

Corporate Human Rights Benchmark 2023 Company Scorecard

Company name ConocoPhillips
Sector Extractives
Overall score 22.7 out of 100

Theme score	Out of	For theme
1.3	10	A. Governance and Policy Commitments
8.5	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
4.9	25	D. Performance: Company Human Rights Practices
4.5	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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 Policy Commitments (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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company's Human Rights Position states: 'We commit to respecting the human rights of all people'. [Human Rights Position_web, N/A: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to UNGPs: The Company's Human Rights Position states: 'We commit to respecting the human rights of all people and will conduct business consistent with the human rights philosophy expressed in the [...] the United Nations Guiding Principles on Business and Human Rights'. However, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Position_web, N/A: conocophillips.com] Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Commitment to ILO core principles: The Company's Human Rights Position states: 'We commit to respecting the human rights of all people and will conduct business consistent with the human rights philosophy expressed in [...] the International Labour Organization Declaration on Fundamental Principles and Rights at Work'. However, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Position_web, N/A: conocophillips.com] Not Met: Explicitly lists all four ILO core principles

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			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects BPs/JVs to commit to ILO core principles: The webpage section Supplier Expectation adds: 'Supplier will conduct its business consistent with our Human Rights Position, including but not limited to [...]: Not knowingly participating in human trafficking. Not using child labor or forced labor, such as prison labor, forcibly indentured labor, bonded labor, slavery or servitude. Recognizing freedom of employees to join, or refrain from joining, legally authorized associations or organizations'. However, as for this particular webpage section, it is not considered an official policy according to CHRB standards, as the Company has a Supply Chain Policy. As indicated above, Human Rights Position states: 'We commit to respecting the human rights of all people and will conduct business consistent with the human rights philosophy expressed in [...] the International Labour Organization Declaration on Fundamental Principles and Rights at Work'. However, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. [Supplier Expectations_web, N/A: conocophillips.com] & [Human Rights Position_web, N/A: conocophillips.com] • Not Met: Explicitly lists all four ILO core principles for BPs/JVs: See above.
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: The Health, Safety & Environment Policy indicates: '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'. [Health Safety amp Environment Policy_web, N/A: conocophillips.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: The Code of Business Ethics and Conduct indicates: 'We are committed to complying with all applicable health, safety and environmental rules, laws and regulations'. The webpage section Supplier Expectation indicates: 'The ConocoPhillips Code of Business Ethics and Conduct (Code) forms the foundation of our compliance and ethics program and provides concrete guidance for employees, suppliers and other stakeholders'. It includes service providers. [Code of Business Ethics and Conduct, N/A: static.conocophillips.com] & [Supplier Expectations_web, N/A: conocophillips.com] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	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: Commitment to respect land ownership/natural resources as in VGGT • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards • Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Company's Human Rights Position 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, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Position_web, N/A: conocophillips.com] • Not Met: Expects EX BPs to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing • Not Met: Commitment to respect the right to water: The Global Water Sustainability Position states: 'We are committed to leading water stewardship throughout our operations taking into account local social, environmental and economic conditions in basins and offshore marine areas where we operate'. However, no commitment to respecting the right to water found. [Global Water Sustainability Position_web, N/A: conocophillips.com] • Not Met: Expects EX BPs to make these commitments
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the	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: Commitment to Voluntary Principles on Security and HRs: The webpage section Valuing Human Rights indicates: 'We have been a member of the VPSHR initiative since its inception in 2000'. [Valuing Human Rights_web, N/A: conocophillips.com] • Not Met: Uses only ICoCA members as security providers

Indicator Code	Indicator name	Score (out of 2)	Explanation
	sector – security (EX)		<ul style="list-style-type: none"> • Not Met: Commits to International Humanitarian Law Score 2 <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights: The webpage section Supplier Expectation indicates: ‘Supplier will conduct its business consistent with our Human Rights Position’. However, no further details found in relation to extractive business partners committing to the VPs or ICoC, and whether they are expected to commit to respect international humanitarian law. [Valuing Human Rights_web, N/A: conocophillips.com]
A.1.4	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: Commitment to remedy adverse HRs impacts • Not Met: Expects EX BPs to make this commitments Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with EX BPs on remedy
A.1.5	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 of threats/attacks on HRDs • Not Met: Expects BPs to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The webpage section Board Oversight indicates: ‘The Public Policy and Sustainability Committee (PPSC) is responsible for identifying, evaluating and monitoring sustainable development and climate-related trends and risks that could affect business activities and performance. The PPSC makes recommendations to the Board and monitors compliance with the company’s policies, programs and practices regarding: Health, safety, security; [...] Water and biodiversity; Human rights and social issues’. [Board Oversight_web, N/A: conocophillips.com] • Not Met: Describes HRs expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	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 review HRs strategy at board level: The webpage section Board Oversight indicates: ‘Sustainable development is a standing agenda item at PPSC [Public Policy and Sustainability Committee] meetings to discuss the SD risk management process, the implementation of our net-zero ambition and Paris-aligned emissions reduction targets, and the use of reporting and disclosure frameworks. [...] The PPSC makes recommendations to the Board and monitors compliance with the company’s policies, programs and practices regarding [...] Human Rights’. The 2021 Sustainability Report indicates: ‘Each committee [Board Committee] [...] convenes at least quarterly’. However, no details found beyond regularity of meetings. [Board Oversight_web, N/A: conocophillips.com] & [2021 Sustainability Report, 2022: static.conocophillips.com] • Not Met: Example of HRs issues/trends discussed in last reporting period: The Company also indicates that in 2021 some of the items of discussion of the Public Policy and Sustainability Committee were: Social risk management; Sustainable Development strategic priorities and ESG engagement strategy. However, no evidence that human rights issues or trends were specifically discussed was found. [2021 Sustainability Report, 2022: static.conocophillips.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
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: At least one board member incentive linked to HRs commitments: The 2021 Sustainability Report indicates: ‘From the CEO to the frontline worker, every employee participates in VCIP [Variable Cash Incentive Program], our annual incentive program, which aligns employee compensation with ConocoPhillips’. It adds: ‘Executive and employee compensation includes the annual Variable Cash

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			<p>Incentive Program (VCIP). This annual cash bonus is based upon company and individual performance on metrics that include health, safety'. The CEO is a Board Member. However, no evidence found on the actual metrics/indicators included in performance incentives. [2021 Sustainability Report, 2022: static.conocophillips.com]</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although the CEO has an incentive for health and safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The 2022 Proxy Statement indicates that the annual incentive program includes a 'Variable Cash Incentive Program ("VCIP")' and the key performance measures include: 'Health, Safety, and Environmental (20%)'. However, no evidence found on the actual metrics/indicators included in performance incentives. [2022 Proxy Statement, 28/03/2022: static.conocophillips.com] • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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	<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: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The 2021 Sustainability Report indicates: 'The Executive Leadership Team (ELT) has final responsibility for developing corporate strategy, implementing sustainability efforts, and reporting company performance. [...] the Sustainability and Public Policy Executive Council (SPEC), a sub-committee of the ELT, has global oversight of existing and emerging sustainable development (SD) and public policy risks and trends including SD and climate-related governance, strategic planning, risk management and public reporting. [...] Members of SPEC were briefed six times during the year on priority topics such as climate change, biodiversity, water, human rights and stakeholder engagement'. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The 2021 Sustainability Report states: 'The Sustainable Development Leadership Team (SDLT) is comprised of global business unit presidents and functional department heads supported by the SD team. Chaired by the vice president, Sustainable Development, the SDLT consults on and facilitates alignment on SD strategic priorities, goals, action plans and results throughout the company'. Human Rights is part of its SD strategy as the Company indicates it includes publications on Human Rights, as indicated in the webpage section Integrating Sustainability: 'We have been on a journey to integrate sustainability into planning and decision making for decades'. [2021 Sustainability Report, 2022: static.conocophillips.com] & [Integrating Sustainability_web, N/A: conocophillips.com] • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation with EX BPs
B.1.2	Incentives and performance management	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: Senior manager incentives linked to HRs commitments: The 2021 Sustainability Report indicates: 'From the CEO to the frontline worker, every employee participates in VCIP [Variable Cash Incentive Program], our annual incentive program, which aligns employee compensation with ConocoPhillips'. It adds: 'Executive and employee compensation includes the annual Variable Cash Incentive Program (VCIP). This annual cash bonus is based upon company and individual performance on metrics that include health, safety'. However, no

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>evidence found on the actual metrics/indicators included in performance incentives. [2021 Sustainability Report, 2022: static.conocophillips.com]</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although the CEO has an incentive for health and safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. Previous assessment was partially based on the 2018 Governance and Accountability which is considered outdated according to the CHRB three-reporting-year timeframe policy. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The 2022 Proxy Statement indicates that the annual incentive program includes a 'Variable Cash Incentive Program ("VCIP")' and the key performance measures include: 'Health, Safety, and Environmental (20%)'. However, no evidence found on the actual metrics/indicators included in performance incentives. [2022 Proxy Statement, 28/03/2022: static.conocophillips.com] • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	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: HRs risks integrated as part of enterprise risk system: The 2021 Sustainability Report indicates: 'Sustainability risks are integrated into the corporate ERM system. Risks from the corporate SD Risk Register are mapped to relevant enterprise risks including market, reputational, operational and political'. The 2021 Annual Report explains its 'Other Risk Factors Facing our Business or Operations', include: 'A disruption, failure, or a cyberattack of these operating systems, or of the networks, software and infrastructure on which they rely, many of which are not owned or operated by us, could [...] negatively impact public health or safety, economic security, or national security'. However, no evidence found of human rights risks and impacts being included beyond health and safety. [2021 Sustainability Report, 2022: static.conocophillips.com] & [2021 Annual Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Provides an example • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external 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"> • Not Met: Score of 1 on A.1.2.a • Met: Communicates HRs policies to all workers in own operations: The 2021 Sustainability Report indicates: 'ConocoPhillips continues to offer a human rights training course which incorporates IPIECA's guidance on human rights training and includes a module on security and human rights. The training has been rolled out globally via a computer-based module to our stakeholder engagement practitioners and other operations staff and management as appropriate based on location'. It adds: 'Stakeholder engagement and human rights training is available for all employees and key contractors'. Local languages are assumed in training. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended 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: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The webpage section Supplier Expectation indicates: 'Our contracts require that suppliers be guided in their performance for ConocoPhillips by the principles and standards set forth in the Code and their own ethics and conduct policies. [...] When contracting with ConocoPhillips, each supplier (whether providing goods or performing work or services) agrees to these principles and accordingly has included them in its own code of conduct'. [Supplier expectations, N/A: conocophillips.com] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: Although extractive business partners are expected to promote a set of Human Rights expectations, it is not clear there are required to cascade the contractual or other binding requirements down their supply chain. [Supplier expectations, N/A: conocophillips.com]

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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: Score of at least 1 on A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: The 2021 Sustainability Report indicates: ‘ConocoPhillips continues to offer a human rights training course which incorporates IPIECA’s guidance on human rights training and includes a module on security and human rights. The training has been rolled out globally via a computer-based module to our stakeholder engagement practitioners and other operations staff and management as appropriate based on location’. It adds: ‘Stakeholder engagement and human rights training is available for all employees and key contractors’. [2021 Sustainability Report, 2022: static.conocophillips.com] • Met: Trains relevant managers including security on HRs: See above, training includes a module on security and human rights. Regarding Voluntary Principles on Security and Human Rights, it indicates: ‘We continue to conduct regular VPSHR 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 training on the VPSHR on an annual basis. [...] Training is also provided for the ConocoPhillips workforce as part of the onboarding process when relevant to working in field locations’. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments: The 2021 Sustainability Report states: ‘Stakeholder engagement and human rights training is available for all employees and key contractors’. However, although the Company indicates there are some trainings for key contractors, no evidence found of human rights training (policy commitments) conducted for extractive business partners in general. [2021 Sustainability Report, 2022: static.conocophillips.com] • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	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: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Company indicates that it carries out a ‘high-level human rights risk assessments on our global operations to identify countries for deeper evaluation of potential human rights issues’. However, it is not clear how it monitors the implementation of its human rights policy commitment across its global operations and extractive business partners. [2021 Sustainability Report, 2022: static.conocophillips.com] • Not Met: Discloses % of EX BP’s monitored • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating 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"> • Met: HRs performance affects selection EX BPs: The 2021 Sustainability Report indicates: ‘The supply chain function contributes to the company’s sustainable development commitments by integrating sustainability into our source-to-settle processes and procedures, which include: Supplier Expectations: Integrity, Labor and Human Rights; Safety [...]. Integrating engagement on labor and human rights into our procurement processes and procedures includes recommended questions and contract language for supplier prequalification, bids, and audits’. [2021 Sustainability Report, 2022: static.conocophillips.com] • Not Met: HRs performance affects ongoing BPs relationships: See above. Labor and Human Rights is part of its source-to-settle processes and procedures including in audits. However, no further information found of how human rights performance is taken into account in the in decisions to renew, expand or terminate business relationships with extractive business partners. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with EX BPs to meet HRs requirements

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how workers and communities identified and engaged in the last two years: The 2021 Sustainability Report indicates: ‘Our stakeholder identification process is a key component of social risk assessment. Each business unit is responsible for identifying stakeholders to understand their perspectives and concerns. The relationships of stakeholders and their priorities are considered to identify any potential points of collaboration or conflict’. The document Community Engagement adds: ‘Business units, assets or projects may perform social or stakeholder mapping as part of Environmental and Social Impact Assessments (ESIAs) or as stand-alone assessments as appropriate. This is evaluated on a case-by-case basis’. It gives an example of engagement: ‘In 2021, the team developed and obtained endorsement of a Reflect Reconciliation Action Plan (RAP), a strategic document that includes a commitment as well as practical actions that will drive the organization’s contribution to reconciliation both internally and in communities. The formal, published document is endorsed by Reconciliation Australia’. [2021 Sustainability Report, 2022: static.conocophillips.com] • Met: Provides two examples of engagement with stakeholders: As it is indicated above, the Company has been in contact with Reconciliation Australia. It also provides another example of engagement: ‘In Northeast British Columbia, we continue to work with local communities as we develop our Montney project. We have a “life of project” Relationship Agreement with the Halfway River First Nation (HRFN) that supports collaborative processes around community engagement and contracting. HRFN and ConocoPhillips worked together in 2021 to broaden our existing pre-engagement approach. This included planning, review and discussion of surface pad site area (SPA) options to be used during the 3-to-4-year development of the project. A review of possible options within the Montney acreage was overlaid with HRFN’s Land Information System, improving awareness for both parties’. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Describes process of identifying risks in own operations: The webpage section Valuing Human Rights indicates: ‘We perform high-level human rights risk assessments on our global operations to identify countries for deeper evaluation of potential human rights issues. Key areas considered include: Security and human rights; Land rights and relocation; Land use; Indigenous Peoples issues and rights; Company and supplier labor standards; Access to water; Cultural heritage; Vulnerable groups. [...] Business units assess and manage human rights risks’. The document Community Engagement adds: ‘Business units, assets or projects may perform social or stakeholder mapping as part of Environmental and Social Impact Assessments (ESIAs) or as stand-alone assessments as appropriate. This is evaluated on a case-by-case basis’. [Valuing Human Rights_web, N/A: conocophillips.com] & [Community Engagement, N/A: static.conocophillips.com] • Met: Describes process for identifying risks in EX BPs: The webpage section Creating Shared Values indicates: ‘Social assessments consider: [...] Risks and impacts related to supplier and contractor activities’. [Creating Shared Value_web, N/A: conocophillips.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation: See above. The webpage section Creating Shared Values indicates: 'Our stakeholder identification process is a key component of social risk assessment. Each business unit is responsible for identifying stakeholders to understand their perspectives and concerns. The relationships of stakeholders and their priorities are considered to identify any potential points of collaboration or conflict. We then develop an engagement plan to address concerns and maintain our focus on developing mutually beneficial relationships. By having open dialogue, we identify and address the potential impacts associated with our operations. This is done through our integrated sustainable development (SD) risk management process where existing and planned exploration and production and major projects are examined against the physical, social and political settings of our operations'. However, it is not clear it includes consultation with Human Rights experts. [Creating Shared Value_web, N/A: conocophillips.com] • Met: Describes how risk identification system is triggered by new circumstances: The webpage section Managing Sustainable Development Risks indicates: 'Before entering a new country —or for other new developments, when warranted by the geopolitical environment — we have adopted comprehensive risk management tools to evaluate and manage these types of risks. A preliminary due diligence assessment is conducted to identify significant risks, including social, environmental and political concerns, and define how they will be managed'. [Managing Sustainable Development Risks_web, N/A: conocophillips.com] • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	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 assessment process and discloses salient HRs risks: The webpage section Valuing Human Rights indicates: 'We perform high-level human rights risk assessments on our global operations to identify countries for deeper evaluation of potential human rights issues. Key areas considered include: Security and human rights; Land rights and relocation; Land use; Indigenous Peoples issues and rights; Company and supplier labor standards; Access to water; Cultural heritage; Vulnerable groups. [...] Business units assess and manage human rights risks'. The document Community Engagement adds: 'Business units, assets or projects may perform social or stakeholder mapping as part of Environmental and Social Impact Assessments (ESIAs) or as stand-alone assessments as appropriate. This is evaluated on a case-by-case basis'. [Valuing Our People_web, N/A: conocophillips.com] & [Community Engagement, N/A: static.conocophillips.com] • Met: Describes how process applies to EX BPs: The webpage section Creating Shared Values indicates: 'Social assessments consider: [...] Risks and impacts related to supplier and contractor activities'. [Creating Shared Value_web, N/A: conocophillips.com] • Not Met: Public disclosure of results of HRs risk assessment: Although the Company discloses a list of key areas it considers, it is not clear the results of its assessments. [Valuing Our People_web, N/A: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders: The Company indicates that 'Each risk is assessed using a matrix that evaluates both its likelihood and consequence. In evaluating the consequence level, we consider potential impacts to stakeholders and the company'. However, no information related to how it involves affected stakeholders in the process was found. [2021 Sustainability Report, 2022: static.conocophillips.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues: The webpage section Valuing Human Rights indicates: 'If our operations identify potential human rights concerns, engagement plans and specific actions to manage and mitigate that risk are developed through engagement with the community or other stakeholders'. The document Community Engagement adds: 'ESIAs assess community impacts, and include mitigation measures for community impacts. As part of ESIAs, communities are engaged regarding potential issues and concerns, as well as preferred mitigation measures'. As for its Sustainable Development risk management [which includes Human Rights], the 2021 Sustainability Report adds: 'Action plans for prioritized risks are typically managed at the BU level, along with the ongoing management of SD performance and engagement designed to minimize or avoid other social and environmental aspects of our business. [...] Line-of-sight goals for business units and key functions are shown as specific action

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>items within the action plans. Mitigation actions can range from single or multiyear specific projects to routine and long-term programs'. [Valuing Human Rights_web, N/A: conocophillips.com] & [Community Engagement, N/A: static.conocophillips.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how global system applies to EX BPs • Not Met: Example of actions decided on at least 1 salient HRs issue: The webpage section Creating Shared Values describes social Risk and Mitigation Actions: 'The 2021 Risk Register includes two social categories: infrastructure and local intervention. Mitigation actions and milestones address the potential impacts and risks to stakeholders'. However, none of them are related to Human Rights salient risks. [Creating Shared Value_web, N/A: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Describes how stakeholders involved in decisions about actions taken: As indicated above: 'engagement plans and specific actions to manage and mitigate that risk are developed through engagement with the community or other stakeholders'. The document Community Engagement adds: 'ESIAs assess community impacts, and include mitigation measures for community impacts. As part of ESIAs, communities are engaged regarding potential issues and concerns, as well as preferred mitigation measures'. [Valuing Human Rights_web, N/A: conocophillips.com] & [Community Engagement, N/A: static.conocophillips.com]
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	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 system for evaluation effectiveness of actions: The 2021 Sustainability Report indicates: 'The SD Risk Management Standard ensures that an action plan is developed to track mitigation activities for each risk included in the corporate SD Risk Register. These plans include details about our commitments, related responsibilities and milestones. As part of annual updates to the register, the action plans and their effectiveness are evaluated, and decisions are made to continue mitigation measures, add new measures or simply monitor the risk for further developments. Significant and high risks are removed from the corporate risk register when mitigation actions have reduced the level of risk, and they are tracked to ensure ongoing mitigation effectiveness. The SD Risk Register and action plans are also used to track performance and guide goal setting'. [2021 Sustainability Report, 2022: static.conocophillips.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for 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: Grievance mechanism accessible to all workers: The 2021 Sustainability Report indicates: 'Any stakeholder, whether employee, contractor, shareholder or the general public may report an actual or suspected violation of the Code anonymously through our 24-hour Ethics Helpline'. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: Workers receive Human Rights training [see B.1.5], hence workers may be aware of the channels through these trainings. The Ethics HelpLine is available in five languages. However, according the Company's website it has also presence in Indonesia, Cambodia and other countries, which languages do not seem to be covered. [Asia Pacific Business, N/A: conocophillips.com] • Met: Describes how workers in EX BPs access grievance mechanism: See above. The Ethics HelpLine is open to contractors. It is assumed extractive business partners' employees can file complaints in relation to suppliers' behaviour. [2021 Sustainability Report, 2022: static.conocophillips.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Expects EX BPs to convey expectation to their BPs: The Code of Business Ethics and Conduct is part of extractive business partners contractual obligation and they are expected to promote it to their own suppliers [see B.1.4.b]. The Code contains information on the Ethics Helpline. [Code of Business Ethics and Conduct: Expectations of Suppliers, N/A: static.conocophillips.com] & [Supplier Expectations_web, N/A: conocophillips.com]
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The 2021 Sustainability Report indicates: ‘Any stakeholder, whether employee, contractor, shareholder or the general public may report an actual or suspected violation of the Code anonymously through our 24-hour Ethics Helpline’. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Ethics HelpLine is available in five languages. However, according the Company's website it has also presence in Indonesia, Cambodia and other countries, which languages do not seem to be covered. Moreover, it is not clear how affected external stakeholders at its own operations are made aware of it. [Asia Pacific Business, N/A: conocophillips.com] • Not Met: Describes how external individuals/communities access grievance mechanism: Although the Ethics HelpLine is open to the general public, and extractive business partners are expected to comply with the provisions found in the Code of Business Ethics and Conduct, the Code does not indicate that it is open to the general public or community, hence it is not clear external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company’s extractive business partners. [Code of Business Ethics and Conduct, N/A: static.conocophillips.com] • Not Met: Expects EX BPs to convey expectation to their BPs
C.3	Users are involved in the design and performance of the 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: Describes how users engaged on design and performance: The Indigenous People Strategy document states ‘Indigenous communities are involved in the design of engagement and consultation’. The 2021 Sustainability Report indicates its stakeholder engagement principle, which includes: ‘Include stakeholders in the design and implementation of the engagement process’. However, no description found of how it engages with potential or actual users on the performance of the mechanism. [2021 Sustainability Report, 2022: static.conocophillips.com] & [Indigenous People, N/A: static.conocophillips.com] • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	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 procedure and timescales for managing complaints or concerns: The Ethics Hotline FAQ indicates: ‘Reports are entered directly on the third-party vendor’s, EthicsPoint, secure server to prevent any possible breach in security. These reports are available to and shared with only those specific individuals within the company who are charged with evaluating and handling these reports’. The Code of Business Ethics and Conduct adds: ‘The ConocoPhillips Ethics HelpLine is managed by a third party’. However, no evidence found on timescales for addressing the complaints or concerns and how complainants are informed. [Make a Report FAQ, N/A: secure.ethicspoint.com] & [Code of Business Ethics and Conduct, N/A: static.conocophillips.com] • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	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 against workers/stakeholders: The Ethics Hotline FAQ indicates: ‘ConocoPhillips’ policy strictly prohibits any retaliation against any person who makes a good faith report of a potential ethical violation. If you believe you have faced retaliation of any kind, please report it so that we can investigate’. [Make a Report FAQ, N/A: secure.ethicspoint.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes practical measures to prevent retaliation: Regarding the Ethics Helpline, the 2021 Sustainability Report indicates: 'there is an anonymous option'. [2021 Sustainability Report, 2022: static.conocophillips.com] Score 2 • Not Met: Specifies no legal action, firing or violence: The Code of Business Ethics and Conduct indicates: 'ConocoPhillips is committed to creating an environment in which we can report suspected violations, participate in investigations and engage in any other legally protected activities without fear of retribution or retaliation. Individuals who do retaliate against others will be subject to disciplinary action, up to and including termination'. The Company discloses a list of examples of retaliation it prohibits: 'Adverse employment action affecting an employee's salary or compensation. [...] Threatening an employee'. However, no evidence found indicating that it will not retaliate against workers and stakeholders through: legal action or violence. [Code of Business Ethics and Conduct, N/A: static.conocophillips.com] • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Code of Business Ethics and Conduct indicates: 'ConocoPhillips is committed to creating an environment in which we can report suspected violations, participate in investigations and engage in any other legally protected activities without fear of retribution or retaliation. Individuals who do retaliate against others will be subject to disciplinary action, up to and including termination'. Extractive business partners are expected to comply with the Code. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at extractive business partners level, as it is not clear the mechanism is open to them. [Code of Business Ethics and Conduct, N/A: static.conocophillips.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: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified: The Valuing Human Rights website states that 'If our operations identify potential human rights concerns, engagement plans and specific actions to manage and mitigate that risk are developed through engagement with the community or other stakeholders. Where appropriate, business units communicate and engage communities and their representatives on how to contact the company and how to address any concerns or grievances.' However, the Company does not specify how it would provide or enable timely remedy for victims. [Valuing Human Rights_web, N/A: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Discloses number of grievances filed, addressed or resolved and outcomes achieved • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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: Pays living wage or sets time-bound target • Not Met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not Met: Achieved paying living wage • Not Met: Reviews definition living wage 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 and revenues beyond legal minimums: The Global Tax Policy indicates: 'ConocoPhillips files annual country-by-country reports to the IRS which disclose certain tax information, including income tax payments and income taxes expenses'. However, it is not clear if it reports, by country, taxes and revenue payment to all countries where it operates. [Global Tax Policy_web, N/A: conocophillips.com] Score 2 <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country: It is not clear it reports, by country, taxes and revenue payment to all countries where it operates. • Not Met: Steps taken to promote transparency in non EITI countries • Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements
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"> • Not Met: Measures to prohibit violence/retaliation against workers for joining trade union: The 2021 Sustainability Report indicates: 'Our approach is consistent with the human rights philosophies [...]. This includes the core labor standards related to [...] freedom of association, right to collective bargaining, [...]'. However, it is not clear the measures the Company puts in place to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). [2021 Sustainability Report, 2022: static.conocophillips.com] • Met: Discloses % of total direct operations covered by CB agreements: The Company indicates that in 2021, 4% of its employees are 'covered by a collective bargaining agreement'. [2021 Sustainability Report, 2022: static.conocophillips.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (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"> • Met: Describes process to identify H&S risks and impacts: The 2021 Sustainability Report indicates: 'Our corporate HSE Management System Standard helps ensure that business activities are consistently conducted in a safe, healthy, environmentally and socially responsible manner across the globe. Our corporate standard aligns with, and is based on, industry standards such as ISO 45001, OHSAS 18001, ISO 14001 and ISO 9001. In accordance with the corporate standard, each business unit maintains an HSE Management System to assess and manage the local operational risks to the business, employees, contractors, stakeholders and the environment. All our business units periodically review their HSE management systems against the corporate standard and are responsible for integrating HSE and sustainability issues into day-to-day operations, project development and decision making. They analyze current status, identify areas for potential improvement, and then implement key activities to reduce risk and further improve HSE performance. They are held accountable through an annual performance assessment'. [2021 Sustainability Report, 2022: static.conocophillips.com] • Met: Discloses injury rate or lost days for last reporting period: The 2021 Sustainability Report indicates it 'Workforce Lost Workday Rate' in 2021: 0.04. [2021 Sustainability Report, 2022: static.conocophillips.com] • Met: Discloses fatalities for last reporting period: The 2021 Sustainability Report indicates it 'had zero fatalities in 2021'. [2021 Sustainability Report, 2022: static.conocophillips.com] <ul style="list-style-type: none"> • Not Met: Discloses occupational disease rate for last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The 2021 Sustainability Report indicates: 'Objectives, targets and deadlines are set and tracked annually to drive strong HSE performance'. However, no further information found on targets related to lost days (or near miss frequency rate) and occupational disease rates for the last reporting period. [2021 Sustainability Report, 2022: static.conocophillips.com] • Met: Met targets or explains why not or actions to improve H&S management systems: The 2021 Sustainability Report indicates: 'We continuously look for ways to operate more safely, efficiently and responsibly. We focus on reducing human error by emphasizing interaction among people, equipment and work processes. We conduct thorough investigations of all serious incidents to understand the root cause and share lessons learned globally to improve our procedures, training, maintenance programs and designs. [...] We seek to continually improve our process safety culture and performance across the entire company. A global network of process safety experts meets regularly to share knowledge and discuss best practices for continuous improvement. To strengthen our process safety performance: Engineers design safer systems with new knowledge and technologies. Trained operations staff perform routine maintenance to mitigate process hazards and ensure asset integrity. Process safety experts analyze events and share knowledge globally'. [2021 Sustainability Report, 2022: 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/recognise indigenous rights holders: The Indigenous Peoples guidance document indicates: '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 conduct pre-engagement analyses to understand indigenous communities in areas of our activities, including their culture, decision-making structures, and methods of communication. [...] 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, N/A: static.conocophillips.com] • Met: Describes how indigenous communities are engaged during assessment: The Indigenous Peoples guidance document indicates: '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 conduct pre-engagement analyses to understand indigenous communities in areas of our activities, including their culture, decision-making structures, and methods of communication. [...] 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, N/A: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to FPIC • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	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 approach to identifying land tenure rights holders and negotiating compensation: 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'. However, it is not clear how it negotiates with tenure rights holders to provide adequate compensation or requested alternatives to financial compensation. [Indigenous People, N/A: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation • Not Met: Describes steps to meet IFC PS 5 in state deals
D.3.7	Security (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 security implementation (incl. VPs or ICOC) and provides an example: The Company publishes a Voluntary Principles of Security and Human Rights Annual Report. The 2021 VPSHR Annual Report indicates: 'Implementation of the company's Human Rights Position, including our commitment to the VPSHR, is done through processes which include human rights issues as part of social considerations at the project and business unit (BU) levels'. It publishes information on its implementation efforts in Colombia, Indonesia, Lydia, USA and Canada. For Colombia, Indonesia, it discloses information on Security Contracts and Agreements, Security Risk Assessments, and Training. [2021 VPSHR Annual Report, 2022: static.conocophillips.com] • Met: Ensures Business Partners/JVs follow security approach: The webpage section Valuing Human Rights indicates: 'All contract security organizations are required to provide VPSHR training to their employees and comply with the principles'. [Valuing Human Rights_web, N/A: conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Security and HRs assessment includes input from local communities: The webpage section Valuing Human Rights indicates: 'Security personnel and community engagement practitioners, including contractors, complete corporate human rights training on the VPSHR on an annual basis'. However, no evidence found that its security and human rights assessments include inputs from the local community, including about their security concerns. [Valuing Human Rights_web, N/A: conocophillips.com] • Not Met: Two examples of working with local communities to improve security
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:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes preventative/corrective action plans for water and sanitation risks: The 2021 Sustainability Report indicates: 'We manage water risks and mitigate potential impacts to water resources, taking into account the unique hydrologic, quality, use and ecological settings of each basin or offshore marine area. [...] Water-related operational, reputational and regulatory risks associated with fresh water use, water stress, offshore produced water discharges and onshore produced water disposal could affect our business'. However, it is not clear how it implements preventive and corrective action plans for identified specific risks to the right to water and sanitation in its own operations. [2021 Sustainability Report, 2022: static.conocophillips.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities • Not Met: Reports progress in meeting targets and trends demonstrating progress
D.3.9	Women's rights (in own extractive operations, which include JVs)	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 processes to stop harassment and violence against women • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap

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 threshold were found, and so the score of 18.13 out of 80 points scored in themes A-D has been applied to produce a score of 4.53 out of 20 points for theme E.

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