

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Canadian Natural Resources  
**Sector** Extractives  
**Overall score** 9.2 out of 100

Theme score	Out of	For theme
1.6	10	A. Governance and Policy Commitments
0.2	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
2.1	25	D. Performance: Company Human Rights Practices
1.8	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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Code of integrity requires employees to 'abiding by the human rights statements adopted by the Company'. The HR statement indicates that 'Canadian Natural believes in, supports and is committed to human rights and social justice'. [Human rights statement (in code of conduct website), N/A: <a href="http://cnrl.com">cnrl.com</a>] &amp; [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul> Score 2 <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 Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Commitment to ILO core principles: See below [Human rights statement (in code of conduct website), N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>Met: Explicitly lists all four ILO core principles: The human Rights statement (allocated on the Company's website) indicates that 'We recognize, respect and abide by all labour, child labour and employment laws and expect our contract service companies, contractors and other third-party companies to meet the same standards. These include prohibitions on child labor, forced labor and discriminatory behavior as well as recognition of the rights of freedom of association and collective bargaining'. [Human rights statement (in code of conduct website), N/A: <a href="http://cnrl.com">cnrl.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: Expects BPs/JVs to commit to ILO core principles: See below [Human rights statement (in code of conduct website), N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Met: Explicitly lists all four ILO core principles for BPs/JVs: As indicated above, the Human Rights statement, the Company commits to respect each ILO core labour area and expects that 'contract service companies, contractors and other third-party companies to meet the same standards' [Human rights statement (in code of conduct website), N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&amp;S of workers: The Corporate Statement on health and safety indicates that the Company 'is committed to conducting its operations in a manner that will protect the health, safety and welfare of their employees, contractors and the public'. The statement then adds a number of health and safety requirements. [Corporate Statement on Health &amp; Safety, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week: Although the Code of integrity states that 'it is the policy of the Company to comply with applicable employment laws, including those governing [...] hours', no specific commitment found to respect ILO standards on working hours. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to H&amp;S of workers: The Code of integrity provides a similar general commitment to the one included in the health and safety statement. The Human Rights statement clarifies that 'Canadian Natural will endeavor to conduct business with contractors and contract service companies who share our values and business principles. We will inform them of our Human Rights Statement and Code of Integrity, Business Ethics and Conduct and expect they will comply with those principles'. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>] &amp; [Human rights statement (in code of conduct website), N/A: <a href="http://cnrl.com">cnrl.com</a>]</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)	0.5	<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: Commitment to respect land ownership/natural resources as in VGGT: Although the Company's website on indigenous relations describes its management approach in relation to land. No formal statement of policy commitment was found to respect land ownership and use as set out in the VGGT. [Indigenous relations on website, N/A: <a href="http://cnrl.com/sustainability/communities/indigenous-relations">cnrl.com/sustainability/communities/indigenous-relations</a>]</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: As indicated above, Although the Company's website on indigenous relations describes its management approach in relation to land. No formal statement of policy commitment was found to respect land ownership and use as in IFC Performance Standards. [Indigenous relations on website, N/A: <a href="http://cnrl.com/sustainability/communities/indigenous-relations">cnrl.com/sustainability/communities/indigenous-relations</a>]</li> <li>• Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Indigenous relations policy states that 'Canadian Natural is committed to conducting activities in a manner that respects the rights and interests of Indigenous peoples and communities [...] Canadian Natural supports the principles of the United Nations Declaration on the Rights of Indigenous Peoples'. [Indigenous relations policy, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Expects EX BPs to make these commitments: The Indigenous relations policy states that 'Canadian Natural expects its employees, consultants, suppliers and contractors to act in accordance with these values and commitments as they relate to the engagement of Indigenous peoples and communities'. Although the policy contains a commitment to respect indigenous peoples rights', no specific and explicit commitment found in relation to land ownership and natural resources, following the VGGT or the IFC performance standards. [Indigenous relations policy, N/A: <a href="http://cnrl.com">cnrl.com</a>]</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: Although the Statement on Environmental management includes comments related to water management no evidence found of a statement of commitment to respect the right to water. [Corporate Statement on Environmental Management, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (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 Voluntary Principles on Security and HRs: The GRI/SASB content index and the Company's website indicate that 'Canadian Natural follows all regulatory requirements in relation to maintaining safe and secure work sites at all our operations.</li> </ul> <p>In Canada, each province has legislation governing the use of private security and investigation services. Canadian Natural, through our Corporate Security Manager, ensures all security providers hired for security at Canadian Natural's locations fully meet provincial licensing requirements. In our Cote d'Ivoire operations, Canadian Natural uses the services of a national private security firm who are fully licensed, authenticated, follow the guidelines under the Voluntary Principles on Security and Human Rights as well as being long standing members of the larger oversight organization International Code of Conduct Association (ICoCA). All security personnel are required to review, sign, and adhere to Canadian Natural's Code of Conduct and Human Rights'. However, this subindicator looks for an explicit policy commitment to respect these VPs. No evidence found neither in the Human Rights statement nor the Code of conduct. [2021 GRI-SASB and SDG Content Index, 04/08/2022: <a href="http://cnrl.com">cnrl.com</a>] &amp; [Code of conduct &amp; human rights website, N/A: <a href="http://cnrl.com">cnrl.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Uses only ICoCA members as security providers: See above. Although the Company indicates that in Cote d'Ivoire it uses a security firm that has been a member 'of the larger oversight organization International Code of Conduct Association (ICoCA)', no evidence found of a policy commitment to only use ICoCA members. [2021 GRI-SASB and SDG Content Index, 04/08/2022: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Commits to International Humanitarian Law</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to commit to these rights</li> </ul>
A.1.4	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: Commitment to remedy adverse HRs impacts</li> <li>• Not Met: Expects EX BPs to make this commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with EX BPs on remedy</li> </ul>
A.1.5	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 of threats/attacks on HRDs</li> <li>• Not Met: Expects BPs to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

### 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	<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: Board level responsibility for HRs</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul>
A.2.2	Board responsibility	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 review HRs strategy at board level</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: At least one board member incentive linked to HRs commitments</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 board incentives for coherence with HRs policies</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	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 process to review business model and strategy for HRs risks: Not met</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</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>• Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making: The Company indicates that the 'Corporate Management Committee is responsible for the implementation and administration of the Code.' The Code indicates that the employees are required to respect the Company's human rights commitments. However, no information comprising specific senior manager responsibility on human rights issues was found. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul> Score 2 <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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Senior manager incentives linked to HRs commitments: The Company presents performance share units and annual bonus as incentives linked to the Company's performance in some categories and that comprise 'All employees and officers of the Corporation, including Senior Management'. One of the categories is 'safety, asset integrity and environmental'. Safety metrics includes injury frequency rate and lost time incident frequency. [Management info circular, 2022: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Performance criteria linked to HRs made public: The Company discloses the criteria for measuring the performance of the category (for safety it would be the recordable injury frequency), the category weighting and how the performance incentives are calculated. [Management info circular, 2022: <a href="http://cnrl.com">cnrl.com</a>]</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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> Score 2 <ul style="list-style-type: none"> <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations: The Company states that 'The review and acceptance of the Code is an annual requirement. Every staff member is expected to remain current with the Code and any amendments that may be made from time to time. The Code is distributed on a yearly basis and each staff member must acknowledge it electronically.' The Code itself specifies that ' Staff are required to perform their employment duties... with the highest ethical standards prevalent in the business community ...[which] include ... abiding by the human rights statements adopted by the Company.' The Code further reads that 'compliance with the Company's policies and procedures are a condition of employment or contractual engagement.' However, the Company does not specify how it ensures the Code is provided in local languages where necessary. [Code of conduct &amp; human rights website, N/A: <a href="http://cnrl.com">cnrl.com</a>] &amp; [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.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: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended 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>• Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to EX BPs: The Company indicates that will inform contractors and contract service companies of the Human Rights Statement and Code of Integrity, Business Ethics and Conduct. However, according to the Company the word "contractors" refers to 'individuals who provide services directly to the Company'. No further details were found on how it communicates these requirements to other extractive business partners. [Code of conduct &amp; human rights website, N/A: <a href="http://cnrl.com">cnrl.com</a>] &amp; [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</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 that 'contractors and consultants are required to acknowledge and sign the Code when joining the Company' (the Code comprises the Company's human rights statement), and indicates that contract service companies will be informed of the Human Rights Statement and expected to comply with those principles'. It is not clear, however, whether contract service companies (understood also as part of the Company's extractive business partners) are contractually bounded to respect human rights. [Code of conduct &amp; human rights website, N/A: <a href="http://cnrl.com">cnrl.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>• Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments</li> <li>• Not Met: Trains relevant managers including security on HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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>• 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</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>• 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</li> <li>• Not Met: HRs performance affects ongoing BPs relationships: The Company states that breach of the Code 'may result in appropriate disciplinary action being taken, up to and including termination of employment, or termination of contract or consulting services', and the Code comprises the Company's human rights statement, however, no evidence that this comprises other business partners was found. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul> <p>Score 2</p> <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	<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 workers and communities identified and engaged in the last two years</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <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</li> <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</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</li> <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 human rights risks and impact assessments	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> <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</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> Score 2 <ul style="list-style-type: none"> <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	1.5	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 indicates that 'ConfidenceLine, our third-party managed integrity hotline, is one of the ways community members, employees, contractors and service providers are able to share workplace concerns or questions in a confidential and anonymous way. The hotline is available by phone or via the ConfidenceLine website'. [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: The 'ConfidenceLine' website offers English and French versions, in accordance with the official languages of the core areas in which the Company operates: western Canada, the U.K. portion of the North Sea and Offshore Africa (Côte d'Ivoire and South Africa). Regarding the workers' awareness of the mechanism, the Company states in the 2021 Stewardship Report to Stakeholders that 'All directors, officers, employees (permanent and part time), contractors and consultants are required to acknowledge and sign the Code when joining the company and review it annually' and the Code has a section that introduces and explains the 'ConfidenceLine' mechanism. [ConfidenceLine website, N/A: <a href="http://cnrl.confidenceline.net">cnrl.confidenceline.net</a>] &amp; [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Describes how workers in EX BPs access grievance mechanism: The Company indicates that the ConfidenceLine is 'available to all Staff, contractors, vendors and other stakeholders', and it covers 'any concerns or questions regarding our Code of Integrity, Business Ethics and Conduct, or unsafe work practices by our employees, contractors, and services providers'. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>] &amp; [ConfidenceLine summary, N/A: <a href="http://cnrl.com">cnrl.com</a>]</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	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: Grievance mechanism accessible to all external individuals and communities: The Company states that "ConfidenceLine, our third-party managed integrity hotline, is one of the ways community members, employees, contractors and service providers are able to share workplace concerns or questions in a confidential and anonymous way. The hotline is available by phone or via the ConfidenceLine website 24 hours a day, 365 days a year." [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The 'ConfidenceLine' website offers English and French versions, in accordance with the official languages of the core areas in which the Company operates: western Canada, the U.K. portion of the North Sea and Offshore Africa (Côte d'Ivoire and South Africa). However, no description of how the Company ensures the awareness of external stakeholders regarding the ethics hotline, ConfidenceLine, was found. [ConfidenceLine website, N/A: <a href="http://cnrl.confidenceline.net">cnrl.confidenceline.net</a>] &amp; [Annual Information Form 2021, 23/03/ 2021: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The Company indicates that the ConfidenceLine covers issues related to 'unsafe work practices by our employees, contractors, and services providers'. However, no indication that this extends to business partners' external stakeholders was found. [ConfidenceLine summary, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
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: The Company describes the procedures for managing the complaints, however, no timescales for addressing the complaints and for informing the complainant were found. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</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: The Company states that matters raised with ConfidenceLine, 'will be reviewed and investigated in accordance with corporate policy and escalated to senior management or the Board of Directors of the Company for further handling, as appropriate' and that the staff can also 'discuss any suspected violations with their Manager or Vice-President who, in turn, will report it to their Senior Vice-President or to the Vice-President, Legal, General Counsel and Corporate Secretary for further escalation, as appropriate'. However, these are not presented as options available for the complainant to challenge the outcome of the grievance process. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders: The Company states that any person making a good faith report of a possible violation of the Code or who assists in an investigation of such violation 'will not be discharged, demoted, suspended, threatened, harassed or in any other manner disadvantaged or discriminated against in their terms and conditions of employment, engagement, business relationship or otherwise. Any attempt at reprisal against the reporting individual will be punished severely which may</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			include demotion or even dismissal for the offending party.' [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a> ] <ul style="list-style-type: none"> <li>• Met: Describes practical measures to prevent retaliation: The Company indicates that 'Any Code violations reported through ConfidenceLine may be made on an anonymous basis, if desired, and will be kept confidential' [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>] Score 2</li> <li>• Not Met: Specifies no legal action, firing or violence: The Company states that the complainant or who assists in the investigation 'will not be discharged, demoted, suspended, threatened, harassed or in any other manner disadvantaged or discriminated against in their terms and conditions of employment, engagement, business relationship or otherwise'. However, no mention of legal action or violence. [Code of Integrity, Business Ethics and Conduct, 14/11/2019: <a href="http://cnrl.com">cnrl.com</a>] • 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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts: The Company states that 'If we become aware of any violation of the Code or any applicable government laws, rules or regulations, or believe that a violation may take place in the future, we take appropriate action'. However, no information about how remedy has been provided found. [Code of conduct &amp; human rights website, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets time-bound target: The Company states that 'It is the policy of the Company to comply with applicable employment laws, including those governing working conditions, wages'. However, no information related to a living wage was found [Code of conduct &amp; human rights website, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Describes how living wage determined</li> </ul> Score 2 <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>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The Company indicates that 'Canadian Natural has operations in two EITI member countries — the UK and Côte d'Ivoire' and presents the EITI reports prepared at a country level. The Company also presents the ESTMA reports. However, the Company does not clearly state that it is a member of the EITI. [Payment to governments on website 2023, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Reports of taxes and revenues beyond legal minimums: The Company indicates that 'Canadian Natural has operations in two EITI member countries — the UK and Côte d'Ivoire' and presents the EITI reports prepared at a country level'. However, it clearly describes that it reports only what is legally required in Canada. [Payment to governments on website 2023, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports taxes and revenue by country: The Company reports the payment of taxes to all EITI or ESTMA member countries, however, no disclosure of payments to the South African government has been found. [Payment to governments on website 2023, N/A: <a href="http://cnrl.com">cnrl.com</a>]</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 indicates that prohibits discriminatory behavior and recognizes the rights of freedom of association and collective bargaining. However, no evidence of measures put in place to avoid intimidation, harassment, retaliation or violence against workers seeking to join a trade was found. [Code of conduct &amp; human rights website, N/A: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Discloses % of total direct operations covered by CB agreements: The Company states that 'Approximately 28% of our contractor workforce in our oil sands mining and upgrading operations represents union workers covered by collective bargaining agreements', however, no information related to the Company's own workers was found. [2021 GRI-SASB and SDG Content Index, 04/08/2022: <a href="http://cnrl.com">cnrl.com</a>]</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 indicates that it does Health Risk Assessments on employees, Worksite Safety Observations, routine inspections and audits. Also, hazard identification, near-miss reporting, incident investigations, and it states that 'employees, contractors and service providers deliver valuable insights about how they can perform their jobs safely and efficiently'. [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The Company discloses the Recordable injury frequency (TRIF) and Lost time incident frequency (LTI) covering employees and contractors, the total TRIF in 2021 was 0.22 and the LTI was 0.02. [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Met: Discloses fatalities for last reporting period: The Company discloses the number fatalities of employees and contractors, in 2021 the number of fatalities of employees was 0, but to the Company's contractors it was 2. [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="http://cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Discloses occupational disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: The Company indicates that 'Our SMS program targets Total Recordable Injury Frequency (TRIF) reduction across our operations'. However, no specific targets were found on this and other health and safety metrics. [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="http://cnrl.com">cnrl.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Met targets or explains why not or actions to improve H&amp;S management systems: Regarding the 2 fatalities in 2021, the Company indicates that 'A joint review of the incident was conducted, resulting in ways that we are reinforcing our commitment to safety across the company' through: Cross-divisional Working Group, to identify improvement opportunities to enhance safety performance to prevent incidents, share best practices and ensure consistency in the implementation of the management system; Safety Excellence/Mission Statement Meetings; and Contractor Safety Excellence Meetings'. [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="https://www.cnrl.com">cnrl.com</a>]</li> </ul>
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	<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: Process to identify/recognise indigenous rights holders: The Company indicates that 'Canadian Natural regularly consults with Indigenous communities across our Western Canadian operations. We seek input regarding proposed development plans through ongoing, proactive two-way communication and have formalized processes to support our work with Indigenous communities'. However, no information was found about the process to identify and recognise affected indigenous peoples. [Indigenous relations on website, N/A: <a href="https://www.cnrl.com/sustainability/communities/indigenous-relations">cnrl.com/sustainability/communities/indigenous-relations</a>]</li> <li>• Met: Describes how indigenous communities are engaged during assessment: The Company states that 'Before a project begins, we consult with communities to explain the project and acquire information about traditional land use and culturally important areas. To ensure ongoing communication, we connect regularly with community leadership, Elders, members and advisory committees to identify and discuss community interests and concerns'. The Company also indicates in its Indigenous Relations Policy that 'Canadian Natural meets regularly with elected Indigenous representatives, Elders and community members to discuss activities and proactively address potential opportunities and concerns. These meetings also explore common objectives and may serve the consultation and regulatory processes.' [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="https://www.cnrl.com">cnrl.com</a>] &amp; [Indigenous relations policy, N/A: <a href="https://www.cnrl.com">cnrl.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to FPIC: The Company states that 'supports the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)'. However, no mention of commitment with the FPIC was found [Indigenous relations policy, N/A: <a href="https://www.cnrl.com">cnrl.com</a>]</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 [Annual Information Form 2021, 23/03/ 2021: <a href="https://www.cnrl.com">cnrl.com</a>]</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: The Company states that 'Canadian Natural follows all regulatory requirements in relation to maintaining safe and secure work sites at all our operations. Each Canadian province has legislation governing the use of private security and investigation services. Canadian Natural ensures all security providers hired for security at Canadian Natural's locations fully meet provincial licensing requirements. In our Cote d'Ivoire operations, we use the services of a national private security firm who are fully licensed, authenticated, follow the guidelines under the Voluntary Principles on Security and Human Rights as well as being long standing members of the larger oversight organization ICoCA, Home – ICoCA – International Code of Conduct Association.' However, it is not clear whether the Company implements the Voluntary Principles or ICoCA at all its operations. [Safety management system webpage, N/A: <a href="https://www.cnrl.com">cnrl.com</a>]</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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (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 preventative/corrective action plans for water and sanitation risks: The company indicates that, in order to identify and assess water-related risks, local communities are taken into account, and that 'potential impacts are risk ranked and operational controls are put in place to control those risks', and describes an example related to this process in its own operations. Besides that, the Company states that 'Canadian Natural used the WWF's Water Risk filter tool to assess whether we withdraw water from water stressed areas. The WWF's Water Risk filter tool Basin Physical Risk data assessed for Canada includes Water Scarcity, Flooding, Water Quality, Ecosystem Service Status and Overall Basin Physical Risk.' However, although the Company states that 'Clean Water and Sanitation' is one of the most relevant UN Sustainable Development Goals they align with, no information was found related to the right to sanitation. [2022 CDP Water Submission, 27/07/2022: <a href="https://www.cnrl.com">cnrl.com</a>] &amp; [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="https://www.cnrl.com">cnrl.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Sets targets on water stewardship that consider water use by local communities: The Company has set targets of 'in situ fresh water use intensity 40% reduction by 2026 from 2017 baseline' and 'oil sands mining fresh river water use intensity 40% reduction by 2026 from 2017 baseline', however, no evidence was found that these targets consider local communities and other users. [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="https://www.cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Reports progress in meeting targets and trends demonstrating progress: The Company presents graphs demonstrating progress towards the targets, indicating a 57% reduction of 'In Situ Fresh Water Use Intensity' and a 48% reduction of 'Oil Sands Mining Fresh River Water Use Intensity'. However, no evidence was found that these targets consider local communities and other users [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="https://www.cnrl.com">cnrl.com</a>]</li> </ul>
D.3.9	Women's rights (in own extractive operations, which include 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 processes to stop harassment and violence against women: The Company indicates in the Code that staff are required to act without harassment, intimidation or discrimination on the basis of gender. In relation to harassment situations, it is also stated that 'All complaints are investigated and, if substantiated, resolved with appropriate corrective action'. Furthermore, the Company indicates it provided training related to their 'Workplace Harassment and Violence Prevention' for all employees and contractors in 2020. [Code of conduct &amp; human rights website, N/A: <a href="https://www.cnrl.com">cnrl.com</a>] &amp; [2021 Stewardship report to stakeholders (Sustainability report), 08/2022: <a href="https://www.cnrl.com">cnrl.com</a>]</li> <li>• Not Met: Working conditions take into account gender issues</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</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 7.37 out of 80 points scored in themes A-D has been applied to produce a score of 1.84 out of 20 points for theme E.

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