

Company Name Exxon Mobil
Industry Extractives
UNGP Core Score (*) 5.0 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
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)		
0.5	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
1	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
5.0	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 Company states that it 'is committed to respecting human rights as a fundamental principle in our operations, implemented through training and the application of our policies and practices. [...] Our practices reflect the spirit and intent of the United Nations' Universal Declaration of Human Rights. Elements of the United Nations' Guiding Principles on Business and Human Rights also guide our approach to managing human rights.' [2018 Sustainability Report - Highlights, 08/2019: corporate.exxonmobil.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: In its Sustainability Report 2018, the Company indicates: 'Elements of the United Nations' Guiding Principles on Business and Human Rights also guide our approach to managing human rights.' However, this statement is not considered a formal commitment according to CHRB wording criteria. [2018 Sustainability Report - Highlights, 08/2019: corporate.exxonmobil.com & Human Rights - Sustainability, 20/12/2019: corporate.exxonmobil.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's Statement on labor and workplace' reads: 'The ILO Declaration sets an obligation on Member States to promote and realize the following principles: Freedom of Association and effective recognition of the right to collective bargaining; Elimination of all forms of forced or compulsory labor; Effective abolition of child labor; Elimination of discrimination in respect of employment and occupation. ExxonMobil and its affiliates support these principles'. Rather than to the ILO declaration, this statement commits to support specific core areas. As indicated below, however, it is not clear if the Company is committed to respect freedom of association and collective bargaining rights in those contexts where there are restrictions under local laws. [Statement on labor and the workplace (website), 03/06/2020: corporate.exxonmobil.com] • Not met: UNGC principles 3-6 • Not met: Explicitly list All four ILO apply to EX BPs: ExxonMobil supplier, vendor and contractor expectations includes prohibition to child and forced labour and non-discrimination, but no explicit reference found to freedom of association and collective bargaining. [Supplier vendor and contractor expectations (website), 20/12/2019: corporate.exxonmobil.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: As indicated above, the Company supports the ILO Core. The Company's statement on labor and the workplace indicates: 'With respect the rights to freedom of association and collective bargaining, the statement reads: 'ExxonMobil recognizes and respects its employees' right to join associations and choose representative organizations for the purpose of engaging in collective bargaining in a manner consistent with applicable laws, rules and regulations as well as local customs as appropriate.' However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'consistent with applicable laws'. [Statement on labor and the workplace (website), 03/06/2020: corporate.exxonmobil.com] • Met: Respect H&S of workers: The Company has a public commitment to provide a healthy and safe working environment for employees and business partners. These commitments are included in its Standards of Business Conduct. [Standards of Business Conduct, 12/10/2017: corporate.exxonmobil.com & Healthy and engaged workforce, 20/12/2019: corporate.exxonmobil.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: H&S applies to EX BPs: 'ExxonMobil expects its suppliers, vendors and contractors to: [...] promote a safe, secure and healthy workplace.' [Supplier vendor and contractor expectations (website), 20/12/2019: corporate.exxonmobil.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"> • Met: Regular stakeholder engagement: In its 2018 Sustainability Report, the Company indicates: 'Our goal is to foster mutual understanding, trust and cooperation with stakeholder groups on sustainability topics. We interact with a variety of stakeholders via community meetings, digital and social media, corporate publications and one-on-one discussions. Maintaining an open dialogue provides opportunities to listen to concerns, discuss approaches and share plans. Across stakeholder groups, from communities and nongovernmental organizations to employees and shareholders, we continue to see broad interest in our environmental, social and governance performance. The table below highlights our key stakeholder groups, their typical areas of interest and ExxonMobil's engagement approach.' The table resume engagement activities by stakeholder group including: communities, employees, suppliers, NGO, etc. [2018 Sustainability Report - Highlights, 08/2019: corporate.exxonmobil.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: The Company reports that: 'Our goal is to foster mutual understanding, trust and cooperation with stakeholder groups on sustainability topics. We interact with a variety of stakeholders through different mechanisms such as community meetings, digital and social media, corporate publications and one-on-one discussions. Maintaining an open dialogue provides opportunities to listen to concerns, identify material issues, benchmark our performance and make strategic business decisions.' However no evidence found of engagement with affected stakeholders and/or their representatives (workers, their families, local communities, etc.) in the development or monitoring of human rights approach. No new relevant evidence found in the latest Sustainability Report. [Stakeholder engagement, 20/12/2019: corporate.exxonmobil.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: On its website section 'Socioeconomic Management', the Company indicates: 'Socioeconomic impacts and opportunities associated with the life cycle of projects can be wide-ranging and varied in their nature. The early identification of potential socioeconomic risks, coupled with comprehensive planning and the effective implementation of measures that avoid, reduce or remedy these risks are fundamental to the overall success of a project [...]. [...] when starting major Upstream projects, we identify and evaluate ESH risks and opportunities by conducting an Environmental, Socioeconomic and Health Impact Assessment (ESHIA).' In addition, on its 'Environmental Management' website, it indicates: 'Successful project execution requires a thorough understanding of the environmental and socioeconomic characteristics of areas where we operate. We typically perform an Environmental, Socioeconomic and Health Impact Assessment for new upstream projects. We use our Environmental Aspects Guide to identify and evaluate various potential environmental and socioeconomic risks and impacts throughout the life of an asset or project. Based on the results, we develop management plans to avoid environmental and socioeconomic impacts, reduce the impacts to acceptable levels or remedy the impacts. We integrate stakeholder feedback as part of our assessments.' However, no evidence found of a general commitment to remedy any adverse impact that it has caused or contributed to. [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com & Environmental Management system, 20/12/2019: corporate.exxonmobil.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 • 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 provided evidence for this indicator to CHRB, however, it was not material. <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	0.5	<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 that 'The early identification of potential socioeconomic risks, coupled with comprehensive planning and the effective implementation of measures that avoid, reduce or remedy these risks are fundamental to the overall success of a project, as well as Upstream and Corporate success. [...] when starting major Upstream projects, we identify and evaluate ESH risks and opportunities by conducting an Environmental, Socioeconomic and Health Impact Assessment (ESHIA). When conducting an ESHIA for a project, we first study and understand the ESH setting. We then identify how our activities will or could interact with the physical, biological and human environment; consult with stakeholders; identify and evaluate positive and negative actual and potential impacts; determine the risks associated with these impacts; avoid the identified risks or reduce the level of risk to an acceptable level; and develop an appropriate monitoring plan.' [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com] • Not met: identifying risks in EX business partners: As indicated above, the Company conducts ESHIA in major upstream projects. However, it is not clear whether the ESHIA cover also extractive business partners projects, as previous evidence was no longer found. The Company provided information to CHRB in relation to this indicator, but it was not material. [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Met: In consultation with stakeholders: The Company indicates that 'When conducting an ESHIA for a project, we first study and understand the ESH setting. We then identify how our activities will or could interact with the physical, biological and human environment; consult with stakeholders; [...]' [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com] • Not met: In consultation with HR experts • Met: Triggered by new circumstances: On its website, the Company indicates: '[...] when starting major Upstream projects, we identify and evaluate ESH risks and opportunities by conducting an Environmental, Socioeconomic and Health Impact Assessment (ESHIA). [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com] • Met: Explains use of HRIAs or ESIA (inc HR): On its website, the Company indicates: '[...] when starting major Upstream projects, we identify and evaluate ESH risks and opportunities by conducting an Environmental, Socioeconomic and Health Impact Assessment (ESHIA). When conducting an ESHIA for a project, we first study and understand the ESH setting. We then identify how our activities will or could interact with the physical, biological and human environment; consult with stakeholders; identify and evaluate positive and negative actual and potential impacts; determine the risks associated with these impacts; avoid the identified risks or reduce the level of risk to an acceptable level; and develop an appropriate monitoring plan'. [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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): The Company states on its website: 'When conducting an ESHIA for a project, we first study and understand the ESH setting. We then identify how our activities will or could interact with the physical, biological and human environment; consult with stakeholders; identify and evaluate positive and negative actual and potential impacts; determine the risks associated with these impacts; avoid the identified risks or reduce the level of risk to an acceptable level; and develop an appropriate monitoring plan.' In addition, in its 'Environmental aspects Guide', the Company indicates: 'Some of the specific characteristics that may be considered when assessing the environmental, social, and regulatory context include: [...] Social and economic conditions, such as community health and dependence on natural resources ; [...] Expectations of governments, lender institutions, community, non-governmental organizations (NGOs), and local media.[...]' However, no further information found describing the process includes human rights risks within the ESHIA, including how social, geographical or other factors are taken into account to assess salience of issues. [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com & Environmental aspects guide, 01/01/2012: corporate.exxonmobil.com] • 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
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: With respect to the implementation of ESHIA's in major upstream projects, the Company indicates: 'We capture the findings and recommendations from the impact assessment process and translate them into a management plan, most often referred to as an Environmental, Socioeconomic and Health Management Plan (EMP).' However, it is not clear whether the due diligence process cover all the Company's operation or just major upstream projects. [Socioeconomic Management (website), 28/08/2018: corporate.exxonmobil.com] • Not met: Including amongst EX BPs • Not met: Example of Actions decided <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	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: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <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	<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 • 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 • 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 <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	<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: Procedures and Open Door Communication' section of the Standards of business conduct explains detailed procedures of reporting for all employees. [Standards of Business Conduct, 12/10/2017: corporate.exxonmobil.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BPs workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company indicates: 'Our stakeholder engagement planning process requires all activities and operations to also include a process for collecting grievances from communities and workforces. When implementing the stakeholder engagement process, dedicated personnel are responsible for community engagement as well as receiving, tracking, analyzing and responding to community grievances. The grievance process incorporates guidance on best practices from the International Finance Corporation and IPIECA'. [Working with local communities, 20/12/2019: corporate.exxonmobil.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system
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: The Company discloses information about its initiatives to face different human rights topics on its website 'Human Rights-Sustainability', such as: 'ExxonMobil conducts human rights training to help build an understanding of human rights issues and an awareness of potential human rights risks. More than 1,600 employees in 47 countries have completed the training since 2015. [...] ExxonMobil works closely with IPIECA to monitor business and human rights trends, and to share and develop practices in human rights supply chain management from the oil and gas industry and other extractive industries. [...] Since 2016, nearly 17,000 personnel have been trained on the Voluntary Principles on Security and Human Rights, a multi-stakeholder initiative that focuses on ways to maintain the safety and security of operations while respecting human rights.' However, these actions do not address remedy for victims of potential human rights violations. [Human Rights - Sustainability, 20/12/2019: corporate.exxonmobil.com] <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		<ul style="list-style-type: none"> • Headline: Papua New Guinea tribe representative allege Exxon LNG project is illegally settled • Area: Right to land • Story: In November 2015, press articles reported claims by Tuguba tribal leader Simon Ekanda alleging that the Exxon-owned Liquefied Natural Gas (LNG) project in Papua New Guinea had illegally appropriated their land: "The LNG project is illegal because the Tuguba tribe, which I am the Chairman, did not give our consent for Exxon Mobil to have access to our private property (the land)," Ekanda said. He argued proper procedures had been ignored These processes include social mapping, clan vetting and land identification and were supposed to be carried out and solved before the project was established. In May 2018, Jubilee Australia research center released a report which investigated the impacts of the ExxonMobil led PNG LNG project on the local affected communities. The report found that while some royalties had been paid to communities near the LNG plant, not all affected parties had received payment. The report also supported the observations made by Mr Ekanda, stating that the failure to pay appropriate royalties was partly due to incomplete land owner identification and vetting process, which should have been completed prior to the commencement of the project. • Sources: [EMTV - 12/11/2015 -: emtv.com.pg][NG Quarterly Environmental and Social Report, Third Quarter 2012 (p.24) -: pnglng.com][Post Courier, 27/12/2017 -: postcourier.com.pg][Australia Research Centre 29/04/2018: jubileeaustralia.org]
E(1).1	The Company has responded publicly to the allegation	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: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: On its 'Socioeconomic Management site', the company says "We seek to implement fair, transparent and collaborative processes to assess and manage the restoration of households including their livelihoods when our activities result in physical or economic displacement....Prior consultation should be conducted when the temporary or permanent use of land for exploration, development, or production purposes has the potential to impact individuals, households or entire communities. Land access and acquisition, resettlement (avoidance of), compensation, and cash management is done in a fair and transparent manner following ExxonMobil's Upstream Land Use Standards". However it isn't clear what the 'Upstream Land Use Standards' are, and this is not sufficient evidence of a commitment to respecting ownership and use of land. [Socioeconomic Management & PNG LNG Environmental and Social Report 2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies apply to the type of business relationships involved • Not met: Policies address the specific rights in question: The company doesn't provide a description of how it identifies legitimate rights of land tenure and does not [Socioeconomic Management & PNG LNG Environmental and Social Report 2018]
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has reviewed management systems to prevent recurrence • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Court allows Alien Tort Statute case over alleged complicity in human rights violations in Indonesia to proceed • Area: Right to security • Story: A lawsuit filed against ExxonMobil in the Federal District Court of Columbia alleges that the company assisted human rights violations including torture, murder and rape perpetrated by the Indonesian military in the territory of Aceh during unrest in the 1990s. The lawsuit, filed in 2001 by 11 Indonesians, alleges Exxon Mobil employed and provided material support to the Indonesian

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>military forces. It claims soldiers were under ExxonMobil's direction and control, making the company liable. The lawsuit was dismissed by a federal judge in September 2009, but the decision was appealed. On 8 July 2011, the Court of Appeals reversed the district court's dismissal of the case, finding that a corporation should not be immune from liability under the Alien Tort Claims Act. ExxonMobil filed a motion with the Court of Appeals asking the court to rehear the case before all the judges of a court and not before a panel. In September 2014, the District Court had allowed plaintiffs to file for leave to amend their complaint in order to try to demonstrate that the facts of the case sufficiently 'touch and concern' the United States so as to overcome the presumption against extraterritoriality that applies to ATS cases. In a decision issued in July 2015, a US federal court ruled that the plaintiffs' claims sufficiently "touch and concern" the United States and may proceed in US court. In June 2019, the the U.S. District Court for the District of Columbia held that it lacked the power to recognize ATS claims against ExxonMobil because such claims had caused diplomatic strife with Indonesia. Following this decision, the lawsuit can continue regarding Indonesian tort law claims against ExxonMobil remain at issue. The decision of the US district court for the Disctrict of Coubia does not rule on the merits of the case, only on the jurisdiction.</p> <ul style="list-style-type: none"> • Sources: [The BHRRC -: business-humanrights.org][Mother Jones, 11/01/2017: motherjones.com][Climate Home News, 11/01/2017: climatechangenews.com][Paul, Weiss law firm website: paulweiss.com]
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: ExxonMobil denies that it was complicit in abuses, but does not deny the events took place. In an article from 2017, a spokesman for the company said ExxonMobil “categorically denies any complicity in any human rights abuses committed by Indonesian soldiers during an Indonesian civil war”. <p>In a 2001 press article it said: “The company said its internal investigation found that managers on the scene were never told of the atrocities by local employees at the time, and that the troops who guarded the gas operations were not used in offensive operations.” [Mother Jones' article about the Indonesia Tort Alien case: motherjones.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states that it 'is committed to respecting human rights as a fundamental principle in our operations, implemented through training and the application of our policies and practices. [...] Our practices reflect the spirit and intent of the United Nations' Universal Declaration of Human Rights. Elements of the United Nations' Guiding Principles on Business and Human Rights also guide our approach to managing human rights.' [2018 Sustainability Report - Highlights, 08/2019: corporate.exxonmobil.com] <ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: In its supplier expectation, it states that suppliers must 'manage activities in a manner that respects human rights and is consistent with the United Nations Guiding Principles on Business and Human Rights in effect as of 2011.' [Supplier vendor and contractor expectations (website), 20/12/2019: corporate.exxonmobil.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has been a member of the Voluntary Principles on Security and Human Rights since 2002. [2018 Sustainability Report - Highlights, 08/2019: corporate.exxonmobil.com]
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but has engaged affected stakeholders: ExxonMobil denies that it was complicit in abuses, but does not deny the events took place. In an article from 2017, a spokesman for the company said ExxonMobil “categorically denies any complicity in any human rights abuses committed by Indonesian soldiers during an Indonesian civil war”. In a 2001 press article it said: “The company said its internal investigation found that managers on the scene were never told of the atrocities by local employees at the time, and that the troops who guarded the gas operations were not used in offensive operations.” <ul style="list-style-type: none"> • Not met: Denies allegations, but reviewed systems to prevent such impacts <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Nonprofit drug rehab program sends patients to work without pay at Exxon, Shell & Walmart • Area: Forced Labour • Story: An investigative report from Al Jazeera's Fault Lines and Reveal from the Center for Investigative Reporting exposed the practices of the Cenikor Foundation, one of the U.S.'s largest and most lucrative work-based drug rehabilitation programs. The Report alleged that the Foundation sent patients struggling with addiction to work for free, in some instances on an ExxonMobil Corporation (ExxonMobil) Refinery, likely in violation of federal labor law. A former Cenikor participant who worked 10 hours per day at oil refineries, laying steel rebar in 115-degree heat, described the conditions as "the closest thing to slavery," according to Reveal. Cenikor's program is premised on the idea that work can help individuals recover from addiction. All participants have to do in return is surrender their pay to cover the costs of the two-year program. <p>However, according to Reveal, Cenikor's rehabilitation program leaves little time for counseling or medical treatment, effectively transforming the rehabilitation facility into a pool of "cheap and expendable labor pool for private companies." Cenikor's practices might be illegal under federal labor law. The Fair Labor Standards Act requires all employees to be paid minimum wage and overtime.</p> <ul style="list-style-type: none"> • Sources: [BHRRC - 08/05/2019: business-humanrights.org][Reveal News - 2019: revealnews.org][Al Jazeera - 24/04/2019: youtu.be]
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: In response to an invitation from the Business and Human Rights Resource Centre to respond to the allegations described in the Reveal report, Exxon Mobil Corporation (ExxonMobil) stated that it conducted a "thorough internal investigation," finding the claims "inaccurate and unsubstantiated." [Response from ExxonMobil, 08/05/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: Exxon Mobil Corporation's (ExxonMobil) detailed the following: "ExxonMobil has conducted a thorough internal investigation of these inaccurate and unsubstantiated third party allegations. ExxonMobil had a direct contract with Cajun Constructors in 2013 and 2015, and we found no documentation that Cajun Constructors, or any subcontractor company of Cajun Constructors, used Cenikor Foundation for any labor at our refinery. To suggest that individuals from the Cenikor Foundation performed unpaid work at our ExxonMobil Refinery, is not credible." [Response from ExxonMobil, 08/05/2019: business-humanrights.org]
E(3).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: Exxon Mobil Corporation (ExxonMobil) states that it "does not use forced or compulsory labor. ExxonMobil recruits its employees and provides working conditions, including payment of wages and benefits, that comply with applicable laws and regulations." [ExxonMobil statement on labor and the workplace (website), 20/12/2019] • Met: Policies apply to the type of business relationships involved: Exxon Mobil Corporation (ExxonMobil) states that it "clearly communicates its expectations on human rights to its suppliers on an annual basis. These expectations include references to key international human rights frameworks, including the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work." [Human Rights - Community, 07/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: Exxon Mobil Corporation (ExxonMobil) does not appear to have advanced policies concerning the protection of employees against forced labor practices, including policies to specifically address the potential financial burdens imposed on workers by, for example, withholding wages or expenses. [ExxonMobil statement on labor and the workplace (website), 20/12/2019]
E(3).3	The Company has taken 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"> • Not met: Denies allegations, but has engaged affected stakeholders: The company denied the allegation and failed to engaged affected stakeholders. • Not met: Denies allegations, but reviewed systems to prevent such impacts: The company denied the allegation and failed to review management systems.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: ExxonMobil denied allegations and failed to implement any review recommendations. • Met: Denies allegations, and ensures systems prevent such impacts: ExxonMobil denied the allegation, finding it "inaccurate and unsubstantiated." In addition, the company stated that "ExxonMobil's Standards of Business Conduct provides a worldwide framework for responsible operations and are consistent with the spirit and intent of the Fundamental Principles and Rights at Work of the 1998 International Labor Organization (ILO) Declaration. If there is additional information that is brought to our attention regarding labor violations or unfair labor practices, we will consider all legal options, which may include seeking compensation for unpaid workers. We contractually require all suppliers to comply with all applicable environmental, health, safety, and labor laws for themselves and their subcontractors." [Response from ExxonMobil, 08/05/2019: business-humanrights.org]
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Iraq: Yazidi complaint to Human Rights Council alleges displacement, abuses & killings by ExxonMobil • Area: Right to security • Story: In July 2019, Yazidi politician Nallein Sowilo filed a complaint against Exxon Mobil Corporation (ExxonMobil) with the United Nations Human Rights Council (HRC). The complaint, seen by the Sunday Telegraph, a UK newspaper, alleged that security forces hired by ExxonMobil fired upon Yazidi protestors, killing two individuals. The complaint also scrutinized ExxonMobil's operations in Kurdistan, northern Iraq, between the period 2011–2014, arguing that company activity caused the displacement of around 5000 Yazidi from their homes. Both the HRC complaint and The Sunday Telegraph highlight the lack of consultation available to the Yazidi, in contravention of the Constitution of Iraq which states that indigenous communities must be consulted when land decisions concerning them are being taken. Furthermore, ExxonMobil allegedly failed to provide copies of the signed contracts to the landowners. • Sources: [Business and Human rights resource center - 16/12/2019: business-humanrights.org]
E(4).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The company responded to the allegations through the Business and Human Rights Resource Centre (BHRRC) but described them as "baseless." [ExxonMobil response to BHRRC, 16/12/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: ExxonMobil's reply does not go in to detail. The company only provides vague references to its human rights policies and affirms that it does not tolerate any violation of human rights. [ExxonMobil Supplier, vendor and contractor expectations, 09/2019]
E(4).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: ExxonMobil's Statement of Principles on Security and Human Rights establishes the expectation that all business units provide security for personnel, facilities, and operations in a manner that respects human rights. [Security and Human Rights, N/A] • Met: Policies apply to the type of business relationships involved: According to ExxonMobil, its Statement of Principals on Security and Human applies to and helps guide "our [ExxonMobil's] majority-owned operating affiliates on how to manage interactions with both host government-assigned security and private security providers." [Security and Human Rights, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: According to ExxonMobil, the company "provides a human rights awareness training program for personnel who work in high-risk areas, including Iraq, and we have done so for many years. The training includes information about the Voluntary Principles on Security and Human Rights, the requirements of ExxonMobil's Statement and Framework on Security and Human Rights and expectations regarding the implementation of the framework in a given county." [Security and Human Rights, N/A & ExxonMobil response to BHRRC, 16/12/2019: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).3	The Company has taken 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"> • Not met: Denies allegations, but has engaged affected stakeholders: The company denied the allegation while failing to engaged affected stakeholders. [ExxonMobil response to BHRRC, 16/12/2019: business-humanrights.org] • Not met: Denies allegations, but reviewed systems to prevent such impacts: The company denied the allegation and failed to review its prevention systems. [ExxonMobil response to BHRRC, 16/12/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: The company denied the allegation and failed to review recommendations. [ExxonMobil response to BHRRC, 16/12/2019: business-humanrights.org] • Met: Denies allegations, and ensures systems prevent such impacts: ExxonMobil denied the allegations, calling them "baseless." However, the company did ensure it had the appropriate systems and policies to prevent human rights violations from occurring. According to ExxonMobil, it is able to prevent abuse by "proactively identifying, avoiding and managing potential impacts, while also enhancing community benefits, is integral to completing projects successfully and developing long-term positive relationships. ExxonMobil condemns human rights violations in any form and has actively expressed these views to governments and others in countries in which our affiliates operate around the world." [ExxonMobil response to BHRRC, 16/12/2019: business-humanrights.org]

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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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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