

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name EOG Resources
Sector Extractives
Overall score 7.9 out of 100

Theme score	Out of	For theme
1.4	10	A. Governance and Policy Commitments
0.7	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
0.7	25	D. Performance: Company Human Rights Practices
1.6	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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Universal Declaration of Human rights (UDHR): The Human Rights policy states that 'We respect internationally recognized human rights principles as set forth in the Universal Declaration of Human Rights'. [Human Rights policy, 01/09/2021: eogresources.com] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to UNGPs: The policy also states that 'Guided by the United Nations Guiding Principles on Business and Human Rights as a framework, we seek to promote respect for human rights throughout our business'. However, 'guided by' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights policy, 01/09/2021: eogresources.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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Commitment to ILO core principles: The HR policy indicates that 'We respect internationally recognized human rights principles as set forth in the Universal Declaration of Human Rights and support the principles described in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work'. However, 'support the principles' is not considered a formal statement of commitment to the ILO Declaration, according to CHRB wording criteria. [Human Rights policy, 01/09/2021: eogresources.com] Not Met: Explicitly lists all four ILO core principles: The HR policy states that 'We respect internationally recognized human rights principles as set forth in the

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			<p>Universal Declaration of Human Rights and support the principles described in the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, including those regarding freedom of association and prohibitions on child labor, forced labor, and discrimination in the workplace’. No evidence found of a policy commitment statement covering also the commitment to respect the right to collective bargaining. The 2021 Sustainability Report indicates its international standards and frameworks informing its approach to human rights, including: ‘International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, including those regarding freedom of association and prohibitions on child labor, forced labor, and discrimination in the workplace’. However, on the one hand, no commitment to respect the right to collective bargaining found, and on the other only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights policy, 01/09/2021: eogresources.com] & [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects BPs/JVs to commit to ILO core principles: The Code for vendors and contractors states that ‘While governments bear the primary responsibility for protecting human rights, the Company is committed to conducting our business in a manner that respects the dignity and human rights of all individuals. The Company will comply with local laws regarding human rights where we operate. EOG also endeavors to complement local laws with internationally recognized human rights principles and frameworks. We expect our contractors and vendors to promote ethical conduct and demonstrate respect for the human rights of all Company stakeholders’. No evidence found of a formal expectation for suppliers to commit to respect the ILO Declaration. The Human Rights policy expects that suppliers and vendors ‘to adhere to this same commitment’ (the commitment already included in the vendor and contractor code). [Code of conduct and ethics for vendors and contractors, 11/02/2022: eogresources.com] & [Human Rights policy, 01/09/2021: eogresources.com] • Not Met: Explicitly lists all four ILO core principles for BPs/JVs
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"> • Not Met: Commitment to respect H&S of workers: The Code of conduct states that ‘The Company strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe, secure and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. However, ‘strives to’ is not considered a formal statement of commitment according to CHRB wording criteria. Previous assessment included a safety and environmental policy, to which also refers the sustainability report. However, this policy was no longer found in public domain. [Code of Business Conduct and Ethics for Director, Officers and Employees, 11/02/2022: eogresources.com] & [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.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 for vendors and contractors states that ‘vendors and contractors working on EOG property have responsibility for maintaining a safe, secure and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions’. [Code of conduct and ethics for vendors and contractors, 11/02/2022: eogresources.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: The HR policy states that ‘EOG respects the rights and local traditions of stakeholders where we operate. We seek to contribute to economic growth, social development, and the overall welfare of the community, and to tailor our actions to each community’s particular culture’. However, no specific commitment found to respect land ownership and natural resources. [Human Rights policy, 01/09/2021: eogresources.com] • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The policy also indicates that 'We also recognize the importance of internationally recognized principles regarding the rights of Indigenous Peoples, such as the United Nations Declaration on the Rights of Indigenous Peoples'. However, no evidence found of a formal policy commitment to respects indigenous peoples' rights or the UN Declaration, as 'recognizing the importance' is not considered a formal commitment according to CHRB wording criteria. [Human Rights policy, 01/09/2021: eogresources.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: Although the Sustainability report devotes a section to describe water management and it indicates that that EOG is focused on 'responsibly managing the water used, produced, transported, treated, stored and disposed of across our operations in a cost-effective and environmentally sustainable manner', no formal policy commitment found to respect the right to water. [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.com] • Not Met: Expects EX BPs to make these commitments
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (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 Voluntary Principles on Security and HRs • Not Met: Uses only ICoCA members as security providers • Not Met: Commits to International Humanitarian Law <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: The Human Rights policy indicates that 'we strive to identify potential adverse human rights impacts in advance and to address issues where needed'. However, no formal policy commitment found to remedy adverse impacts that it has caused or contributed to. [Human Rights policy, 01/09/2021: eogresources.com] • Not Met: Expects EX BPs to make this commitments <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: The Code of conduct and ethics for vendors and contractors indicates: 'EOG will not take adverse action or otherwise allow retaliation against anyone who in good faith reports a violation or suspected violation of this Contractor Code or the Employee Code or suspected unethical or illegal conduct. Anyone who retaliates in any way against a person who in good faith reports a violation or suspected violation of this Contractor Code or the Employee Code or suspected unethical or illegal conduct will be subject to disciplinary action, which may include termination of the relationship with EOG and may include criminal prosecution'. However, no evidence found of a commitment to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders, beyond a non-retaliation policy for reporting a violation, which is considered generic for the purposes of this subindicator. [Code of conduct and ethics for vendors and contractors, 11/02/2022: eogresources.com] • Not Met: Expects BPs to make this commitment: See above. However, no expectation of a commitment for business partners not to tolerate attacks or intimidation against human rights defenders could be found. [Code of conduct and ethics for vendors and contractors, 11/02/2022: eogresources.com] <p>Score 2</p> <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	<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: Board level responsibility for HRs: The Company states that oversight of its approach to human rights issues is primarily the responsibility of our Nominating, Governance and Sustainability Committee. [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] • Not Met: Describes HRs expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	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: Process to review HRs strategy at board level: The Nominating, Governance and Sustainability Committee Charter discloses the Committee's duties, which include: 'The Committee shall oversee the Company's human rights matters, including the Company's Human Rights Policy and related policies and practices'. The 2021 Sustainability Report notes that 'as part of this responsibility, the Committee reviews potential ESG-related impacts to the company and makes recommendations to the Board, our Audit Committee, Compensation and Human Resources Committee, and management, as appropriate'. It also further discloses Board risk oversight of ESG matter including the role of the other Board Committees. The Human Rights Policy reaffirms that the 'Nominating, Governance and Sustainability Committee of the Board of Directors has oversight responsibility for our Human Rights Policy'. However, no specific description found of the processes [how it is briefed, processes to discuss it, timeframe for meetings] it has in place to discuss and regularly review its human rights strategy or policy or management processes at Board level or a Board Committee. No further evidence found in the webpage section Board of Directors. [Nominating, Governance and Sustainability Committee Charter, 09/02/2022: egresources.com] & [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] • Not Met: Example of HRs issues/trends discussed in last reporting period <p>Score 2</p> <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	0.5	<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: At least one board member incentive linked to HRs commitments: The 2021 Sustainability Report notes: 'EOG's executive officers are eligible to receive bonuses under the Annual Bonus Plan based on the achievement of operational, financial, and strategic goals established by the Compensation and Human Resources Committee of the Board. [...] ESG-related performance is evaluated under a separately weighted ESG-related goal as part of the Annual Bonus Plan'. It includes 'Total recordable incident rate'. The 2022 Proxy Statement contains further information on the performance goals, indicating the performance goal: 'Improve strong safety and environmental record, including a reduction in methane, GHG and flaring intensity rates and improvement in wellhead gas capture rate'. The CEO is a Board member. [2022 Proxy statement, N/A: s24.q4cdn.com] & [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The weight of the goal is: 7.5% and the assessment is the following: 'Achieved lowest recordable incident rate, methane and flaring intensity rates and highest wellhead gas capture rate to-date'. The CEO is a Board member. However, no evidence found on the actual human rights-related metrics/indicators included in performance incentives, as the 7.5% weight includes other goals to be reached. [2022 Proxy statement, N/A: s24.q4cdn.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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making Score 2 <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments • 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Senior manager incentives linked to HRs commitments: The 2021 Sustainability Report notes: 'EOG's executive officers are eligible to receive bonuses under the Annual Bonus Plan based on the achievement of operational, financial, and strategic goals established by the Compensation and Human Resources Committee of the Board. [...] ESG-related performance is evaluated under a separately weighted ESG-related goal as part of the Annual Bonus Plan'. It includes 'Total recordable incident rate'. The 2022 Proxy Statement contains further information on the performance goals, indicating the performance goal: 'Improve strong safety and environmental record, including a reduction in methane, GHG and flaring intensity rates and improvement in wellhead gas capture rate'. [2022 Annual Report, 2023: s24.q4cdn.com] & [2022 Proxy statement, N/A: s24.q4cdn.com] Score 2 <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S • Not Met: Performance criteria linked to HRs made public: The weight of the goal is: 7.5% and the assessment is the following: 'Achieved lowest recordable incident rate, methane and flaring intensity rates and highest wellhead gas capture rate to-date'. However, no evidence found on the actual human rights-related metrics/indicators included in performance incentives, as the 7.5% weight includes other goals to be reached. [2022 Proxy statement, N/A: s24.q4cdn.com] • Not Met: Review of other senior management incentives for coherence with HRs policies
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: HRs risks integrated as part of enterprise risk system • Not Met: Provides an example Score 2 <ul style="list-style-type: none"> • Not Met: Risk assessment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external 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: Score of 1 on A.1.2.a • Met: Communicates HRs policies to all workers in own operations: The 2021 Sustainability Report notes: 'To promote our commitment to ethical business practices, EOG maintains an active global compliance training program. Training is provided to employees upon joining the company and then to employees and contractors periodically thereafter. [...] To help implement our human rights commitment, we provide guidance on the importance of respecting human rights and identifying potential human rights issues as part of our global compliance training program'. [2021 Sustainability report, N/A: egoresources-com.s3.us-west-2.amazonaws.com] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <ul style="list-style-type: none"> • Not Met: Describes how HRs policies are contractual/binding for suppliers • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes how workers are trained on HRs policy commitments: The 2021 Sustainability Report notes: 'To promote our commitment to ethical business practices, EOG maintains an active global compliance training program. Training is provided to employees upon joining the company and then to employees and contractors periodically thereafter. [...] To help implement our human rights commitment, we provide guidance on the importance of respecting human rights and identifying potential human rights issues as part of our global compliance training program'. [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.com] • Not Met: Trains relevant managers including security on HRs: See above. However, it is not clear security personnel receive specific human rights training relevant to their role. [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments • 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 • 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	<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 performance affects selection EX BPs • Not Met: HRs performance affects ongoing BPs relationships <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
B.1.8	Approach to engagement with affected stakeholders	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 workers and communities identified and engaged in the last two years: The 2021 Sustainability Report notes: 'We consider stakeholder interests when developing our approach to ESG matters and the content in this report'. It discloses a table with different stakeholders including communities, employees, land and mineral owners and NGOs. Along with stakeholders' groups, it indicates 'strategies and tools we typically use to facilitate engagement' for each group. Regarding employee engagement, it states: 'We engage employees and build our collaborative culture by encouraging teams throughout the company — and across disciplines — to share their thoughts and solutions at regular internal conferences and planning sessions. [...] In addition to fostering engagement across functions and operating areas, members of our executive team routinely interact with personnel throughout the company. [...] EOG also facilitates engagement through regular all-staff meetings in our operating areas, company newsletters, intranet articles, and training. We organize a broad range of volunteer activities and support employees in volunteering in our communities. EOG continues to be recognized as a Top Workplace by Energage based on an annual survey of employees across the company's operations, reflecting EOG's positive culture and work environment'. As for engagement with communities, it adds: 'We meet with community leaders and permitting authorities to discuss specific projects during the planning process and on an ongoing basis. We also reach out to — and engage with — community leaders and civic organizations to learn how we can support local philanthropic and other community efforts. In addition, the land personnel in our operating areas work closely with surface and mineral owners and other community members near our operations to communicate plans and address questions and concerns. Our Land Administration Call Center addresses questions from interest owners, including inquiries related to land and royalty ownership'. As for Indigenous Peoples: 'As part of our commitment to respect tribal heritage resources, we proactively engage federal, state, and local land management agencies in multiple jurisdictions to create cooperative cultural review and assessment protocols. Our goal in these efforts is to address site-specific concerns

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>based on stakeholder input, local knowledge, and cultural preservation best practices'. It discloses a table named 'Engaging Stakeholders'. It contains three main points: 'Identify local stakeholder and potential community concerns; Develop relationships and lines of communication with local stakeholders, including through individual or community meetings; Partner to build strong relationships with stakeholders through collaborative efforts'. However, no further details on how it identifies affected stakeholders with whom to engage in the last two years found, including workers amongst extractive business partners or local communities. [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders whose HRs may be affected: See above. The 2021 Sustainability Report discloses a table with different stakeholders including communities, employees, land and mineral owners and NGOs. However, it is not clear how these categories of stakeholders are linked to human rights risks and impacts. It also explains how it engages with communities and employees, among other stakeholders. Nevertheless, this subindicator looks for the categories of stakeholders whose human rights have been or may be affected by its activities. No further evidence found. [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.com] • Not Met: Provides two examples of engagement with stakeholders: See above. The 2021 Sustainability Report discloses information on: community engagement, its volunteer culture, grievance mechanisms, partnering with local community organizations, STEM education, among other topics. On its engagement with employees, it notes: 'Based on the 2021 survey, our offices in Artesia, Houston, Oklahoma City, and San Antonio were each recognized as a Top Workplace. EOG was also included on the Top Workplace USA list, which recognizes companies that create a positive work environment by prioritizing a people-centered culture and giving employees a voice'. Also, 'members of our executive team routinely interact with personnel throughout the company. For example, they participate in operating area reviews and annual technical conferences with employees from across disciplines, as well as the annual management conference that is attended by leaders from across the company. Furthermore, our CEO provides a company update to each operating area at least three times per year'. However, this subindicator looks for examples of a dialogue between the Company and its stakeholders that enables it to hear, understand and respond to their interests and concerns in relation to human rights. No further evidence found. [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.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	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 process of identifying risks in own operations • Not Met: Describes process for identifying risks in EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks • Not Met: Describes how process applies to EX BPs • Not Met: Public disclosure of results of HRs risk assessment <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
B.2.3	Integrating and acting on human rights risks and impact assessments	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 system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to EX BPs • Not Met: Example of actions decided on at least 1 salient HRs issue <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken

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B.2.4	Tracking 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: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company states that it provides its personnel and stakeholders with multiple channels by which to submit claims of human rights-based grievances that may be associated with operations. These include feedback to company representatives at work locations; contacting representatives of Human Resources, the Land Department, the Legal Department, or the Compliance Committee; and a 24-hour Compliance and Ethics hotline and online reporting system, through which concerns can be shared confidentially and anonymously. The webpage section Ethics Point adds: ‘We want you and all workers, employees, contractors and vendors to feel comfortable in approaching EOG management in instances where you believe violation of our policies or unethical conduct has occurred. The EthicsPoint Hotline is provided as an additional means for reporting your concerns’. [Human Rights policy, 01/09/2021: egoresources.com] & [EthicsPoint_web, N/A: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made aware: Employees receive human rights training and the Human Rights Policy contains provisions on the reporting mechanisms [see B.1.5]. The 2021 Sustainability Report indicates: ‘The hotline and online reporting system are available worldwide in local languages spoken in our areas of operation’. [EthicsPoint_web, N/A: secure.ethicspoint.com] & [2021 Sustainability report, N/A: egoresources-com.s3.us-west-2.amazonaws.com] • Met: Describes how workers in EX BPs access grievance mechanism: The Human Rights Policy states: ‘EOG provides its personnel and stakeholders with multiple channels by which to submit claims of human rights-based grievances that may be associated with our operations’. The Code of Conduct for Vendors and Contractors indicates: ‘EOG vendors and contractors have the responsibility to report violations of this Contractor Code or other conduct relating to EOG’s business that they suspect may be unethical or in violation of applicable laws and regulations. Reporting actual or suspected misconduct allows EOG to investigate potential problems, stop actual misconduct and prevent future issues’. In both documents, the Company discloses the different reporting channels provided by the Company. [Human Rights policy, 01/09/2021: egoresources.com] & [Code of conduct and ethics for vendors and contractors, 11/02/2022: egoresources.com] • Not Met: Expects EX BPs to convey expectation to their BPs
C.2	Grievance mechanism(s) for external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company states that it provides its personnel and stakeholders with multiple channels by which to submit claims of human rights-based grievances that may be associated with operations. These include feedback to company representatives at work locations; contacting representatives of Human Resources, the Land Department, the Legal Department, or the Compliance Committee; and a 24-hour Compliance and Ethics hotline and online reporting system, through which concerns can be shared confidentially and anonymously. [Human Rights policy, 01/09/2021: egoresources.com] Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: Although the EthicsPoint is available in three languages, it is not clear it is available in local languages of all local communities. Moreover, it

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>is not clear how the Company ensures all affected external stakeholders, including communities, at its own operations are made aware of it. [EthicsPoint_web, N/A: secure.ethicspoint.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how external individuals/communities access grievance mechanism: The Human Rights Policy states: 'EOG provides its personnel and stakeholders with multiple channels by which to submit claims of human rights-based grievances that may be associated with our operations'. The Code of Conduct for Vendors and Contractors indicates: 'EOG vendors and contractors have the responsibility to report violations of this Contractor Code or other conduct relating to EOG's business that they suspect may be unethical or in violation of applicable laws and regulations. Reporting actual or suspected misconduct allows EOG to investigate potential problems, stop actual misconduct and prevent future issues'. In both documents, the Company discloses the different reporting channels it provides. However, it is not clear that external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company's business partners (or to the Company's own mechanism to report in relation to business partners' behaviour). [Human Rights policy, 01/09/2021: egresources.com] & [Code of conduct and ethics for vendors and contractors, 11/02/2022: egresources.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 • 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 • 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 Code of Conduct for Vendors and Contractors notes: 'EOG will not take adverse action or otherwise allow retaliation against anyone who in good faith reports a violation or suspected violation of this Contractor Code or the Employee Code or suspected unethical or illegal conduct. Anyone who retaliates in any way against a person who in good faith reports a violation or suspected violation of this Contractor Code or the Employee Code or suspected unethical or illegal conduct will be subject to disciplinary action, which may include termination of the relationship with EOG and may include criminal prosecution'. Although it is a contractor code, it indicates it prohibits retaliation against anyone reporting violations of this code as well as the code used in its own operations [Employee Code]. [Code of conduct and ethics for vendors and contractors, 11/02/2022: egresources.com] • Met: Describes practical measures to prevent retaliation: The 2021 Sustainability Report notes: 'EOG's hotline and online reporting system are hosted by a third party to maintain anonymity'. [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Code of Conduct for Vendors and Contractors notes: 'EOG will not take adverse action or otherwise allow retaliation against anyone who in good faith reports a violation or suspected violation of this Contractor Code or the Employee Code or suspected unethical or illegal conduct. Anyone who retaliates in any way against a person who in good faith reports a violation or suspected violation of this Contractor Code or the Employee Code or suspected unethical or illegal conduct will be subject to disciplinary action, which may include termination of the relationship with EOG and may include criminal prosecution'. However, it is not clear it has prohibition of retaliation which also covers workers, individual stakeholders and communities at business partners level [as it is not clear the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			mechanism is open to them]. [Code of conduct and ethics for vendors and contractors, 11/02/2022: eogresources.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <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: EOG Resources Trinidad Nitro Unlimited [A Company's subsidiary] is 'part of the process for the first TTEITI [Trinidad and Tobago EITI] Report' covering the period 1 October 2018 to 30 September 2020. Regarding the Company, the Report notes: 'EOG Group - Other than the specific participants listed among the forty-five selected by the Steering Committee, EOG reported a locally-registered subsidiary – EOG Resources Trinidad Nitro Unlimited. This company is not involved in upstream operations'. No evidence found that the Company is a EITI member. The Company provided additional feedback to CHRB regarding this indicator, however, no further evidence found. [EITI Trinidad and Tobago report 2019/20, 2020: static1.squarespace.com] & [TTEITI's beneficial ownership_web, N/A: tteiti.com] Score 2 <ul style="list-style-type: none"> • Not Met: Reports of taxes and revenues beyond legal minimums: See above. However, no evidence found the Company publicly reports, by country, the taxes and revenue payments to some countries beyond legal requirements for disclosure. [EITI Trinidad and Tobago report 2019/20, 2020: static1.squarespace.com] & [TTEITI's beneficial ownership_web, N/A: tteiti.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country: The 2022 Annual Report reports on income tax provision for the United States, Trinidad and 'Other International'. As for Other International it notes: '[it] primarily consists of EOG's China and Canada operations. The China operations were sold in the second quarter of 2021. EOG began exploration programs in Australia in the third quarter of 2021 and in Oman in the third quarter of 2020. The decision was reached in the fourth quarter of 2021 to exit Block 36 and Block 49 in Oman'. The TTEITI [Trinidad and Tobago EITI] Report contain discloses of the Company's local subsidiary. No evidence found that the Company publicly reports, by country, taxes and revenue payments to all countries where it operates. No further evidence found in the Natural Resource Revenue Data webpage nor in the TTEITI webpage. [2022 Annual Report, 2023: s24.q4cdn.com] & [EITI Trinidad and Tobago report 2019/20, 2020: static1.squarespace.com] • 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)	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: Measures to prohibit violence/retaliation against workers for joining trade union • Not Met: Discloses % of total direct operations covered by CB agreements <p>Score 2</p> <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	<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 to identify H&S risks and impacts: The 2021 Sustainability Report notes: 'All workers are empowered to proactively identify and communicate potential hazards, near misses, and other safety issues. These observations can help us to recognize trends and identify and mitigate factors that can lead to incidents. We collect incident data to identify trends and implement corrective actions as necessary. [...] Hazards and appropriate safety precautions are assessed, identified, and discussed in prejob safety meetings before tasks are performed. As necessary, we also conduct safety stand-downs in which we stop work across an operation to discuss safety hazards and mitigations. [...] Our practices related to hazard identification and risk management include: Providing initial, periodic, and refresher safety training; Collecting incident data and conducting trend analysis; Identifying and reporting potential hazards and near misses; Utilizing work methods that manage the level of risk; Taking corrective actions as necessary'. [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] • Met: Discloses injury rate or lost days for last reporting period: The Company reports that Lost time Incident Rate (incidents per 200,000 work hours) was 0.03 for employees and 0.13 for contractors in 2021. [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] • Met: Discloses fatalities for last reporting period: The Company reports that number of fatalities for employee and contractor is 0 in 2021. [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] • Not Met: Discloses occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The 2021 Sustainability Report notes: 'EOG's executive officers are eligible to receive bonuses under the Annual Bonus Plan based on the achievement of operational, financial, and strategic goals established by the Compensation and Human Resources Committee of the Board. [...] ESG-related performance is evaluated under a separately weighted ESG-related goal as part of the Annual Bonus Plan'. It includes 'Total recordable incident rate'. The 2022 Proxy Statement contains further information on the performance goals. However, this subindicator looks specific for targets related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period. No further evidence found. Human rights related Executive incentives is assessed in B.1.2. [2021 Sustainability report, N/A: egresources-com.s3.us-west-2.amazonaws.com] & [2022 Proxy statement, N/A: s24.q4cdn.com] • Not Met: Met targets or explains why not or actions to improve H&S management systems

Indicator Code	Indicator name	Score (out of 2)	Explanation
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/recognise indigenous rights holders • Not Met: Describes how indigenous communities are engage during assessment Score 2 <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
D.3.6	Land rights: Land acquisition (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: Describes approach to indentifying lang tenure rights holders and negotiating compensation Score 2 <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)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example • Not Met: Ensures Business Partners/JVs follow security approach Score 2 <ul style="list-style-type: none"> • Not Met: Security and HRs assessment includes input from local communities • 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes preventative/corrective action plans for water and sanitation risks Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women: The Code indicates: 'We are firmly committed to providing equal opportunity in all aspects of employment and a workplace free of discrimination, harassment or segregation based on sex, [...] or any other characteristic protected by law. [...] Similarly, offensive or hostile working conditions created by such discrimination, harassment or segregation will not be tolerated. Any employee who engages in discrimination or harassment will be subject to disciplinary action, up to and including termination of employment'. The 2021 Sustainability Report discloses information on workers' benefits program, including paid leave. The Code of Conduct for Vendors and Contractors adds: 'EOG policies are designed to ensure that all employees, vendors and contractors are treated fairly and with respect, by EOG and each other. We are firmly committed to providing equal opportunity in all aspects of employment and a workplace free of discrimination, harassment or segregation based on sex, [...] pregnancy (including childbirth and related medical conditions) [...] or any other characteristic protected by law. [...] Similarly, offensive or hostile working conditions created by such discrimination, harassment or segregation will not be tolerated. Anyone who engages in discrimination or harassment will be subject to disciplinary action, which may include termination of the relationship with EOG. If you feel that you have experienced or observed any discriminatory or harassing behavior, you are encouraged to voice your concerns, by reporting in accordance with the procedures described in Section 2 of this Contractor Code. Retaliation against anyone who lodges a complaint in good faith, or participates in the investigation of a complaint, will not be tolerated'. Although the Company indicates it does not tolerate any type of discrimination, it does not describe its process to prohibit and address harassment, intimidation and violence specifically against women. [Code of Business Conduct and Ethics for Director, Officers and Employees, 11/02/2022: eogresources.com] & [Code of conduct and ethics for vendors and contractors, 11/02/2022: eogresources.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Working conditions take into account gender issues: See above. The 2021 Sustainability Report discloses different benefit programs it offers, including: 'Ovia Health - This maternity and family benefits platform offers apps that provide support across the entire parenthood journey. Features include a health assessment, symptom tracking, one-on-one coaching, and return-to-work support. [...] Family Care Pay - We offer up to 160 hours of paid time off for the birth, adoption, or foster care of a child, or serious health condition of an employee's spouse, child, or parent, and any step or in-law relationship that applies to those listed. This pay is in addition to paid leave available to mothers following the birth of a child'. The Code of Conduct for Vendors and Contractors adds: 'We are firmly committed to providing equal opportunity in all aspects of employment and a workplace free of discrimination, harassment or segregation based on sex, [...] pregnancy (including childbirth and related medical conditions) [...] or any other characteristic protected by law. [...] Similarly, offensive or hostile working conditions created by such discrimination, harassment or segregation will not be tolerated'. However, no further description found of how it takes into account differential impacts on women and men of working conditions, including to reproductive health. No further evidence found in the Code of Business Conduct and Ethics for Director, Officers and Employees. [2021 Sustainability report, N/A: eogresources-com.s3.us-west-2.amazonaws.com] & [Code of conduct and ethics for vendors and contractors, 11/02/2022: eogresources.com] • 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 6.28 out of 80 points scored in themes A-D has been applied to produce a score of 1.57 out of 20 points for theme E.

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