

**Corporate Human Rights Benchmark  
2019 Company Scoresheet**

**Company Name** UltraTech Cement  
**Industry** Extractive  
**Overall Score (\*)** 9.5 out of 100

Theme Score	Out of	For Theme
0.5	10	A. Governance and Policies
2.0	25	B. Embedding Respect and Human Rights Due Diligence
0.4	15	C. Remedies and Grievance Mechanisms
1.9	20	D. Performance: Company Human Rights Practices
1.9	20	E. Performance: Responses to Serious Allegations
2.8	10	F. Transparency

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

Please note that Occidental Petroleum and Anadarko Petroleum merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Occidental Petroleum.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

**A. Governance and Policies (10% of Total)**

**A.1 Policy Commitments (5% of Total)**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: General HRs commitment</li> <li>• Not met: UNGC principles 1 &amp; 2: The company states that "We adhere in intent and action to the Group policy on Human Rights, in line with principles ascribed in the UN Global Compact". However, it does not state a clear commitment with the UNGC. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: UDHR</li> <li>• Not met: International Bill of Rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: UNGPs</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: ILO Core</li> <li>• Not met: UNGC principles 3-6: Although the company has explicitly mentioned each of the UNGC which are relevant to human rights, it does not say it commits to it, it only states that "We adhere in intent and action to the Group policy on Human Rights, in line with principles ascribed in the UN Global Compact". [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Explicitly list All four ILO apply to EX BPs: Although the company has explicitly mentioned each of the UNGC which are relevant to human rights (ILO core), it does not say it commits to it, it only states that "We adhere in intent and action to the Group policy on Human Rights, in line with principles ascribed in the UN Global Compact". [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: Although the company has explicitly mentioned each of the UNGC which are relevant to human rights (ILO core), it does not say it commits to it, it only states that "We adhere in intent and action to the Group policy on Human Rights, in line with principles ascribed in the UN Global Compact".</li> <li>• Met: Respect H&amp;S of workers: The company claims to "be committed to provide a safe work place". [Our SHE Policy, 01/04/2010: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: The company states that "a non-negotiable feature at UltraTech, is safety. For us, this strongly embedded core value is seen as the 'only way to operate' and we engage with all our stakeholders, be it our employees, suppliers, contractors or community, while keeping this philosophy in mind". [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul>
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments</li> <li>• Not met: Voluntary Principles (VPs) participant</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights</li> <li>• Not met: ILO 169</li> <li>• Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)</li> <li>• Not met: Expects BPs to respect these rights</li> </ul> <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: The company expresses that "Our ongoing pursuit is to build a framework of policies, and technical and management standards which are aligned to international standards as defined by the UN SDGs, IFC (...)". However it does present an actual commitment with IFC performance standards.</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expects BPs to commit to all these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The company states that "the Aditya Birla Group has institutionalised a sustainability framework that defines three strategic pillars which should be embraced by the Group businesses to achieve a common sustainability vision. The three strategic pillars are: Responsible Stewardship, Stakeholder Engagement and Future Proofing". Ultratech is part of the Aditya Birla Group. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: The company discloses its stakeholder engagement process according to the different types of stakeholders. In the case of local communities it shows its stakeholders engagement platforms (Community need assessments Disaster management workshops; Community visits; Satisfaction surveys; Meetings with community heads) and engagement topics (Emergencies; Building relationships; Living standards; Direction and application). The same applies to NGOs: stakeholders engagement platforms (Published articles; One-on-one interactions; Direct contact during activities; Social surveys) and engagement topics (Transparency; Timely information on future plans; Support on social issues; Identification of effort areas; Disclosure on compliance).</li> </ul> <p>However, no explicitly commitment to engage stakeholders in the design of its human rights approach was found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: CEO or Board approves policy</li> <li>• Not met: Board level responsibility for HRs</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion: The company has a Corporate Health and Safety Board which is "Chaired by the Business Head, this Board meets every two months to review OHS performance of the organisation as a whole and decide actions for further improvement". However, this is not a board of directors-level committee. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key EX RH risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communicates its policy to all workers in own operations: The company claims that "the policies have been communicated to key internal stakeholders of the Company. The communication is an on-going process to cover all stakeholders". However, it does not describe the steps it takes to communicate its human rights policies to all worker, including in local languages.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder: The company claims that "The policies have been communicated to key internal stakeholders of the Company. The communication is an on-going process to cover all stakeholders". However, it does not describe the steps it takes to communicate its human rights policies to all worker, including in local languages.</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	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: Commits to all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy to EX contractors and joint ventures: The company claims that "the policies have been communicated to key internal stakeholders of the Company. The communication is an on-going process to cover all stakeholders". However, it does not describe the steps it takes to communicate its human rights policies to its business partners.</li> <li>• Not met: Including to EX BPs (removed)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on EX BPs</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2 [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Trains all workers on HR policy commitments: The Company reports training hours, although it is not mentioned whether it includes human rights. No further evidence found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Trains relevant EX managers including security personnel: See above. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not 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	<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: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: The company states that "the Incident Investigation sub-committee ensures the reporting of all incidents including near misses. This is done by developing and implementing incident investigation procedures, consistently across all sites. Line managers are trained in quality incident investigation and active communication of significant incidents along with recommendations for corrective measures, or its prevention, are relayed across the organisation. The committee is also responsible for identifying and analysing incident trends, briefing the site apex committee and monitoring to ensure timely closure of recommended actions". However, it is not clear whether this includes monitoring human rights in general or is an approach for remediation of health and safety issues. If that is the case, it does not show how it monitors the implementation of HS policy". [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Monitoring EX BP's</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of EX supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	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: HR affects selection EXs business partners: It is claimed that "the Company has a Human Rights Policy which is also applicable to its subsidiaries". Moreover, it does disclose each human rights pre- requirement for potential business partners (Child Labour, Forced and Compulsory Labour, Working Hours, Health and Society, Statutory Compliances). [Annual Report 2018-19, 2018-19: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: HR affects on-going EX business partner relationships: Once the process above described is cleared, "we have a long-term relationship with the vendors with annual rate contracts, periodical feedback and fair approach". However, no description of how human rights performance is taken into account in decisions to renew, expand or terminate business relationships was found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.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: Both requirement under score 1 met</li> <li>• Not met: Working with EX business partners to improve performance</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: The Company claims to have "mapped its internal as well as external stakeholders" including "the disadvantaged, vulnerable and marginalised stakeholder's viz. communities around its manufacturing units and its workers / contractual workers". "The Company's endeavour to bring in inclusive growth are channelized through the Aditya Birla Centre for Community Initiatives and Rural Development. Several initiatives such as health care, education, infrastructure, watershed management, safe drinking water and sanitation, sustainable livelihood, self-help groups and income generation etc. Are extended to the Company's contract workers and people living near to the Company's manufacturing units. The Company has adopted safety as a culture. It has engaged employees at all the levels - whether employees, contractors, suppliers or the community and has taken a structured approach, through leadership involvement, in order to bring about a culture change that views safety as non-negotiable". [Annual Report 2018-19, 2018-19: <a href="http://ultratechcement.com">ultratechcement.com</a> &amp; Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Frequency and triggers for engagement: The company discloses its stakeholder engagement process according to the different types of stakeholders. In the case of local communities it shows its stakeholders engagement platforms (Community need assessments Disaster management workshops; Community visits; Satisfaction surveys; Meetings with community heads) and engagement topics (Emergencies; Building relationships; Living standards; Direction and application). The same applies to NGOs: stakeholders engagement platforms (Published articles; One-on-one interactions; Direct contact during activities; Social surveys) and engagement topics (Transparency; Timely information on future plans; Support on social issues; Identification of effort areas; Disclosure on compliance). However, no information found in relation to frequency. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Engagement includes EX business partners workers: Engagement includes business partners, but the issues covered are not related to human rights (Product quality and pricing, Supply quality; Organisation's performance and timely payments; Cost overrun for compliance with company laws; Unbiased treatment and redressal, if required; Adherence to SLA (Service Level Agreement); Business security and growth). No further information was found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Engagement includes EX business partners communities</li> </ul> <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	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: Identifying risks in own operations: The company claims that "material issues were identified on the basis of information garnered from our varied stakeholder groups through ongoing engagements. Through interactions with specialists, who may have a significant point of view on our business, we were able to capture a broader, forward looking perspective. This ensured a full and fair view of best practices and trends of sustainability in defining our materiality". [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: identifying risks in EX business partners: It does not mention business partners.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders: No description was found of the global systems in place to identify its human rights risks and of how impacts takes place on a regular basis across its activities, in consultation with affected or potentially affected stakeholders.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: In consultation with HR experts: The company claims to consult with specialists, but there is no evidence of human rights experts precisely: "these material issues were identified on the basis of information garnered from our varied stakeholder groups through ongoing engagements. Through interactions with specialists, who may have a significant point of view on our business, we were able to capture a broader, forward looking perspective. This ensured a full and fair view of best practices and trends of sustainability in defining our materiality". [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Triggered by new circumstances: No description was found of how the systems are triggered by new country operations, new business relationships or changes in the human rights context in particular locations.</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The company states that "in the year 2015-16 we conducted our materiality assessment process in accordance with our sustainability framework. Accordingly, we carried out a detailed and structured materiality assessment to identify, prioritise and validate aspects considering our Group sustainability framework". However, no evidence found of the process the assess the potential human rights salient issues, including how geographical, economic, social or other factors were taken into account. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided: The company describes various examples of actions points to tackle risks, but no human rights key industrial risks were found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not 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	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: System to check if Actions are effective</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>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</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</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 states that "our comprehensive grievance management system encourages employees to proactively report on human rights violations, sexual harassment and discrimination". However, details of this system were not found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.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: Number grievances filed, addressed or resolved: The Company claims that no grievance related to human rights issues was filed in the past financial year. [Annual Report 2018-19, 2018-19: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect EX BPs to have equivalent grievance system</li> <li>• Not met: Opens own system to EX BPs workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects EX BPs to have community grievance systems</li> <li>• Not met: EX BPs communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</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	<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 statement prohibiting retaliation</li> <li>• Not met: Practical measures to prevent retaliation</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-based judicial and non-judicial grievance mechanisms	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> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <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	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: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	<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: Living wage target timeframe or achieved</li> <li>• Not met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Pays living wages</li> <li>• Not met: Reviews living wages definition with unions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Member of EITI</li> <li>• Not met: Reports of taxes and revenues beyond legal minimums</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Reports taxes and revenue by country</li> <li>• Not met: Steps taken re non EITI countries</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The company states that it upholds "the freedom of association and the effective recognition of the right to collective bargaining". However, no information on how the company commits and puts in place measures to prohibit any form of intimidation or retaliation against workers seeking to exercise these rights was found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses % covered by collective bargaining: The company indicates that 'around 21.13% of our permanent employees are members of the above mentioned trade unions'. However, it is not clear the total percentage of the workforce that is covered. [Annual Report 2018-19, 2018-19: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <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)	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: Injury Rate disclosures: The Lost Time Injuries rates was disclosed: 0.36 in 2017-2018. However, it is not clear whether figures include joint ventures. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Met: Fatalities disclosures: The company discloses the number to fatalities to directly employed per 10,000 (0), indirectly employed (2) and involving 3rd parties (3). [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The company the targets the LTIFR to be less than 0.5 and indicates that it has "achieved LTIFR of 0.34 during the reporting period" for direct employees. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Met: Met targets or explains why not: The company has met the target. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul>
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Process to identify indigenous rights holders</li> <li>• Not met: How engages with communities in assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to FPIC (or ICMM)</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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Approach to identification of land tenure rights holders</li> <li>• Not met: Describes approach to doing so if no recent deals</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works</li> <li>• Not met: Steps to meet IFC PS 5 in state deals: The company indicates that "our ongoing pursuit is to build a framework of policies, and technical and management standards which are aligned to international standards as defined by the (...) IFC". However, not evidence was found that the company the follows IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Describes approach if no recent deals</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (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: How implements security (inc VPs or ICOC)</li> <li>• Not met: Example of respecting HRs in security</li> <li>• Not met: Ensures Business Partners follow security approach</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Assesses and involves communities</li> <li>• Not met: Working with local community</li> </ul>
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Action to prevent water and sanitation risks: The company describes procedures taken to "secure water and sanitation". "As part of CSR we have implemented various projects for the community to ensure availability of safe drinking water, sanitation and hygiene facilities, e.g., installation of RO plants, construction of toilets, etc". [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors</li> <li>• Not met: Reports progress in meeting targets and shows trends in progress made</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		No allegations meeting the CHRB severity threshold were found, and so the score of 7.59 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.90 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.84 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, UltraTech Cement made data public that met one or more elements of the methodology in 8 cases, leading to a disclosure score of 0.84 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: The company indicates that "this report is in accordance with Global Reporting Initiatives (GRI) Standards Core option" and it discloses a GRI Content Index. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	UltraTech Cement met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not 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,

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