

Company Name ConocoPhillips
Industry Extractives
Overall Score (*) 38.1 out of 100

Theme Score	Out of	For Theme
3.4	10	A. Governance and Policies
12.4	25	B. Embedding Respect and Human Rights Due Diligence
5.8	15	C. Remedies and Grievance Mechanisms
5.6	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
5.9	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <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, 27/06/2018: secure.ethicspoint.com] Not met: International Bill of Rights Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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. [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] Not met: UNGC principles 3-6 Not met: Explicitly list All four ILO apply to EX BPs Score 2 <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

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			operations, lives in the communities in which we operate or uses our products.' [Health, Safety and Environment Policy, 27/06/2018: static.conocophillips.com] <ul style="list-style-type: none"> Met: H&S applies to EX BPs: As above. [Health, Safety and Environment Policy, 27/06/2018: static.conocophillips.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Voluntary Principles (VPs) participant: The Company is a corporate participant of the Voluntary Principles on Security and Human Rights. The Company states 'We will maintain ongoing discussion with government, NGO and other business stakeholders through our participation in the Voluntary Principles on Human Rights and Security'. [Human Rights Position, 01/02/2016: static.conocophillips.com] Not met: Respecting indigenous rights: The company states 'we recognise and respect the choice of indigenous communities to live as distinct peoples, with their own cultures and relationships to the land'. The Company also states in their Indigenous Peoples document 'Business units, assets or projects develop plans that support culturally respectful consultation and engagement'. However, it is also borderline as to whether this is a distinct commitment to respecting indigenous rights. [Indigenous People, 27/06/2018: static.conocophillips.com & Respecting Indigenous peoples, 27/06/2018: conocophillips.com] Not met: ILO 169: The Company states 'The company's approach to engagement with indigenous communities, in locations where they are an important stakeholder group for our operations, is consistent with the principles of the International Labour Organization Convention 169, concerning Indigenous and Tribal Peoples, and the United Nations Declaration on the Rights of Indigenous Peoples'. However, being 'consistent with' is not considered a commitment. [Human Rights Position, 01/02/2016: static.conocophillips.com] Not met: UN Declaration on the Rights of Indigenous People (UNDRIP): The Company states "The company's approach to engagement with indigenous communities, in locations where they are an important stakeholder group for our operations, is consistent with the principles of the International Labour Organization Convention 169, concerning Indigenous and Tribal Peoples, and the United Nations Declaration on the Rights of Indigenous Peoples." However, being "consistent with" is not considered a commitment. [Human Rights Position, 01/02/2016: static.conocophillips.com] Not met: Expects BPs to respect these rights: The Company states the following: 'Supplier will conduct its 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. These principles require that Supplier does not knowingly participate in human trafficking; use child labor or forced labor, such as prison labor, forcibly indentured labor, bonded labor, slavery or servitude; and recognize freedom of employees to join, or refrain from joining, legally authorized associations or organizations. Supplier will observe strict requirements for the selection of security contractors to avoid human rights risks in countries where security firms are not properly regulated.' However, no explicit requirement for suppliers to commit to the ILO Convention 169 or the UN Declaration on the Rights of Indigenous People could be found, or to the VPs or ICoCA, or relevant UN instruments. Text refers to 'employees, our suppliers, and other with whom we engage'. [Supplier expectations, 11/7/2019: conocophillips.com] Score 2 <ul style="list-style-type: none"> Not met: FPIC commitment Not met: Voluntary Guidelines on Tenure Rights Not met: IFC performance standards Not met: Zero tolerance for land grabs Not met: Respecting the right to water Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits to stakeholder engagement: The Company CEO states "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

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			<p>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, 31/12/2017: static.conocophillips.com & Engaging stakeholders, N/A: conocophillips.com]</p> <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 incorporated into business unit, asset or project stakeholder engagement plans. [Indigenous People, 27/06/2018: static.conocophillips.com & Community Engagement, 27/06/2018: 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 is not the same as committing to remedy. [Community Engagement, 27/06/2018: static.conocophillips.com & Human Rights Due Diligence, 27/06/2018: 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, 27/06/2018: static.conocophillips.com] • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): The 'Company prohibits retaliation of any kind against employees for raising an ethical or legal concern or for participating in an investigation in good faith.' However, no evidence found of commitment to not attack, retaliate peoples who oppose to the Company's on human rights, human rights defenders. [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: The Company's code of conduct, which covers a general human rights commitment, has been signed by the Chief Executive Officer. [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] • Met: Board level responsibility for HRs: The Company states on its website that 'The public policy committee of the board of directors makes recommendations to the board, and monitors compliance with the company's programs and practices regarding health, safety and environmental protection, including climate change, water and biodiversity management; business operations in sensitive countries; government relations and political contributions; human rights and social issues; corporate philanthropy; and corporate advertising'. [Governance and Accountability, 27/06/2018: conocophillips.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO: The CEO makes an annual presentation to stockholders, which includes, among different topics, a comment on Human rights. However, human rights-related references seems to be included in one part of a slide, or to outline the sustainable development governance within the Company, which is not sufficient as evidence of discussing business importance or setting out the approach. The Sustainability report also includes a letter from the CEO and mentions human rights, however, information about the Company's approach or business importance could not be found, as evidence seems to refer to explanations of results related to sustainability, being one of the issues human rights. [Annual Meeting of Stockholders presentation 2019, 14/5/2019: static.conocophillips.com & Sustainability Report, 31/12/2015: static.conocophillips.com]
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board/Committee review of salient HRs: Public Policy Committee of the Board of Directors oversees the Company's position on public policy issues, which includes human rights. They oversee the company's position on public policy issues, and evaluates and monitors risks (covering human rights related risks). This committee then makes recommendations to the board and monitors compliance with the company's programs and practices related to human rights. The Committee convenes at least quarterly, and is comprehensively updated on [Sustainability Report, 31/12/2017: static.conocophillips.com] Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key EX RH risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to ILO core conventions 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. [Sustainability Report, 31/12/2017: static.conocophillips.com & Governance and Accountability, 27/06/2018: conocophillips.com] Score 2 <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 matters expert and Global issue working groups for Human Rights/Stakeholder engagement, water, biodiversity, climate change'. [Governance and Accountability, 27/06/2018: conocophillips.com & Sustainability Report, 31/12/2017: static.conocophillips.com] Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Senior manager incentives for human rights: The Company states 'All employee compensation includes an annual cash bonus based upon company, business and individual performance. We incorporate metrics of health, safety and environmental performance in our annual incentive compensation program.' on their website. In their Health, Safety and Environment Policy, 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'. According to feedback provided to CHRB from the Company, the metric for compensation includes the performance of suppliers working in its

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			<p>operations. [Governance and Accountability, 27/06/2018: conocophillips.com & Health, Safety and Environment Policy, 27/06/2018: static.conocophillips.com]</p> <ul style="list-style-type: none"> • Met: At least one key EX HR risk, beyond employee H&S: The Company has disclosed " awards under our Executive Compensation programs are determined by company performance measured against several criteria, including the development and implementation of strategic plans to enhance our operating and financial position. The strategic planning process includes consideration of climate change and sustainable development risks and opportunities, such as human rights risks" [Governance and Accountability, 27/06/2018: conocophillips.com & Health, Safety and Environment Policy, 27/06/2018: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: The Criteria is made public in the Performance and Compensation section of the Governance Accountability Company website page. [Governance and Accountability, 27/06/2018: conocophillips.com]
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company states in its Human Rights Due Diligence guidance 'Human rights issues are incorporated into Capital Projects and HSE management systems (using a 'Plan, Do, Assess, Adjust' approach)' and that 'Human rights issues are incorporated into the HSE Due Diligence Standard guidance.' The Company, in its sustainability report, includes a flowchart explaining the process of sustainable development risk management, which includes human rights. [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com & Sustainability Report, 31/12/2017: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Public Policy Committee is comprised of Independent Directors. The committee assesses 'risks that could affect the Company's business activities and performance. The Committee makes recommendations to the board and monitors the compliance with the company's programs and practices regarding....human rights. Furthermore, the Public Policy Committee reviews this as part of its sustainable development review at least annually (incl. Human Rights) during its meetings which the Company has disclosed take place five times a year. However, no evidence found of the Company carrying out an assessment of the adequacy of the enterprise risk management in managing human rights, either overseen by the Audit Committee, or carried out by an independent third party, during last reporting year. [Sustainability Report, 31/12/2017: static.conocophillips.com & Governance and Accountability, 27/06/2018: conocophillips.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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 • Not met: Communicates its policy to all workers in own operations: The Company states in its Human rights due diligence publication 'Our Human Rights position and its implementation are communicated internally and externally. Training and guidance on human rights concepts, company approach to due diligence and implementation resources are provided to identified leaders and practitioners and made available to all employees through formal training and 'Networks of Excellence'. However, no evidence found on whether it is communicated in local languages where necessary. [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Communicating policy to EX contractors and joint ventures: The Company states in its code of conduct for suppliers 'Our contracts require that suppliers be guided in their performance for ConocoPhillips by the principles and standards set forth in the ConocoPhillips Code and their own ethics and conduct policies' [...] When contracting with ConocoPhillips, each Supplier (whether providing goods or performing works or services) agrees to these principles and accordingly has included them in its own code of conduct). The Code sets expectations for 'suppliers, contractors and others who work on our behalf to be guided by the standards set forth in our code'. [Code of Business Ethics and Conduct, 27/06/2018:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>secure.ethicspoint.com & Code of Business Ethics and Conduct: Expectations of Suppliers, 27/06/2018: static.conocophillips.com]</p> <ul style="list-style-type: none"> • Not met: Including to EX BPs (removed) <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, the Company contractually requires suppliers and partners to agree with code's principles and include them accordingly in their codes. [Code of Business Ethics and Conduct: Expectations of Suppliers, 27/06/2018: static.conocophillips.com & Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] • Met: Including on EX BPs: See above.
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company states in its Human rights diligence publication that 'training and guidance on human rights concepts, company approach to due diligence and implementation resources are provided to identified leaders and practitioners and made available to all employees through formal training and 'Networks of Excellence'. [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com] • Met: Trains relevant EX managers including security personnel: The Company states on its website 'We continue to utilize training for security contractors as part of our regular training of security providers in priority countries for security and human rights issues. Security personnel and community engagement practitioners, including contractors, complete corporate human rights and training on VPHRS on an annual basis. All contract security organizations are required to provide VPHRS training and comply with the principles. Training is also provided for the ConocoPhillips workforce as part of the on-boarding process when working in field locations'. [Human Rights, 27/06/2018: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company states in its Human rights diligence guidance 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; potential human rights risks or issues are identified and evaluated periodically through business unit, asset or project level risk assessments; community concerns or grievances related to company activities or human rights are tracked at business unit, asset or project level as appropriate, including responses and resolutions. Mechanisms include community or stakeholder relations contact points at the business unit level, and ConocoPhillips Ethics hotline and email address'. • Not met: Monitoring EX BP's <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action: The Company provides the following example: 'In Alaska, our Putu exploration well is situated approximately three miles from the village of Nuiqsut, making it much closer to a community than other projects on the North Slope. We are committed to collaborating with the Nuiqsut community to address their concerns on having an exploration well drilled close to their village and working with them to develop a robust mitigation plan to address issues and concerns. Through extensive outreach with the village, we made several changes to the plan for the well'. This example, however, is not the object of study of this indicator, as it looks for corrective action plans when non-compliances with policy are found. [Sustainability Report, 31/12/2017: static.conocophillips.com] • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection EXs business partners: Human rights risks are identified as part of corporate authorization guidelines for new ventures. The Company has clarified that all of these processes and systems take into account business partners - including contractors. The human rights issues that are considered are those outlined in the Company's Human Rights Position The Company disclosed in its Security & Human Rights guidance document that it 'has conducted research related to security providers with proven good track records on human rights'. The

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company states in the Sustainability Report that sustainability criteria, including labour and human rights, is integrated in the companies supplier selection and evaluation. [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com & Security & Human Rights, 27/06/2018: static.conocophillips.com]</p> <ul style="list-style-type: none"> • Not met: HR affects on-going EX business partner relationships: The Company states in their Human Rights Due Diligence Guidance that the New Country Entry Process evaluates human rights issues and risks and Human Rights risk are identified as part of corporate authorization guidelines for new ventures. The Company disclosed in its Security & Human Rights publication that it 'has conducted research related to security providers with proven good track records on human rights'. However, it is not clear how this affects the company's relationship with the partners. [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: as above • Not met: Working with EX business partners to improve performance: The Company has clarified that they describes that they engage with suppliers and contractors on sustainable development issues, which include human rights, through our Quarterly Business Reviews, Supplier Relationship Management, Supplier Sustainability Forum and supplier audits. However, no examples found of specific work carried out to improve performance on human rights. [Supply Chain, 14/09/2018: conocophillips.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: The Company states that their stakeholder mapping process is a 'key component of social issues risk assessment. Each business unit is responsible for identifying stakeholder - those who may impact or be impacted by our business - to understand their perspectives, values, interests and concerns. The relationships of stakeholders to each other are then mapped to identify any potential points of collaboration or conflict.' The Company reports engagement with indigenous peoples in Canada in its sustainability report. [Sustainability Report, 31/12/2017: static.conocophillips.com] • Met: Frequency and triggers for engagement: The Company states that after the stakeholder identification process they 'prioritize key stakeholders and develop an engagement plan to address concerns and maintain our focus on developing mutually beneficial relationships.' The Company states that they have stakeholder engagement professionals in each business unit who manage stakeholder mapping and integrate local input into business decisions. These managers 'help ensure respect for human rights and alignment with local and international standards.' and 'They develop relationships by seeking early and frequent engagement with stakeholders to build trust through regular dialogue. [Sustainability Report, 31/12/2017: static.conocophillips.com & Key stakeholders, N/A: conocophillips.com] • Not met: Engagement includes EX business partners workers: The Company discusses how the engage with major suppliers 'on standardized environmental key performance indicators to ensure alignment with our environmental, social and governance (ESG) performance objectives'. However, it is not clear whether this explicitly covers human rights. Also, it is unclear whether the Company engages with workers from business partners or their local communities. [Sustainability Report, 31/12/2017: static.conocophillips.com & Supplier expectations, 11/7/2019: conocophillips.com] • Not met: Engagement includes EX business partners communities <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: The Company provides an analysis of stakeholder engagement on the North Slope in a video published by the Company on YouTube. They give an example of a well being too close, and the Company responding to moving the well by another mile. The Company also describes how they brought in Tier 4 Generators to help with noise and pollution, and bringing on air quality monitors. <p>The Company also describes how ongoing engagement through Eagle Ford Citizens Advisory Committee and Eagle Ford Leadership Roundtables in the U.S. includes regular meetings with community leaders from counties in the Company's operating areas. And allow the company to identify and cooperatively manage potential risks. However, these cases are not specifically related to human rights. [Sustainability Report, 31/12/2017: static.conocophillips.com & ConocoPhillips: Stakeholder Engagement on the North Slope, 03/05/2018: youtube.com]</p>

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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, 27/06/2018: static.conocophillips.com] • 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, 27/06/2018: 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, 27/06/2018: 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, 27/06/2018: 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. However, not clear whether the Company directly consults with human rights experts to carry out the identification/assessment process. [Human Rights Due Diligence, 27/06/2018: 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, 27/06/2018: 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, 27/06/2018: static.conocophillips.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)	1	The individual elements of the assessment are met or not as follows: Score 1 <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, 27/06/2018: 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. [Risk Management, 15/7/2019: conocophillips.com] Score 2 <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	2	The individual elements of the assessment are met or not as follows: Score 1 <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, 27/06/2018: static.conocophillips.com] • Not met: Including amongst EX BPs: The Company has clarified that the Sustainable Development Risk Assessment, New Country Entry Process, Capital Projects Management System and HSE Management System and HSE Due Diligence processes all take into account our business partners and contractors. However, we could not find this information in public available documents. • Met: Example of Actions decided: The Company's Stakeholder Engagement Action Plan identifies the actions identified to meet stakeholder engagement commitments, including managing human rights risks. [Stakeholder Engagement Plan, 14/09/2018: conocophillips.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	The individual elements of the assessment are met or not as follows: Score 1 <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, 27/06/2018: 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'. [VP Annual Report 2018, 2018: static.conocophillips.com] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: The Company states that 'Our Human Rights position and its implementation are communicated internally and externally' in the Human Rights Due Diligence Document. The Company states 'Training and guidance on human rights concepts, company approach to due diligence and implementation resources are provided to identified leader and practitioners and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>made available to all employees through formal training and "Networks of Excellence." [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com]</p> <ul style="list-style-type: none"> • Not met: Comms plan re assessing risks: See B.2.2. • Not met: Comms plan re action plans for risks: See B.2.2 • Met: Comms plan re reviewing action plans: See B.2.4 [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com & VP Annual Report 2018, 2018: static.conocophillips.com] • Not met: Including EX business partners <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

C. Remedies and Grievance Mechanisms (15% of Total)

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. ' 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, 27/06/2018: secure.ethicspoint.com] <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 Company states that 'The Ethics Helpline is hosted by a third party to ensure anonymity and available worldwide via the web or phone in multiple languages.' The Conoco Ethics line link is accessible in Spanish, English, Indonesian, Norwegian, Polish, Russian, Arabic and Chinese. [Ethics Point, 30/08/2018: 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, 11/7/2019: conocophillips.com] • Met: Opens own system to EX BPs workers: The Company states that contracts are expected to be guided by the business code of conduct, which covers the grievance mechanism. This applies to third parties including suppliers and business partners (which the company clarified includes joint venture partners). [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: 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, 27/06/2018: 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, 27/06/2018: static.conocophillips.com] • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system: Although the grievance mechanism is available to external and internal stakeholders, it is not clear 'those individuals and communities have access to the Company's own channel(s)/mechanism(s) to raise complaints or concerns about the Company's extractive business partners or their operations'.
C.3	Users are involved in the design and	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: Engages users to create or assess system: The Indigenous People strategy document states 'Indigenous communities are involved in the design of

Indicator Code	Indicator name	Score (out of 2)	Explanation
	performance of the channel(s)/mechanism(s)		<p>engagement and consultation'. Also, part of the Company's approach to stakeholder engagement is to 'Include stakeholders in the design and implementation of the engagement process.' [Indigenous People, 27/06/2018: static.conocophillips.com & Stakeholder Engagement Plan, 14/09/2018: conocophillips.com]</p> <ul style="list-style-type: none"> • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company states in its code of conduct 'The Ethics HelpLine is managed by a third party. When you contact the Ethics HelpLine by phone, a representative will listen to your concerns, ask you some questions and then review the information with you to ensure it's accurate. All phone representatives are trained to interview callers and collect information. ' [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] • Met: How complainants will be informed: The Company states in its code of conduct 'When you contact the Ethics HelpLine online, you will be prompted for specific information relating to your concern. You will also be assigned a confidential identification number that allows you to retrieve a response or exchange information with Global Compliance & Ethics.' [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company states: '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'. However, it is unclear how these issues are escalated to higher levels, and if these issues include complaints and concerns from workers and stakeholders. [Human Rights Due Diligence, 27/06/2018: static.conocophillips.com]
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: The Company discloses, under their 'commitment to non-retaliation' in the code of conduct, which covers human rights, 'ConocoPhillips is committed to creating an environment where we can report suspected violations, participate in investigations and engage in any other legally-protected activities without fear of retribution or retaliation. That's why our Company prohibits retaliation of any kind against employees for raising an ethical or legal concern or for participating in an investigation in good faith. Acting in "good faith" means that you have given all the information you have and have made a sincere report — it doesn't mean that your report must turn out to be an actual violation. Individuals who do retaliate against others will be subject to disciplinary action, up to and including termination. ' [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] • Met: Practical measures to prevent retaliation: Individuals can choose to report anonymously, the helpline is also managed by a third party. The Company also states 'Even if you choose not to report anonymously, both your identity and the fact that a report has been made will be kept confidential to the extent possible while still allowing for a thorough investigation. ' [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BPs to prohibit retaliation: The Company states that contractors and business partners oblige by the code. The Company has clarified to CHRB that business partners covers joint venture partners. [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <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

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe or achieved • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Member of EITI: The Company is a supporting company of the EITI. [EITI Supporters: Companies, 04/07/2018: eiti.org] • Not met: Reports of taxes and revenues beyond legal minimums Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company states that they will conduct business consistent with the human rights philosophy expressed in the Universal Declaration of Human Rights (UDHR), and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. However, no evidence found of a commitment to not interfering with the rights of workers to form or join trade unions (or equivalent worker bodies where the right to freedom of association is restricted under law), and put in place measures to prohibit any form of intimidation or retaliation against workers seeking to exercise these rights. [Code of Business Ethics and Conduct, 27/06/2018: secure.ethicspoint.com] • Not met: Discloses % covered by collective bargaining: The Company discloses that '4% of U.S. employees are covered by an independent trade union or collective bargaining agreement.' However, this percentage does not reflect workers outside of the US. [Valuing Human Rights, 11/7/2019: conocophillips.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company reports the Workforce Total Recordable Rate and the Employee Total Recordable Rate. [Sustainability Report, 31/12/2017: static.conocophillips.com] • Met: Lost days or near miss disclosures: The Company discloses the Workforce Lost Workday Rate and the Employee Lost Workday rate. [Sustainability Report, 31/12/2017: static.conocophillips.com] • Met: Fatalities disclosures: The Company states that they had no fatalities in 2017 Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: The Company states that they have a goal to 'prevent all injuries, occupational illnesses and incidents'. No specific public evidence found in publicly available sources about actual figures, even if 0. [Sustainability Report, 31/12/2017: static.conocophillips.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Met targets or explains why not: The Company describes how they had no fatalities in 2017 and they 'once again broke records in 2017 with significant reductions in serious incidents and workforce recordable injuries. We believe our focus on the 8 Life Saving Rules and field verification is preventing injury by reducing the risk of incidents when workers perform critical activities. Targeted reliability conversations and verification of the 8 Life Saving Rules uncover potential risks and elevate a sense of vulnerability and chronic unease, helping to prevent catastrophic events in an environment of complex risk factors.' However, the company has not set clear targets. [Sustainability Report, 31/12/2017: static.conocophillips.com]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to identify indigenous rights holders: The Company states in their Indigenous Peoples guidance document 'Business units, assets or projects identify indigenous groups for consultation on company activities that may impact them. Participatory methods of engagement are sought wherever possible including capacity building of indigenous communities to engage in a participatory manner'. Business units, assets or projects also 'conduct pre-engagement analyses to understand indigenous communities in areas of our activities, including their culture, decision-making structures, and methods of communication.' The Company also states 'Where governmental frameworks or requirements do not exist or are not clear as to requirements of companies to engage, consult or enter into formal agreements with indigenous communities, the company has put in place mechanisms for understanding indigenous group dynamics, traditional land use and preferences for engagement and consultation.' [Indigenous People, 27/06/2018: static.conocophillips.com] • Met: How engages with communities in assessment: The Company states that 'Business units, assets or projects identify indigenous groups for consultation on company activities that may impact them. Participatory methods of engagement are sought wherever possible including capacity building of indigenous communities to engage in a participatory manner'. [Indigenous People, 27/06/2018: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes approach to doing so if no recent deals: In the 'Land use' section of the Indigenous Peoples document the Company states '• Business units, assets or projects have identified indigenous groups that may have a traditional claim to land where the company operates. • Engagement and consultation plans address land claims or issues where appropriate. • Business units, assets or projects are prepared to address indigenous community concerns where appropriate, including making adjustments to plans in order to avoid interference with local livelihoods and traditional land use. Where appropriate, consultation with indigenous communities is conducted to determine what mitigation efforts will be most effective'. [Indigenous People, 27/06/2018: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works: No details found relating to valuation methods in sources provided by the Company. • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: How implements security (inc VPs or ICOC): The Company is a participating company in the Voluntary Principles of Security and Human Rights. The Company publishes an annual report detail their implementation of the VPs. It indicates that implementing VPs is supported by processes that include, among other processes, risk assessments including security and human rights, security and audit compliance programme and training activities. [VP Annual Report 2018, 2018: static.conocophillips.com] • Met: Example of respecting HRs in security: The Company details how they respect human rights in security operations in their VPs Annual Report. The Company uses the example of how they manage security and human rights in four countries: Colombia, Indonesia and Libya. In Indonesia, it describes details of security risk assessment, security audit, and training. [VP Annual Report 2018, 2018: static.conocophillips.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Ensures Business Partners follow security approach: The Company states 'If we are entering into a joint venture, we use these assessments during negotiations with potential co-ventures to outline the risks identified, clearly state our expectations on environmental and social-issue performance and discuss how the venture will seek to manage these concerns.' However, it is not clear whether they must adhere to the Company's security and human rights position. [VP Annual Report 2018, 2018: static.conocophillips.com] Score 2 • Met: Assesses and involves communities: The Company states 'We systematically assess how our activities might impact communities and ecosystems, evaluating potential impact and how issues can be avoided or mitigated. We begin our investigation with the host country's legal requirements and supplement these as needed with our own HSE standards and sustainable development risk management process, which address security and human rights issues.' The Company also discloses 'Each Business Unit's Stakeholder Engagement plan for engaging community stakeholders incorporates assessment of human rights issue.' [VP Annual Report 2018, 2018: static.conocophillips.com & Human Rights Due Diligence, 27/06/2018: static.conocophillips.com] • Not met: Working with local community: The Company discusses tensions that they have had in Colombia. The Company states 'Since the illegal 2016 blockade of a ConocoPhillips well site by antifracking activists in Colombia, there have not been any further negative encounters. ConocoPhillips 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 for the VMM-3 and VMM-2 blocks, located in Colombia's Middle Magdalena River Valley.' However, it is not clear that this action improved security or prevented or addressed tensions related to its operations. [VP Annual Report 2018, 2018: static.conocophillips.com]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Action to prevent water and sanitation risks: The Company's risk register 'includes three broad categories for water: secure access to source water supply, produced water management and induced seismicity. Mitigation actions can range from routine to one or multiyear specific projects to long-term programs.' These mitigation actions include: 'Conduct options analysis to address projected water resource shortage for development projects. Construct central facilities and install pipeline infrastructure to enable produced water recycling. [...] Environmental monitoring of produced water discharges. Develop toxicity testing baseline for produced water discharges.' 'Water-related risks and action plans are regularly reviewed by the Water Issues Working Group with the objective of sharing water risk learnings across the company. [...]Water risks, regulatory requirements and business unit priorities are managed at the business unit level, enabling tailored, region-specific business goals to address unique challenges and opportunities'. However, although they refer to water recycling and water shortages for development projects, no details found to context of right to water or water to be used by local communities. [Water risk register and action plan, 9/9/2019: conocophillips.com] Score 2 • Not met: Water targets considering local factors: In Montney, Canada, the Company has set a goal of recycling 80% of produced water in the basin. In the US, the Company has a target to use 100% recycled produced water for hydraulic fracturing in the China Draw development area. However, it is unclear how these goals take into account local factors such as water use by local communities. [Unconventional onshore operations, 9/9/2019: conocophillips.com] • Not met: Reports progress in meeting targets and shows trends in progress made

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: ConocoPhillips continues to face lawsuits over 2011 oil spill in China • Area: Environment • Story: In 2011, 3,000 barrels of oil polluted 6,200 square km of water in the Bohai Bay area. The well was owned by ConocoPhillips and CNOOC. In April 2012, a Chinese court ordered ConocoPhillips and CNOOC to pay CAD 269,000 to 21 fishermen who claimed that economic interests and their livelihoods and economic activity have been severely damaged after the oil spill. However, the claimants of the case states that they have not been compensated by the companies yet. ConocoPhillips and CNOOC already have paid about CAD 270 million to the State Oceanic Administration, which governs maritime issues in China. In addition, the two companies also agreed with China's Ministry of Agriculture to pay CAD 160 million to settle claims related to the spill. In July 2015, a lawsuit was filed by a Chinese NGO (China Biodiversity Conservation and Green Development Foundation) against ConocoPhillips and CNOOC requesting the companies to conduct further clean-up in the area. The plaintiff in the trial which has been heard in 2016, demands that the two companies "immediately repair the damage in the Bohai Bay ecosystem • Sources: [CRJEnglish, 9/12/2016: english.cri.cn][South China Morning Post, 11/12/2016: scmp.com][ConocoPhillips, 18/9/2011: conocophillips.com][ConocoPhillips, 13/7/2011: conocophillips.com]
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: The Company responded after the incident in 2011, however, it has not published any comment since the law case was filed in 2015. [Press release, July 2011: conocophillips.com] <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	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: In its 'Health, Safety and Environment policy' 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. Wherever we operate, we will conduct our business with respect and care for both the local and global environment and systematically manage risks to drive sustainable business growth". [Health, Safety and Environment Policy, 27/06/2018: static.conocophillips.com] • Met: Policies apply to the type of business relationships involved: The Peng Lai B platform, near where the oil seepage was identified, was operated by ConocoPhillips, thus the company's policies apply to the relevant business relationship involved. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: ConocoPhillips has not endorsed the UN CEO Water Mandate, and thus doesn't satisfy the requirements for this indicator.
E(1).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"> • Met: Engages with affected stakeholders: On its website ConocoPhillips says "We are actively supporting a portfolio of programs focused on preserving and protecting the Bohai Bay environment, and communities along the Bohai Economic Rim. Over time we aim to support a range of programs addressing such diverse environmental issues as sustainable fishing, pollution reduction, wetlands conservation, water quality improvement, marine ecosystem protection and risk management in the Bohai Bay area. These programs will help enhance the long-term health of the bay and nearby communities....As part of an agreement with the Ministry of Agriculture ("MOA"), RMB 618.5 million (approximately USD 97 million) to be used to improve fishery resources and the marine fishery environment. The Ministry of Agriculture is administering the funds and is responsible for developing appropriate programs." [Bohai Bay initiative explanation: conocophillips.com.cn & Bohai Bay project description: conocophillips.com.cn] <ul style="list-style-type: none"> • Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders. • Not met: Provides remedies to affected stakeholders: The Company has paid compensation to some stakeholders, but not all of them: ConocoPhillips and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>CNOOC already have paid about CAD 270 million to the State Oceanic Administration, which governs maritime issues in China. In addition, the two companies also agreed with China's Ministry of Agriculture to pay CAD 160 million to settle claims related to the spill. Furthermore, under a damage compensation agreement, CNOOC paid CAD 70.84 million for environmental protection efforts in Bohai Bay. In April 2012, a Chinese court ordered ConocoPhillips and CNOOC to pay CAD 269,000 to 21 fishermen who claimed that economic interests and their livelihoods and economic activity have been severely damaged after the oil spill. However, the claimants of the case states that they have not been compensated by the companies yet.</p> <ul style="list-style-type: none"> • Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. • Not met: Denies allegations, but has engaged affected stakeholders • Not met: Denies allegations, but reviewed systems to prevent such impacts <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: See above. • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company improving the system or engaging with stakeholders followed by the case.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.05 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, ConocoPhillips made data public that met one or more elements of the methodology in 29 cases, leading to a disclosure score of 3.05 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company includes a GRI index as a reference tool and reports under the GRI standards. [GRI/IPIECA/UNGP Index, 27/06/2018: conocophillips.com]
F.3	Key, High Quality Disclosures	0.8 out of 4	<p>ConocoPhillips met 2 of the 10 thresholds listed below and therefore gets 0.8 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

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

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As CHR B Ltd, 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.