

Company Name ConocoPhillips
Industry Extractives
UNGP Core Score (*) 12.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0.5	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
2	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
12.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note 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 2020 Methodology document. 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

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Code of Conduct states 'As part of our commitment to our global community and to each other, we uphold individual human rights.' [Code of Business Ethics and Conduct, 2020 Update, 2020: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company states its 'approach is consistent with the human rights philosophies expressed in the following global frameworks: [...] United Nations Guiding Principles on Business and Human Rights'. However, 'consistent with' is not considered a formal commitment according to CHRB wording guidelines. [Valuing Human Rights, N/A: conocophillips.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: ILO Core: The Company states 'We will conduct our business consistent with the human rights philosophy expressed in the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.' However, being 'consistent with' is not considered an explicit commitment according to CHRB wording criteria. [Code of Business Ethics and Conduct, 2020 Update, 2020: static.conocophillips.com] Not met: UNGC principles 3-6 Not met: Explicitly list All four ILO apply to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core Met: Respect H&S of workers: The Company states 'ConocoPhillips is committed to protecting the health and safety of everybody who plays a part in our operations, lives in the communities in which we operate or uses our products.' [Health, Safety and Environment Policy, N/A: static.conocophillips.com] Met: H&S applies to EX BPs: As above. [Health, Safety and Environment Policy, N/A: static.conocophillips.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to stakeholder engagement: The Company CEO states 'A critical part of our leadership includes engaging with stakeholders — employees, partners, shareholders and communities near our operations — to address climate-related risks and other environmental and social interests.' The Company also states 'Our goal is to respectfully engage with local stakeholders across our business to understand their values and interests, reduce the impact of our operations, and contribute to economic opportunities'. The Company then proceeds to describe engagement plans. Furthermore, the Company states in their human rights section 'When our operations identify potential human rights concerns during risk assessments, they then develop engagement plans and specific actions to manage and mitigate that risk. We seek to partner and engage with indigenous communities to diminish the negative aspects of our operations and maximize the social and economic benefits we can bring communities neighbouring our operations.' [Sustainability Report, 2018: static.conocophillips.com & Stakeholder Engagement, N/A: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commits to engage stakeholders in design: The Indigenous People chart linked by the Company in their Sustainability Report states in the focus area regarding consultation and agreement 'Indigenous communities are involved in the design of engagement and consultation'. The Community Engagement chart linked by the Company states that 'Community engagement and consultation is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			incorporated into business unit, asset or project stakeholder engagement plans.' [Indigenous People, N/A: static.conocophillips.com & Community Engagement, N/A: static.conocophillips.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company discloses the following: 'Community relations staff has a process in place to surface, track and respond to concerns or grievances in a timely manner and to develop appropriate mitigation measures.' 'Stakeholder relations staff has a process in place to respond to concerns or grievances in a timely manner.' However, responding to concerns does not imply a formal statement of commitment to remedy. Additionally, in its 2018 Sustainability report, the Company explains that part of its Social Performance Guidance includes 'Assessing potential risks to stakeholders' human rights, incorporating risks into planning and providing a grievance mechanism to remedy realized impacts.' However, no formal commitment to remedy adverse impacts could be found. [Community Engagement, N/A: static.conocophillips.com & Human Rights Due Diligence, N/A: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives: The Company states in their 'Human Rights Due Diligence' Implementation Guidance that 'Where appropriate, business units, assets or projects have communicated with and engaged communities and their representatives on how to contact the company, and how to address any concerns or grievances.' However, it is not clear if the Company is committed to collaborate in initiatives that provide access to remedy. [Human Rights Due Diligence, N/A: static.conocophillips.com] • Not met: Work with EX BPs to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2. Companies are awarded this if they are committed either to the ILO Declaration (or each ILO Core area) or the UN Global Compact. • Met: Senior responsibility for HR: The Company indicates that the Executive Leadership Team is in charge of 'Human Rights, Stakeholder Engagement, Water, Biodiversity [and] Climate Change.' [2018 Sustainability Report, 2019: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: There is a flow chart which breaks down the tiers of responsibility for Human Rights issues. Below the Executive Leadership team there is the Sustainable Development Leadership Team, the Health, Safety & Environment Leadership Team, and, in business units, 'BU Leadership Teams, Subject Matter Expert and Global Issue Working Groups for Human Rights/Stakeholder Engagement, Water, Biodiversity, Climate Change'. [2018 Sustainability Report, 2019: static.conocophillips.com] • Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company states in its Human Rights Due Diligence publication 'We performed a high-level human rights risk assessment (by country) of its global operations using externally provided human rights risk assessment tools to identify countries of focus for deeper level evaluation of potential human rights issues. Key areas include: security and human rights; land use/relocation; indigenous issues and rights; company and supplier labor standards; access to water; and vulnerable groups; Environmental and Social Impact Assessments (ESIAs) assess human rights issues where appropriate; sustainable Development Scorecards are completed for capital projects including an analysis of human rights issues, and are updated through project phases; the New Country Entry process evaluates human rights issues and risks; human rights risks are identified as part of corporate authorization guidelines for new ventures; Business unit Stakeholder Engagement and Social Performance plans incorporate assessment of human rights issues, as appropriate'. [Human Rights Due Diligence, N/A: static.conocophillips.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: identifying risks in EX business partners: The Company states that Sustainable Development Risk Assessment, New Country Entry Process, Capital Projects Management System and HSE Management System and HSE Due Diligence processes are used to identify and assess Human Rights. However, it is unclear if these are used to identify risks in business partners. [Human Rights Due Diligence, N/A: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company states in its Human Rights Due Diligence publication 'We performed a high-level human rights risk assessment (by country) of its global operations using externally provided human rights risk assessment tools to identify countries of focus for deeper level evaluation of potential human rights issues. In addition, the Company has New Country Entry processes to evaluate human rights issues and risks. The Company also states that 'Sustainable Development Scorecards are completed for capital projects including an analysis of human rights issues, and are updated through project phases.' [Human Rights Due Diligence, N/A: static.conocophillips.com] • Met: In consultation with stakeholders: The Company states in their human rights due diligence guidance that "Business unit Stakeholder Engagement and Social Performance plans incorporate assessment of human rights issues, as appropriate." . The Company also discloses 'Business units and functions collaborate on human right due diligence processes and share best practices through working groups and Networks of Excellence.' and that 'Business unit, asset or project Stakeholder Engagement plans incorporate an assessment of human rights issues as appropriate, and project Social Performance plans also address such issues as appropriate. Where business units maintain separate social performance plans, human rights issues are also addressed.' [Human Rights Due Diligence, N/A: static.conocophillips.com] • Not met: In consultation with HR experts: The Company states that they using are using 'externally provided human rights risk assessment tools'. This tool is provided by IPEICA, and was designed in consultation with the Danish Institute for Human Rights. Additionally, on its website, section 'Valuing Human Right,' it states it participates 'in IPEICA's broader work on human rights due diligence and grievance mechanisms and incorporate IPEICA guidance into our own training and practices.' However, it is not clear whether the Company directly consults with human rights experts to carry out the identification/assessment process. [Human Rights Due Diligence, N/A: static.conocophillips.com & IPEICA human rights guide, 12/2013: ipeica.org] • Met: Triggered by new circumstances: The Company has New Country Entry processes to evaluate human rights issues and risks. [Human Rights Due Diligence, N/A: static.conocophillips.com] • Met: Explains use of HRIAs or ESIA (inc HR): The Company states that Social Impact Assessments (ESIAs) assess human rights issues where appropriate in their Human Rights Due Diligence guidance document. Furthermore, the Company states in the Sustainability Report 'We have stakeholder engagement professionals in each business unit who manage our stakeholder mapping and integrate local input into our business decisions. These specialists help project teams understand the impact on the community and environment. They also help ensure respect for human rights and alignment with local and international standards' The Company also states 'When our operations identify potential human rights concerns during risk assessments, they then develop engagement plans and specific actions to manage and mitigate that risk.' [Human Rights Due Diligence, N/A: static.conocophillips.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company states that during their Human Rights Due Diligence process, in the Impact Assessment State, the Company performed a high-level human rights risk assessment (by country) of its global operations using externally provided human rights risk assessment tools to identify countries of focus for deeper level evaluation of potential human rights issues. Key areas include: security and human rights; land use/relocation; indigenous issues and rights; company and supplier labor standards; access to water; and vulnerable groups. [Human Rights Due Diligence, N/A: static.conocophillips.com] • Not met: Public disclosure of salient risks: The Company discloses a risk register and action plan, but these results do not seem to be from the assessment described above, but only from the identification of stakeholders. [Community Risk Management, N/A: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: The Company states in its Human Rights Due Diligence publication 'Human rights issues are incorporated into Capital Projects and HSE management systems (using a 'Plan, Do, Assess, Adjust' approach); Human rights issues are incorporated into the HSE Due Diligence Standard guidance; Business unit, asset or project Stakeholder Engagement plans incorporate an assessment of human rights issues as appropriate, and project Social Performance plans also address such issues as appropriate. Where business units maintain separate social performance plans, human rights issues are also addressed'. [Human Rights Due Diligence, N/A: static.conocophillips.com] • Not met: Including amongst EX BPs: No information relating to this indicator could be found in public documents. • Not met: Example of Actions decided: The Company has provided examples of stakeholder engagement in Alaska. However, no example of actions decided relating to human rights issues could be found. [Responsibly Developing Alaska's Willow Project, 09/09/2020: conocophillips.com & Listening to Stakeholders on Alaska's North Slope, 14/04/2020: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: System to check if Actions are effective: The Company states that Human Rights issues are tracked at business unit, asset or project level and communicated internally as appropriate based on human rights risks identified at a country level. The Company states that these are evaluated periodically through business unit, asset or project level risk assessments. [Human Rights Due Diligence, N/A: static.conocophillips.com] • Met: Lessons learnt from checking effectiveness: Each year, the Company publishes an Annual Report to the Voluntary Principles on Security and Human Rights (VPSHR), which includes a "Lessons and Issues" section that identifies any lessons learned from the Company's implementation of the VPSHR. The Company indicates that since the 'illegal 2016 blockade of a ConocoPhillips well site by antifracking activists in Colombia, there have not been further negative encounters. Conoco Phillips Colombia attributes this, in part, to the extensive stakeholder engagement conducted with community members. Working with agencies of the Colombian government at the national, regional and local levels, we engaged with stakeholders, including local communities, nearly 200 times since the beginning of the project, listening to their concerns and addressing their questions about our plans'. [Voluntary Principles on Security and Human Rights Annual Report 2018, 2018: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: As above
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 [Human Rights Due Diligence, N/A: static.conocophillips.com] • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Met: Comms plan re reviewing action plans: See B.2.4 • Not met: Including EX business partners: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from 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"> • Met: Channel accessible to all workers: In the Company Code of Conduct, which applies to all workers, the Company states 'If you feel that you have experienced or observed any discriminatory or harassing behaviour, you are encouraged to voice your concerns. Tell your supervisor or another member of management, your Human Resources representative or any of the points of contact listed in our Code.' <p>The Company states 'You may also choose to report anonymously where local law allows by contacting the Ethics Helpline. The Ethics Helpline is available by calling 877-327-2272 (within the U.S. or Canada). If calling from outside the U.S. or Canada, use the telephone numbers listed on the website. The Ethics Helpline is managed by a third party. [Code of Business Ethics and Conduct, 2020 Update, 2020: static.conocophillips.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: The Ethics Point website is accessible in Spanish, English, Indonesian, Norwegian, Polish, Russian, Arabic and Chinese. [Ethics Point, N/A: secure.ethicspoint.com] • Met: Expect EX BPs to have equivalent grievance system: The Company expects the following from its suppliers: 'Supplier disseminates its Ethics Policy and provides a mechanism for employees to report suspected misconduct anonymously, where local law allows. Supplier prohibits retaliation of any kind against employees for raising an ethical or legal concern.' [Supplier expectations, N/A: conocophillips.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states in its Human Rights Due Diligence publication 'Any stakeholder, whether employee, contractor, shareholder or the general public, may report an actual or suspected violation anonymously through our 24-hour Ethics Helpline'. [Human Rights Due Diligence, N/A: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company states in its Human Rights Due Diligence publication 'The Ethics Helpline is hosted by a third party to ensure anonymity and is available worldwide via the web or phone in multiple languages' [Human Rights Due Diligence, N/A: static.conocophillips.com] • Not met: Expects EX BPs to have community grievance systems • Met: EX BPs communities use global system: As indicated above, anyone, including general public, can report through the 24-hour ethics line. [Human Rights Due Diligence, N/A: static.conocophillips.com]
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

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.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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