

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Occidental Petroleum
Industry Extractives
Overall Score (*) 23.0 out of 100

Theme Score	Out of	For Theme
3.9	10	A. Governance and Policies
3.8	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
4.4	20	D. Performance: Company Human Rights Practices
4.6	20	E. Performance: Responses to Serious Allegations
2.2	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 2018 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 • 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, 10/2015: oxy.com] • 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, 10/2015: oxy.com] Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	2	The individual elements of the assessment are met or not as follows: Score 1 • 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, 10/2015: oxy.com] • Met: All four ILO apply to EX BPs: The Company's human rights policy contains a commitment to all ILO core areas. 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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'. [Human rights policy: oxy.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: 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'. [Human rights policy: oxy.com] • Met: Respect H&S of workers: 'Occidental is committed to [...] protecting health and safety of all Employees'. [Human rights policy: oxy.com & Code of business conduct, 10/2015: oxy.com] • Met: H&S applies to Ex BPs: See above, human rights policy also applies to suppliers and contractors.
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments: Human Rights policy states that the Company 'is committed to observing the laws in the countries in which it operates, to respecting the cultural values of the communities in which it operates including the indigenous peoples recognized by the laws of the applicable jurisdiction, to giving appropriate regard to the self-sufficiency, sustainability, health, safety and the environment of such communities.' The Company does not, however specifically state that it respects the rights of indigenous people. [Human rights policy: oxy.com] • Not met: Respecting indigenous rights: The Human Rights policy states that the Company 'is committed to observing the laws in the countries in which it operates, to respecting the cultural values of the communities in which it operates including the indigenous peoples recognized by the laws of the applicable jurisdiction, to giving appropriate regard to the self-sufficiency, sustainability, health, safety and the environment of such communities.' The Company does not, however specifically state that it respects the rights of indigenous people. [Human rights policy: oxy.com] • Not met: ILO 169 • Not met: UNDRIP • Not met: Expects BPs to respect these rights: Although the Company expects suppliers and contractors to observe human rights in its operations following the Company's policy, this commitment does not include indigenous rights. [Human rights policy: oxy.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment: On its website section 'Foundations-Ethical Business, Code of Business Conduct and Human Rights Policy', the Company states: '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. To complement these efforts, Occidental's human rights training materials are made available to community representatives.' However, the Company does not explicitly endorse universal Free-Prior-Informed-Consent as policy. [Foundations: oxy.com] • Not met: Vol Guidelines on Tenure • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to respect all these rights
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: 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 to support Human Rights within the spheres of Occidental's activity and influence'. [Human rights policy: oxy.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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

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			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'. [Stakeholder engagement: oxy.com] <ul style="list-style-type: none"> • 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'.
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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, May 2016: oxy.com] Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Code of conduct contains commitments on human rights and is prefaced and signed by the CEO. [Code of business conduct, 10/2015: oxy.com] • Met: Board level responsibility for HRs: The Corporate Governance, Nominating, and Social Responsibility committee has, amongst its primary duties to oversee 'compliance with Occidental's Human Rights Policy'. [Corporate Governance, Nominating and Social Responsibility Committee on website: oxy.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
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: As indicated in its charter, the purposes of the Governance Committee include 'review the Corporation's Human Rights Policy and related social responsibility programs and practices; and report to the Board with respect to the foregoing'. The charter discloses the operation of the Committee, its composition and the minimum frequency of the meetings. [Governance and SR Committee Charter: oxy.com] <ul style="list-style-type: none"> • 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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Senior responsibility fo HR (inc ILO): 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’. [Human rights policy: oxy.com] Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for EX BRs
B.1.2	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: Senior manager incentives for human rights Not met: At least one key EX HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR part of enterprise risk system: The Company has a Health, Environmental and safety management system with oversight from the Environmental, Health and Safety Committee of the Board, and in the context of this system, occidental assesses potential social and environmental impacts, including water scarcity, human rights and indigenous peoples’ rights. However, it is not clear whether risks related to human rights are integrated as part of the broader enterprise risk management systems. [Annual report, 2017: oxypublications.com & Our approach to risk management on website: oxy.com] Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Communicates its policy to all workers in own operations: The Company states that the human rights policy ‘shall be included in the Code of Business Conduct provided to all Employees and shall be available on Occidental’s intranet websites’. ‘All new employees of Occidental must participate in an orientation program covering this Human Rights policy within six months of beginning employment’. ‘All Occidental officers and managers shall ensure that the employees who report to them are familiar with this Human Rights Policy’. However, no evidence found of the policies being communicated to employees in local languages where necessary. [Human rights on website: oxy.com & Code of business conduct, 10/2015: oxy.com] Score 2 <ul style="list-style-type: none"> Met: Communication of policy commitments to stakeholder: The Company indicates that ‘stakeholder engagement covers a wide range of activities, 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’. It also indicates that ‘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. To complement these efforts, Occidental’s human rights training materials are made available to community representatives’. [Stakeholder engagement: oxy.com & Human rights on website: oxy.com] Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Steps to communicate policy commitments to BRs: The human rights policy states that ‘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 supplier who share Occidental’s values’. In The Social responsibility brochure it states that ‘we routinely conduct due diligence on prospective business partners, contractors, suppliers and agents, and convey our expectation that they comply with the

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			<p>company's policies, including our Code of Business conduct'. [Human rights policy: oxy.com & Social responsibility overview: business-humanrights.org]</p> <ul style="list-style-type: none"> • Met: Including to EX BPs: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • Not met: Including on EX BPs
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Trains all workers on HR policy commitments: The Social responsibility brochure indicates that 'Compliance officers are assigned to a region or business unit to conduct periodic training on the Code of Business Conduct and ensure compliance with Occidental's policies'. In the Human rights policy it indicates that 'Occidental shall provide Human Rights training to employees selected to receive training as part of its periodic Code of Business conduct Training. All new employees of Occidental must participate in an orientation program covering this Human Rights Policy within six months of beginning employment'. However, it is not clear whether all employees have received training on human rights policy within the last three reporting years. [Social responsibility overview: business-humanrights.org & Human rights policy: oxy.com] • Not met: Trains relevant managers including security personnel: The Human rights policy states that 'contractors shall provide initial Human Rights training to their employees before they begin their work assignments for Occidental, and shall provide them with refresher course training on annual basis. Occidental will encourage Human Rights training be provided to public security forces specifically assigned to protect Company personnel and facilities. Where necessary and appropriate, Occidental will provide funding to support training'. Security contracts with contractors 'shall include commitment by the party providing such services to the United Nations Code of Conduct for Law Enforcement Officials' (both private and public entities providing these services). No evidence found, however, in relation to training to its own security personnel in public sources. [Human rights policy: oxy.com & Social responsibility overview: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not 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: Monitoring implementation of HR policy commitments: The Company indicates on its website that the Environment and Safety Management system (HESMS) sets consistent worldwide performance expectations and standards across each business segment's respective operations [...] The HESM facilitates compliance with laws and regulations and the management of HES and Social responsibility risks to improve overall business performance'. However, it is not clear whether this includes monitoring compliance with human rights policy. [Our approach to risk management on website: oxy.com & Human rights on website: oxy.com] • Met: Monitoring EX BP's: The Company states on its website that 'Occidental routinely evaluates suppliers and contractors to ensure they meet the company's operating standards. As part of the Compliance Program, we convey our expectation that they comply with the Company's policies, including our Code and Human Rights Policy. Our international procurement contracts routinely include provisions with respect to the observance of human rights, ethical business conduct and other relevant Occidental policies'. [Human rights on website: oxy.com & Social responsibility overview: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	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: HR affects selection extractives business partners: The Company indicates in the social responsibility brochure that 'we routinely conduct due diligence on prospective business partners, contractors, suppliers and agents, and convey our expectation that they will comply with the company's policies, including our code of business conduct'. [Social responsibility overview: business-humanrights.org & Human rights policy: oxy.com] • Met: HR affects on-going business partner relationships: The Human rights policy states that 'failure of a contractor to comply with the provisions in a Foreign Contract concerning respect for Human Rights may be treated as a breach of such Foreign Contract and be subject to appropriate remedies contained therein for

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			breaches, up to and including termination of the Foreign Contract'. [Human rights policy: oxy.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company indicates that it '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'. However, it is not clear how it has identified and engaged in the last two years on human rights. [Human rights on website: oxy.com & Stakeholder engagement: oxy.com] • Met: Frequency and triggers for engagement: The Company indicates that 'by providing fresh perspectives to emerging risks and opportunities, Occidental welcomes constructive engagement with its stakeholder. Stakeholder engagement covers a wide range of activities, 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'. [Stakeholder engagement: oxy.com] • Not met: workers in SP engaged • Met: communities in the SC engaged: See above Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: Although the Company indicates that 'regular engagement informs our policies and systems', no details found in relation to input given. [Human rights on website: oxy.com & Stakeholder engagement: oxy.com]

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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: identifying risks in EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Met: In consultation with stakeholders: Stakeholder engagement provides 'fresh perspectives to emerging risks and opportunities'. 'Stakeholder engagement covers a wide range of activities' including 'discussion of specific projects with neighbours and permitting authorities'. [Stakeholder engagement: oxy.com] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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. [Our approach to risk management on website: oxy.com] • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

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B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: 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. [Our approach to risk management on website: oxy.com] • Not met: Example of Actions decided • Not met: Including amongst EX BRs Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX BRs Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The 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. [Human rights policy: oxy.com & Code of business conduct, 10/2015: oxy.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • 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 ‘we operate in four core countries [...] Oman, Qatar and the United Arab Emirates in the Middle East and Colombia in Latin America’. [Code of business conduct, 10/2015: oxy.com & Annual report, 2017: oxypublications.com] • Not met: Opens own system to EX BP 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. [Human rights policy: oxy.com & Code of business conduct, 10/2015: oxy.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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

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	individuals and communities		<p>concerns forward in good faith'. [Code of business conduct, 10/2015: oxy.com & Human rights policy: oxy.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • 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). [Code of business conduct, 10/2015: oxy.com & Integrity helpline on website: integrity-helpline.com] • Met: EX BP 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. [Human rights policy: oxy.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • 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 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 code states that 'the Helpline is the Company's anonymous, confidential reporting system maintained by and independent third party that immediately refers all reports to the Chief Compliance Officer'. [Code of business conduct, 10/2015: oxy.com] • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: The code states that 'The Audit Committee of the Board of Directors may be contacted if you feel that appropriate action has not been taken using the reporting channels above. Concerns reported directly to the Audit Committee should be marked "Confidential" and addressed to the Chairman of the Audit Committee'. [Code of business conduct, 10/2015: oxy.com]
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The code states that 'the Company prohibits retaliation against anyone who brings questions or concerns forward in good faith'. It also indicates that: 'individuals who [...] retaliate against someone for reporting or providing information about a claim, may be subject to disciplinary measures. [Code of business conduct, 10/2015: oxy.com] • Met: Practical measures to prevent retaliation: The code states that 'the Helpline is the Company's anonymous, confidential reporting system maintained by and independent third party'. [Code of business conduct, 10/2015: oxy.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BRs to prohibit retaliation
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)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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 • 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)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Member of EITI • Not met: Reports of taxes 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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company indicates that respects the rights to freedom of association and collective bargaining, and is committed to providing a workplace that 'is free from harassment and discrimination on the basis of ... or membership in any political, religious or union organization'. [Human rights policy: oxy.com] • Not met: Discloses % covered by collective bargaining: The Company indicates in the Annual Performance summary table that 10.3% of its employees are unionized. However, this refers only to employees in the USA and is not clear the total percentage of workforce covered by collective bargaining agreements. [Annual Performance Summary Table: oxy.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: Figures for the last three reporting periods covering its own employees and both employees & contractors. Recordable injuries and illnesses per 100 workers. [Annual Performance Summary Table: oxy.com] • Met: Fatalities disclosures: For the last three reporting periods. [Annual Performance Summary Table: oxy.com] Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (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: Process to identify indigenous rights holders: In the stakeholder engagement section of the website, the Company indicates that 'stakeholder engagement process includes the identification of key stakeholders; an assessment of stakeholder interests and issues; an evaluation of the community's socio-economic needs; the development and implementation of a stakeholder engagement plan. Occidental's management hold regular dialogue, meetings and consultations with stakeholder groups'. However, no evidence found in relation to the specific process to identify and recognise affected or potentially affected indigenous peoples. [Stakeholder engagement: oxy.com & Human rights on website: oxy.com] • Not met: How engages with communities in assessment: The Company indicates on its website that regular stakeholder engagement 'informs our policies and systems to ensure that human rights including where appropriate, indigenous people's rights are consistently considered throughout our operations'. However, it is not clear whether it engages directly with indigenous communities in carrying out risk assessments. [Human rights on website: oxy.com & Stakeholder engagement: oxy.com] Score 2 <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights (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: Approach to identification of land tenure rights holders Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> Not met: How valuation and compensation works 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: How implements security (inc VPs or ICOC) Not met: Example of respecting HRs in security Met: Ensures Business Partners follow security approach: The Human rights policy states that 'foreign contracts for the provision of security services with respect to Occidental's Foreign activities shall include a commitment by the party providing such services to the United Nations Code of Conduct for Law Enforcement Officials, as applied in the ILO Declaration of Fundamental Principles and Rights at Work'. The Company 'will seek to include' the same clauses in contracts with public entities for the provision of security services. [Human rights policy: oxy.com & Human rights on website: oxy.com] Score 2 <ul style="list-style-type: none"> Not met: Assesses and involves communities Not met: Working with local community
D.3.8	Water and sanitation (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: Action to prevent water and sanitation risks: The Company explains on its website that it routinely assesses its 'water management practices including those with respect to water supply, treatment and discharge, to identify water-related risks and opportunities for improvement'. 'Occidental works to ensure its water use does not affect the ability of cities, towns, farms and ranches near our operations to secure its access to water resources'. In the CDP water report, the Company reports how it carries out risk assessments and identifies risks related to water and water stress, however, no evidence found of how it implements preventive and corrective action plans for identified specific risks in relation to the right to water and sanitation (although it reports actions for other water-related risks, and reports local stakeholder engagement in case of water scarcity risks). [CDP Water report, 2017: oxy.com & Water management on website: oxy.com] Score 2 <ul style="list-style-type: none"> Not met: Water targets considering local factors 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		No allegations meeting the CHRB severity thresholds were found, and so the score of 18.41 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.60 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.21 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Occidental Petroleum made data public that met one or more elements of the methodology in 21 cases, leading to a disclosure score of 2.21 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Not met: Company reports on GRI Not met: Company reports on SASB Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Occidental Petroleum met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<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) Discussing challenges openly • Not 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 Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not 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 2018 Key Findings report for more details of the research process.

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As CHRB 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.