

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Suncor Energy  
**Sector** Extractives  
**Overall score** 17.0 out of 100

Theme score	Out of	For theme
2.0	10	A. Governance and Policy Commitments
1.8	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
6.3	25	D. Performance: Company Human Rights Practices
3.4	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"> <li>Met: General HRs commitment: The Human Rights policy states that 'Suncor has a corporate responsibility to respect human rights and to ensure that we are not complicit in human rights abuses. We seek to avoid infringing on the rights of others and strive to remedy harms that occur as a result of our activities. Our responsibility to respect human rights applies to all of our activities and to our business relationships with others'. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Commitment to UNGPs: It also states that 'Our commitment to respecting human rights is [...] informed by the international law and standards [...] including: Guiding Principles on Business and Human Rights: Implementing the UN "Protect, Respect, and Remedy" framework'. However, to be 'informed by' is not considered a formal statement of commitment according to CHRB wording criteria. The Company also refers to UNGPs in other sources, however, this indicator looks for statements of commitments placed in policy documents [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</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	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: Commitment to ILO core principles: See below [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Fundamental Principles and Rights at Work		<ul style="list-style-type: none"> <li>• Met: Explicitly lists all four ILO core principles: The Human Rights policy states that 'Suncor's employment policies adhere to all applicable domestic laws and honour internationally accepted labour standards, including those concerning freedom of association and collective bargaining, non-discrimination, forced labour, and underage workers in the workplace'. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects BPs/JVs to commit to ILO core principles: See below.</li> <li>• Not Met: Explicitly lists all four ILO core principles for BPs/JVs: The supplier code (which covers 'suppliers, contractors, consultants and other third parties we do business with') states that 'Suncor respects human rights and we have processes in place to ensure that we are not complicit in human rights abuses. Our commitment to respect human rights applies to all of our activities and to our business relationships with others'. 'We expect that our business associates will abide by the laws of the countries in which they operate while also respecting human rights principles'. No explicit reference found in relation to each ILO core area of fundamental rights at work. [Supplier code of conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Company's code of conduct states that 'Journey to Zero is our vision for creating a culture of safety that is shared by everyone at Suncor [...] We share a responsibility for achieving results the right way, safely. This means protecting the safety and health of our team members, the environment and operating our business reliably and efficiently'. [Standards of business conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</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 code for suppliers states that 'we expect that our business associates will share Suncor's commitment to safety and promote the health and well-being of their personnel and others affected by their operations'. [Supplier code of conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week</li> </ul>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	0	<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: The Canadian Aboriginal Relations policy states that 'Suncor is committed to working closely with Canada's Aboriginal peoples and communities to build and maintain effective, long-term and mutually beneficial relationships. To achieve this commitment, we strive for relationships that are based on transparency, mutual respect and trust'. However, this does not include a formal commitment to respect indigenous peoples' rights. The Company's report on sustainability states that 'we seek to build a grow authentic and meaningful relationships with indigenous Peoples are mutually beneficial. Beyond commitments outlined in our policies, both Suncor and Syncrude have agreements with indigenous communities near our operations [...] These agreements reflect how we work together on a range of matters [...]'. The website also contains information regarding indigenous relations. However, no formal statement of policy commitment to respect indigenous peoples' rights was found. [Aboriginal relations policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to make these commitments</li> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing</li> <li>• Not Met: Commitment to respect the right to water: The Environment, health and safety policy states that 'we will operate our business in a manner that aims to minimize our impact on air, water, land, biodiversity and climate'. The report on sustainability indicates that 'responsible water use is critical to the company, to neighbouring communities and to our stakeholders'. It also states that 'we believe water is a shared and precious resource that must be managed wisely'. However, no formal statement of policy commitment to respect right to water was found. [Environment Health &amp; safety policy, 21/12/2021: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<a href="https://cdn.suncor.com">cdn.suncor.com</a> & [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to Voluntary Principles on Security and HRs: The human rights policy states that 'Our commitment to respecting human rights [...] is informed by the international law and standards [...] including: The Voluntary Principles on Security and Human Rights. However, 'informed by' is not considered a formal statement of commitment according to CHRB wording criteria. The policy also indicates that 'our security policies and guidelines should be consistent with international standards, including the Voluntary Principles on Security and Human Rights'. However, 'should be consistent' is not considered a formal statement of commitment according to CHRB wording criteria. The report on sustainability states that 'we adhere to the Voluntary Principles on Security and Human Rights'. However, this commitment is placed in a periodic report, which is not considered a suitable source for policy statements according to CHRB methodology. Finally, the Company has a corporate security policy. However, no evidence was found in this document of a formal commitment to the voluntary principles or to de International Code of Conduct Association. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Uses only ICoCA members as security providers: See above. [Corporate Security policy, 15/01/2020: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Commits to International Humanitarian Law</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to commit to these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: The Human Rights policy states that 'Suncor has a corporate responsibility to respect human rights and to ensure that we are not complicit in human rights abuses. We seek to avoid infringing on the rights of others and strive to remedy harms that occur as a result of our activities'. However, 'strive to' is not considered a formal statement of commitment according to CHRB wording criteria. Although it also states that 'A process for human rights impact assessment, undertaken regularly, is essential to identify, prevent, mitigate and remedy our potential impacts on human rights', it does not include a commitment to remedy. The sustainability report also states that 'engaging with communities is an important part of our approach to managing human rights and providing access to rectify, or remedy, a situation'. However, sustainability reports are not considered a suitable source for policy statements according to CHRB methodology. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Expects EX BPs to make this commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with EX BPs on remedy</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects BPs to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<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: Board level responsibility for HRs: The Sustainability Report indicates: 'The Environment, Health, Safety and Sustainable Development (EHS&amp;SD) Committee oversees and manages matters relating to environment, health, safety and sustainable development'. Human Rights is part of the Company's 'sustainable development approach'. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes HRs expertise of Board member: The 2022 Management Proxy Circular indicates the skills and experience of its Board members. Eight out of ten Board directors have experience on 'Social Performance', meaning: 'Significant experience in the areas of corporate social responsibility, community relations, Indigenous relations, inclusion and diversity, and human rights'. However, no further details found. [2022 Management Proxy Circular, 10/05/2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul>
A.2.2	Board responsibility	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: Process to review HRs strategy at board level: The Environmental, Health, safety &amp; Sustainable development Committee assists the board by: 'Monitoring the effectiveness and integrity of the Corporation's internal controls as they relate to operational risks of the corporation's physical assets and matters of environment, health, safety and sustainable development. [...] Approving on behalf of the Board of Directors certain physical asset integrity and EHS&amp;SD matters as delegated by the Board, including the matters outlined in this mandate. Reviewing and formulating recommendations to the Board of Directors with respect to the Corporation's strategies and policies pertaining to the environment, health, safety and sustainable development'. As indicated in previous indicator, 'sustainable development' includes human rights. [EH&amp;S Committee mandate, 2020: <a href="https://suncor.com">suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: At least one board member incentive linked to HRs commitments: The 2022 Sustainability Report indicates: 'Suncor's board practices regarding performance evaluation and compensation consider ESG factors by: evaluating senior executive performance annually against well-defined goals that support and reinforce our business objectives, including ESG performance considering our performance against enterprise-wide sustainability goals related to safety, [...] and social performance, to determine the annual incentive payment amounts for the Chief Executive Officer and the rest of the executive'. Regarding Executive compensation, the 2022 Management Proxy Circular adds: 'In 2021 we re-defined our strategic objectives and immediately began demonstrating progress'. Achieve world-class ESG performance is among it. The CEO is a Board member. However, it is not clear what the objectives and specific indicators for the compensation are. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: Although the CEO has an incentive for safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
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"> <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> <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making: The Company states in its human rights policy that 'The President and Chief Executive Officer of Suncor is accountable to the Board of Directors for ensuring this policy is effectively implemented'. However, this subindicator looks for a senior role or committee (different than the CEO or the Executive committee as a whole) accountable for human rights implementation at Company-wide level. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation with EX BPs</li> </ul>
B.1.2	Incentives and performance management	0.5	<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: Senior manager incentives linked to HRs commitments: The 2022 Sustainability Report indicates: 'Suncor's board practices regarding performance evaluation and compensation consider ESG factors by: evaluating senior executive performance annually against well-defined goals that support and reinforce our business objectives, including ESG performance considering our performance against enterprise-wide sustainability goals related to safety, [...] and social performance, to determine the annual incentive payment amounts for the Chief Executive Officer and the rest of the executive'. Regarding Executive compensation, the 2023 Management Proxy Circular adds: 'To continue to drive focus on safety, in the 2023 Annual Incentive Plan (AIP) we have doubled the overall weighting on safety to 22.5%. We have also introduced a new safety metric (SIFa) that measures how well we prevent the most serious injuries. Industry-standard recordable injury frequency also remains an important component of the 2023 AIP'. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [2023 Management Proxy: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: Although senior executives have an incentive for safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. [2023 Management Proxy: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	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: HRs risks integrated as part of enterprise risk system: The 2021 Annual Report indicates: 'committed to proactive program of enterprise risk management intended to enable decision-making through consistent identification and assessment of risks inherent to its assets, activities and operations'. It then discloses its risk factors, which include: Major Operational Incidents(Safety, Environmental and Reliability); Labour Relations; Land Claims and Indigenous Consultation. [2021 Annual report, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Met: Provides an example: The 2021 Annual Report discloses some of the impacts of safety risks to its business: 'The company's businesses also carry the risks associated with poor or substandard environmental and safety performance, which is closely scrutinized by governments, the public and the media, and could result in a suspension of or inability to obtain regulatory approvals and permits, or, in the case of a major environmental or safety incident, delays in resuming normal operations, fines, civil suits or criminal charges against the company'. [2021 Annual report, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <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)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	to workers and external stakeholders		<ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to all workers in own operations: The 2022 Report on Sustainability indicates: 'Suncor's workforce must complete annual training about our Code [Standards of Business Conduct Code] and affirm that they've read The Way We Do Business and comply with the Code. The Way We Do Business summarizes all of Suncor's policies, guidance and standards that make up the Code'. However, the Code does not seem to contain the Company's Human Rights policies. The Human Rights Policy indicates: 'awareness among Suncor's employees is key to ensuring that we meet the goals of this policy and we are committed to training and communicating our approach to human rights, as part of the implementation of this policy'. However, no evidence found of actual Human Rights courses or communications in place. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.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 2022 Management Proxy Circular indicates: 'Compliance with the supplier code of conduct is a standard term of all Suncor supply chain contracts', and the Supplier Code includes human rights. [2022 Management Proxy Circular, 10/05/2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments: The 2022 Report on Sustainability indicates: 'Suncor's workforce must complete annual training about our Code [Standards of Business Conduct Code] and affirm that they've read The Way We Do Business and comply with the Code. The Way We Do Business summarizes all of Suncor's policies, guidance and standards that make up the Code'. However, the Code does not seem to contain the Company's Human Rights policies. The Human Rights Policy indicates: 'awareness among Suncor's employees is key to ensuring that we meet the goals of this policy and we are committed to training and communicating our approach to human rights, as part of the implementation of this policy'. However, no evidence found of actual Human Rights training taking place. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.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: The 2022 Report on Sustainability indicates: 'We introduced a process in 2021 that asks suppliers if they have their own COC. If a company does not have one, it allows us to have a conversation and conduct education and awareness training on the importance of a Code of Conduct'. However, it is not clear there is generic Human Rights training for its extractive business partners. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: Suncor's business units must conduct annual self-assessments against the requirements of the OEMS [Operational Excellence Management System] standard and are also subject to OEMS audits'. The OEMS 'applies a systematic approach to manage our environment, health and safety commitments'. However, although the Company indicates it audits compliance to its health and safety commitments, it is not clear it has a system to monitor the implementation of its Human Rights policy, both for its own operations and extractive business partners. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Discloses % of EX BP's monitored</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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	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: HRs performance affects selection EX BPs: The 2022 Report on Sustainability indicates: ‘To guide our decisions on who we work with, all businesses and suppliers must pre-qualify to provide services or materials to Suncor by answering a series of questions, including on sustainability. [...] The questions address topics such as safety goals, Indigenous relations/ participation, climate change, human rights, inclusion and diversity, community investment and social innovation. Our Supply Chain Qualify and Select Supplier process follows the pre-qualification process and helps inform purchasing decisions’. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Met: HRs performance affects ongoing BPs relationships: The Supplier Code of Conduct indicates: ‘We expect all of our business associates to act consistently with the values, expectations and requirements outlined in this code. Failure to do so may result in serious consequences, including termination of our business relationship’. The Code contains the Company’s Human Rights expectations. [Supplier code of conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.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 Canadian Aboriginal Relations Policy indicates: ‘Suncor commits itself to listening and communicating with Aboriginal peoples directly and openly about events, issues and ideas. We seek to consult in a timely, interactive and culturally appropriate manner. [...] We work with communities to identify community investment opportunities that support Aboriginal cultures and priorities’. It also has a Stakeholder Relation Policy: ‘ [it] provides a consistent approach to the company’s relationships with stakeholders. It outlines Suncor’s responsibilities and commitments, and is intended to guide our business decisions on a day-to-day basis’. The 2022 Report on Sustainability notes: ‘We engage with stakeholders in multiple ways, including meetings, workshops and conferences. [...] We seek to engage with partners in an atmosphere of mutual respect, knowing there will be times when we work with partners that don’t support elements of our business or have different perspectives than ours. We welcome different opinions and perspectives that help us work toward the greater good and drive positive change. When it comes to our workforce, we believe in engaging our employees and building a culture where feedback is encouraged. Employee engagement is especially important in maintaining strong business delivery in times of change’. It also remarks ‘ We’re developing and maintaining positive, meaningful relationships with stakeholders, communities and Indigenous Peoples by: [...] working with local stakeholders, communities and Indigenous Peoples to define an appropriate way to: share information; consider interests and impacts; incorporate feedback, at all stages, in a manner that respects local and traditional decision-making processes’. However, although the Company has different policies on stakeholder engagement, no description found of how it identifies affected stakeholders, including workers or local communities in its supply chain, in the last two years. [Canadian aboriginal Policy 2016, 10/2016: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [Stakeholder relations policy, 2016: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders: The 2022 Report on Sustainability indicates: ‘In 2021, members of the Suncor supply chain team participated in various industry discussions focused on economic reconciliation’. However, the Company is expected to provide two examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</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: The Human Rights Policy states: ‘A process for human rights impact assessment, undertaken regularly, is essential to identify, prevent, mitigate and remedy our potential impacts on human rights. The scope of our human rights due diligence should include our own operations and where we can influence our third party business relationships, those of others. We recognize that a heightened level of due diligence is required in high risk and conflict environments’. However, it is not clear that a human rights impact assessment actually takes place. No further evidence found. The 2022 Report on Sustainability indicates: ‘Principal risks have the potential to materially affect our ability to meet or support our strategic objectives. In the constantly evolving energy business, new risks can emerge while established risks can take on new forms or orders of magnitude. We manage the identification of new principal risks through our critical and principal risk processes’. The Company discloses risk matrix, however there is no clear reference to human rights risks, only to health and safety. No evidence found, however, of a description of the process to identify potential human rights risks and impacts. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Describes process for identifying risks in EX BPs: See above. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.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</li> <li>• Not Met: Describes risks identified in relation to new circumstances: As indicated above, ‘We recognize that a heightened level of due diligence is required in high risk and conflict environments’. However, no description found of the risks identified in relation to such events, including through heightened due diligence in any conflict-affected areas. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul>
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"> <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: The 2022 Report on Sustainability indicates: ‘We use a single risk-matrix tool to align the company on terminology and approach. We consistently assess risks in terms of magnitude of consequence and likelihood. The tool helps assign responsibility for different levels of residual risk. The consequences are based on the following five receptors on the risk matrix: [...] Health and safety’. No further details found including a saliency assessment that determines which are the Company’s salient human rights. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
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"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Human Rights Policy indicates: ‘A process for human rights impact assessment, undertaken regularly, is essential to identify, prevent, mitigate and remedy our potential impacts on human rights’. However, no evidence found of a global system to take action to prevent, mitigate or remediate its salient human rights issues. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.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> <p>Score 2</p> <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	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 system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		<ul style="list-style-type: none"> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
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"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <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	<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 workers: The 2022 Report on Sustainability indicates: 'We provide and facilitate access to remedies through the Suncor Integrity Hotline, which is available 24/7 to employees, contractors and the public'. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: The 2022 Report on Sustainability indicates: 'Suncor's workforce must complete annual training about our Code [Standards of Business Conduct Code] and affirm that they've read The Way We Do Business and comply with the Code'. It contains provisions of the hotline. The Suncor Integrity Hotline is available in English and in French. However, it is not clear it is available in all appropriate languages. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [Ethics Point, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Met: Describes how workers in EX BPs access grievance mechanism: The Supplier Code of Conduct: 'There may be times where you may not feel comfortable to talk to your Suncor representative about something that seems inconsistent with this code. That's why the confidential and anonymous Suncor Integrity Hotline exists. You can contact the hotline 24 hours a day, seven days a week, 365 days a year. NAVEX Global is our external provider for this service and they will assist you in filing the report'. [Supplier code of conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs: See above. However, it is not clear it expects its extractive business partners to convey the same expectation on access to grievance mechanism to their own business partners. [Supplier code of conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</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 2022 Report on Sustainability indicates: 'We provide and facilitate access to remedies through the Suncor Integrity Hotline, which is available 24/7 to employees, contractors and the public'. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Suncor Integrity Hotline is available in English and in French. It is not clear it is available in all local languages. Moreover, it is not clear how affected external stakeholders are made aware of the channel. [Ethics Point, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The Supplier Code of Conduct: 'There may be times where you may not feel comfortable to talk to your Suncor representative about something that seems inconsistent with this code. That's why the confidential and anonymous Suncor Integrity Hotline exists. You can contact the hotline 24 hours a day, seven days a week, 365 days a year. NAVEX Global is our external provider for this service and they will assist you in filing the report'. However, it is not clear that external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company's extractive business partners. [Supplier code of conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.3	Users are involved in the design and performance of	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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	the mechanism(s)		<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism: Regarding its Integrity Hotline , the 2022 Report on Sustainability indicates: ‘Suncor’s program is mature and well-established. We monitor best practices and look for opportunities for improvement’. However, it is not clear how it engages with potential or actual users (or individuals or organisations acting on their behalf) on the improvement of the mechanism. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</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: When asked ‘How long will it take to resolve my concerns?’, the Company indicates: ‘The short answer is, it depends. Every report is treated seriously and to ensure we effectively review your concerns, we want to be as diligent as possible. You are always welcome to follow up or ask a question about your report using your Report Key’. As for being informed of the results of the investigation, it states: ‘While we may not be able to share the outcome from a disciplinary or corrective action standpoint, violations of our Standards of Business Conduct result in real world consequences. A substantiated complaint may result in coaching, a reprimand and even dismissal, depending on the circumstances’. However, no details found on timescales for addressing the complaints or concerns (even if not specific dates, some time reference) and for informing the complainant found. [Integrity Hotline FAQ, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</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 conduct contains a no retaliation commitment: ‘Suncor will not penalize or discriminate against anyone who provides information in good faith relating to an activity they believe is illegal or contrary to Suncor policy’. [Standards of business conduct, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Met: Describes practical measures to prevent retaliation: According to the Integrity Hotline FAQ reports can be filled anonymously. [Integrity Hotline FAQ, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence</li> <li>• Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and	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: The Company discloses information of its Integrity Hotline report volume of calls in 2021: 220. 26% of these reports were related to people; 33% to the environment, health and safety. However, no information found specifically on the number of human rights related grievances filed, addressed or</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating lessons learned		<p>resolved and outcomes achieved for its own workers, for external individuals and communities. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</p> <ul style="list-style-type: none"> <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)	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"> <li>• Met: Reports of taxes and revenues beyond legal minimums: The Company annually reports payments according to Canada's Extractive Sector Transparency Measures Act (ESTMA) (equivalent level of reporting to the EITI Standard). According to the Company's website the Extractive Sector Transparency Measures Act 'requires entities that are subject to Canadian law and engaged in the extraction of oil, natural gas or minerals to report payments, on an annual basis, made to all governments in Canada and abroad'. As indicated below, the Company reports taxes and revenues in every country. [Extractive Sector Transparency Measures Act (ESTMA)_web, N/A: <a href="https://suncor.com">suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Reports taxes and revenue by country: The Company reports taxes and revenue by country. [2022 ESTMA Annual Report, 30/05/2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Measures to prohibit violence/retaliation against workers for joining trade union: The 2022 Report on Sustainability indicates: 'Our employment policies adhere to all applicable domestic laws and are consistent with internationally accepted labour standards. These include: freedom of association and collective bargaining'. However, it is not clear the measures the Company puts in place to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Met: Discloses % of total direct operations covered by CB agreements: The 2022 ESG Disclosure Index indicates: '25% of active workforce [is] covered under collective bargaining'. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.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 Company indicates: 'To strengthen operational excellence and safety performance, and align with global best practices, we restructured the senior leadership team in 2021 to increase operational experience at the executive level and created a centralized Operational Risk Management (ORM) organization. In establishing the ORM team, we have heightened our risk management and OEMS [Suncor's Operational Excellence Management System] support by consolidating key services into one function. These changes will improve our performance by providing operations with the necessary support, processes and tools they need to more effectively identify and manage risk. [...] We're identifying and maximizing opportunities for safe work practices and procedures, regionally and company-wide. Audits and management reviews are in place to ensure our practices are effective and prevent the reoccurrence of similar incidents'. As for its approach to health, it remarks: 'We take a holistic approach to wellness by understanding four interconnected elements of well-being – social, psychological, financial and physical – and their effect on overall health. We strive to foster a resilient and thriving workplace where we take care of each other and people feel safe and supported'. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The 'Total lost time injury frequency' in 2021 was 0.03. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Met: Discloses fatalities for last reporting period: There was 1 fatality in 2021. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Discloses occupational disease rate for last reporting period: The 2022 Report on Sustainability indicates: 'Suncor is focused on eliminating fatalities and serious injuries at the worksite'. No further details found, including injuries (evidence focus on 'serious injuries') and illness/disease.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: The 2022 Report on Sustainability indicates: 'Suncor is focused on eliminating fatalities and serious injuries at the worksite'. No further details found, including injuries (evidence focus on 'serious injuries') and illness/disease. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Met: Met targets or explains why not or actions to improve H&amp;S management systems: The 2022 Report on Sustainability indicates: 'Suncor is focused on eliminating fatalities and serious injuries at the worksite. Our SIF program emphasizes the value of reporting, investigating and managing potential SIF [Serious Injury and Fatality] incidents. It encourages learning and improved safety performance across our operations. The goal is to bring increased visibility to SIF exposures, enabling the organization to identify and address their precursors. We had four SIF events, including one fatality and three life-altering serious injuries, at Suncor in 2021'. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.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: The Company has a policy on Canadian Aboriginal relations where it recognises 'the unique legal and constitutional rights of Aboriginal peoples. [...] This recognition and respect should be integrated into our business approach and the way we operate'. The Stakeholder Policy states: 'Suncor's stakeholders are the individuals and groups who could be affected by our operations or who could, through their actions, affect our business'. The 2022 Report on Sustainability indicates: 'We seek to build and grow authentic and meaningful relationships with Indigenous Peoples that are mutually beneficial'. However, it is not clear the process it has in place to identify and recognise affected indigenous peoples. [Canadian aboriginal Policy 2016, 10/2016: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [Stakeholder relations policy, 2016: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Describes how indigenous communities are engage during assessment: The 2022 Report on Sustainability indicates cases of different partnerships with Indigenous business and communities. However, it is not clear whether the Company engages with indigenous communities in carrying out the assessment of operations/proposed operations. [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to FPIC: Regarding to Rights of indigenous peoples, the Company indicates: 'Suncor seeks to ensure that: there is no coercion, intimidation, or manipulation; engagement is done in advance of decisions; broad information is shared; and that Suncor receives broad support for its proposed actions'. However, no commitment to free prior and informed consent (FPIC) found. [2022 ESG Disclosure Index, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources</li> </ul>
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to indentifying lang tenure rights holders and negotiating compensation: The 2022 Report on Sustainability indicates: 'Suncor has never had to involuntarily resettle any communities'. 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 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to compensation including valuation</li> <li>• Not Met: Describes steps to meet IFC PS 5 in state deals</li> </ul>
D.3.7	Security (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The Human Rights Policy states that 'our security policies and guidelines should be consistent with international standards, including the Voluntary Principles on Security and Human Rights, and the laws of the jurisdictions in which we operate'. The 2022 Report on Sustainability adds: 'We respect the human rights of our workforce and nearby communities, while maintaining the safety and security of our personnel, assets and operations. [...] We respect the human rights of our workforce and nearby communities, while maintaining the safety and security of our personnel, assets and operations'. Moreover, it has a Corporate Security Policy. However, it is not clear how it implements its security approach (including implementing its commitment to the Voluntary Principles on Security and Human Rights or the International Code of Conduct for Private Security Providers). In addition, it is expected to provide an example of how it ensures respect for human rights (including the human rights of people in local communities) in the course of maintaining the security of company-managed operations. [Human Rights policy, N/A: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Ensures Business Partners/JVs follow security approach</li> <li>• Not Met: Security and HRs assessment includes input from local communities</li> <li>• Not Met: Two examples of working with local communities to improve security</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Describes preventative/corrective action plans for water and sanitation risks: The 2022 Water Response indicates various risks identified and its responses. For example: 'In order to achieve mine closure and progress reclamation opportunities, a process for the safe release of treated water back to the environment is required to accomplish timely mine closure [...]. We require both federal regulations and provincial regulatory approval to release treated oil sands mine water to the environment within a certain timeframe. Indigenous communities and stakeholders have increased sensitivity about water release, concerns over water quality and quantity, health impacts, and impacts to local biodiversity. The lack of certainty increases risk to long term closure plans as currently constructed and the ability to manage both quantity and quality of water during operational phase of the projects'. Its primary response to the risk was: 'Engage with regulators/policymakers, local communities, NGOs and the general public, improve monitoring and increase investment in new technologies and management alternatives'. It goes on explaining that 'In 2020, 86 active projects were underway through COSIA [...] at a cost of \$319 million. As a result of this work, these projects have reduced freshwater use intensity at in situ operations by 44% and reduced net water use intensity from the Athabasca River at mining operations by 22% – all since 2012 and we continue to work on these numbers'. [2022 Water Response CDP, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Sets targets on water stewardship that consider water use by local communities: The 2022 ESG Disclosure Index indicates its contributions in action to the UN SDGs Goal 6: Clean water and sanitation: 'Participation in the UN SDG Goal Ambition Accelerator Program where we are assessing how Suncor could align with the ambition of delivering net positive water impacts by 2050. The program encourages companies to take ambitious action to achieve the SDGs through assessing current performance, identifying risk areas, and exploring new opportunities across business units and functions'. However, no evidence found of targets on water stewardship that take into consideration water use by local communities and other users in the vicinity of its operations. [2022 ESG Disclosure Index, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</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</li> <li>• Not Met: Working conditions take into account gender issues</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2022 Management Proxy Circular indicates: 'The Diversity Policy provides that the Board should include individuals from diverse backgrounds, having regard to gender [...] other diverse attributes. In particular, the Board believes there should be an appropriate number of female directors and aspires to maintain a Board in which each gender represents at least 30% of the members of the Board'. The 2022 Report on Sustainability indicates how it calculates the 'Ratio of basic salary and remuneration of women to men'. However, it is not clear the steps it takes to address any gender pay gap throughout all levels of employment and how it measures it. [2022 Management Proxy Circular, 10/05/2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>] &amp; [2022 Report on Sustainability, 2022: <a href="https://sustainability-prd-cdn.suncor.com">sustainability-prd-cdn.suncor.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 13.60 out of 80 points scored in themes A-D has been applied to produce a score of 3.40 out of 20 points for theme E.

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