

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Gazprom
Sector Extractives
Overall score 6.4 out of 100

Theme score	Out of	For theme
0.8	10	A. Governance and Policy Commitments
0.5	25	B. Embedding Respect and Human Rights Due Diligence
1.0	20	C. Remedies and Grievance Mechanisms
4.2	25	D. Performance: Company Human Rights Practices
0.0	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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Sustainable development policy states that 'the Gazprom Group assumes the following obligations to achieve the sustainable development goals: to respect human rights without fail, including labor rights, the right to a favorable environment, the right to occupational health [...]'. [Human Rights website, N/A: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to UNGPs: The Sustainable development policy states that 'The following key documents governing sustainable development on the national and international levels are taken into account when formulating and implementing the Policy: the Guiding Principles on Business and Human Rights endorsed by the UN Human Rights Council in its resolution 17/4 dated June 16, 2011'. However, 'taking into account' is not considered a formal statement of commitment to the UNGPs according to CHRB wording criteria. [Sustainable Development Policy, 30/04/2021: gazprom.com] Not Met: Commitment to OECD MNE Guidelines
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"> Not Met: Commitment to ILO core principles: The Company states that the 'the Declaration on Fundamental Principles and Rights at Work adopted by the International Labor Organization on June 18, 1998' is among 'The following key documents governing sustainable development on the national and international

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	Principles and Rights at Work		<p>levels are taken into account when formulating and implementing the Policy.' However, the policy does not include a commitment to respecting the human rights that the ILO has declared to be fundamental rights at work. The Company has provided comments to CHRB regarding this subindicator. However, no formal Commitment found to respect the ILO Declaration, as 'take into account' is not considered a formal commitment according to CHRB wording criteria. Although the Company does refer to each ILO core area and for some core area it recognises an obligation, for others they are referred as 'goals'. [Sustainable Development Policy, 30/04/2021: gazprom.com]</p> <ul style="list-style-type: none"> • Not Met: Explicitly lists all four ILO core principles: The Company states that its 'The Gazprom Group's sustainability goals include... Rights of employees to labor and education'. It specifies that this includes forced labour, child labour, freedom of association and collective bargaining and discrimination. However, besides a broader 'goal', it does not include a commitment to those rights. The policy recognises the obligations to 'respect human rights without fail, including labor rights, the right to occupational health [...] to prevent all forms of discrimination and forced labor and to ensure the possibility of filing relevant complaints [...]'. However, no formal commitment to respect all of freedom of association, collective bargaining and prohibiting child labour. [Sustainable Development Policy, 30/04/2021: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects BPs/JVs to commit to ILO core principles: The Sustainable Development policy states that 'this Policy is binding for the Gazprom Group and is advisory for the controlled entities that are not subsidiaries and entities of Gazprom, as well as for partners and counterparties of the Company'. However, policy seems just to be 'advisory' for partners. in addition, as indicated above, no formal commitment was found to the ILO Declaration. [Sustainable Development Policy, 30/04/2021: gazprom.com] • Not Met: Explicitly lists all four ILO core principles for BPs/JVs: The Sustainable Development policy states that 'this Policy is binding for the Gazprom Group and is advisory for the controlled entities that are not subsidiaries and entities of Gazprom, as well as for partners and counterparties of the Company'. However, policy seems just to be 'advisory' for partners. in addition, as indicated above, no formal commitment was found to each ILO core area. [Sustainable Development Policy, 30/04/2021: gazprom.com]
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"> • Met: Commitment to respect H&S of workers: The Company states that 'Gazprom is fully aware of its responsibility to society for creating a safe working environment, including road safety during its operations, and complying with industrial and fire safety requirements.' The primary goals of Gazprom and its subsidiaries in the field of occupational, industrial, fire and road safety are to create a safe working environment and to protect the lives and health of employees; to reduce the risks of emergencies and incidents at hazardous facilities; and to reduce the risks of work-related road accidents; to provide fire safety. [Occupational Industrial Fire and Road Safety Policy, 17/09/2019: gazprom.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Company has provided comments to CHRB regarding this indicator, referencing the social impact report. However, this subindicator looks for policy statements placed in formal policy documents. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects BPs/JVs to commit to H&S of workers • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week
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"> • Not Met: Commitment to respect land ownership/natural resources as in VGGT • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards • Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Company states in its Code of Corporate Ethics that it aims to respect the interests and rights of small-numbered indigenous peoples to maintain their traditional lifestyles and preserve their native habitat. The Company also states in its Sustainable Development Policy that its sustainable development mission and goals include supporting indigenous minorities in promoting their interests and rights to their traditional lifestyle (work and cultural activities), and preserving their original living environment. However, development goals are not

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>considered as a formal commitment to respecting indigenous people's rights under CHRB wording criteria. The policy also adopts the obligation of respecting human rights including 'the right to traditional lifestyle and the original living environment, and the right to education. However, no formal, direct commitment to respect indigenous rights or the ILO Convention 169 or the UNDRIP. [Code of Corporate Ethics, 20/08/2019: gazprom.com] & [Sustainable Development Policy 2022, 29/04/2023: gazprom.com]</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to make these commitments: The Sustainable Development policy states that 'this Policy is binding for the Gazprom Group and is advisory for the controlled entities that are not subsidiaries and entities of Gazprom, as well as for partners and counterparties of the Company'. However, policy seems just to be 'advisory' for partners. in addition, as indicated above, no formal commitment was found to the respect indigenous peoples' rights. [Sustainable Development Policy, 30/04/2021: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing • Not Met: Commitment to respect the right to water • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to Voluntary Principles on Security and HRs • Not Met: Uses only ICoCA members as security providers • Not Met: Commits to International Humanitarian Law <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights
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"> • Not Met: Commitment to remedy adverse HRs impacts • Not Met: Expects EX BPs to make this commitments <p>Score 2</p> <ul style="list-style-type: none"> • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects BPs to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company presents a 'Sustainable Development Committee of the Gazprom Board of Directors', however, no information regarding specific governance oversight of respect for human right was found. [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] • Not Met: Describes HRs expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
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"> • Not Met: Process to review HRs strategy at board level: The Company states that the Sustainable Development Committee 'preliminarily reviews matters related to sustainable development'. However, no description of the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes was found [Annual Report 2021, 2022: gazprom.com] • Not Met: Example of HRs issues/trends discussed in last reporting period: The Company indicates that The Ethics Commission's performance is reported to the Chairman of the Management Committee 'In 2022, the Ethics Commission held ten meetings to review 19 inquiries. The majority of inquiries received in 2022 were related to the interpretation of the Code of Ethics' provisions focusing on the prevention and management of potential conflict-of-interest situations, and requirements to personal behavior in the workplace'. However, this subindicator looks for evidence of specific human rights topics discussed at Board Level. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: At least one board member incentive linked to HRs commitments: The Company indicates that for Members of Gazprom Board of Directors 'Bonus remuneration is variable depending on the Company's year-end results for the completed fiscal year, taking into account the degree of achievement of the corporate-wide KPIs as of the end of the fiscal year', and some of the key performance indicators (KPIs) are in the areas of 'industrial safety' and 'human rights'. The Company has provided comments to CHRB regarding this subindicator contained in the sustainability report: 'KPI targets in process safety are included in the list of indicators to assess the Gazprom Group's sustainability progress'. However, it is not clear what are the specific metrics/quantitative targets including in Board members' remuneration. [Principles of remuneration, 2022: gazprom.com] & [Sustainable Development Policy 2022, 29/04/2023: gazprom.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Some of the key performance indicators (KPIs) are indicated to be in the area of 'human rights', however, these indicators ('average hours spent by employees for all types of training per year' and 'share of employees who participated in professional development skills upgrading and retraining programs') are not related to salient human rights issues considered in CHRB. [Sustainable Development Policy 2022, 29/04/2023: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The Company discloses the indicators taken into account: 'In terms of industrial safety: reduction in workplace accidents rate; reduction in workplace incidents rate', however, no information relating these to the calculation of annual bonus was found [Sustainable Development Policy 2022, 29/04/2023: gazprom.com] • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model <p>Score 2</p> <ul style="list-style-type: none"> • 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"> • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making: The Company states that 'Overall management of sustainable development aspects fall within the competence of PJSC Gazprom's Management Committee' and that 'overseeing the implementation of the Sustainable Development Policy of the Gazprom Group is the responsibility of the Chairman of PJSC Gazprom's Management Committee, while at subsidiaries this is among the duties of their Directors General'. However, no information related to a specific senior manager role accountable for human rights issues was found. [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments: The Company indicates that 'Structural units of PJSC Gazprom and its subsidiaries perform day-to-day management of various sustainable development aspects falling within their competence', however, no information regarding how the Company assigns responsibility in these units was found. [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation with EX BPs

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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"> • Not Met: Senior manager incentives linked to HRs commitments: The Company indicates that for the members of the Management Committee and other executives: 'As per the Annual Bonus Scheme, remuneration is linked to the achievement of corporate KPIs'. The key performance indicators (KPIs) include indicators linked to 'industrial safety'. The Company has provided comments to CHRB regarding this subindicator contained in the sustainability report: 'KPI targets in process safety are included in the list of indicators to assess the Gazprom Group's sustainability progress'. However, it is not clear what are the specific metrics/quantitative targets including in senior executives' remuneration. [Annual Report 2021, 2022: gazprom.com] & [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: The KPIs include indicators indicated to be in the area of 'human rights', however, these indicators ('average hours spent by employees for all types of training per year' and 'share of employees who participated in professional development skills upgrading and retraining programs') are not related to salient human rights issues considered in CHRB. The Company has provided comments to CHRB regarding this subindicator contained in the sustainability report: 'KPI targets in process safety are included in the list of indicators to assess the Gazprom Group's sustainability progress'. However, it is not clear what are the specific metrics/quantitative targets included, and whether it includes health and safety of contractors or local communities. [Sustainable Development Policy 2022, 29/04/2023: gazprom.com] & [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The Company discloses the specific KPIs and indicates that 'The annual bonus payable to members of PJSC Gazprom's Management Committee (excluding the Chairman of the Management Committee) comprises two components – corporate (80%) and individual (20%)', while 'The annual bonus payable to the Chairman of the Management Committee only comprises the corporate component'. However, no information regarding the percentage of the bonus linked to these specific indicators was found. [Sustainable Development Policy 2022, 29/04/2023: gazprom.com] & [Annual Report 2021, 2022: gazprom.com] • Not Met: Review of other senior management incentives for coherence with HRs policies
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"> • Not Met: HRs risks integrated as part of enterprise risk system: The Company indicates that the 'Risk Management System' overviews sustainability risks and describes the 'PJSC Gazprom's Approach to Material Sustainability Risks Management, however, no information related to human rights risks was found [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assessment by Audit Committee or independent third party
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"> • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Company indicates that 'Ensuring the implementation of the Code of Ethics is the responsibility of PJSC Gazprom's standing Corporate Ethics Commission (Ethics Commission). The Company has provided additional comments to CHRB regarding this subindicator. However, no evidence was found in relation to how it proactively communicates human rights commitments to all its workers, including local languages where necessary. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] & [Human Rights website, N/A: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience: The Company has provided comments to CHRB regarding this subindicator, however, evidence was not material. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru]
B.1.4.b	Communication /dissemination of policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
	commitment(s) to business relationships		<ul style="list-style-type: none"> • Not Met: Describes steps to communicate HRs policies to EX BPs: The Company indicates that 'Gazprom Invest exercises three-stage control over the contractors' compliance with process safety requirements at PJSC Gazprom's facilities. Gazprom remains in constant touch with contractors on process safety issues on a 24/7 basis. This enables contractors to report any potential hazards that may result in injuries, employees' ill health and various incidents. The facilities featuring high process risks have incident prevention working groups set up jointly with contractors. PJSC Gazprom's facilities hold safety meetings (stopwatches) to inform the contractors' employees about incidents and relevant preventive action taken and also run Information Centers on process safety matters'. However, this indicator looks for evidence of how the Company communicates its human rights policy expectations to its extractive business partners. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how HRs policies are contractual/binding for suppliers: It also adds that 'Statements of work used as part of the procurement process require contractors to have a process safety management system in place. The relevant requirements are also included in contracts for work (services) at PJSC Gazprom's facilities'. 'In accordance with STO Gazprom 18000.2-015-2021 Requirements for Process Safety Management System. Procedure for Interacting with Contractors to Ensure Compliance with Process Safety Requirements at PJSC Gazprom's Facilities'. However, no evidence found of contractual or other binding arrangement requiring extractive business partners to respect human rights (as required in policy section). [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs
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"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Company indicates that 'Employees of PJSC Gazprom's Administration, as well as its branches and subsidiaries, receive regular training by taking a Corporate Ethics e-learning course with a test-based knowledge assessment. In 2022, 30,865 employees completed the course'. However, no further details found, including whether training includes human rights. It also states that 'The Gazprom Group has set requirements for employees' process safety skills in each type of activity. Training and Professional Development Programs have been developed for each category of the Gazprom Group employees at both internal professional training centers and specialized educational organizations'. 'In the reporting year, the total number of the Gazprom Group employees who completed training in process safety reached 177,219'. However, evidence seems to focus on safety topics only. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Trains relevant managers including security on HRs <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments: The Company indicates that 'In 2022, a remote learning course titled Corporate Ethics at PJSC Gazprom for Suppliers was developed for third-party employees. The course will be rolled out in 2023'. However, it is not clear whether it includes human rights policies & expectations. In addition, it seems to be a planned action, not being rolled out yet. The Company indicates that 'more than 70,000 employees of the contractors received process safety training. In the reporting year, the Central Examination Board of PJSC Gazprom assessed the occupational health and ISPSM knowledge of 22 managers of the contractors that previously had incidents or systematically violated process safety requirements. In the reporting year, PJSC Gazprom's Central Examination Commission tested the knowledge of occupational health and safety requirements and ESMSs of 22 heads of contractor organisations who had previously committed accidents or systematically violated occupational safety requirements. In 2022, as part of the Capital Project Management open session, the contractors' managers undertook training in leadership skills for process safety management, and also completed a process safety culture course. 2022 also saw joint training sessions held with the contractors to respond to emergencies at PJSC Gazprom's capital construction sites'. However, evidence seems to focus in safety only. This subindicators looks for training of extractive business partners in relation to human rights expectations. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Discloses % suppliers trained

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Code of ethics states that the Ethics Commission 'shall be responsible for the enforcement of the requirements and provisions of the code'. The Code also provides mechanisms to address the Commission. However, this subindicator looks for evidence of how the Company proactively monitors compliance with human rights commitments. The Sustainable Development policy describes key mechanisms for implementing the policy, including 'monitoring and assessing impacts of ongoing projects on the Gazprom Group and stakeholders, as well as on the environment, society and economy at large'. Although the policy describes additional mechanisms, no evidence found of the process by which it actually monitors compliance with human rights commitments, including in both own operations and extractive business partners. [Sustainable Development Policy, 30/04/2021: gazprom.com] & [Code of Corporate Ethics, 20/08/2019: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses % of EX BP's monitored • Not Met: Describes how workers are involved in monitoring: The Company notes that 'every employee can report an incident via a trade union organization or an occupational health officer. In addition, employees can submit proposals on how to improve the ISPSM components'. However, this subindicator looks for evidence of how Company employees participate in the active monitoring of compliance on human rights in own operations and extractive business partners. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes: The Company provided comments to CHRB regarding this subindicator, including the number of inquiries made to the Ethics Commission for review and labour conditions assessments (carried out once every five years). However, this subindicator looks for details of non-compliances found as part of the active human rights compliance monitoring processes and the number of corrective actions that were needed. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru]
B.1.7	Engaging and terminating business relationships	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"> • Not Met: HRs performance affects selection EX BPs • Not Met: HRs performance affects ongoing BPs relationships <p>Score 2</p> <ul style="list-style-type: none"> • Met: Works with EX BPs to meet HRs requirements: The Company indicates that 'more than 70,000 employees of the contractors received process safety training. In the reporting year, the Central Examination Board of PJSC Gazprom assessed the occupational health and ISPSM knowledge of 22 managers of the contractors that previously had incidents or systematically violated process safety requirements. In the reporting year, PJSC Gazprom's Central Examination Commission tested the knowledge of occupational health and safety requirements and ESMSs of 22 heads of contractor organisations who had previously committed accidents or systematically violated occupational safety requirements. In 2022, as part of the Capital Project Management open session, the contractors' managers undertook training in leadership skills for process safety management, and also completed a process safety culture course. 2022 also saw joint training sessions held with the contractors to respond to emergencies at PJSC Gazprom's capital construction sites'. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru]
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"> • Not Met: Describes how workers and communities identified and engaged in the last two years • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations • Not Met: Describes process for identifying risks in EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The Company has provided comments to CHRB Regarding this subindicator. However, one of the sources was in Russian. No evidence found of comments provided in English in publicly available sources. It also indicates that 'The Gazprom Group identifies and assesses process safety hazards and risks and investigates related incidents in line with STO Gazprom 18000.1-002-2020 Integrated System of Process Safety Management. Hazard Identification and Risk Management for Process Safety Purposes. In the reporting year, the standard was updated'. However, this subindicator looks for evidence of how the Company assesses its own operations to determine what are its salient human rights issues, including factors taken into consideration to determine saliency. [Risk Management Policy, 2018: gazprom.com] & [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Describes how process applies to EX BPs • Not Met: Public disclosure of results of HRs risk assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to EX BPs • Not Met: Example of actions decided on at least 1 salient HRs issue <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company notes on its website that ' Within the framework of preserving the lifestyles of the indigenous minorities of the North and facilitating the free movement of reindeer across Bovanenkovskoye, a special commission was set up with representatives of Gazprom Dobycha Nadym, administration officials of Yar-Sale, and reindeer herders. As a result, 22 crossings were designed to allow animals and sledges to move freely across the field (via a sloping mound backfilled especially for them or due to elevated utility systems). Reindeer herds migrate two times a year. Every migration usually involves about 100 people and more than 8,000 animals. Each year, the special commission checks if Bovanenkovskoye is ready for reindeer migration. The organization of reindeer passages is a unique example of cooperation between a business enterprise and indigenous people of the tundra'. However, this subindicator looks for (at least) two examples of how the Company communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. [Human Rights website, N/A: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company indicates that 'Any employee of Gazprom who believes to have witnessed an instance of discrimination or a violation of rights shall address his/her immediate superior. If the subsequent measures prove ineffective, information about this situation may be referred to the Corporate Ethics Commission of Gazprom', the applications to the Commission can be filed via email, the hotline or directly in the name of the Chairman of the Corporate Ethics Commission of Gazprom [Human Rights website, N/A: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The mechanisms are introduced in the Code of Corporate Ethics and the Company states that 'employees shall attend a special training course on the implementation of this Code and take a subsequent knowledge test at least once every three years', however, regarding the availability of the mechanism in different languages no information was found. [2019 Code of Corporate Ethics, 20/08/2019: gazprom.com] • Not Met: Describes how workers in EX BPs access grievance mechanism • Not Met: Expects EX BPs to convey expectation to their BPs
C.2	Grievance mechanism(s) for external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all external individuals and communities <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism • Not Met: Expects EX BPs to convey expectation to their BPs
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"> • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
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"> • Not Met: Describes procedure and timescales for managing complaints or concerns: The Company describes the 'Ethics Commission's inquiry review procedure'. However, no timescales for addressing the complaints and for informing the complainant were found. The Company has provided comments to CHRB regarding this subindicator, however, evidence provided was already considered (from previous reporting year). [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] & [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: The Company indicates the measures to discipline employees for non-compliance with the Code of Corporate Ethics. However, no evidence that the Company explains the types of outcomes to the complainant through use of the grievance mechanism was found [Annual Report 2021, 2022: gazprom.com] • Not Met: Describes escalation to senior levels / independent adjudicators: The Company describes the possibility of involvement of senior executive in the application of penalties to the employee that has violated the Code. However, the escalation to senior level is not indicated as an option of the complainant and no evidence was found that the mechanism covers external stakeholders [2019 Code of Corporate Ethics, 20/08/2019: gazprom.com]
C.5	Prohibition of retaliation for raising complaints or concerns	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Code of ethics states that 'the Company guarantees that the provision by an employee of any information concerning violations of this Code shall be kept

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>confidential and shall not have any adverse consequences for the job position of the employee providing such information'. However, no further details found, including a commitment to not retaliate being made extensive to external stakeholders filing complaints'. [Code of Corporate Ethics, 20/08/2019: gazprom.com]</p> <ul style="list-style-type: none"> • Not Met: Describes practical measures to prevent retaliation: The Company states that reports via the hotline of Corporate Ethics Commission are 'anonymous, confidential and protected from misuse'. However, no evidence found of a commitment to not retaliate, and that the mechanism covers external stakeholders was found [Annual Report 2021, 2022: gazprom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence: The Company states that 'shall not have any adverse consequences for the job position of the employee providing such information'. However, no information regarding other forms of retaliation was found [Code of Corporate Ethics, 20/08/2019: gazprom.com] • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders
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"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
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"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
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"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Company indicates that 'In 2022, the Ethics Commission held ten meetings to review 19 inquiries. The majority of inquiries received in 2022 were related to the interpretation of the Code of Ethics' provisions focusing on the prevention and management of potential conflict-of-interest situations, and requirements to personal behavior in the workplace'. No further details, including the amount of grievances filed, addressed or resolved related to human rights, and outcomes for stakeholders. [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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"> • Not Met: Pays living wage or sets time-bound target: The Company indicates that 'In the reporting year, the average monthly salary at the subsidiaries responsible for the core operations of PJSC Gazprom (gas production, processing, transportation, and underground storage) amounted to RUB 127,300'. The Company provides sources from Statista showing that the monthly minimum wage in Russia was RUB 15,279 in 2022. Therefore, these employees receive on average more than 8 times the minimum wage. However, these are 'average' figures for the employees performing at the company's core operations. It is not clear whether all employees are being paid a living wage. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] & [Monthly minimum wage in Russia from 2011 to 2023 (Statista), N/A: statista.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying living wage: As above. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] & [Monthly minimum wage in Russia from 2011 to 2023 (Statista), N/A: statista.com] • Not Met: Reviews definition living wage with unions
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"> • Not Met: Member of EITI • Not Met: Reports of taxes and revenues beyond legal minimums <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country • Not Met: Steps taken to promote transparency in non EITI countries: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material, as it referred to providing tax authorities with access to the Company's system. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Measures to prohibit violence/retaliation against workers for joining trade union: The Company states that 'As of the beginning of 2020, the Gazprom Workers' Union had 353,276 members and covered 84.9 per cent of employees currently working in the companies and organizations of the Gazprom Group' [Trade union webpage, N/A: gazprom.com] • Met: Discloses % of total direct operations covered by CB agreements: The Company indicates that '100% of employees of PJSC Gazprom and its subsidiaries, which signed the General Collective Bargaining Agreement, were covered by collective agreements' [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The Company indicates that 'The Company identifies process safety hazards and risks accordance with STO Gazprom 18000.1-002-2020 Integrated System of Process Safety Management. Hazard Identification and Risk Management for Process Safety Purposes'. 'The ISPSM is integrated into the Company's business process management and regulated by STO Gazprom 18000.1-001-2021 Integrated System of Process Safety Management. Key Provisions. The ISPSM establishes a uniform procedure to manage process safety in accordance with applicable laws, latest scientific and technological solutions, and corporate requirements, while also taking into account geographic, production and other conditions characteristic of each PJSC Gazprom subsidiary, entity or branch. Key ISPSM elements: occupational health and safety management system; industrial safety management system; road safety management system; fire safety management system'. [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] • Met: Discloses injury rate or lost days for last reporting period: The Company discloses the Lost time injury frequency rates (LTIFR) [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] • Met: Discloses fatalities for last reporting period: The Company discloses the Fatality rates (FAR) resulting from incidents and indicates that in the reporting year 5 people died. [2021 Sustainability report, N/A: sustainability.gazpromreport.ru]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Discloses occupational disease rate for last reporting period: The Company discloses the Occupational disease rate (ODR) [2021 Sustainability report, N/A: sustainability.gazpromreport.ru] Score 2 <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company notes that 'KPI targets in process safety are included in the list of indicators to assess the Gazprom Group's sustainability progress'. However, no specific details found in relation to quantitative targets on injury rates, disease rates and fatalities. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Met targets or explains why not or actions to improve H&S management systems
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Process to identify/recognise indigenous rights holders: The Company states that 'In the Khanty-Mansi – Yugra and YamalNenets Autonomous Areas, the Group together with its associated organizations and joint ventures cooperates with peoples included in the Common List of Minor Indigenous Peoples of Russia. These peoples are the Khanty, Mansi, Nenets, Selkups, Evenks, Evens (Lamuts), Nivkh people, Orok people (Ulta), and others'. However, this subindicator looks for evidence of how, where operations or proposed operations may impact on indigenous peoples, the Company describes its process to identify and recognise affected indigenous peoples with whom to engage. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Describes how indigenous communities are engaged during assessment: The Company reports on different projects to support indigenous minorities during last reporting year. However, this subindicator looks for evidence of the Company describing how it engages indigenous communities as part of the impacts assessment, involving them in the process. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to FPIC • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The Company states that 'does not relocate indigenous minorities'. However no recent example of how obtained FPIC or dropped a deal was found [Human Rights website, N/A: gazprom.com]
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes approach to identifying land tenure rights holders and negotiating compensation Score 2 <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation • Not Met: Describes steps to meet IFC PS 5 in state deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The Company indicates that 'To better protect the staff and inventories of the Gazprom Group entities against emergencies and terrorist attacks and to ensure protection of local residents and territories against emergencies linked to incidents and accidents at hazardous industrial facilities of the Gazprom Group entities, we have in place the civil defense system'. However, no further details found, including how it implements a security approach following the Voluntary Principles on Security and Human Rights. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Ensures Business Partners/JVs follow security approach Score 2 <ul style="list-style-type: none"> • Not Met: Security and HRs assessment includes input from local communities • Not Met: Two examples of working with local communities to improve security
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes preventative/corrective action plans for water and sanitation risks: The Company indicates that contributes to 'ensure availability and sustainable management of water and sanitation for all' by 'Reducing the volumes of wastewater discharged into surface water bodies and enhancing the wastewater treatment level; Ensuring sustainable quality water supply to production and other facilities, ensuring efficient wastewater disposal'. However, no information was found related to specific measures taken to prevent identified risks to the right to water. [2021 Sustainability report, N/A: sustainability.gazpromreport.ru]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities: The Company has the following targets 'reduce wastewater discharges into surface water bodies; improve wastewater treatment'. However, no evidence found of specific targets on water stewardship, including consideration of water use by local communities. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] • Not Met: Reports progress in meeting targets and trends demonstrating progress: The Company reports on its progress in meeting targets. However, as indicated above, this subindicator looks for evidence of targets on water stewardship beyond regulatory compliance. [Annual Report 2021, 2022: gazprom.com]
D.3.9	Women's rights (in own extractive operations, which include JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment: The Company indicates that provides 'The Gazprom Group ensures equal remuneration for men and women in positions requiring the same professional expertise and competencies. The ratio of fixed and variable remuneration is the same for both genders. However, no information related to gender pay gap was found, including any steps to address it. [2022 Sustainability report, 2023: sustainability.gazpromreport.ru] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Land Rights • Headline: Report criticizes Nord Stream 2 project for carbon dioxide and methane emissions, severe ecological damage, and impact on indigenous peoples' livelihood in Russia • Story: In their "Why Nord Stream 2 Is A Bad Deal" report, Urgewald has criticized the Nord Stream 2 pipeline for causing at least 100 million tons per year in carbon dioxide emissions and an unspecified amount of methane leakages along its supply chain, which would not be compliant with the Paris Agreement. The extraction and transport of gas for the project, owned by Gazprom, reportedly is inflicting severe ecological damage in Russia's Yamalo-Nenets Autonomous Okrug and destroying the reindeer-herding livelihoods of 41,000 indigenous Nenets by disrupting traditional grazing and migration routes. The German Institute for Economic Research has reportedly called Nord Stream 2 a "likely candidate for stranded assets", and Urgewald says participation in the project also poses economic and reputational risk for its financiers Wintershall Dea, Uniper, OMV, Shell and Engie. Wintershall Dea, owned by BASF and Alfa Group's LetterOne, is further criticized for saying it would lower GHG emissions in its own operations but failing to set targets for emissions from its fossil gas and oil products, which are slated to increase significantly. Uniper, principally owned by Fortum, declared it would reduce carbon emissions from its European power production but has not specified how this goal would be met and has even opened a new coal-powered plant, Datteln IV, in Germany in 2019. Engie is also criticized for converting coal-fired plants into fossil gas or wood-fired biomass plants, which have high carbon impacts. Previously, insurers Munich Re, Axa and Zurich withdrew from financing Nord Stream 2 to avoid US sanctions. [Urgewald, 2021, "Why Nord Stream 2 is a Bad DealWhy Nord Stream 2 is a Bad Deal": urgewald.org]
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: A response by the company is not publicly available. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(1).2	The company has investigated and taken	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned.

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		Score 2 • Not Met: Identified and implemented improvements: There is no evidence the company implemented improvements in its policies/processes and/or made changes to its management systems following the events and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy: There is no evidence suggesting that the company provided remedy to the affected stakeholders • Not Met: Evidence for lack of Impact or link Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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