

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Phillips 66  
**Sector** Extractives  
**Overall score** 7.5 out of 100

Theme score	Out of	For theme
1.1	10	A. Governance and Policy Commitments
0.7	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
0.7	25	D. Performance: Company Human Rights Practices
1.5	20	E. Performance: Responses to Serious Allegations

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

**A. Governance and Policy Commitments (10% of Total)**

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: General HRs commitment: The Code of Business Ethics and Conduct indicates: 'we believe business has a role in promoting respect for human rights throughout the world, as do other representative groups in civil society'. However, no formal commitment to respect Human Rights found. [Code of Business Ethics and Conduct, 2022: <a href="https://www.phillips66.com/~/media/Phillips66/2022-2023-Code-of-Business-Ethics-and-Conduct.pdf">phillips66.widen.net</a>]</li> <li>• Not Met: Universal Declaration of Human rights (UDHR): The Company's Position on Human Rights indicates: 'We conduct our operations [...] consistent with the spirit of the Universal Declaration of Human Rights'. However, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. [Position on Human Rights_web, N/A: <a href="https://www.phillips66.com">phillips66.com</a>]</li> <li>• Not Met: International Bill of Human Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to UNGPs</li> <li>• Not Met: Commitment to OECD MNE Guidelines</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to ILO core principles</li> <li>• Not Met: Explicitly lists all four ILO core principles: The Code of Business Ethics and Conduct indicates: 'We embrace the right of all people to live their lives free from social, political or economic discrimination or abuse. [...] we will not hold any person in slavery or servitude or use forced or indentured labor, nor engage in human trafficking'. However, no commitment found to respect the other ILO Core</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<p>commitments: child labour, freedom of association and collective bargaining. [Code of Business Ethics and Conduct, 2022: <a href="http://phillips66.widen.net">phillips66.widen.net</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects BPs/JVs to commit to ILO core principles</li> <li>• Not Met: Explicitly lists all four ILO core principles for BPs/JVs: The Business Partner Principles of Conduct expects extractive business partners to: 'Observe all applicable laws and regulations governing wages, hours, recruiting and employment practices, and prohibit unlawful discrimination, harassment and retaliation against their employees'. However, it is not clear it expects extractive business partners to respect the other ILO Core commitments: forced labour, child labour, freedom of association and collective bargaining. [Business Partner Code of Conduct, 2022: <a href="http://phillips66.widen.net">phillips66.widen.net</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Code of Business Ethics and Conduct indicates: 'Safety is one of our core values. It is the foundation for how we operate and conduct business. To live this core value, we must plan and execute our business in a manner that protects the health and safety of our employees, contractors, vendors, and the communities in which we operate. We are committed to the safety of everyone who works in our facilities, lives in the communities where we operate or uses one of our products'. [Code of Business Ethics and Conduct, 2022: <a href="http://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to H&amp;S of workers: The Business Partner Principles of Conduct indicates it expects extractive business partners to: 'Conduct their operations in a manner that does not jeopardize the safety or healthy work environment of their employees and provide workplaces that meet all applicable environmental, health and safety laws, regulations, and directives'. [Business Partner Code of Conduct, 2022: <a href="http://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The Business Partner Principles of Conduct indicates it expects extractive business partners to: 'Observe all applicable laws and regulations governing [...] hours'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Business Partner Code of Conduct, 2022: <a href="http://phillips66.widen.net">phillips66.widen.net</a>]</li> </ul>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect land ownership/natural resources as in VGGT</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards</li> <li>• Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration</li> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing</li> <li>• Not Met: Commitment to respect the right to water</li> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to Voluntary Principles on Security and HRs</li> <li>• Not Met: Uses only ICoCA members as security providers</li> <li>• Not Met: Commits to International Humanitarian Law</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to commit to these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts</li> <li>• Not Met: Expects EX BPs to make this commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with EX BPs on remedy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects BPs to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

## A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The 2022 Sustainability Report indicates: 'The Public Policy and Sustainability Committee manages the company's sustainability program and associated initiatives and: Reviews compliance with HSE policies and [...] social trends and uncertainties; Reviews exposure to and management of environmental, social and political trends and risks [...]; Reviews and makes recommendations on the company's policies, programs and practices regarding HSE protection [...] and sustainability matters'. These include human rights. [2022 Sustainability Report, 2023: <a href="#">issuu.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul>
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Process to review HRs strategy at board level: The Public Policy and Sustainability Committee has among its duties: 'review and monitor the Company's compliance with the Company's policies, programs and practices regarding: (1) health, safety and environmental protection; (2) health and safety performance; [...] social impact [...]; the Committee shall review the Company's sustainability program and receive reports on the progress of the Company's sustainability initiatives. The Committee will also review the Company's report on sustainability'. According to the 2022 Proxy Statement, it met five times in 2021. [Public Policy and Sustainability Committee, 09/12/2022: <a href="#">s22.q4cdn.com</a>] &amp; [2022 Proxy Statement, 2022: <a href="#">s22.q4cdn.com</a>]</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: At least one board member incentive linked to HRs commitments: The 2022 Proxy Statement indicates: 'Our executives' compensation includes base salary, an annual bonus opportunity under our Variable Compensation Incentive Program ("VCIP"), and equity-based compensation [...]'. The VCIP includes 'Safety &amp; Operating Excellence (25%)'. It explains Safety &amp; Operating Excellence: 'For personal and process safety performance, we measure ourselves against the top performing companies in our industry. Generally, these companies fall within the top two quartiles of all companies reported. We then establish our threshold, target, and maximum goals based on the performance (25th, 50th, and 75th percentiles) of this group of companies. For asset availability, for which comparative data is not available, we establish our threshold, target, and maximum goals based on our operating plan and historical performance with the goal of continuous improvement, incorporating the segments of our business and weighting them by adjusted EBITDA'. The CEO is a Board member. However, the performance scheme seems to be based on comparison with other Company rather than based on its Human Rights performance about its own metrics in key issues. [2022 Proxy Statement, 2022: <a href="#">s22.q4cdn.com</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public: Although the Company indicates that Safety &amp; Operating Excellence represents 25% of Executive annual bonus, it is not clear the what percentage safety represents and, as indicated above, target seems to be linked to other Company's performance. [2022 Proxy Statement, 2022: <a href="#">s22.q4cdn.com</a>]</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation with EX BPs</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives linked to HRs commitments: The 2022 Proxy Statement indicates: 'Our executives' compensation includes base salary, an annual bonus opportunity under our Variable Compensation Incentive Program ("VCIP"), and equity-based compensation [...]'. The VCIP includes 'Safety &amp; Operating Excellence (25%)'. It explains Safety &amp; Operating Excellence: 'For personal and process safety performance, we measure ourselves against the top performing companies in our industry. Generally, these companies fall within the top two quartiles of all companies reported. We then establish our threshold, target, and maximum goals based on the performance (25th, 50th, and 75th percentiles) of this group of companies. For asset availability, for which comparative data is not available, we establish our threshold, target, and maximum goals based on our operating plan and historical performance with the goal of continuous improvement, incorporating the segments of our business and weighting them by adjusted EBITDA'. However, the performance scheme seems to be based on comparison with other Company rather than based on its Human Rights performance about its own metrics in key issues. [2022 Proxy Statement, 2022: <a href="https://s22.g4cdn.com">s22.g4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> <li>• Not Met: Performance criteria linked to HRs made public: Although the Company indicates that Safety &amp; Operating Excellence represents 25% of Executive annual bonus, it is not clear the what percentage safety represents and, as indicated above, target seems to be linked to other Company's performance. [2022 Proxy Statement, 2022: <a href="https://s22.g4cdn.com">s22.g4cdn.com</a>]</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system: The 2022 Annual Report discloses the Company's risk factor, including: 'Any casualty occurrence involving our assets or operations could result in serious personal injury or loss of human life [...]'. For assets located near populated areas, including residential areas, commercial business centers, industrial sites and other public gathering areas, the level of damage resulting from these risks could be greater'. However, it is not clear the company considers Human Rights risks beyond health and safety. [2022 Annual Report - Form 10-K, 2023: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Provides an example: It adds the negative impacts it can have: 'Damages resulting from an incident involving any of our assets or operations may result in our being named as a defendant in one or more lawsuits asserting potentially substantial claims or in our being assessed potentially substantial fines by governmental authorities. Should any of these risks materialize at any of our equity affiliates, it could have a material adverse effect on the business and financial condition of the equity affiliate and negatively impact their ability to make future distributions to us'. However, as indicated above, it is not clear the company</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>considers Human Rights risks beyond health and safety. [2022 Annual Report - Form 10-K, 2023: <a href="https://d18rn0p25nwr6d.cloudfront.net">d18rn0p25nwr6d.cloudfront.net</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Communicates HRs policies to all workers in own operations: The Company indicates that 'All employees participate in biannual training on the Code of Ethics and must attest that they will comply with the Code annually. [...] The Code of Ethics covers topics including, but not limited to, human rights [...]'. Local languages are assumed in training. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to EX BPs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The 2021 UK Modern Slavery Act indicates: 'the Company's contract terms set out the Company's expectations for its suppliers to adhere to the Business Partner Principles of Conduct and to comply with all laws relating to combating slavery and human trafficking, including the Act and the request to implement due diligence procedures for its own suppliers'. It also states in its 2022 Sustainability Report that: 'We expect our business partners and suppliers to comply with the contractual obligations and criteria in our Business Partner Principles of Conduct. These principles require our suppliers to work with our employees in a manner consistent with our values and Code of Ethics'. [2021 UK Modern Slavery Act, 2022: <a href="https://phillips66.co.uk">phillips66.co.uk</a>] &amp; [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: See above. Extractive business partners are contractually expected to implement due diligence procedures for its own suppliers. However, it is not clear extractive business partners are required to cascade the contractual or other binding requirements down their own business partners. [2021 UK Modern Slavery Act, 2022: <a href="https://phillips66.co.uk">phillips66.co.uk</a>]</li> </ul>
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"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Met: Describes how workers are trained on HRs policy commitments: The 2022 Sustainability Report indicates: 'All employees participate in biannual training on the Code of Ethics and must attest that they will comply with the Code annually. [...] The Code of Ethics covers topics including, but not limited to, human rights [...]'. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Not Met: Trains relevant managers including security on HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains BPs to meet HRs commitments</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Company indicates that 'Our procurement policy governs all our supply chain activities. We employ formal processes to consistently vet suppliers to protect people, ensure adherence to industry-standard frameworks for quality and monitor financial stability. [...] Understanding and monitoring the work conducted by our suppliers and business partners is integral to efficient and robust business operations, sustainability and respect for human rights. We audit suppliers' manufacturing facilities and examine contracts within our supply chain to ensure adherence to policy. Our suppliers are expected to certify that the materials incorporated into products sold to Phillips 66 comply with all laws, including those pertaining to human rights, slavery and human trafficking'. As for its own operations: 'Our facilities are subject to rigorous internal, industry and external audits and inspections, and our operations are managed to ensure compliance and asset integrity'. However, although the Company audits its own facilities, it is not</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>clear it includes the monitoring of compliance with its Human Rights Policy. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses % of EX BP's monitored</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective actions process</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul>
B.1.7	Engaging and terminating business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs performance affects selection EX BPs</li> <li>• Not Met: HRs performance affects ongoing BPs relationships: The 2022 Sustainability Report indicates: 'Our suppliers are expected to certify that the materials incorporated into products sold to Phillips 66 comply with all laws, including those pertaining to human rights, slavery and human trafficking'. However, it is not clear how human rights performance is taken into account in decisions to renew, expand or terminate business relationships, including with suppliers. It should include service providers. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with EX BPs to meet HRs requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years: The 2022 Sustainability Report indicates: 'Our stakeholders include employees, shareholders, investors, customers, communities where we operate, Indigenous peoples, legislators and energy consumers. They enable us to fulfill our purpose and execute our strategy. Reaching out and listening through open lines of communication is a priority for us. [...] Our processes provide a proactive, measured and responsive approach to stakeholder engagement'. However, it is not clear how it has identified, and engaged with affected stakeholders, including workers or local communities in its extractive business partners, in the last two years. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations</li> <li>• Not Met: Describes process for identifying risks in EX BPs: The 2022 Sustainability Report indicates: 'We employ formal processes to consistently vet suppliers to protect people, ensure adherence to industry-standard frameworks for quality and monitor financial stability. [...] Understanding and monitoring the work conducted by our suppliers and business partners is integral to efficient and robust business operations, sustainability and respect for human rights. We audit suppliers' manufacturing facilities and examine contracts within our supply chain to ensure adherence to policy. Our suppliers are expected to certify that the materials incorporated into products sold to Phillips 66 comply with all laws, including those pertaining to human rights, slavery and human trafficking. We engage with suppliers to enhance our operating performance through innovative products and the execution of continuous improvement opportunities'. However, it is not clear if the Company conducts due diligence processes to identify which are the potential impacts it can face through extractive business partners. Current evidence seems to focus on compliance monitoring. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances: The 2022 Sustainability Report indicates: 'We conduct a comprehensive social risk assessment for new projects to understand the people and concerns along a proposed route'. However, no further details found. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks</li> <li>• Not Met: Describes how process applies to EX BPs</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company discloses information on different mitigation system. It indicates, for example, mitigation systems within its Health, Safety and Environmental Management. However, it does seem to be part of its global system to prevent, mitigate or remediate its salient human rights issues. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Not Met: Describes how global system applies to EX BPs</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The 2021 UK Modern Slavery Act indicates: 'The Company has processes for reporting concerns relating to violations of the law or non-compliance with the Code of Ethics or Business Partner Principles of Conduct, including the use by its suppliers of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Phillips 66 also maintains a 24/7 ethics hotline and email account where employees, contractors or outside third parties can report any concerns of possible ethics violations, including slavery and human trafficking'. [2021 UK Modern Slavery Act, 2022: <a href="https://phillips66.co.uk">phillips66.co.uk</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: The Code of Business Ethics and Conduct indicates: 'Representatives fluent in many languages are available. Translation services are also available'. Workers are trained on the Code [see B.1.5], which contains information on the Help Line. [Code of Business Ethics and Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Met: Describes how workers in EX BPs access grievance mechanism: The Business Partner Principles of Conduct indicates: 'You can contact the Global Compliance and Ethics office directly or anonymously through the Phillips 66 Ethics Help Line'. The document contains details of the different ways to access it. Also, as indicated above, the 2021 UK Modern Slavery Act indicates: 'The Company has processes for reporting concerns relating to violations of the law or non-compliance with the Code of Ethics or Business Partner Principles of Conduct, including the use by its suppliers of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Phillips 66 also maintains a 24/7 ethics hotline and email account where employees, contractors or outside third parties can report any concerns of possible ethics violations, including slavery and human trafficking'. [Business Partner Code of Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>] &amp; [2021 UK Modern Slavery Act, 2022: <a href="https://phillips66.co.uk">phillips66.co.uk</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to convey expectation to their BPs: See above. The Business Partner Principles of Conduct discloses information on grievance channels for extractive business partners. Extractive business partners are expected to ensure their suppliers compliance through due diligence [see B.1.4.b]. However, it is not clear the due diligence process requires extractive business partners' suppliers to apply the exact same principles. [Business Partner Code of Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The 2021 UK Modern Slavery Act indicates: 'Phillips 66 also maintains a 24/7 ethics hotline and email account where employees, contractors or outside third parties can report any concerns of possible ethics violations, including slavery and human trafficking, anonymously if they feel the need'. [2021 UK Modern Slavery Act, 2022: <a href="https://phillips66.co.uk">phillips66.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Code of Business Ethics and Conduct indicates: 'Representatives fluent in many languages are available. Translation services are also available'. However, it is not clear how affected external stakeholders at its own operations are made aware of it. [Code of Business Ethics and Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: Although the Business Partner Principles of Conduct has information on the Company's grievance channels for its extractive business partners, it is not clear it is open for external individuals and communities to have access to it in order to raise Complaints or concerns about human rights issues at the Company's extractive business partners. [Business Partner Code of Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on design and performance</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Code of Business Ethics and Conduct indicates: 'If you choose to remain anonymous and would like an update or wish to follow up with the Global Compliance and Ethics office, you can request a follow-up identification code. The Global Compliance and Ethics office can then ask questions or provide updates through the help line using this number. However, remember that it will be difficult to solve problems or conduct investigations, unless you provide sufficient, detailed information'. However, no timescales for addressing the complaints were found. [Code of Business Ethics and Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: The Code of Business Ethics and Conduct indicates: 'The Company strictly prohibits retaliation against any individual who makes a good faith report of alleged wrongdoing or who participates in an investigation. Suspected retaliation should be reported immediately to the Global Compliance and Ethics office'. [Code of Business Ethics and Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Met: Describes practical measures to prevent retaliation: The Code of Business Ethics and Conduct indicates: 'Although you are encouraged to identify yourself to assist our Company in effectively addressing your concern, you may choose to remain anonymous. The Company will respect your choice'. [Code of Business Ethics and Conduct, 2022: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets time-bound target</li> <li>• Not Met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Achieved paying living wage</li> <li>• Not Met: Reviews definition living wage with unions</li> </ul>
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Member of EITI</li> <li>• Not Met: Reports of taxes and revenues beyond legal minimums</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports taxes and revenue by country: The Global Tax Policy indicates: 'Our tax strategy is to comply with tax obligations in every country where we create value, by both timely paying the proper amount of tax due and complying with tax reporting requirements'. However, it is not clear the Company publicly reports, by country, the taxes and revenue payments to some countries beyond legal requirements for disclosure. No evidence found. [Global Tax Policy, N/A: <a href="http://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Not Met: Steps taken to promote transparency in non EITI countries</li> <li>• Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Measures to prohibit violence/retaliation against workers for joining trade union</li> <li>• Not Met: Discloses % of total direct operations covered by CB agreements: The Company indicates that 33% of its US workforce union-represented. However, it is not clear the total proportion of its direct operations workforce covered by collective bargaining agreements. [2021 Human Capital Report, 2022: <a href="http://issuu.com">issuu.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The 2022 Sustainability Report indicates: 'Our business units complete an annual report on risks, including a list of corrective actions to address risks identified and closed during the year'. The document Health, Safety and Environmental Management System [HSEMS] indicates: 'Our HSEMS is a process designed to systematically identify, assess and manage the operational risks to employees, contractors, stakeholders, business and the environment. The routine application of the HSEMS provides on-going identification, prioritization and control of these risks. This standard establishes a continuous improvement process for the implementation of the HSE Policy, leadership expectations and core values. It has four distinct phases [...]. Within these four phases are 15 interrelated elements. Proper implementation of each element is essential for the effective functioning of the HSEMS'. The different phases are: Plan, Do, Assess and Adjust. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>] &amp; [Health, Safety and Environmental Management System, N/A: <a href="https://phillips66.widen.net">phillips66.widen.net</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The Company indicates its 'Combined Lost Workday Case Rate' [Also known as Lost Time Incident Rate] for 2021: 0.04. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Met: Discloses fatalities for last reporting period: The Combined Fatalities count for 2021 was zero. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Not Met: Discloses occupational disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The 2022 Sustainability Report indicates: 'We are determined to be the energy industry's safest and most reliable company. We believe that a zero-process-safety-incident and zero-injury workplace is achievable. [...] This priority is embodied in our investment in asset maintenance and integrity and our HSE policies, programs and procedures'. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> <li>• Met: Met targets or explains why not or actions to improve H&amp;S management systems: The 2022 Sustainability Report indicates: 'Our rigorous auditing protocols enable us to assess our performance and progress frequently. On-site inspections are conducted by both third-party auditors and Phillips 66 internal auditors trained to recognize health and safety best practices. All deviations are investigated and corrected'. Also, 'We periodically host large-scale company training summits. This is an opportunity to gather people from every health and safety committee in the company to share best practices, goals and performance milestones. In addition, attendees gain new techniques, skills and knowledge they can implement at their home facility. The summits also encourage union leaders and Phillips 66 management to maintain an open dialogue and speak with a unified voice about safety'. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> </ul>
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Process to identify/recognise indigenous rights holders</li> <li>• Not Met: Describes how indigenous communities are engaged during assessment: The Company indicates that 'Phillips 66 has been working with Indigenous peoples to build meaningful relationships and honor them and their connection to the land in the regions where we do business. As Todd Denton, our Senior Vice President for Health, Safety and Environment, and Projects, said at a company forum during Native American History Month, "Getting diverse Indigenous perspectives is invaluable to us as a company and industry. We want Native American people to know Phillips 66 is engaged with the tribes and Indigenous peoples." We work with tribal representatives when repairs or updates need to be made to pipelines or other assets on or near land that is important to them. For example, in the summer of 2021, Midstream leadership met with members of the Osage Nation to discuss replacing parts of the Cherokee East Pipeline between Ponca City and Glenpool, Oklahoma, which crosses native lands'. However, it is not clear whether the Company engages with Indigenous communities in carrying out the assessment of operations/proposed operations. [2022 Sustainability Report, 2023: <a href="https://issuu.com">issuu.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to FPIC</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to indentifying lang tenure rights holders and negotiating compensation: The 2022 Sustainability Report indicates: ‘Our stakeholders include [...] communities where we operate [...]’. However, it is not clear how it identifies legitimate tenure rights holders, including through engagement with the affected or potentially affected communities in the process, with particular attention to vulnerable or marginalised tenure rights holders and how it negotiates with them to provide adequate compensation or requested alternatives to financial compensation, when acquiring, leasing or making other arrangements to use or restrict the use of or access to land or natural resources. [2022 Sustainability Report, 2023: <a href="https://www.issuu.com">issuu.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to compensation including valuation</li> <li>• Not Met: Describes steps to meet IFC PS 5 in state deals</li> </ul>
D.3.7	Security (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example</li> <li>• Not Met: Ensures Business Partners/JVs follow security approach</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Security and HRs assessment includes input from local communities</li> <li>• Not Met: Two examples of working with local communities to improve security</li> </ul>
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes preventative/corrective action plans for water and sanitation risks: Regarding its water management, the 2022 Sustainability Report indicates: ‘We have developed leading Key Performance Indicators as part of our water use efficiency program for our facilities, including condensate returned to steam produced and condensate recovered versus consumed in the process’. Also, ‘We repurposed a conventional reverse osmosis unit to use closed-circuit reverse osmosis (CCRO) to treat about 900 gallons per minute (GPM) of concentrated brine for use in boilers. [...] We see results in significantly improved cooling tower cycles, and the annual raw water demand for Borger’s boilers is down by 473 million gallons. [...] We regularly engage with wastewater trade associations like the Water Environment Federation to work with our peers to develop and share best practices. [...] We are also working on a project to treat and recycle 3,200 GPM of wastewater to be used in boilers at our Borger Refinery. This project will help the refinery meet new selenium discharge requirements’. Finally, ‘Our Remediation Management team is responsible for treating water that may have been contaminated. In 2021, the team treated and recycled over 48 million barrels of water for reuse at our facilities, reducing the amount of freshwater needed to operate’. However, no details found of specific actions taken to face specific identified risks. Evidence seem to refer to improving management systems. [2022 Sustainability Report, 2023: <a href="https://www.issuu.com">issuu.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Sets targets on water stewardship that consider water use by local communities</li> <li>• Not Met: Reports progress in meeting targets and trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Describes processes to stop harassment and violence against women: The Company states that ‘The Company is committed to maintaining a work environment that is free of all forms of unlawful conduct, including sexual or other forms of unlawful harassment. This includes a prohibition of any actions by employees, supervisors or management that abuse individual dignity through slurs or jokes on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, veteran status, genetic information, or any legally protected status, or other objectionable conduct, including harassment, bullying or discriminating conduct that interferes with another employee’s performance. Such conduct is unacceptable and will not be tolerated. [...] The Company will not tolerate abusive language, physical violence or the threat of physical violence at the Company. Employees are expected to cooperate fully in the Company’s investigation of reports. Reprisals or retribution against an employee who files a complaint in good faith will not be tolerated.’ However, there is not a process to stop any kind of harassment described by the Company. [Code of Business Ethics and Conduct, 2022: <a href="https://www.phillips66.widen.net">phillips66.widen.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Working conditions take into account gender issues</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment [Equal Employment Opportunity_web, N/A: <a href="#">phillips66.jobs</a>] &amp; [2022 Proxy Statement, 2022: <a href="#">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 5.97 out of 80 points scored in themes A-D has been applied to produce a score of 1.49 out of 20 points for theme E.

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