

Corporate Human Rights Benchmark 2023 Company Scorecard

Company name Oil and Natural Gas Corporation
Sector Extractives
Overall score 7.8 out of 100

Theme score	Out of	For theme
0.9	10	A. Governance and Policy Commitments
0.2	25	B. Embedding Respect and Human Rights Due Diligence
3.0	20	C. Remedies and Grievance Mechanisms
2.1	25	D. Performance: Company Human Rights Practices
1.6	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 Human Rights policy indicates that 'The Company is committed to respecting the human rights of its workforce, communities and those affected by its operations, wherever it does its business, including our business partners and contractors'. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to UNGPs: The policy also claims that 'the Company strives to uphold the spirit of human rights, as enshrined in the [...] United Nations Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights'. However, 'strive to uphold the spirit, as enshrined in' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com] Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Commitment to ILO core principles: The Human Rights policy indicates that 'the Company strives to uphold the spirit of human rights, as enshrined in [...] the International Labour Organization's Declaration on Fundamental Principles and Rights at Work'. However, 'strive to uphold the spirit, as enshrined in' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Explicitly lists all four ILO core principles: The HR policy 'recognizes and respects the right of its employees to exercise freedom of association in matters related to their employment, [...] The Company is committed and respects the right of collective bargaining of its employees, as per applicable laws/guidelines/regulations. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'as per applicable laws/guidelines/regulations'. It also indicates that 'The Company has zero tolerance towards and prohibits engagement of Child Labour, Forced Labour and any form of human trafficking'. Finally, 'The Company prohibits discrimination in the matter of compensation, training, opportunities and employee benefits'. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to ILO core principles: The HR policy indicates that 'The Company expects its business partners and contractors to treat their employees, and to interact with communities in ways that respect human rights and adheres to the spirit and intent of our Human Rights Policy. The Company requires our business partners and contractors to adhere to all domestic laws and expects them to adhere to the International Labour Organization's (ILO) core principles'. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com] • Not Met: Explicitly lists all four ILO core principles for BPs/JVs: Although the Company expects its business partners to adhere to the ILO core principles, this subindicator looks for explicit commitment to each one of them. As indicated above, it is not clear if there's a commitment to respect freedom of association and collective bargaining in all contexts and locations. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.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 Human Rights policy states that 'The Company is committed to provide and maintain a safe, healthy workplace by addressing the risks of accident, injuries and hazards on a continuous basis'. • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The policy indicates that 'The Company ensures compliance with applicable laws related to wages, work hours, leaves, leave with wages, and benefits, to both regular employees of the company as well as workers deployed by contractors'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate'. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: See above the HR policy statement on health and safety. The policy indicates that 'The Company expects its business partners and contractors to treat their employees, and to interact with communities in ways that respect human rights and adheres to the spirit and intent of our Human Rights Policy. The Company requires our business partners and contractors to adhere to all domestic laws and expects them to adhere to the International Labour Organization's (ILO) core principles'. • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: As above.
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: The HR policy indicates that 'The Company engages with local communities on human rights matters that are important to them such as surface rights, access to clean water, health and sanitation. [...] The Company aims to ensure through dialogue that it is listening to, learning from and considering their views on surrounding ecosystem, as it conducts its business'. No statement found, however, committing explicitly to respect land ownership and natural resources as set out in the Voluntary Guidelines on Responsible Governance of tenure. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com] • 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 HR policy indicates that 'The Company engages with local communities on human rights matters that are important to them such as surface rights, access to clean water, health and sanitation. The Company engages with people in these communities, including indigenous peoples as well as vulnerable

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			<p>and disadvantaged groups. The Company aims to ensure through dialogue that it is listening to, learning from and considering their views on surrounding ecosystem, as it conducts its business'. No statement found, however, committing explicitly to respect indigenous peoples' rights. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com]</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to make these commitments <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: As indicated above, 'The Company engages with local communities on human rights matters that are important to them such as surface rights, access to clean water, health and sanitation. [...] The Company aims to ensure through dialogue that it is listening to, learning from and considering their views on surrounding ecosystem, as it conducts its business'. However, no specific statement found committing to respecting right to water. Although it reports in relation to sustainable water management strategy, no specific policy statement found formally committing to respect this right. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com] • 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: The Human Rights policy states that 'the Company strives to uphold the spirit of human rights, as enshrined in [...] the Voluntary Principles on Security and Human Rights'. However, 'strive to uphold the spirit, as enshrined in' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights policy of ONGC and OVL, 06/2022: ongcindia.com] • 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 • 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 • Not Met: Example of HRs issues/trends discussed in last reporting period <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 • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies

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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 <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation with EX BPs [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com]
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 • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • 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 • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment 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 states that it 'has an elaborate training infrastructure to impart various types of trainings to its employees and workers. Different elements of Human Rights are incorporated as part of these trainings. However, exclusive training on Human Rights is carried in few work centres, for example employees of Rajahmundry Asset and Uran plant received 136 hours and 7 hours of training on Human Rights'. However, it is not clear if this training is conducted in local languages. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.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
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"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how HRs policies are contractual/binding for suppliers: The Company states in one of its business principles that 'Do human rights requirements form part of your business agreements and contracts? (Yes/No) Yes, the Human Rights aspect of ONGC extend to suppliers and contractors of the Company.' However, no description of how human rights are binding or whether they are incorporated in contracts was found. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs
B.1.5	Training on Human Rights	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: Score of at least 1 on A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: The Company states that 'ONGC continue to build the awareness and knowledge of its

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employees and workers on Human Rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have. ONGC has an elaborate training infrastructure to impart various types of trainings to its employees and workers. Different elements of Human Rights are incorporated as part of these trainings. However, exclusive training on Human Rights is carried in few work centres, for example employees of Rajahmundry Asset and Uran plant received 136 hours and 7 hours of training on Human Rights'. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com]</p> <ul style="list-style-type: none"> • 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 • Not Met: Discloses % suppliers trained
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 • Not Met: Discloses % of EX BP's monitored • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process: In response to a question asking the Company to 'Provide details of any corrective actions taken or underway to address significant risks / concerns arising from [value chain partner] assessments', the Company states that 'The Company ensures fair pay, which is at least the minimum wage or the appropriate prevailing wages, whichever is higher, to comply with all legal requirements on wages. Compliance is ensured with all applicable regulations related to human rights such as the Payment of Wages Act, 1936; Minimum Wages Act, 1948; Equal Remuneration Act, 1976; Industrial Dispute Act, 1947; ESI Act, 1948; Employees Provident fund and Miscellaneous Act, 1952; The Contract Labour (Regulation and Abolition) Act (CLRA), 1970; Child Labour (Prohibition and Regulation) Act, 1986.' While the Company details information on how it ensures compliance with the law, it does not describes its corrective action process. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] • Not Met: Discloses findings and number of correction action processes
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"> • 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"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with EX BPs to meet HRs requirements
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: The Company states that 'Our structured program enables us to identify internal and external stakeholders at each phase, who either, directly or indirectly, affect or are affected by our company's business operations in short and long run. This engagement strategy also ensures stakeholder inclusive decision-making approach.' It also states that 'For FY'20, we at ONGC, adopted a well-integrated approach by utilizing both formal and informal modes of consultations for identification of stakeholder's needs and expectations to build long-term partnerships. This process involved four key phases namely Plan, Identify, Engage and Report. In the first phase, tentative means of engagement were set to interact with key stakeholders identified in the second phase. In the third phase, ONGC Group engaged with the stakeholders to understand their requirements. The results of the third phase were used to identify material aspects that need to be communicated by ONGC Group to its stakeholders, in addition to reporting its performance.' However, the Company does not describe how it has identified, and engaged with affected stakeholders, including workers or local communities in its supply chain, in the last two years. [Sustainability Report FY'20, 2021: ongcindia.com] • Not Met: Discloses stakeholders whose HRs may be affected: The Company states that 'ONGC Group has identified critical stakeholders via various direct and indirect mediums and also guarantees robust interactions with each of our stakeholder categories.' However, it does not disclose the categories of stakeholders whose

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>human rights have been or may be affected by its activities. [Sustainability Report FY'20, 2021: ongcindia.com]</p> <ul style="list-style-type: none"> • 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: The Company states that 'Across ONGC Group, we have systems and processes in a manner that minimizes human rights violations in our operations as well as our supply chain. We recognise that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved, whether directly or indirectly, through our own activities or our business relationships. We manage these risks by integrating the responses to our due diligence into our policies and internal systems, acting on the findings, tracking our actions, and communicating with our stakeholders about how we address impacts.' However, the Company does not describe the processes it uses to identify its human rights risks and impacts in specific locations or activities, covering its own operations. [Sustainability Report FY'20, 2021: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process for identifying risks in EX BPs: The Company states that 'Across ONGC Group, we have systems and processes in a manner that minimizes human rights violations in our operations as well as our supply chain. We recognise that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved, whether directly or indirectly, through our own activities or our business relationships. We manage these risks by integrating the responses to our due diligence into our policies and internal systems, acting on the findings, tracking our actions, and communicating with our stakeholders about how we address impacts.' However, the Company does not describe the processes it uses to identify its human rights risks and impacts through relevant business relationships. [Sustainability Report FY'20, 2021: ongcindia.com] • 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 discloses some priorities for action, such as: HSE, Diversity & Inclusion, Women Development, Inclusion of Persons with Disabilities (PwD). The Company states that 'Throughout its supply chain, the Company has implemented a methodical approach to ensure compliance with applicable labour practice requirements, including child labour and human rights issues'. However, no details found on the process to assess human rights risks and impacts. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how process applies to EX BPs • Not Met: Public disclosure of results of HRs risk assessment <p>Score 1</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	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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		<ul style="list-style-type: none"> • 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 <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 states that 'A structured four-tier Grievance Management System is in place to address employee grievances. Grievance channels include the Reporting Authority of the employee, Sectional In-charge, Key Executive, and the Appeals Committee.' Besides that, the Company states that 'In order to make our stakeholder interface more collaborative, we also have a structured Grievance Redressal portal. [...] Through this portal, ONGC is committed to empowering each stakeholder – citizen, vendor, employee, former employee etc. to register their grievances relating to any operational wing of ONGC through a single window on our corporate web portal.' [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] & [Sustainability Report FY'20, 2021: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The channel available can be accessed and used only in English. • Not Met: Describes how workers in EX BPs access grievance mechanism: The Company states that, about the grievance portal, 'ONGC is committed to empowering each stakeholder – citizen, vendor, employee, former employee etc. to register their grievances relating to any operational wing of ONGC through a single window on our corporate web portal. We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have. We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns.' However, it is unclear if this allows workers of extractive business partners to raise grievances against the business partners' conduct vi this channel. The Company further indicates: 'We also promote the provision of effective grievance mechanisms by our business partners, including our suppliers and contractors.' However, this does not make it clear whether business partners are required to have a grievance channel for their workers. [Sustainability Report FY'20, 2021: ongcindia.com] • Not Met: Expects EX BPs to convey expectation to their BPs
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"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company states that 'ONGC also follows a robust and well structured grievance redressal mechanism defining clear provisions for employees as well as external stakeholders including the customers, suppliers and general public.' The Company also states that 'We place importance on the provision of effective remedy wherever human rights impacts occur through company-based stringent grievance mechanisms.' [Sustainability Report FY'20, 2021: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Company states that 'We continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have.' However, it is not clear how it ensures external stakeholders are made aware of the grievance mechanisms. [Sustainability Report FY'20, 2021: ongcindia.com] • Not Met: Describes how external individuals/communities access grievance mechanism: The Company states that 'Through this portal, ONGC is committed to empowering each stakeholder – citizen, vendor, employee, former employee etc. to register their grievances relating to any operational wing of ONGC'. However, it is not clear if stakeholders have the opportunity to raise grievances against the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			conduct of the Company's extractive business partners via this channel. The Company further indicates: 'We also promote the provision of effective grievance mechanisms by our business partners, including our suppliers and contractors.' However, it is not clear if the implementation of a grievance mechanism is something the Company requires business partners to do. [Sustainability Report FY'20, 2021: ongcindia.com] • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes procedure and timescales for managing complaints or concerns • Not Met: Describes technical, financial, advisory support to enable equal access Score 2 • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators: The Company states that 'The mechanism allows employees to escalate their grievances to the level of the Director (HR) of the Company and, in some cases, even to the Executive Committee for justifiable redressal of issues & concerns. [...]' All the employees have access to the CMD and Directors through e-mails.' However, no information was found as to whether external stakeholders also have the opportunity to escalate their complaints in the same way. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com]
C.5	Prohibition of retaliation for raising complaints or concerns	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Public statement prohibiting retaliation against workers/stakeholders • Not Met: Describes practical measures to prevent retaliation Score 2 • Not Met: Specifies no legal action, firing or violence • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions Score 2 • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes approach taken to remedy adverse HRs impacts: The Company states that 'As a responsible principal employer, ONGC Group ensures that contractual labour is treated fairly and immediate corrective actions are taken in response to any complaints or disputes'. However, no evidence found of specific cases where remedy has been provided. [Sustainability Report FY'20, 2021: ongcindia.com] • Not Met: Describes how remedy would be provided if no adverse impact identified: The Company indicates that 'We place importance on the provision of effective remedy wherever human rights impacts occur through company-based stringent grievance mechanisms'. However, no details found on the specific process it would follow to provide remedy. [Sustainability Report FY'20, 2021: ongcindia.com] Score 2 • Met: Describes changes to systems, processes and practices to prevent future impacts: The Company states, in response to the question of 'Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints' that 'ONGC has also introduced E-Grievance handling mechanism for quick redressal of grievances, which can be assessed with the link grievance.ongc.co.in [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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 discloses the number of grievances filed, addressed and resolved, including the 'Number of complaints received on sexual harassment, gender discrimination and other discrimination/human rights violations'. However, the Company does not describe the outcomes achieved for its own workers and for external individuals and communities that may be adversely impacted by the company. [Sustainability Report FY'20, 2021: ongcindia.com] • 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 states that 'Each worker associated with ONGC Group has a right to seek compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income.' However, there are no references to family members and/or dependents. [Sustainability Report FY'20, 2021: ongcindia.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying living wage: The Company states that 'Each worker associated with ONGC Group has a right to seek compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income.' And, it also states that 'Our labour contractors, manufactures, and suppliers are paying at least the minimum wage or the appropriate prevailing wages, whichever is higher, in order to comply with all legal requirements on wages, and provide any fringe benefits required by law or contract.' However, this is not sufficient to be considered as the Company achieving paying a living wage. No information was found to prove that the Company considers the workers' families or dependents when determining the wages. [Sustainability Report FY'20, 2021: ongcindia.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: The Company discloses the payment of taxes and revenues (income, foreign, municipal), but it does not indicate going beyond legal requirements. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country: The reports are divided into income, municipal, and foreign taxes. However, no information was found of reports on taxes and revenue by country. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] • Not Met: Steps taken to promote transparency in non EITI countries • 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)	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: Measures to prohibit violence/retaliation against workers for joining trade union: The Company states that 'The Company is also committed to maintain a workplace that is protected and secured from violence, intimidation, harassment or any other form of disruptive conditions due to internal or external threat. Employees are encouraged to highlight concerns and suggestions related to occupational health and safety hazards to the Company for redressal.' However, there is nothing indicating specific steps to avoid any retaliation. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses % of total direct operations covered by CB agreements: The Company ensures that it recognizes the right of collective bargaining, however the % of covering within the workforce is not disclosed. [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] Score 2 <ul style="list-style-type: none"> • Not 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)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process to identify H&S risks and impacts: The Company states that 'In order to ensure that all the business activities are undertaken in accordance with the required regulations, guidelines, standards and rules, ONGC has set up an all-inclusive audit routine comprising of internal as well as external audits. Internal Safety Audits (ISA) are conducted at regular intervals based on the risk matrix of the functional units to comply with QHSE Management System and during FY'20, Internal Safety Audits (ISA) were conducted at 266 installations.' However, no description of the processes used to identify H&S risks were found. [Sustainability Report FY'20, 2021: ongcindia.com] • Met: Discloses injury rate or lost days for last reporting period: The Company discloses a table indicating 'Loss Time Injury Frequency', 'Lost-days' and 'Near-miss' [Sustainability Report FY'20, 2021: ongcindia.com] • Met: Discloses fatalities for last reporting period: The Company discloses the fatalities number in a H&S table. [Sustainability Report FY'20, 2021: ongcindia.com] • Not Met: Discloses occupational disease rate for last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company states that 'In our attempt to achieve the mission "Zero Fatality", ONGC launched "Ten Safety Rules" awareness programme during the reporting year that serve as the foundation of safety across the organization.' However, targets related to injury or lost days rate and occupational disease rates could not be found. [Sustainability Report FY'20, 2021: ongcindia.com] • Not Met: Met targets or explains why not or actions to improve H&S management systems: The Company states that 'While we working towards the 'Zero Fatality-Zero Harm' ideology across all our operations, we unfortunately witnessed some fatalities and incidents during the year. Taking cognizance of the same, we have increased the level of stringency in implementation of safety practices at all of our work centres, and we continue to work towards achieving an incident-free year'. However, no information was found as to what new measure were to be implemented to reach the targets. [Sustainability Report FY'20, 2021: ongcindia.com]
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 • Not Met: Describes how indigenous communities are engage during assessment 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
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 indentifying lang 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)	0.5	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 states that 'Periodic security audits are performed by the Industrial Security Inspection team of Intelligence Bureau, and internal security audits are frequently conducted by the senior officers of ONGC Group to identify gaps and areas of improvements across installations.' However, no information was found as to how the Company implements any findings from the audits it conducts. Further evidence of implementation was not found. [Sustainability Report FY'20, 2021: ongcindia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Ensures Business Partners/JVs follow security approach: The Company states that 'We take full responsibility to ensure human rights are respected throughout our value chain. Safeguarding people who work with us helps build a resilient, stable and sustainable supply chain. [...] This commitment applies to all our operations, our products and services and our business relationships. We stipulate conditions requiring compliance of applicable labour statutes on our suppliers, contractors and vendors through formal written agreements. Across ONGC Group, we have systems and processes in a manner that minimizes human rights violations in our operations as well as our supply chain.' [Sustainability Report FY'20, 2021: ongcindia.com] <p>Score 2</p> <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	<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 preventative/corrective action plans for water and sanitation risks: The Company states that it 'take[s] proactive measures to ensure that the wastewater being released from our operations does not cause any significant environmental damage.' Although some measures related to water management are disclosed, there are no mentions of risks and impacts that affect peoples' human right to water. [Sustainability Report FY'20, 2021: ongcindia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities • Not Met: Reports progress in meeting targets and trends demonstrating progress
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"> • Met: Describes processes to stop harassment and violence against women: The Company states that 'ONGC has set up an Internal Complaints Committee (ICC) to deal with complaints of Sexual Harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act & Rules 2013. ONGC has launched a dedicated webpage which includes Policy on Sexual Harassment, Learning Modules on POSH, Gender Sensitisation, Handbook, Case Studies, details of ICC members, etc.' [Annual report 2021-22 (integrated report), 06/08/2022: ongcindia.com] • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment <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: Health & Safety • Headline: ONGC under investigation over drifting of vessels • Story: On May 20, 2021, the oil ministry in India announced that it had set up a three-member committee to enquire into the sequence of events that led to the drifting of ONGC vessels during cyclone Taukte that cost several lives. <p>The panel will enquire whether the warnings issued by the meteorological department and other statutory authorities were adequately considered and acted upon. It would also investigate if the standard operating procedures for securing the vessels and dealing with disaster management were adequately followed. The committee would also examine lapses and gaps in the systems leading to the stranding and drifting of the vessels and recommend ways to prevent such incidents in the future.</p> <p>[RepublicWorld.com, 19/05/2021 "Govt Orders Probe into Drifting of ONGC Vessels": republicworld.com] [British Safety Council, 01/07/2021, "Indian government launches inquiry into ONGC barge tragedy that claimed 86 lives": britsafe.in] [Scroll.in, 04/08/2021, "The decisions that led to India's worst offshore disaster": scroll.in] [PSU Watch, 21/05/2021, "Barge mishap: ONGC announces compensation of Rs 2 lakh for kin of deceased, Rs 1 lakh for survivors": psuwatch.com]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).1	The company has responded publicly to the allegation	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: Public response: ONGC said in a statement after the accident "At this hour, we are looking at rescue and rehabilitation task. Our business partner Afcons who was operating the affected barges has been with us in this task. We are saddened by the events and express our deep sorrow at the loss of life and pay our tributes to the BNVs (Brave, Nature's Victims). The combined rescue and search efforts will be continued for few more days and we hope that it will help us save more lives. In this hour of grief, M/s Afcons are working on the compensation for the affected crew, which will be operationalised soon." <p>In an interview with television channel Times Now soon after the incident, an ONGC spokesperson claimed that following cyclone alerts and ensuring safety was the responsibility of vessel captains and the consortium of companies contracted to carry out maintenance work at the oil fields.</p> <p>The ONGC maintained that it had immediately alerted everyone at Mumbai High about IMD's first cyclone warnings on May 13. This, according to the ONGC, was the extent of its role, since operations of many of the vessels were under the charge of Afcons and the companies it had subcontracted. In a statement to the Indian Express on May 21, an ONGC official claimed, "we are not mariners, we are oil and gas experts". [Scroll.in, 04/08/2021: scroll.in] [PSU Watch, 21/05/2021: psuwatch.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company responded in general terms and did not address the allegation in detail.
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: ONGC has setup a helpdesk and an helpline numbers for the family of the affected personnel. However, there is no evidence suggesting that the company engaged with the affected stakeholders as part of understanding the causes of the impacts alleged. [Scroll.in, 04/08/2021: scroll.in] • Not Met: Identified cause: ONGC placed the blame on the master or the captain of the ill-fated barge. ONGC repeatedly claimed that following cyclone alerts and ensuring safety was the responsibility of vessel captains and the consortium of companies contracted to carry out maintenance work at the oil fields. However, beyond these claims to exempt ONGC from responsibility for accidents, the company does not present investigative results on the underlying causes of the events concerned. [PSU Watch, 21/05/2021: psuwatch.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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)	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: Provided remedy: Days after the accident, Oil & Natural Gas Corporation (ONGC) announced a compensation of Rs 2 lakh for the families of those who have died and are missing and Rs 1 lakh for the survivors. [PSU Watch, 21/05/2021: psuwatch.com] • Not Met: Evidence for lack of Impact or link: The company denies being responsible for the alleged impact, repeatedly claiming that following cyclone alerts and ensuring safety was the responsibility of vessel captains and the consortium of companies contracted to carry out maintenance work at the oil fields. <p>According to a company's official "ONGC can only issue advisories and suggestions about the weather." The official stated that the ONGC's standard operating procedures for adverse weather do not specify exact safe zones to move to, and that those decisions are left to the vessels. "We are not an agency that can tell them forcefully to go from here to there. The vessels are guided by DG Shipping [the Directorate General of Shipping] and the Navy".</p> <p>However, the affected stakeholders do not accept the argument that the ONGC is only responsible for issuing advisories. "ONGC is the master of everything at Mumbai High," said a survivor. "They can pass any order, and drive any vessel out of their fields. Afcons works under ONGC." Thereby, this is not sufficient evidence to prove the company is not linked to the impact. [Scroll.in, 04/08/2021: scroll.in]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: There is no evidence showing that the remedy was not considered satisfactory by the affected stakeholders. • Met: Remedy delivered: Media sources confirmed that the ONGC had paid the compensation amount they had announced right after the incident: Rs 2 lakh to kin of deceased victims, and Rs 1 lakh to survivors. [Scroll.in, 04/08/2021: scroll.in] • Not Met: Independent remedy process used

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