

**Company Name** Occidental Petroleum  
**Industry** Extractives  
**UNGP Core Score (\*)** 9.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
2	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
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
1	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
<b>Remedies and Grievance Mechanisms</b>		
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
<b>9.5</b>	<b>26</b>	

(\*) 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"> <li>• Met: General HRs commitment: The Code of conducts states that ‘the Company respects and promotes human rights within the spheres of our activities and influence’. [Code of Business Conduct, 5/2016: <a href="#">oxy.com</a>]</li> <li>• Met: UDHR: The Code of conducts states that ‘We support the universally recognized rights and freedoms set forth in the Universal Declaration of Human Rights’. [Code of Business Conduct, 5/2016: <a href="#">oxy.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	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: ILO Core: The Code of Business Conduct states that ‘we support the universally recognized rights and freedoms set forth in the Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Voluntary Principles on Security and Human Rights’. [Code of Business Conduct, 5/2016: <a href="#">oxy.com</a>]</li> <li>• Met: Explicitly list All four ILO apply to EX BPs: The Company’s Human Rights Policy contains a commitment to all ILO core areas, including respecting ‘the rights to freedom of association and collective bargaining’. Regarding contractors and suppliers the policy states that ‘Occidental is committed to promoting respect for ethical conduct and Human Rights with its contractors and suppliers. Occidental will communicate its expectations, including its expectations with respect to training and compliance, to contractors and suppliers and will demonstrate a preference for working with those contractors and suppliers who share Occidental’s values’. It also indicates that ‘foreign, including security arrangements with respect to Foreign Activities, shall include provisions with respect to the observance of Human Rights’. Also, the ‘Chief Compliance Officer shall have authority to investigate any report by an Employee or other Stakeholder of any suspected violation of this Human Rights policy by any employee or Contractor’. In addition, in its website it states: ‘As part of the Compliance Program, we convey our expectation that [suppliers] comply with the company’s policies, including our Code and Human Rights Policy.’ [Occidental Human Rights Policy, 10/2015: <a href="#">oxy.com</a> &amp; Foundations: Ethical Business, Code of Conduct and Human Rights Policy, N/A: <a href="#">oxy.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: The Human Rights Policy states that ‘Occidental is committed to providing a workplace that does not use forced or child labor; that respects the rights to freedom of association and collective bargaining; that it is free from harassment and discrimination’. [Occidental Human Rights Policy, 10/2015: <a href="#">oxy.com</a> &amp; Foundations: Ethical Business, Code of Conduct and Human Rights Policy, N/A: <a href="#">oxy.com</a>]</li> <li>• Met: Respect H&amp;S of workers: ‘Occidental is committed to [...] protecting health and safety of all Employees’. [Occidental Human Rights Policy, 10/2015: <a href="#">oxy.com</a> &amp; Foundations: Ethical Business, Code of Conduct and Human Rights Policy, N/A: <a href="#">oxy.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: See above, human rights policy also applies to suppliers and contractors.</li> </ul>
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"> <li>• Met: Commits to stakeholder engagement: Its Human Rights policy commits it to ‘being attentive to concerns raised by Stakeholders, including with respect to the needs of the communities in which it operates, and to working with Stakeholders</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to support Human Rights within the spheres of Occidental's activity and influence'. [Occidental Human rights policy: <a href="http://oxy.com">oxy.com</a> &amp; Foundations: Ethical Business, Code of Conduct and Human Rights Policy, N/A: <a href="http://oxy.com">oxy.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to engage stakeholders in design: The Company indicates that 'stakeholder engagement is both a central activity at Occidental and a catalyst for continuous improvement in our social responsibility policies, practices and reporting. We are committed to building trust with our stakeholders through regular and transparent communication and consistent actions. By providing fresh perspectives to emerging risks and opportunities, Occidental welcomes constructive engagement with stakeholders [...] from discussion of specific projects with neighbours and permitting authorities, to interaction with community representatives and civic organizations to identify how the company can assist in sustainable and inclusive economic development'. [Foundations: Stakeholder engagement, N/A: <a href="http://oxy.com">oxy.com</a>]</li> <li>• Met: Regular stakeholder design engagement: The Company indicates that 'Occidental actively engages with community stakeholders at town meetings, through surveys, and with direct consultations to help understand local issues and manage expectations. This regular engagement informs our policies and systems to ensure that human rights including, where appropriate, indigenous people's rights are consistently considered throughout our operations'. [Foundations: Ethical Business, Code of Conduct and Human Rights Policy, N/A: <a href="http://oxy.com">oxy.com</a>]</li> </ul>
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"> <li>• Not met: Commits to remedy: In its Code of Business Conduct, the Company states: 'We are committed to reviewing and responding to all matters that may violate our ethical and compliance standards contained in the Code and Company policies. This includes promptly conducting fair and thorough investigations tailored to the circumstances and taking appropriate remedial steps as warranted, including disciplinary action.' The Code include human rights issues, however, it is not clear if this commitment is extensive to remedy adverse impacts on individuals, workers and communities that it has caused or contributed to. [Code of Business Conduct, 5/2016: <a href="http://oxy.com">oxy.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>

## 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	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: Commits to ILO core conventions: See A.1.2</li> <li>• Met: Senior responsibility for HR: The Human rights policy states that 'The Chief Compliance Officer periodically shall conduct a review to verify that the processes contemplated by the Human Rights Policy are in place and, following each such review, shall make a certification on that subject to the Committee of the Board of Directors responsible for oversight of this Human Rights Policy'. [Occidental Human rights policy: <a href="http://oxy.com">oxy.com</a> &amp; Foundations: Ethical Business, Code of Conduct and Human Rights Policy, N/A: <a href="http://oxy.com">oxy.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>
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"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: identifying risks in EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders: While stakeholder engagement provides 'fresh perspectives to emerging risks and opportunities' and 'Stakeholder engagement covers a wide range of activities' including 'discussion of specific projects with neighbours and permitting authorities', no evidence could be found of this being apart of a due diligence process to identify human rights risks, or evidence of this being an active/ongoing action. [Foundations: Stakeholder engagement, N/A: <a href="http://oxy.com">oxy.com</a>]</li> <li>• Not met: In consultation with HR experts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
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"> <li>• Not met: Salient risk assessment (and context): The Company indicates that its 'Health, Environment and Safety (HES) risk management program provides a consistent and rigorous methodology to help the company identify and assess safety, environmental, social and operational risks across all areas of business operations'. Occidental has required the implementation of risk management standards 'at all operating locations and levels of the organization to identify, prioritize and apply feasible risk mitigation options'. Through this system 'as a regular practice in new projects, Occidental assesses potential social and environmental impacts, including water scarcity, human rights, and indigenous people's rights. This comprehensive process helps us identify and address potential risks and stakeholder concerns promptly'. However, it is not clear what the company considers to be its salient issues and how relevant factors such as geographical, economic, social or other factors are taken into account. [Foundations: Our approach to risk management, N/A: <a href="#">oxy.com</a>]</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: Action Plans to mitigate risks: Although the Company indicates that the Health, environmental and safety management system 'helps us identify and address potential risks and stakeholder concerns promptly', it is not clear the process to take action following risk assessment has evaluated the different human rights risks. [Foundations: Our approach to risk management, N/A: <a href="#">oxy.com</a>]</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
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"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## 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"> <li>• Met: Channel accessible to all workers: The Human Rights Policy and the Code of Conduct, both applying to all employees, describe the mechanisms to report incidents and concerns. There are several mechanisms including contacting key persons within the Company, call the Compliance line or using the website operated by a third party to make reports. [Occidental Human Rights Policy, 10/2015: <a href="#">oxy.com</a> &amp; Code of Business Conduct, 5/2016: <a href="#">oxy.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages: The Code of conduct indicates that 'reports can be made in many languages, including Arabic, English and Spanish'. These and Portuguese are available on the website too. The Company indicates in its annual report that i 'conducts operations in Oman, United Arab Emirates (UAE), Qatar and Colombia', as well as the USA. [Occidental Human Rights Policy, 10/2015: <a href="http://oxy.com">oxy.com</a> &amp; 2019 Annual Report, 2020: <a href="http://oxy.com">oxy.com</a>]</li> <li>• Not met: Opens own system to EX BPs workers: Human rights policies apply to suppliers and contractors, includes instructions to report grievance and states that 'The Chief Compliance Officer shall have authority to investigate any report by an Employee or other Stakeholder of any suspected violation of this Human Rights policy by any Employee or Contractor'. In addition, the Code of conduct states that 'the Company prohibits retaliation against anyone who brings questions or concerns forward in good faith'. However, it is not clear whether these rules apply to Joint Ventures. [Occidental Human Rights Policy, 10/2015: <a href="http://oxy.com">oxy.com</a> &amp; Code of Business Conduct, 5/2016: <a href="http://oxy.com">oxy.com</a>]</li> </ul>
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"> <li>• Met: Grievance mechanism for community: The Human rights policy states that 'The Chief Compliance Officer shall have authority to investigate any report by an Employee or other Stakeholder of any suspected violation of this Human Rights policy by any Employee or Contractor'. In addition, the Code of conduct states that 'the Company prohibits retaliation against anyone who brings questions or concerns forward in good faith'. [Occidental Human Rights Policy, 10/2015: <a href="http://oxy.com">oxy.com</a> &amp; Code of Business Conduct, 5/2016: <a href="http://oxy.com">oxy.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The Company's mechanisms are available on the website and in the local languages where the company operates (Middle East, Colombia, the USA). [Occidental Human Rights Policy, 10/2015: <a href="http://oxy.com">oxy.com</a> &amp; Workplace Alert Program, N/A: <a href="http://integrity-helpline.com">integrity-helpline.com</a>]</li> <li>• Met: EX BPs communities use global system: As indicated above, the Chief Compliance officer shall have authority to investigate reports referring to breaches of Human rights policies by any Employee or Contractor. [Occidental Human Rights Policy, 10/2015: <a href="http://oxy.com">oxy.com</a> &amp; Foundations: Ethical Business, Code of Conduct and Human Rights Policy, N/A: <a href="http://oxy.com">oxy.com</a>]</li> </ul>
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"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## 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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