

## Corporate Human Rights Benchmark 2023 Company Scorecard

**Company name** China National Offshore Oil  
**Sector** Extractives  
**Overall score** 2.7 out of 100

Theme score	Out of	For theme
0.0	10	A. Governance and Policy Commitments
0.0	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
0.7	25	D. Performance: Company Human Rights Practices
0.5	20	E. Performance: Responses to Serious Allegations

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 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 2022 Methodology document for the sector concerned. 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 Policy Commitments (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	<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: General HRs commitment: The Company states that 'CNOOC Limited [subsidiary of CNOOC Group] respects the basic rights to which all employees are entitled, strictly abides by applicable domestic and international laws and regulations [...] We act in strict compliance with local laws and regulations such as the Labour Law of the People's Republic of China and the Labour Contract Law of the People's Republic of China'. However, no evidence found of a CNOOC group policy commitment to respect all internationally recognised human rights. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="https://www.cnooltd.com">cnooltd.com</a>] &amp; [CNOOC Ltd care for employees on website, N/A: <a href="https://www.cnooltd.com">cnooltd.com</a>]</li> <li>Not Met: Universal Declaration of Human rights (UDHR)</li> <li>Not Met: International Bill of Human Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Commitment to UNGPs</li> <li>Not Met: Commitment to OECD MNE Guidelines</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	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: Commitment to ILO core principles: The Company states that 'CNOOC Limited respects the basic rights to which all employees are entitled, strictly abides by applicable domestic and international laws and regulations'. However, no formal policy statement of commitment to respect the rights that the ILO has declared to be fundamental rights at work was found. [CNOOC Ltd Environmental, Social and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<p>Governance Report 2021, 12/04/2022: <a href="http://cnooc.com.cn">cnooc.com.cn</a>] &amp; [CNOOC Ltd care for employees on website, N/A: <a href="http://cnooc.com.cn">cnooc.com.cn</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Explicitly lists all four ILO core principles: CNOOC Limited states 'that We act in strict compliance with local laws and regulations such as the Labour Law of the People's Republic of China and the Labour Contract Law of the People's Republic of China, and international conventions ratified by the Chinese Government, such as the Discrimination (Employment and Occupation) Convention'. The ESG report also indicates that 'We strictly conform to labour laws, abide by stipulations on salary, overtime, and statutory benefits as required by local authorities, and prohibit the use of forced labour. We strictly abide by the Provisions on the Prohibition of Using Child labour in China and legal requirements for the prohibition of employing child labour in the countries or regions in which we operate, and prohibit any employment or use of child labour'. It also indicates that 'CNOOC Limited respects and supports the employees' freedoms of association, assembly and joining a labour union organisation conferred by the law. Guided by the Labour Union Law of the People's Republic of China, we have established labour unions at all levels to safeguard employees' legitimate rights and interests'. However, evidence refers to CNOOC Limited, not being clear if applies to the whole CNOOC Group, and is placed in a periodical report, which is not considered a suitable source for policy statements according to CHRB methodology. In addition, no specific evidence found in relation to right to collective bargaining. Finally, Freedom of association according to ILO conventions are expected to refer to join organisations of the workers' own choosing. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooc.com.cn">cnooc.com.cn</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects BPs/JVs to commit to ILO core principles</li> <li>• Not Met: Explicitly lists all four ILO core principles for BPs/JVs</li> </ul> </li></ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&amp;S of workers: CNOOC Limited states in its ESG report that 'we also care for employees' physical and mental health, and protect their rights and interests from multiple dimensions while building a safe and healthy working environment'. It also indicates that 'CNOOC Limited strictly abides by the Work Safety Law of the People's Republic of China, the Detailed Rules for the Administration of Offshore Oil Safety, the Safety Rules for Offshore Fixed Platforms and other relevant laws, regulations and industry standards'. However, these type of statements are found on the CNOOC limited website and periodic reports. No evidence found of a policy document stating the CNOOC Group's commitment to respect the health and safety of their workers. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooc.com.cn">cnooc.com.cn</a>] &amp; [CNOOC Ltd care for employees on website, N/A: <a href="http://cnooc.com.cn">cnooc.com.cn</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week: CNOOC Limited states in its Annual report that 'The Company strictly complies with labour laws and regulations, opposes any form of inhumane treatment, abides by the regulations on salaries, overtime hours and statutory benefits promulgated by jurisdictions where the business are operated and prohibits any forced labour'. However, no formal commitment about respecting the ILO conventions on working hours was found, including the whole CNOOC Group. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnooc.com.cn">cnooc.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects BPs/JVs to commit to H&amp;S of workers</li> <li>• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week</li> </ul>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (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: Commitment to respect land ownership/natural resources as in VGGT</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards</li> <li>• Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration</li> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing</li> <li>• Not Met: Commitment to respect the right to water: CNOOC Limited states in its ESG report that 'Adhering to the Water Law of the People's Republic of China, we</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			have formulated policies and regulations such as the Rules for Water Conservation Management. Meanwhile, we have performed comprehensive water resources management by strengthening technological transformation and comprehensive treatment and reuse of wastewater, and carrying out tests on water balance and research on water-saving potential of enterprises'. No evidence found, however, of a Company Wide policy statement committing to respect the right to water. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooc.com.cn">cnooc.com.cn</a> ] & [Environmental protection on website, N/A: <a href="http://cnooc.com.cn">cnooc.com.cn</a> ] • Not Met: Expects EX BPs to make these commitments
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to Voluntary Principles on Security and HRs • Not Met: Uses only ICoCA members as security providers • Not Met: Commits to International Humanitarian Law Score 2 • Not Met: Expects EX BPs to commit to these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to remedy adverse HRs impacts • Not Met: Expects EX BPs to make this commitments Score 2 • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with EX BPs on remedy
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects BPs to make this commitment Score 2 • Not Met: Commitment to working with HRDs to create safe and enabling environment

## A.2 Board Level Accountability (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 • Not Met: Board level responsibility for HRs • Not Met: Describes HRs expertise of Board member Score 2 • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Process to review HRs strategy at board level • Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: Score of 1 on A.1.2.a</li> <li>Not Met: Senior responsibility for HRs implementation and decision making: The Company states that 'The day-to-day management is conducted by senior management and employees of the Company, under the direction of the CEO and the oversight of the Board.' Besides that it states that 'The primary functions performed by the Board include: Overall responsibility for the Company's ESG strategy and reporting, evaluating and determining the Company's ESG related risks, and ensuring appropriate and effective ESG risk management and internal control systems are in place;' However, it does not indicate any specific senior role position for daily management of human rights. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>Not Met: Resources and expertise allocation with EX BPs</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 linked to HRs commitments: No evidence found of incentives associated to human rights for any function. Evidence is related with 'work quality and value contribution and further tilts to technological experts and frontline staff.' [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> <li>Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Performance criteria linked to HRs made public</li> <li>Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: HRs risks integrated as part of enterprise risk system: The company describes its ESG materiality analysis stating that "The identification of substantive issues was conducted by an independent third-party consultant of the Company. The evaluation collected 20 issues related to the economy, environment, labour and human rights. These key issues were derived from a wide range of data, including the Environmental, Social and Governance Reporting Guide of the HKEx, GRI Index, TCFD Disclosure, opinions of relevant parties, policies and management strategies of the Company, industry benchmarking, ESG rating system analysis, internal publications and media coverage. [...] Based on the survey results, the Company conducted analysis to identify and assess the importance of issues. We solicited opinions from the senior management of CNOOC Limited and evaluated the importance of these issues to CNOOC Limited, from the perspective of the company." However, the Company does not provide an explanation of how the above analysis is integrated in the Company's general risk management system. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Provides an example</li> <li>Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: Score of 1 on A.1.2.a</li> <li>Not Met: Communicates HRs policies to all workers in own operations: The Company indicates that its 'directors and senior executives are required to be familiar with and abide by the Code of Ethics. Every year, the Code of Ethics is reviewed and amended by the Board, and disclosed on the Company's website'. However, this does not comprise all workers and the Code does not mention any human or labour rights. [Environmental, Social &amp; Governance Report 2022, 31/12/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>] &amp; [CNOOC Ltd Code of Ethics for Directors and Senior Officers, 25/08/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Communicates HRs policies to stakeholders: The Company states that 'We place emphasis on communications with our stakeholders and have</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>established an open and transparent communication channel for each category of stakeholders to understand their expectations and requests.' However it is not clear whether this communication includes a proactive communication of the policy commitments by the Company. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnoocLtd.com">cnoocLtd.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Example of how HRs policies are accessible for intended audience: The Company states that 'Through specified communication methods, we looked into and sorted out the focuses and concerns of the stakeholders, and responded with corresponding actions and measures.' However, these methods are not defined further. No further evidence was found on how the company ensures that the form and frequency of its communication is accessible to the intended audience. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnoocLtd.com">cnoocLtd.com</a>]</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: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to EX BPs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how HRs policies are contractual/binding for suppliers: The Company states in its Modern Slavery and Human Trafficking Statement that: 'We expect our suppliers to support and respect human rights and avoid complicity in human rights abuses. There is an express contractual undertaking in all of our contracts for suppliers to comply with our policies and procedures'. However, this document applies only to the CNOOC UK. No evidence was found of similar statements applying to the entire Company. [Slavery and Human Trafficking Statement: <a href="http://cnoocinternational.com">cnoocinternational.com</a>]</li> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their 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: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments: The Company states that in 2022, it organized 11 compliance trainings, covering trade sanctions, export control, anti-monopoly, national security review of foreign investment, prevention of insider trading, anti commercial bribery, anti-corruption, overseas employment, ESG and human rights. However, no information related to how the workers were trained was found. [Environmental, Social &amp; Governance Report 2022, 31/12/2022: <a href="http://cnoocLtd.com">cnoocLtd.com</a>]</li> <li>• Not Met: Trains relevant managers including security on HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains BPs to meet HRs commitments</li> <li>• Not Met: Discloses % suppliers trained</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: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Company states that 'For audit and supervision, we have a whistleblower protection system and have implemented policies on audit and supervision and anti-corruption among suppliers, third-party agents, and intermediaries to ensure compliant and effective corporate governance'. It is also indicated that 'We devoted more efforts to identifying supplier environment and social risks, and invited third-parties to sort out and inspect suppliers' latest operation, interrelationships and credit risks, so as to expel those with abnormal operation and high credit risks'. However, no specific evidence in relation to human rights was found. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnoocLtd.com">cnoocLtd.com</a>]</li> <li>• Not Met: Discloses % of EX BP's monitored</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective actions process</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul>
B.1.7	Engaging and terminating 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: HRs performance affects selection EX BPs: The Company indicates that social and governance issues are important to establish relations with a BP. However, no further details were found. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnoocLtd.com">cnoocLtd.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: HRs performance affects ongoing BPs relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with EX BPs to meet HRs requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years: The Company states that 'reviews corporate governance reports, working reports on internal control, risk management and compliance management, ESG reports, and the results of communication between stakeholders and analysis of material issues so as to ensure the whole-process involvement of the Board in ESG management and disclosure.' However, no evidence was found on the identification and engagement with affected stakeholders in relation to human rights. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooc.com">cnooc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations: The Company identifies risks associated to ESG, health, safety and many other issues. However, no evidence found of the process followed to identify which are the potential risks and impacts on human rights. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooc.com">cnooc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes process for identifying risks in EX BPs</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation: The Company states that 'The identification of substantive issues was conducted by an independent third-party consultant of the Company. The evaluation collected 20 issues related to the economy, environment, labour and human rights.' And it states that 'The independent consultant of the Company conducted a questionnaire survey on seven major stakeholder groups respectively, including shareholders and creditors, employees and employee organisations, government and regulatory authorities, partners and subcontractors, the public and communities, public welfare organisations and non-governmental organisations, and clients, and invited stakeholders to evaluate the importance of these issues. Based on the survey results, the Company conducted analysis to identify and assess the importance of issues'. However, no evidence found in relation to whether this consultation was used to inform a due diligence process to specifically identify potential human rights risks and impacts, including consultation with human rights experts. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooc.com">cnooc.com</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks: The Company states that 'The identification of substantive issues was conducted by an independent third-party consultant of the Company. The evaluation collected 20 issues related to the economy, environment, labour and human rights.' However, no further details were found, including how it assessed the saliency of human rights risks and impacts. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooc.com">cnooc.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes how process applies to EX BPs</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
B.2.3	Integrating and acting on	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
	human rights risks and impact assessments		<ul style="list-style-type: none"> <li>• Not Met: Describes how global system applies to EX BPs</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions: The Company states that 'We embed ESG in our daily risk management. Risks are identified and evaluated by experts from different departments and projects, taking into account our objectives, classification methods and norms, as well as changes in our internal and external environments. The possibility and consequences of every type of risks are evaluated in terms of their impact on the environment, personnel, our reputation and finance. The implementation of countermeasures is tracked and regularly reviewed to ensure that risks at all levels are adequately monitored and handled'. However, this subindicator looks for specific details of how the system is operated to track effectiveness of particular actions taken in relation to human rights impacts considered salient. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The company states in the annual report that it 'has established a unified domestic and overseas compliance complaint channel (<a href="http://cnooclttd.com">cnooclttd.com</a>) which provides the complaint channels for employees and those who deal with the Company (e.g. customers and suppliers) to raise concerns, in confidence, with the Company about possible improprieties'. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: This channel is available in English and Chinese, however, it is unclear how the Company ensure accessibility of workers in all the regions it operates in.</li> <li>• Not Met: Describes how workers in EX BPs access grievance mechanism</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism accessible to all external individuals and communities: The Company states: 'Our stakeholders include shareholders and creditors, employees and employee organisations, governments and regulatory authorities, business partners and service providers, the public and communities, charities and non-government organisations (NGOs), and clients. We place emphasis on communications with our stakeholders and have established an open and transparent communication channel for each category of stakeholders to understand their expectations and requests.' However, it is unclear if external individuals and communities are able to raise complaints and grievances via these channels. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company does not clarify how accessibility to and awareness of its communication channels is ensured. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the 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: Describes how users engaged on design and performance</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, 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: Describes procedure and timescales for managing complaints or concerns</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	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 against workers/stakeholders: The Company states that 'Retaliation against anyone who speaks up about potential or actual violations is not acceptable and will not be tolerated.' [Compliance Manual for Entities and Employees, N/A: <a href="https://www.cnocinternational.com">cnocinternational.com</a>]</li> <li>• Not Met: Describes practical measures to prevent retaliation: The Company states that 'We recognize you have the choice to raise this concern anonymously, unless state/territory regulations prohibit anonymity. Please be discreet in telling us who you are and other private information, and we also guarantee that your private information will be treated as confidential.' Besides that the Company states that 'Appropriate action will be taken where an employee retaliates against someone who speaks up.' However, a conditional provision of anonymity is not sufficient. Furthermore, it is not clear what the Company considers "appropriate action". [Complaint channel, 01/02/2023: <a href="https://www.cnocltd.com">cnocltd.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence</li> <li>• Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders</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: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse 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: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Discloses number of grievances filed, addressed or resolved and outcomes achieved</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

## D. Performance: Company Human Rights Practices (25% 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: Pays living wage or sets time-bound target</li> <li>• Not Met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Achieved paying living wage</li> <li>• Not Met: Reviews definition living wage with unions</li> </ul>
D.3.2	Transparency and accountability (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: Member of EITI</li> <li>• Not Met: Reports of taxes and revenues beyond legal minimums</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports taxes and revenue by country</li> <li>• Not Met: Steps taken to promote transparency in non EITI countries</li> <li>• Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements</li> </ul>
D.3.3	Freedom of association and collective bargaining (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: Measures to prohibit violence/retaliation against workers for joining trade union: The Company states that 'In compliance with the Labor Union Law of the People's Republic of China, we have established labor unions at all levels, which are responsible for supervising the Company's fulfilment of responsibilities and obligations and the implementation of all business activities that are related to employees' benefits and communicating with the management of the Company on behalf of employees. CNOOC Limited respects and supports the employees' freedoms of association, assembly, and joining a labor union organization conferred by the law while at the same time maintaining close communication with the legal department and labor unions.' However, there are no indications of measures to prohibit retaliation or violence against these employees. [Environmental, Social &amp; Governance Report 2022, 31/12/2022: <a href="https://www.cnooc.com.cn/en/2022/03/2022-ESG-report">cnooc.com</a>]</li> <li>• Not Met: Discloses % of total direct operations covered by CB agreements</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	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: Describes process to identify H&amp;S risks and impacts: The Company states that 'We strengthened inspections to continuously improve our capabilities of risk control. Special attention had been dedicated to the supervision of key operation processes, schedule and major engineering projects. We built a closed-loop of inspections, analysis and supervision. Special investigation and rectification of potential safety risks were conducted at offshore oil platforms to achieve full coverage of self-inspection. We continued to shape a robust safety culture featuring "People orientation, Implementation and Intervention". Focusing on fulfilling the work safety responsibilities, we arranged one-on-one interviews with the leaders in charge of work safety, so that they would play an exemplary and leading role. [...] We strengthened the safety supervision and management of overseas projects, and clarified the allocation of overseas safety responsibilities to ensure the compliant, safe and stable operation of our overseas projects. Besides that, the Company states that 'The Company's operations expose itself and the communities in which it operates to some risks, including potential major safety accidents, and other consequences caused by natural disasters, social unrest, health problems in operation personnel, security lapses, and some unforeseen external damage. Major HSE accidents may cause injuries or deaths, business disruptions, and hence tarnish our reputation. These may also affect our bidding right, and even lead us to lose the operating right in some areas. In the meantime, the regulatory regimes for HSE issues in different countries are likely to become more stringent over time, so we may be liable for enormous expenses (e.g., fines, penalties, clean-up fees and third-party claims) for violating HSE-related laws and regulations'. [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="https://www.cnooc.com.cn/en/2022/03/2022-ESG-report">cnooc.com</a>] &amp; [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="https://www.cnooc.com.cn/en/2022/03/2022-ESG-report">cnooc.com</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The Company discloses it Lost Time Injury Rate for employees and direct contractors as 0.05 in 2022 and Lost Days Due to Work Injury as 923 in 2022. [Environmental, Social &amp; Governance Report 2022, 31/12/2022: <a href="https://www.cnooc.com.cn/en/2022/03/2022-ESG-report">cnooc.com</a>] &amp; [CNOOC Ltd Annual report 2021, 12/04/2022: <a href="https://www.cnooc.com.cn/en/2022/03/2022-ESG-report">cnooc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Discloses fatalities for last reporting period: The Company states that had 2 fatalities among employees and direct contractors. [Environmental, Social &amp; Governance Report 2022, 31/12/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> <li>• Not Met: Discloses occupational disease rate for last reporting period: The Company states that 'We have implemented systematic management for occupational health, promoted safety management for offshore catering, deepened the use of occupational health management information system, and implemented graded control of occupational hazards. All these have helped us to monitor our employees' health, periodically test of occupational-disease-inductive factors and achieve an occupational health examination rate of 100%' However, no disclosure on the occupational disease rate as such was found. [Environmental, Social &amp; Governance Report 2022, 31/12/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>] Score 2</li> <li>• Not Met: Set targets for H&amp;S performance: The Company states that 'We formulated and released the CNOOC Three-year Action Plan for Objective Deepening Production Safety [...] so as to further consolidate the responsibility of safe operation at all levels and in all links; We formulated and released the Interim Provisions on Accountability for Accidents and Violations of Safety [...]' However, it does not indicate to have set any targets related to injury or lost days rates, neither occupational disease or fatalities rates. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.com</a>]</li> <li>• Met: Met targets or explains why not or actions to improve H&amp;S management systems: Although no evidence was found in relation to targets, the Company describes how it is improving its system: 'Implemented the Three-year Action Plan in depth to solve production safety problems, and launched an extensive "100-day campaign to improve safety management".' Besides that, it states that 'We constructed a closed-loop working mechanism to ensure inspection efficiency, established a long-term mechanism for supervision, inspection and tracking analysis, and carried out special investigation and rectification on potential safety risks of offshore oil platforms. As yet, we have conducted full coverage inspections of all manned platforms and FPSOs at sea; We emphasised safety education, compiled and published safety warnings, and printed the Accidents Collection. We worked hard to arrange safety training for team leaders, new hires, contractors and other key personnel at "three posts", and organised professional exchanges for safety practitioners'. [CNOOC Ltd Environmental, Social and Governance Report 2021, 12/04/2022: <a href="http://cnooclttd.com">cnooclttd.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	<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: Process to identify/recognise indigenous rights holders</li> <li>• Not Met: Describes how indigenous communities are engaged during assessment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to FPIC</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources</li> </ul>
D.3.6	Land rights: Land acquisition (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: Describes approach to identifying land tenure rights holders and negotiating compensation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to compensation including valuation</li> <li>• Not Met: Describes steps to meet IFC PS 5 in state deals</li> </ul>
D.3.7	Security (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example</li> <li>• Not Met: Ensures Business Partners/JVs follow security approach</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Security and HRs assessment includes input from local communities</li> <li>• Not Met: Two examples of working with local communities to improve security</li> </ul>



