

Company Name EOG Resources
Industry Extractives
UNGP Core Score (*) 2.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
0	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	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	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	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
2.5	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	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: General HRs commitment: The Company states in its Sustainability Report that "EOG strives to protect human rights, respect native lands and culture and honour the cultural, social and religious beliefs and traditions of others". However, "strives to" is not sufficient as commitment. [Sustainability Report 2017, 10/2018: eogresources.com & 2018 Sustainability Report, 09/2019: eogresources.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • 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 indicates that 'We are firmly committed to providing equal opportunity in all aspects of employment and firmly committed to providing a workplace free of discrimination, harassment or segregation based on sex, race, colour, age, religion, national origin, physical or mental disability, protected Veteran status, sexual orientation, gender identity or any other characteristic protected by law'. However no evidence has been found of a commitment to respect the ILO core HR. [Code of business conduct and ethics for director, officers and employees, 26/09/2018: eogresources.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 code states that 'The Company strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions'. The Company also has a Safety and Environmental policy in which it commits to 'make safety and environmental concerns an integral part of our business planning, development, and decision making'. [Code of business conduct and ethics for director, officers and employees, 26/09/2018: eogresources.com & Safety and environmental policy] • Met: H&S applies to EX BPs: The COC for vendors indicates that 'Vendors and contractors working on EOG property have responsibility for maintaining a safe, secure and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions'. [Code of business Conduct and ethics for vendors and contractors, 26/09/2018: eogresources.com]
A.1.4	Commitment to engage with stakeholders	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"> • Not met: Commits to stakeholder engagement: The Company states that it regularly interacts with the property owners of the land on which it operates, since most of its operations in North America are in rural areas. It also proactively engages with others in the communities where it operates, including local community groups, civic leaders, elected officials and first responders. However, no formal statement of commitment to engaged with affected stakeholders found. Examples of the examples of engagement provided refers to investments carried out in the surrounding communities rather than dialogue in relation to impacts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>experienced in life and environment. [Our Communities, N/A: eogresources.com & 2018 Sustainability Report, 09/2019: eogresources.com]</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: See above. In addition, the Company states that 'EOG values our operations on the Native American lands in North Dakota and Utah, and partners with local Native American tribes. EOG and our employees appreciate how important it is to develop and maintain mutually beneficial relationships in the communities where we work and operate. At EOG, we work to help preserve and improve the quality of life for those who live and work in our communities. Communities benefit from safe roads, first-rate schools, quality healthcare, affordable housing and a trained work force' [2018 Sustainability Report, 09/2019: eogresources.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
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 <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 • 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	<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. • Not met: Senior responsibility for HR: The Company has nominated the Governance and Sustainability Committee, however, it is not clear if this committee oversees human rights issues. [2018 Sustainability Report, 09/2019: eogresources.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company reports its board responsibility of risk oversight, including ESG. Also, it states that principal issues faced by the Company are evaluated in order to identify, mitigate and manage such risks. However, no description found of the process of identification concerning human rights. [2018 Sustainability Report, 09/2019: eogresources.com] • Not met: identifying risks in EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks Not met: Including amongst EX BPs Not met: Example of Actions decided Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <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 Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans 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 Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Code of conduct, which applies to all employees, describes different procedures to report violations of the Code or applicable laws and regulations. This includes talking to supervisors, the Compliance Committee or call to the Ethics hotline. [Code of business conduct and ethics for director, officers and employees, 26/09/2018: eogresources.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: Although the Company indicates its compliance and ethics hotline, there are no references to the number of grievance filled related to human rights. [Compliance and Ethics Helpline, N/A] Not met: Channel is available in all appropriate languages: The website is only available in English. [Compliance and Ethics Helpline, N/A] Not met: Expect EX BPs to have equivalent grievance system Not met: Opens own system to EX BPs workers: The Code for vendors and contractors explains that EOG's reporting procedures are open for vendors and contractors, including the same mechanisms that are available for the Company's employees. However, it is not clear whether they are open for all extractive business partners (including Joint Ventures). [Code of business Conduct and ethics for vendors and contractors, 26/09/2018: eogresources.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Grievance mechanism for community: The Company's Compliance and Ethics Hotline is available online. However, there is no statement indicating the accessibility to communities and other stakeholders. [Compliance and Ethics Helpline, N/A] Score 2 <ul style="list-style-type: none"> Not met: Describes accessibility and local languages: Although the Company's Ethics Hotline is available online, there is no indication of how the accessibility is ensured and established to external individuals and communities. [Compliance and Ethics Helpline, N/A]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system: As stated above, the Company's Compliance and Ethics Hotline is available online. However, there is no explicit statement against accessibility to communities affected by its business partners. [Compliance and Ethics Helpline, N/A & Code of business Conduct and ethics for vendors and contractors, 26/09/2018: eogresources.com]
C.7	Remediating 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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