process to identify and prevent risks of severe impacts on human rights and fundamental freedoms, human health and safety. Thus, since 2016, the Group started conducting campaigns to audit working conditions amongst its suppliers. These audits are conducted by a specialized service provider, with which TOTAL signed a framework contract in 2016'. However, it is not clear if this also covers extractive business partners. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2: See indicator A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Met: Example of corrective action: The Company provides information about some findings from its GoodCorporation partnership: 'finding concerns the relatively weak position of subcontractor employees vis-à-vis their employers e.g. wages that do not adequately factor in the cost of living in the country. In this regard, through continuous improvement of our procurement methods and best practices identified within the Group, our E&amp;P business segment is strengthening its processes for labor contractors and is making efforts to ensure that they benefit from decent and fair wage conditions down the subcontracting chain - with the support of the headquarters procurement entity.' [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>• Not met: Discloses % of EX supply chain monitored</li> </ul>
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"> <li>• Not met: HR affects selection EXs business partners: In its Registration Document 2018, the Company indicates: 'The supplier qualification process was harmonized at</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Group level in 2017 by Total Global Procurement. A new internal framework was published in 2018. A new computerized qualification tool will gradually be rolled out starting in 2019, with a planned scope of 107 countries thus far. It will be used to automate and document the supplier qualification process, which unfolds in four stages: 1. confirmation of interest; 2. a risk pre- analysis to decide whether an in-depth analysis of each criterion is necessary (HSE, anti- corruption, societal, financial, technical); 3. determination of the qualification status; 4. monitoring and renewal of qualification. Qualifications are valid for three years'. However, it is not clear if it is being implemented already (evidence indicates it is not being rolled out yet at the time of the report) and covering suppliers and contractors (extractive business partners). [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: HR affects on-going EX business partner relationships: The Company states that 'Our Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings.' In addition, according to its Registration Document 2018: 'the Group has set up a supplier assessment process to identify and prevent risks of severe impacts on human rights and fundamental freedoms, human health and safety. Thus, since 2016, the Group started conducting campaigns to audit working conditions amongst its suppliers. These audits are conducted by a specialized service provider, with which TOTAL signed a framework contract in 2016.' However, Total does not provide information on how Human Rights performance affects on-going business partner relationships and clarifies whether it includes business partners. [Code of Conduct, Dec 2018: <a href="http://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with EX business partners to improve performance: The Company also discloses the following information: 'in September 2018, TOTAL, BP, Equinor and Shell announced their intention to develop a common collaborative approach to assess the respect of human rights by their suppliers. The partner companies are convinced of the importance of working with suppliers that respect human rights, on the one hand, and take good care of their employees, on the other. The goal of this common approach is to encourage the improvement of working conditions in the supply chain of the companies involved.' However, it is not clear whether it has been implemented, and includes extractive business partners. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul>
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"> <li>• Met: Stakeholder process or systems: Total indicates in its Registration Document 2018 that it 'sets up dialogue procedures with its stakeholders at every level of its organization. In accordance with the Group's framework on societal matters, stakeholders are identified, mapped and prioritized according to their levels of expectations and involvement. This mapping is kept up to date. A structured dialogue with the stakeholders is established and maintained, initially at local level but also at the central level. At the local level, TOTAL has deployed since 2006 its internal Stakeholder Relationship Management (SRM+) methodology. [...] This approach aims to list the main stakeholders of each Subsidiary and site (depots, refineries, etc.), to categorize them, to schedule consultation meetings to better understand their expectations, concerns and opinions. This approach then permits to define action plans to manage the impacts of activities and to take into account local development needs in order to build a long- term trusting relationship. This mechanism is used to explain the Group's Activities to communities and other stakeholders, and to pay particular attention to potentially vulnerable local populations. It has been integrated in almost all the Subsidiaries. The system is supplemented by a network of mediators with local communities, deployed within the Exploration &amp; Production segment to maintain a constructive dialogue with neighboring communities. At the central level, the relevant departments of the Holding also ensure that dialogue is maintained with the Group's stakeholders'. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Met: Engagement includes EX business partners communities: It also indicates: 'In accordance with internationally recognized human rights standards, TOTAL requires the Group entities to maintain a regular dialogue with their stakeholders and make sure that their activities have no negative consequences on local communities or, if these cannot be avoided, that they limit, mitigate and remedy them. The solutions proposed in response to the expectations of local communities are coordinated by the societal teams that work in close collaboration with the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>legal, safety and environmental teams.[...]TOTAL takes initiatives to establish dialogue by listening to and involving stakeholders in order to develop constructive and transparent relations with them. For industrial projects developed by the Group, this information, consultation and dialogue process starts well before any decisions on investments.' [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company uses the Human Rights Compliance Assessment (HRCA) tool developed by the Danish Institute for Human Rights to assist Total's business units in identifying and addressing Human Rights Risks in business unit operation. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Met: identifying risks in EX business partners: Total's Human Rights Impact Assessment Document section 12.6. 'Identifying and Assessing Impacts states " Assessment includes impacts that are caused or contributed to by the Project, and also those that are directly linked to the Company through products, services or other activities by any of its business partners." [Human Rights Impact Assessment (HRIA), 2015: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: Total has is a signatory of a Global Framework Agreement with a worldwide trade union federation, IndustriALL Global Union. This agreement focuses on the protection of the rights and working conditions of Total's employees; as well as that of contractors and suppliers employees including areas such as prohibition of forced labour and child labour, non-discrimination and favourable working conditions. Hence forming part of Total's ongoing risk identification on a global scale. [Human Rights Briefing Paper, 2016: <a href="http://total.com">total.com</a>]</li> <li>• Met: In consultation with stakeholders: The Company's Human Rights Briefing Paper Update 2018 states: 'Our Due Diligence Actions: Our Stakeholder Relationship Management Tool+ (SRM+) is an effective tool for defining and regularly re-adjusting the societal/CSR strategy of our business units. Based on identifying and mapping our main stakeholders and a clear understanding of local expectations and issues, the aim is to assess the quality of the relationship and then jointly define an action plan to build a long-term trusting relationship grounded in respect for human rights.' [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a> &amp; Human Rights Impact Assessment (HRIA), 2015: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: In consultation with HR experts: In its Human Rights Impact Assessment Document, the Company indicates: 'Contractor personnel employed for the assessment include a project manager and consultants able to organize and carry out the HRIA including the stakeholder engagement process (Human Rights expert, sociologist, anthropologist, etc.). It is also necessary to have local consultants as part of the team, to bring local knowledge and understanding of the context and to facilitate engagement with stakeholders. The Human Rights expert shall be a person with the experience and capacity to understand and evaluate Human Rights risks and potential impacts and at least one person in the team shall have experience in, and the ability to, engage effectively with stakeholders.' [Human Rights Impact Assessment (HRIA), 2015: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Triggered by new circumstances: Total's General Specification Sustainable Development Human Rights Impact Assessment Document outlines the need for and scope of a dedicated HRIA given a series of contexts. These contexts detail a number of triggers including new country operation and new business relationships. [Human Rights Impact Assessment (HRIA), 2015: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Explains use of HRIAs or ESIA (inc HR): See above [Human Rights Impact Assessment (HRIA), 2015: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): Total states in its Human Rights Internal Guide "we integrate respect for Human Rights into our risk and impact management processes, including but not limited to new country entry evaluations, acquisitions and divestitures procedures, environmental and social baselines and impact assessments, purchasing systems, etc." In addition to this, the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and key industry risks)		<p>Company "Conduct assessments to identify, prevent or mitigate potential Human Rights impacts that may be caused directly by the Business unit's projects or operations, or by project partners and suppliers." To do Total uses "The Human Rights Compliance Assessment (HRCA), a tool developed by the Danish Institute to assist Business units in identifying and addressing Human Rights risks in Business units operations, was adapted to the Group's specific context and needs." [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Public disclosure of salient risks: Total's Human Rights Briefing Paper states that "Salient Human Rights issues as defined in the UN Guiding Principles Reporting Framework are those Human Rights that stand out because they are at risk of the most severe negative impact through the company's activities or business relationships." Total goes on to list Human Rights in the workplace, human rights and local communities and human rights and security as "broad and important focal human rights areas." These address specific human rights issues such as forced labour, child labour, freedom of association, non-discrimination, fair remuneration etc." No new relevant evidence in last Briefing Paper. [Human Rights Briefing Paper, 2016: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: In its Human Rights Briefing Paper Update 2018, the Company explains its salient issues and then devotes a section to explain the actions that is carrying out in relation to each one of human rights in the workplace (forced labour, discrimination safety), local communities (access to land, right to health and adequate standard of living) and security (misuse of Force). [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> <li>• Met: Including amongst EX BPs: As above. In addition, contractors, and in some cases joint ventures are part of the different processes and interventions described in the document. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>• Met: Example of Actions decided: For instance, its actions to address human rights issues in the Workplace - Labour Rights includes: 'Strengthening our governance: [...] In January 2015, Total signed a global CSR agreement with international union federation IndustriALL Global Union, which represents more than 50 million workers in 140 countries in the energy, mining and manufacturing sectors.[...] Reinforcing awareness and training: 'In October 2017, we held a Contracts and Human Rights Session facilitated by Shift, a leading center of expertise on business and human rights, with the Contracts Legal Practice Group – on embedding human rights in contracts for lawyers. This session also provided the opportunity for our lawyers to share relevant examples of contract provisions that have been useful in helping the company ensure that our partners respect human rights. [...] Our due diligence actions: [...] As part of the new TGP qualification and monitoring methodology which will be gradually launched across our business units starting 2018, a human rights risk analysis will be carried out for potential suppliers, or suppliers renewing a contract with Total up to certain monetary threshold. [...] Collaboration: We continue to actively participate in international working groups that address human rights issues in the supply chain.[...]'. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: System to check if Actions are effective: Total has partnered with GoodCorporation conducting ethical assessments of the company's business units. The partnership has resulted in a risk based process involving employees, suppliers and subcontractors, customers and other business partners, host countries, local community and management to evaluate the practical implementation of Total ethical and human rights principles set out in the code of Conduct. This process entails conducting on-site visits and multiple conversation with rights holders. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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"> <li>• Met: Comms plan re identifying risks: Under the heading "Communicate" in Total's Human Rights Internal Guide it states "explain to stakeholders how these issues [Human rights risks] are being addressed, including through public reporting on due diligence steps taken." [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Met: Comms plan re assessing risks: The Company has demonstrated it assesses and discloses human rights salient issues (see b.2.2)</li> <li>• Met: Comms plan re action plans for risks: See indicator B.2.3 [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns: The Company provided comments to CHRB regarding this indicator. However these were not material to this indicator. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### 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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Channel accessible to all workers: The Company indicates: 'To support employees on a day- to- day basis, the Group encourages a climate of dialogue and trust that enables individuals to express their opinions and concerns. Employees can thus go to their line manager, an HR or other manager, their Compliance Officer or their Ethics Officer. The Group's employees and Suppliers, as well as any other external stakeholder, can contact the Ethics Committee to ask questions or report any incident where there is a risk of non- compliance with the Code of Conduct using the generic email address (<a href="mailto:ethics@total.com">ethics@total.com</a>). [...] The Human Rights Department and the Ethics Committee rely on a network of "ethic officers" in charge of promoting the values set out in the Code of Conduct among employees working in the Group's subsidiaries and ensuring that the Group's commitments are correctly implemented at the local level'. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a> &amp; Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: It states in the Human Rights Briefing paper that "2015, there were 475 reported cases Group wide, relating to the Code of Conduct. 51 of these inquiries were handled directly by the Group Ethics Committee while the remaining inquiries were handled at the business units' level." However, it is not clear whether or not these cases were relating to Human Rights concerns or general Code of Conduct issues. Furthermore, the number of addressed/resolved cases is not specified. No new relevant evidence found in latest Briefing. [Human Rights Briefing Paper, 2016: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Met: Opens own system to EX BPs workers: As indicated above, the Company's Ethics Committee address is open to employees, suppliers as well as any other external stakeholder. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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"> <li>• Met: Grievance mechanism for community: In its Registration Document 2018, the Company indicates: 'The Group framework provides for the implementation of operational procedures to handle grievances by providing local communities with a preferential, rapid and simple channel to voice their problems and grievances. The Group's local entities handle these grievances in order to offer an appropriate response to anyone who feels that they have suffered damage as a result of the activity and to improve internal processes in order to reduce nuisances or impacts that may be caused by the activities. At Exploration &amp; Production, a set of tools is made available to the subsidiaries, including, in particular, a standard procedure designed to make it easier for local communities to access the grievances mechanisms. This standard procedure complies with the United Nations guiding principles on Business and Human Rights.' [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: 'The Community Liaison Officer (CLO) maintains a dialogue between the business unit and the local</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>communities. CLOs, who are employees of Total and come from the local community and therefore speak the local language and understand local customs. As such they often play a key role in integrating the company into the local context.' However, it is not clear that all communities throughout Total's operation have a mechanism for grievances (if they are not part of the community where the CLO is). [Human Rights Briefing Update Paper 2018, April 2018: <a href="https://sustainable-performance.total.com">sustainable-performance.total.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: EX BPs communities use global system: As indicated above, the local mechanisms for communities are open to anyone. In addition, as indicated in indicator C.1 the Company's channel to the Ethics Committee for complaints is open to employees, suppliers as well as any other external stakeholder.</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> <li>• Met: Engages users to create or assess system: Total states that 'the grievance procedure should be designed in collaboration with representatives from the local community to reflect their needs and interests and to create ownership and trust in this mechanism.' [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>]</li> <li>• Met: Description of how they do this: The Company states that Community Liaison Officers (CLO) are involved in the development of the grievance procedures. The CLOs are typically members of the local community, whose language they speak and whose customs they understand, are employed by our business units so that they can maintain a dialogue with the local communities. The grievance mechanism introduced in Uruguay is an example of the company engaging with potential or actual users in the design process of the grievance mechanism. Uruguay has 'a dedicated mechanism for the handling of grievances was introduced in Uruguay as part of stakeholder communications as early as the seismic campaign (exploration phase). This plan, which was drawn up by the business unit's societal team is supported by the presence in the field of a Community Liaison Officer (CLO) who is a member of the local community.' No new evidence found in the latest Briefing. [Human Rights Briefing Paper, 2016: <a href="https://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: EX BPs consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	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"> <li>• Met: Public statement prohibiting retaliation: Total's Code of Conduct states that it does 'not tolerate reprisals of any kind against employees who voice concerns in good faith regarding compliance with the Code of Conduct.' The Group's system to report grievances to the Ethics committee (ethics@total.com) is open to employees and third parties. 'The group will tolerate no retaliation measure toward anyone who submits a report in good faith and undertakes to respect confidentiality'. [Code of Conduct, Dec 2018: <a href="https://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="https://total.com">total.com</a>]</li> <li>• Not met: Practical measures to prevent retaliation: The Company indicates in its Registration Document 2018 that 'The Ethics Committee is a central and independent structure where sit representatives of all TOTAL's business segments. Its key role is one of listener and support. Both employees and external stakeholders can refer matters to the Ethics Committee by email at ethics@total.com. The Committee ensures the confidentiality of the complaints, which can only be lifted with the agreement of the complainant.' However, no evidence found of the system allowing anonymous complaints, or other practical measures to prevent retaliation. [Registration Document 2018, Mar 2019: <a href="https://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects EX BPs to prohibit retaliation</li> </ul>
C.6	Company involvement with State-	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"> <li>• Not met: Won't impede state based mechanisms</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	based judicial and non-judicial grievance mechanisms		<ul style="list-style-type: none"> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: Total describes a situation in PNG where a family's canoe was capsized by one of the Company's transportation boats. The local family claimed that their personal belongings including gardening tools, a flashlight and various food items were lost as a result. Upon receiving the grievance, the Company Onsite Grievance Committee met to discuss the matter and subsequently offered food rations, gardening tools and solar lamps which was accepted by the local family. The settlement process was completed within 14 days with community members witnessing the transaction for transparency reasons. [Human Rights Briefing Update Paper 2018, April 2018: <a href="https://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Says how it would remedy key sector risks</li> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

### 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"> <li>• Not met: Living wage target timeframe or achieved: The Company's 2017 Annual Report states that 'A large majority of employees benefit from laws that guarantee a minimum wage, and, whenever this is not the case, the Group's policy ensures that compensation is above the minimum wage observed locally. Regular benchmarking is used to assess compensation based on the external market and the entity's competitive environment. Each entity's positioning relative to its reference market is assessed by the Human Resources Department of each business segment, which monitors evolutions in payroll, turnover and consistency with the market.' However, it does not provide any information regarding living wages. [Human Rights Briefing Update Paper 2018, April 2018: <a href="https://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes how living wage determined</li> <li>• Not met: Pays living wages</li> <li>• Not met: Reviews living wages definition with unions</li> </ul>
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"> <li>• Met: Member of EITI: The Company is a member of the Extractive Industry Transparency Initiative (EITI). [EITI MEMBERS REGISTRY_2016-2019 as at 29 Feb 2016, 2016: <a href="https://eiti.org">eiti.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Reports taxes and revenue by country: In its Code of Conduct, the Company indicates that it takes 'part in international initiatives, including the Extractive Industries Transparency Initiative.' It further states that 'as part of our commitment to the implementation and success of the EITI in the countries where we operate, we leveraged our relationship with the Myanmar government to explain the benefits of EITI membership for countries and companies. Myanmar committed to joining the EITI in late 2012 and was admitted as a candidate country by the International EITI Board in July 2014.' Total has also published payments made to governments by project and by type of payment, in all the countries where the Company operates. No new relevant evidence in latest Briefing. [Code of Conduct, Dec 2018: <a href="https://total.com">total.com</a> &amp; Human Rights Briefing Paper, 2016: <a href="https://total.com">total.com</a>]</li> <li>• Not met: Steps taken re non EITI countries</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company is committed to respecting the right of freedom of association and collective bargaining. However, no evidence found in relation to commitment to not interfere with workers exercising these rights. As indicated below, the Company has 71.5% coverage, which is a proxy for 'measures in place to prohibit' intimidation. [Human Rights Briefing Paper, 2016: <a href="#">total.com</a> &amp; 2017 Registration Document including the Annual Financial Report, 2017: <a href="#">total.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining: 71.5% of employees were covered by collective bargaining agreements in 2018. In addition, the Company indicates that it has an agreement with IndustriALL since 2015: '[...] the worldwide trade union federation, IndustriALL Global Union [...] represents 50 million employees in 140 countries. Under this agreement, the Group made a commitment to maintain minimum Corporate Social Responsibility (CSR) standards and guarantees worldwide for subsidiaries in which it has more than a 50% stake (occupational health and safety, human rights in the workplace, enhancement of the dialogue with employees, life insurance, professional equality, societal responsibility and assistance with organizational changes).' [Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: The Company discloses its Total Recordable Injury Rate. For 2018 this was 0.91 recorded injuries per million hours worked. [Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> <li>• Met: Lost days or near miss disclosures: The Company discloses its number of lost time injuries per million hours worked. For 2018 is was 0.59 lost time injuries per million hours worked. The Company also report on the number of days lost per lost time injury. For 2018, this was 26 days. [Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> <li>• Met: Fatalities disclosures: The Company reports the number of occupational fatalities for 2018 as 4. [Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company states: 'In addition to its aim of zero fatalities in the exercise of its activities, the Group has set the target of continuously reducing the TRIR(1) and, for 2018, of keeping it below 0.9 for all personnel (Group and External Contractors).' [Registration Document 2018, Mar 2019: <a href="#">total.com</a>]</li> <li>• Not met: Met targets or explains why not</li> </ul>
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (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"> <li>• Met: Process to identify indigenous rights holders: The Company also appoints Community Liaison Officers (CLOs) in its Exploration &amp; Production business segment. The CLOs, typically members of the local community, whose language they speak and whose customs they understand, are employed by its business units so that they can maintain a dialogue with the local communities including indigenous communities. Total also states in its Human Rights Briefing Paper 2016 that 'since 2006, Total has been implementing its SRM+ (Stakeholder Relationship Management) tool which helps to identify and map our main stakeholders, schedule meetings and engagement sessions, understand their perceptions and concerns, and then define an action plan for building a long-term, sustainable relationship.' This tool is used for engaging with local stakeholders including women, minorities, indigenous peoples'. [Registration Document 2018, Mar 2019: <a href="#">total.com</a> &amp; The Community Liaison Officer (CLO): the front line of local dialogue: <a href="#">total.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How engages with communities in assessment: The Company indicates that it 'requires the Group entities to maintain a regular dialogue with their stakeholders and make sure that their activities have no negative consequences on local communities or, if these cannot be avoided, that they limit, mitigate and remedy them. The solutions proposed in response to the expectations of local communities are coordinated by the societal teams that work in close collaboration with the legal, safety and environmental teams.' The Group's principles 'requires our business units to engage meaningfully with indigenous peoples [...] where necessary, we conduct Human Rights Impacts Assessments with an engagement focus on vulnerable groups, including indigenous and tribal peoples'. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a> &amp; Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>Score 2</li> <li>• Not met: Commits to FPIC (or ICMM): The Company's Human Rights Internal Guide states that accordance with the ILO Convention No. 169 (specifically referring to Indigenous Rights), "indigenous peoples have the right to, Free, Prior and Informed Consent (FPIC) for developments affecting them." However, Total does not make a commitment to respect FPIC. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Gives recent example FPIC or dropping deal</li> </ul>
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"> <li>• Not met: Approach to identification of land tenure rights holders: Total states that its practices include 'avoiding any physical displacement whenever possible, establishing clear and transparent procedures in consultation with affected people, proposing replacement land of equal quality whenever possible, providing support for livelihood restoration, ensuring people are compensated appropriately and by paying specific attention to vulnerable people'. In its 2018 report, Total discloses information about a case in Tanzania and another one in Papua New Guinea: 'In Tanzania, where 4,000 hectares of land and 200 villages will be impacted to varying degrees by the 1,143 km pipeline project, a major program to involve the stakeholders is being deployed by a dedicated local team in order to facilitate access to information for the greatest number and to come up with differentiating solutions that take the concerns and problems of the various populations concerned into consideration (nomads, shepherds, traditional miners). In Papua New Guinea, where land law is customary, i.e., based on ancestral oral traditions, social mapping and identification of landowners has been carried out in the LNG PRL-15 project area in accordance with the petroleum developments law.' However, no specific details found in relation to how it identifies legitimate tenure right holders. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> <li>• Not met: Describes approach to doing so if no recent deals</li> <li>Score 2</li> <li>• Not met: How valuation and compensation works</li> <li>• Not met: Steps to meet IFC PS 5 in state deals</li> <li>• Not met: Describes approach if no recent deals</li> </ul>
D.3.7	Security (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: How implements security (inc VPs or ICOC): Total is a member of the Voluntary Principles and it states that its 'security policy incorporates the Voluntary Principles and identifies five priorities: Establishing formal relations between affiliates and governments to arrange for the deployment of security forces in accordance with our principles; The transfer of equipment, which should occur only in exceptional circumstances and requires strict oversight; Audits of security providers' recruitment procedures; Special training for security personnel; Reporting of incidents.' In addition, in its Registration Document 2018, the Company indicates: 'When government security forces are deployed to ensure the protection of the Group's staff and assets, the Group entities maintain an ongoing dialogue with the representatives of national or regional authorities in order to raise their awareness on the need to respect the VPSHR and encourage them to sign memorandums of understanding that comply with these principles. TOTAL regularly organizes training sessions and awareness- raising activities on the risk of misuse of force, and more generally on the VPSHR, for its staff, private security providers and government security forces.' [Code of Conduct, Dec 2018: <a href="http://total.com">total.com</a> &amp; Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Example of respecting HRs in security: Example given in its Registration Document 2018: 'In 2018, TOTAL partnered with other Extractive Companies and the Myanmar Center for Responsible Business to organize two VPSHR awareness workshops for government officials, private security providers and NGOs in Myanmar.' And also in its Human Rights Briefing Paper Update 2018 the Company discloses information about its work in Bolivia in the Incahuasi gas development project: 'Since 2014, we have organized VPSHR awareness induction and training sessions for 500 participants in the country including private security contractors and public security forces with a focus on our responsibility to respect human rights and proportionate use of force in line with applicable international standards, while working with us on the Incahuasi project and other activities. [...] "At one point in 2017, community members demonstrated against a contractor who was working in our gas plant. We ensured that the police providing protection to the site maintained an appropriate distance. We also engaged with the protestors (working together with our CSR colleagues) to ensure that the situation did not escalate and that the misuse of force or any other violation of the human rights of the protesters was prevented. The demonstrators' grievances were resolved amicably." [Security Manager, Total E&amp;P Bolivia] ' [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a> &amp; Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>• Met: Ensures Business Partners follow security approach: In the Human Rights Internal Guide, the Company states that they 'expect our suppliers and contractors to adhere to standards that are equivalent to ours..'. The Company states that 'as far as non-operated joint ventures are concerned we make ongoing efforts so that the operator applies equivalent Ethics and Human Rights principles to ours.' Total states in its Human Rights Internal Guide that "Respect for the rights of local communities and other stakeholders by security forces is essential. The Group seeks to prevent incidents when conducting security activities. The Group's approach, reiterated in our security policy, is based on internationally recognized Human Rights and industry standards including the Voluntary Principles. These Principles aim to guide Business units so that where they provide and ensure provision of operational security this is done in a manner that is consistent with respecting Human Rights." However, there is no explicit reference to business partners to award this score. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Assesses and involves communities</li> <li>• Met: Working with local community: See above (About the experience in Bolivia - Incahuasi gas development project). Total also states that 'coordination between the Group's security teams and those in charge of community relationships within societal teams is essential so that concerns and questions from communities are addressed before they can become security issues. Identifying early and appropriate responses to community concerns will ensure better relations with communities, help reduce tensions, and mitigate the risk of Human Rights abuses'. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a> &amp; Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> </ul>
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"> <li>• Met: Action to prevent water and sanitation risks: The Company states: 'TOTAL implements the following water risk management actions: 1. monitor water withdrawals to identify priority sensitive sites and then carry out a risk assessment; 2. improve the water resources management depending on identified needs, by adapting the priority sites' environmental management system. In order to identify the priority facilities, TOTAL records the withdrawal and discharge of water on all of its sites and assesses these volumes on the basis of the current and future water stress indicators of the WRI (1) Aqueduct tool (currently 9.7% (2) of fresh water withdrawals take place in a global water stress area). In addition, TOTAL assesses water resources risk levels of priority facilities which are those that withdraw more than 500,000 m<sup>3</sup> per year and are located in areas potentially exposed to water resource risks, using the Local Water Tool (LWT) for Oil &amp; Gas from the Global Environmental Management Initiative (GEMI). This tool also helps to guide the actions taken to mitigate any risks in order to make optimal use of water resources on these sites.' It indicates that works with a number of professional organizations including locally in Uganda with local communities. [Registration Document 2018, Mar 2019: <a href="http://total.com">total.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: In its website section 'Water: Preserving a vital resource', the Company states: 'Our goal is very clear: we want to limit as much as possible the impact of our activities on water resources everywhere we operate, across the life cycle of our facilities and products.' However, this target does not consider water use by local communities and other users. [Water: Preserving a vital resource, Jul 2019: <a href="#">total.com</a>]</li> <li>• Not met: Reports progress in meeting targets and shows trends in progress made: The Company reports that 'By the end of 2018, out of the 24 priority sites identified, the level of water risk was assessed on 16 priority Group sites [...]'. Following this assessment, two sites were identified as being at risk and were reported to the CDP. This analysis process is expected to be extended to other current priority sites, including eight additional sites that have been identified. The main indicator used in this reporting is aggregated withdrawal.' The Company has inserted a table of figures relating to fresh water withdrawals excluding cooling water (million metres cubed) from 2016 to 2018. However, no evidence found of reporting against specific targets set considering water use by local communities and other users, showing trends. [Registration Document 2018, Mar 2019: <a href="#">total.com</a> &amp; 2017 Registration Document including the Annual Financial Report, 2017: <a href="#">total.com</a>]</li> </ul>

### 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"> <li>• <b>Headline:</b> Niger Delta oil spills</li> <li>• <b>Area:</b> Environmental damage</li> <li>• <b>Story:</b> Total is a partner in the Joint Venture Shell Petroleum Development Company of Nigeria Limited (SPDC), holding a 10% stake in the company. SPDC has been criticised for frequent oil spills in the Niger Delta, which have caused serious damage to the environment, human health and livelihoods. In November 2013, Amnesty International (AI) and the Centre for Environment, Human Rights and Development (CEHRD) published a report entitled 'Nigeria: Bad information: Oil spill investigations in the Niger Delta' that alleged specific cases in which the SPDC joint venture had falsely reported the cause of oil spills, the volume of oil spilt, or the extent and adequacy of clean up measures or compensation.</li> </ul> <p>In June 2014, a ruling by the London Technological and Construction Court ruled that where there are inadequate systems in place, the Company would be responsible for the resulting pollution caused by criminals. In January 2015, it was reported in the press that the Company had agreed to pay approximately USD 80m (GBP 55m) to compensate a Nigerian community for E15 two spills in 2008 and 2009. GBP 35m was to be split between individual villagers and GBP 20m would go to the Bodo community to build health clinics and refurbish schools. In 2017, Shell tried to strike out the lawsuit alleging that some members of the community had obstructed the clean up. The Court dismissed the claim. Later that year the company sought to prevent the community from going back to court by requesting to include a clause in the settlement, according to which any disruptive act by any resident of the Bodo community would lead to termination of the lawsuit. However, on 24 May 2018, a UK judge ruled that the Bodo community should retain the right to revive the claim for another year with no conditions attached, in the event of the clean-up not be completed to an adequate.</p> <p>During 2018, allegations related to these operations remain ongoing: On March 16, 2018, Amnesty International has exposed evidence that Shell and Eni are taking weeks to respond to reports of spills and publishing misleading information about the cause and severity of spills, which may result in communities not receiving compensation. Similarly, on August 4, 2018, the Nigerian Times reported that members of Bakiri community, in the area of Bayelsa State, conducted a demonstration against the alleged neglect by Shell Petroleum Development Company (SPDC), accusing the company of neither sending relief materials nor a medical team to care for the health challenges posed by an incident that took place in May 2018. It is reported that the oil spill occurred along the 24 inch Trans-Ramos pipeline of SPDC and had affected communities in Bayelsa and Delta states and that over 50 fishing settlements had been destroyed by the spill.</p> <ul style="list-style-type: none"> <li>• Sources: [Amnesty International, 07/11/2013 -: <a href="#">amnesty.org</a>][The Guardian, 07/01/2015 -: <a href="#">theguardian.com</a>][The Independent, 16/03/2018: <a href="#">independent.co.uk</a>][Amnesty International, -: <a href="#">amnesty.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Public response available: Shell/SPDC responded publicly in a hearing in the Hague. However, CHRB could not find evidence that Total has made any public comments to the allegations related to SPDC.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(1).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised</li> <li>• Met: Policies apply to the type of business relationships involved</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: Total has a public environmental policy covering oil spill clean ups and prevention measures.</li> </ul>
E(1).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Met: Provides remedies to affected stakeholders: SPDC agreed to pay for the clean up following a court case. However, at a later stage, they attempted to prevent the community from pursuing legal action if the clean-up was not performed to an adequate standard. Therefore it cannot be considered to provide remedy satisfactory to the victims.</li> </ul> <p>In addition, SPDC has indicated: 'SPDC is pleased that after significant engagement in 2016 and 2017 with the communities and other stakeholders managed by the BMI, the clean-up and remediation activities commenced in September 2017. (...) Should activities continue uninterrupted it is expected to take approximately three years. Phase 1 of the clean-up is expected to be completed in early 2018 as per plan. However, for clean-up and remediation to be successful, the repeated re-contamination of cleaned-up sites due to crude oil theft and illegal refining must end. A coordinated approach among all stakeholders, particularly federal and state government agencies is essential to address the ongoing problem of re-pollution'.</p> <ul style="list-style-type: none"> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: Haiti tanker truck explosion claims seven</li> <li>• Area: Health and safety</li> <li>• Story: At least seven people were killed and about 30 others seriously hurt when a tanker truck belonging to the Total oil company caught fire and exploded in the town of Hinche in Haiti in March 2016. Witnesses told AFP that the tanker truck hit a wall and spilled gasoline as it was getting in place to unload fuel at a Total service station. The flammable liquid spread and caught fire when it reached vendors cooking food on outdoor grills. The flames quickly returned to the tanker, which set off the explosion. Seven people died on the spot, and the burns victims were rushed to area hospitals and to Port-au-Prince for treatment, Haiti's Civil Defence office said. Four homes neighbouring the Total service station also went up in flames, and 22 vehicles were damaged, local authorities said in a preliminary assessment.</li> <li>• Sources: [AFP 18/03/2016 -: <a href="http://iol.co.za">iol.co.za</a>][Yahoo news: <a href="http://yahoo.com">yahoo.com</a>]</li> </ul>
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public response available: The truck was an independent carrier that loaded up with Total oil and delivered it to service stations, but "did not belong to Total," a spokesman for the French oil company told AFP</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(2).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised</li> <li>• Met: Policies apply to the type of business relationships involved</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company discloses its injury rates and lost days. [Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul>
E(2).3	The Company has taken	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<ul style="list-style-type: none"> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Total amongst other companies sued over environmental contamination by a group of indigenous people in Argentina</li> <li>• <b>Area:</b> Environmental damage</li> <li>• <b>Story:</b> December 17, 2018, An investigative report by Greenpeace reported that its Andino team investigated the impacts of the oil and gas developments in northern Patagonia, an area where the indigenous group the Mapuche live. The report claimed that Royal Dutch Shell, Total and other companies were involved in illegal dumping of highly toxic oily sludge waste at various sites in the region. One of the alleged illegal waste ponds was estimated to cover an area of 6.3 to 13.6 Hectares of land and is located 6km north of the town Anelo. According to the report, the wastes are hazardous and can cause damage, directly or indirectly to living beings or contaminate the soil. The report says that a local whistleblower provided Greenpeace with video evidence of the dump site, with a subsequent investigation by the organisation claiming to have tracked the trucks dumping the waste to two sites, one operated by Royal Dutch Shell and the other by Total.</li> <li>• <b>Sources:</b> [Le Figaro Premium - 17/12/2018: <a href="http://lefigaro.fr">lefigaro.fr</a>][Greenpeace - 17/12/2018: <a href="http://greenpeace.fr">greenpeace.fr</a>][Agence France Presse - 17/12/2018: <a href="http://france24.com">france24.com</a>][Latin America Bureau - 11/03/2019: <a href="http://lab.org.uk">lab.org.uk</a>]</li> </ul>
E(3).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public response available: The company provides a public response to the allegations on its website. [Response to Treater S.A. allegations, 19/06/2019: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The company's response provides sufficient detail about the allegation and explains the company's own position on the issue. [Response to Treater S.A. allegations, 19/06/2019: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul>
E(3).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company has a commitment to protect the rights of local communities, including the health &amp; safety of the people in the community, and respect the environment. [Code of Conduct, Dec 2018: <a href="http://total.com">total.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The commitment goes down to the Company's business partners. [Code of Conduct, Dec 2018: <a href="http://total.com">total.com</a> &amp; Human Rights Briefing Update Paper 2018, April 2018: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: The Company systematically monitors the discharged water quality and the level of soil pollution, however it is not a member of the CEO Water Mandate. [2017 Registration Document including the Annual Financial Report, 2017: <a href="http://total.com">total.com</a>]</li> </ul>
E(3).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: The company says that it provided a response to Greenpeace Andino in 2018 following the release of their report, in the form of a letter signed by the Chairman and CEO, however the contents of that letter is not publicly available. Although the company has responded to the Greenpeace letter, it has failed to provide evidence of meaningful engagement with the Mapuche Confederation of Neuquén, and thus doesn't satisfy this requirement. [Response to Treater S.A. allegations, 19/06/2019: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> <li>• Not met: Encourages linked business to engage affected stakeholders: Total says that it conducted a number of onsite inspections at Treater S.A.'s facilities. Additionally there have been samples taken as part of an investigation by the Neuquén Province Public Prosecutor's office, which Total says shows no signs of anomalies in soil quality. The company also notes that it ceased sending waste to the Treater S.A. site after a follow-up inspection of the facilities which found the site to be saturated, however there is no evidence of Total encouraging Treater S.A. to engage with the Mapuche Confederation of Neuquén. [Response to Treater S.A. allegations, 19/06/2019: <a href="http://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of Total or Treater S.A providing remedies to the affected communities in the area . [Response to Treater S.A. allegations, 19/06/2019: <a href="https://www.total.com/sustainable-performance">sustainable-performance.total.com</a>]</li> <li>• Met: Has reviewed management systems to prevent recurrence: Total provides evidence of having reviewed its management systems through conducting onsite inspections at Treater S.A's facilities and also in its decision to stop sending waste to the Treater S.A. operated site. [Response to Treater S.A. allegations, 19/06/2019: <a href="https://www.total.com/sustainable-performance">sustainable-performance.total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: CHRB did not find evidence of the Company providing remedy to the affected communities. [Response to Treater S.A. allegations, 19/06/2019: <a href="https://www.total.com/sustainable-performance">sustainable-performance.total.com</a>]</li> <li>• Not met: Has improved systems and engaged affected stakeholders: Total provides evidence that it has improved its systems, saying "When Total Austral inspected Treater S.A.'s facilities again, it nonetheless noticed that the site was saturated, the industry having underestimated the increase in volumes from Vaca Muerta. In consultation with Treater S.A., Total Austral stopped sending waste to their site. It now uses another waste management service provider, while waiting for the construction of a new waste treatment facility that Total Austral has taken the initiative to build, potentially with other oil and gas operators." However there is insufficient evidence to demonstrate engagement with the affected communities. [Response to Treater S.A. allegations, 19/06/2019: <a href="https://www.total.com/sustainable-performance">sustainable-performance.total.com</a>]</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Bright Shipping-owned Sanchi collision leaves 32 crew members missing in China</li> <li>• <b>Area:</b> H&amp;S</li> <li>• <b>Story:</b> Thirty-two people went missing after an oil tanker collided with a cargo ship off China's eastern coast on the 6th of January 2018, resulting in the deaths of all the thirty-two individuals on board. The victims were from the Iranian tanker Sanchi, which was carrying 136,000 tonnes of oil condensate. South Korean petrochemical company Hanwha Total Co., a 50-50 partnership between the Seoul-based Hanwha Group and French oil giant Total, contracted the Sanchi to import Iranian condensate to South Korea. The other ship involved in the collision, CF Crystal, was a bulk carrier with had a flag of Hong Kong. Hanwha Total Co., and its parent company Total S.A. did not communicate on this case in public.</li> <li>• <b>Sources:</b> [The Guardian, 07/01/18: <a href="https://www.theguardian.com">theguardian.com</a>][Reuters, 07/01/18: <a href="https://www.reuters.com">reuters.com</a>]</li> </ul>
E(4).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"> <li>• Not met: Public response available</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(4).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"> <li>• Met: Company policies address the general issues raised: The Company has a Health and Safety policy. [Code of Conduct, Dec 2018: <a href="https://www.total.com">total.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The company has a Health and Safety policy which apply also to its suppliers. [Code of Conduct, Dec 2018: <a href="https://www.total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company discloses its injury rates and lost days. [Human Rights Briefing Update Paper 2018, April 2018: <a href="https://www.total.com/sustainable-performance">sustainable-performance.total.com</a>]</li> </ul>
E(4).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"> <li>• Not met: Engages with affected stakeholders: The Company's response to the accident is not available in public.</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders: CHRB has found no evidence for remedies</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.26 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Total made data public that met one or more elements of the methodology in 31 cases, leading to a disclosure score of 3.26 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: Total has published its latest GRI Standards content index report 2018-2019. [GRI Standards Content Index 2018-2019, 2019: <a href="https://sustainable-performance.total.com">sustainable-performance.total.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0.4 out of 4	Total met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)</li> <li>• Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)</li> </ul>

### 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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.