

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name**      Marathon Oil  
**Sector**              Extractives  
**Overall score**        4.1 out of 100

Theme score	Out of	For theme
0.2	10	A. Governance and Policy Commitments
0.5	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
0.7	25	D. Performance: Company Human Rights Practices
0.8	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	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: General HRs commitment: The Chairman &amp; CEO message prefacing the sustainability report (and the website) indicates that 'we are also committed to respecting human rights and recently released a Human Rights policy' The report devotes a section to human rights, states that 'At Marathon Oil, we believe respecting human rights is a moral and business imperative'. However, commitments are expected to be placed in formal policy documents. The HR policy states that 'Our Human Rights Policy is guided by and informed by: Our understanding that human rights are fundamental rights. Our recognition that while governmental authorities have the primary responsibility for protecting human rights, business have a social responsibility to respect human rights and has the ability to make a positive impact on human rights'. However, this document does not include a general statement committing to respect human rights. Although the Policy contains specific commitments related to different aspects of human rights, this subindicator looks for a policy statement of general human rights commitment'. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>] &amp; [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Universal Declaration of Human rights (UDHR): The HR policy states that 'Our Human Rights Policy is guided by and informed by [...] Internationally recognized human rights such as the principles set for in the United Nations Declaration of Human Rights'. However, 'informed by' and 'guided by' are not considered formal statement of commitment to the UDHR according to CHRB wording criteria. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: International Bill of Human Rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to UNGPs</li> <li>• Not Met: Commitment to OECD MNE Guidelines</li> </ul>
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"> <li>• Not Met: Commitment to ILO core principles: See below [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Explicitly lists all four ILO core principles: The human rights policy states that 'we are committed to: providing a safe workplace and we prohibit the use of forced or child labor, trafficking of persons and abusive disciplinary practices. Non-discriminatory hiring and diversity of our workforce, and prohibiting workplace harassment, violence or discrimination against anyone based on any protected characteristic'. However, no evidence found of a commitment to respect the rights to freedom of association and collective bargaining'. Similar statements can be found in the code of conduct. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>] &amp; [Code of business conduct (website policy), N/A: <a href="https://cobc.wp.marathonoil.com">cobc.wp.marathonoil.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Expects BPs/JVs to commit to ILO core principles: The human rights policy states that 'We [...] expect our suppliers to adhere to business principles consistent with our own. This includes the expectation that anyone providing contracted services for our personnel, facilities and/or operations provides those services in a manner that respects human rights'. However, as indicated above, no evidence was found of a general commitment to the ILO Declaration. The Code of conduct also indicates that 'expect all the businesses in our supply chain to follow these same requirements' [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>] &amp; [Code of business conduct (website policy), N/A: <a href="https://cobc.wp.marathonoil.com">cobc.wp.marathonoil.com</a>]</li> <li>• Not Met: Explicitly lists all four ILO core principles for BPs/JVs: See above. No evidence found of an explicit requirement of commitment to rights covered by each ILO core labour area. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>] &amp; [Code of business conduct (website policy), N/A: <a href="https://cobc.wp.marathonoil.com">cobc.wp.marathonoil.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Code of conduct states that 'we are committed to providing a safe workplace, including a workplace free of substance abuse'. Then the Company describes a number of health and safety requirements. [Code of business conduct (website policy), N/A: <a href="https://cobc.wp.marathonoil.com">cobc.wp.marathonoil.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to H&amp;S of workers: Business partners are required to follow the Company's code. [Code of business conduct (website policy), N/A: <a href="https://cobc.wp.marathonoil.com">cobc.wp.marathonoil.com</a>]</li> <li>• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week</li> </ul>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect land ownership/natural resources as in VGGT: Although the Company indicates on its website that 'by engaging with landowners, we seek to foster understanding and trust and lay the foundation for mutually beneficial, long-lasting relationships', no formal statement of commitment to respect land ownership and natural resources, as set out in the VGGT was found.</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards</li> <li>• Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Human rights policy states that it has processes to enable identification and remediation of impacts, including 'Engaging with stakeholders to build trust and to understand how our operations impact communities where we operate. This includes engaging with Indigenous communities in a way that is culturally sensitive and enhances the community's economic capacity'. However, no formal statement of policy commitment to respect indigenous people's rights was found. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing</li> <li>• Not Met: Commitment to respect the right to water: Although the Company devotes a section of the website and in its reports to describe its water stewardship</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			practices, and states that 'we target opportunities that conserve fresh water for community needs while reducing business risk linked to access to water resources, no evidence found of a policy commitment to respect the right to water. [2022 Proxy statement, 25/05/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a> ] <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to Voluntary Principles on Security and HRs: The Human Rights policy states that 'We have a large and diverse extended supply chain and expect our suppliers to adhere to business principles consistent with our own. This includes the expectation that anyone providing security for our personnel, facilities and/or operations provides those services in a manner that respects human rights'. However, no evidence found of a formal commitment to the Voluntary Principles on security and human rights. The Company describes the specific case of Equatorial Guinea on its website. However, this subindicator looks for formal policy statements of commitment. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Uses only ICoCA members as security providers: See above. No evidence found of commitment to use only members of International Code of Conduct Association. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Commits to International Humanitarian Law</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to commit to these rights</li> </ul>
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"> <li>• Not Met: Commitment to remedy adverse HRs impacts: The Human rights policy states that 'Marathon Oil maintains processes to enable the identification and remediation of adverse human rights impacts we may cause or to which we contribute, including [...]'. However, although the Company indicates that it has processes that enable remedy, no formal statement of commitment to remedy adverse impacts caused or contributed to was found. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Expects EX BPs to make this commitments</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with EX BPs on remedy</li> </ul>
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"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects BPs to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

## 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs: The Company states that implementation of its human rights policies is driven by the Law, Corporate Communications and Government Relations organizations through its General Counsel. It notes that board-level oversight is provided by the Health, Environmental, Safety and Corporate Responsibility Committee of Marathon Oil. However, the Company has not provided details of the taskforce or senior responsibility who support the board to implement its human rights policy. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications: The CEO states in the 2021 Sustainability Report 'We also are committed to respecting human rights and recently released a Human Rights Policy', however, no information related to why human rights matter to the business or to any challenges to respecting human rights was found. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> </ul>
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"> <li>• Not Met: Process to review HRs strategy at board level: The Company states that its Human Rights Policy 'shall be reviewed at least once every five years, or more frequently as stipulated by the approver, or when a significant change occurs,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			including changes in law, that impact content.' However, there is no description of process of how the Company's human rights policy or strategy is reviewed or discussed. <ul style="list-style-type: none"> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
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"> <li>• Not Met: At least one board member incentive linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</li> </ul>

## 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"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation with EX BPs</li> </ul>
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"> <li>• Met: Senior manager incentives linked to HRs commitments: The Company states that its short-term incentive program for executives 'align our financial and operational goals with our health, environmental, safety and security (HES&amp;S) and corporate sustainability commitments'. The Company also provides information about the annual bonus linked to safety in its Proxy Statement. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>] &amp; [2022 Proxy statement, 25/05/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Performance criteria linked to HRs made public: The Company indicates in its 2022 Proxy Statement how the safety metrics and weight are calculated for the annual bonus and discloses the 2021 calculation. It States 'Calculated by dividing (a) the Occupational Safety and Health Administration (OSHA) recordable incidents multiplied by 200,000 by (b) the total number of exposure hours. This metric includes both Company employees and contractors and is applied to Company operated properties only' and discloses the 2021 calculation'. [2022 Proxy statement, 25/05/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
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"> <li>• Not Met: HRs risks integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations: The Company states that 'The Code is also placed on company-issued laptops and phones, and hard copies of the Code summary are available in Marathon Oil</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	external stakeholders		<p>offices. Every new Marathon Oil employee receives a communication summarizing their roles and responsibilities under the Code, including ways they can raise Code-related questions and concerns. All active employees, including new hires, are required to complete an annual Code Questionnaire and Certification, and additional online Code training annually, with modules on anti-corruption, harassment, security and protecting information and reporting concerns'. The Company's Code comprises human rights. However, it is not clear whether the Company provides this communication in all appropriate languages. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>
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"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to EX BPs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that 'Our supplier agreements mandate adherence to relevant standards and policies as well as our Code of Business Conduct, which covers ethical, social, labor and anti-discrimination standards'. The Code comprises human rights. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments</li> <li>• Not Met: Trains relevant managers including security on HRs: The Company indicates that it has well-established and effective security and human rights policies that set expectations that those providing security for our personnel, facilities and operations provide those services in a manner that respects human rights. However, no description of training security workers was found. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains BPs to meet HRs commitments</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
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"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs</li> <li>• Not Met: Discloses % of EX BP's monitored</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective actions process</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul>
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"> <li>• Not Met: HRs performance affects selection EX BPs: The Company states that 'Before working with a new supplier, Marathon Oil follows a vetting process to determine technical capabilities, complexity and risk of the associated service and a supplier's health, environment and safety record'. However, no information related to other human rights was found. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: HRs performance affects ongoing BPs relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with EX BPs to meet HRs requirements</li> </ul>
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"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• 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"> <li>• Not Met: Describes process of identifying risks in own operations: The Company states that it 'maintains processes to enable the identification and remediation of adverse human rights impacts we may cause or to which we contribute, including: engaging in ongoing human rights due diligence; engaging with stakeholders...; providing stakeholders multiple avenues through which human rights issues and concerns can be reported and responded to, where appropriate, with remedies; ... tracking how it addresses human rights impacts.' However, there is no evidence of how the Company conducts human rights risks identification in specific locations or activities. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Describes process for identifying risks in EX BPs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
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"> <li>• Not Met: Describes assessment process and discloses salient HRs risks</li> <li>• Not Met: Describes how process applies to EX BPs</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
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"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company indicates that 'We also maintain processes to enable the identification and remediation of adverse human rights impacts, including engaging in ongoing human rights due diligence and tracking how we address human rights'. However, no clear description of this process was found. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Describes how global system applies to EX BPs</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
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"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>



## 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Company states that 'If you suspect or have knowledge of illegal or unethical conduct related in any way to the Company, you must report it to your supervisor, your supervisor's manager, Internal Audit, Law, Human Resources, Environment, Safety, Security &amp; Product Quality or the Integrity Helpline.' The Company also reports that the Integrity Helpline is a resource for anonymous advice or discussion on workplace behavior and ethics. [Code of business conduct, 12/2022: <a href="http://marathonpetroleum.com">marathonpetroleum.com</a>] &amp; [EthicsPoint, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware</li> <li>• Not Met: Describes how workers in EX BPs access grievance mechanism: The Company states that 'Once approved, suppliers are informed [...] about how to report potential violations of our code, policies and standards to our Integrity Helpline.' However, it is not clear if the workers of extractive business partners can access the Helpline to report human rights concerns against the business partner. [2021 Sustainability report, 2022: <a href="http://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
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"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The Company states that 'We provide stakeholders with multiple avenues through which human rights issues and concerns can be reported and addressed, where appropriate, with remedies. These include: Marathon Oil's publicly available Integrity Helpline, which allows for anonymous reporting; Marathon Oil official e-mail; Community feedback mechanisms, including local meetings and direct contact with Marathon Oil Community Liaison personnel.' [2021 Sustainability report, 2022: <a href="http://cdn.sanity.io">cdn.sanity.io</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The Company states that 'We provide stakeholders with multiple avenues through which human rights issues and concerns can be reported and addressed, where appropriate, with remedies. These include: Marathon Oil's publicly available Integrity Helpline, which allows for anonymous reporting; Marathon Oil official e-mail; Community feedback mechanisms, including local meetings and direct contact with Marathon Oil Community Liaison personnel.' However, it is not clear if this includes access for external stakeholders to voice complaints on the conduct of extractive business partners. [2021 Sustainability report, 2022: <a href="http://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
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"> <li>• Not Met: Describes how users engaged on design and performance</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
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"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Company states that 'If you contact the Integrity Helpline, you will be provided a case number to use in identifying your inquiry. The group of professionals who answer your call will work with you to get the information the Company needs to address your concern. Business Integrity and Compliance coordinates the resolution of all allegations. This may include the involvement of Human Resources, Internal Audit, Law and departmental management as necessary.' However, no information was found regarding response timescales. [Code of business conduct, 12/2022: <a href="http://marathonpetroleum.com">marathonpetroleum.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that it will not allow retaliation against any individual. It considers acts of retaliation to be misconduct and a violation of this Code. However, it is not clear whether the Integrity Helpline also works for other stakeholders. [Code of business conduct, 12/2022: <a href="http://marathonpetroleum.com">marathonpetroleum.com</a>]</li> <li>• Not Met: Describes practical measures to prevent retaliation: The Company states that when people contact the Integrity Helpline with a report of misconduct, they will be given the opportunity to remain anonymous. However, it is not clear whether the Integrity Helpline also works for other stakeholders. [Code of business conduct, 12/2022: <a href="http://marathonpetroleum.com">marathonpetroleum.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence</li> <li>• Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders</li> </ul>
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"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
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"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
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"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets time-bound target</li> <li>• Not Met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Achieved paying living wage</li> <li>• Not Met: Reviews definition living wage with unions</li> </ul>
D.3.2	Transparency and accountability (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"> <li>• Not Met: Member of EITI</li> <li>• Not Met: Reports of taxes and revenues beyond legal minimums</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports taxes and revenue by country</li> <li>• Not Met: Steps taken to promote transparency in non EITI countries</li> <li>• Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Measures to prohibit violence/retaliation against workers for joining trade union</li> <li>• Not Met: Discloses % of total direct operations covered by CB agreements</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>
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"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The Company states that it provides orientation, training, coaching, and mentoring to strengthen the skills and safety of its employees and contractors. The Training and Qualification element of responsible Operations Management System (ROMS) establishes expectations for addressing risks inherent to its business, including safety risks. [...] ROMS guides our efforts to identify and address key health challenges in our operations. Our exposure assessment process builds upon and aligns exposure risk management with our HES&amp;S risk assessment process. We identify and rank potential chemical, physical and biological exposure hazards according to risk and then apply industrial hygiene monitoring to control hazards.' [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The Company reports that Lost Time Incident Rate (LTIR) was 0.03 for contractor and 0.00 for employee in 2021. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Met: Discloses fatalities for last reporting period: The Company reports that the number of fatalities (combined employee and contractor) was 0 in 2021. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses occupational disease rate for last reporting period</li> <li>• Not Met: Set targets for H&amp;S performance</li> <li>• Not Met: Met targets or explains why not or actions to improve H&amp;S management systems</li> </ul>
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"> <li>• Not Met: Process to identify/recognise indigenous rights holders</li> <li>• Not Met: Describes how indigenous communities are engaged during assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to FPIC</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources</li> </ul>
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"> <li>• Not Met: Describes approach to identifying land tenure rights holders and negotiating compensation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes approach to compensation including valuation</li> <li>• Not Met: Describes steps to meet IFC PS 5 in state deals</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (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"> <li>• Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The Company states that 'the U.S. State Department has flagged the country of Equatorial Guinea (EG) for human rights risks stemming in part from public and private security forces. EG continues to be a key asset in Marathon Oil's portfolio, and the Company has well-established and effective security and human rights policies that set expectations that those providing security for personnel, facilities and operations provide those services in a manner that respects human rights. The Company employs a proprietary guard service to help protect onshore facilities and engage with the Navy of Equatorial Guinea to safeguard its offshore facilities. The Company reports that it had no known security-related incidents resulting in a human rights violation in operations since acquiring the EG asset. In 2021, it worked with the Government of Equatorial Guinea and the U.S. Coast Guard to review the International Ship and Port Facility Security Code to enhance safety and security at the country's ports while respecting human rights.' However, no information was found on general processes for implementation of its security approach. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Ensures Business Partners/JVs follow security approach</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Security and HRs assessment includes input from local communities</li> <li>• Not Met: Two examples of working with local communities to improve security</li> </ul>
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"> <li>• Not Met: Describes preventative/corrective action plans for water and sanitation risks: The Company states that 'We practice responsible water sourcing, conservation, reuse, recycling and proper disposal. Our regional water management strategy is designed to reduce the impacts of our water use on stakeholders and the relevant watersheds, and to minimize risks associated with produced water disposal, supply sourcing and business interruption. We target opportunities that conserve fresh water for community needs while reducing business risk linked to access to water resources.' However, there is not a description and the sanitation theme is not mentioned. [2021 Sustainability report, 2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Sets targets on water stewardship that consider water use by local communities</li> <li>• Not Met: Reports progress in meeting targets and trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Describes processes to stop harassment and violence against women: The Company states that it prohibits workplace harassment, violence, and discrimination against anyone based on any protected characteristic. However, the Company does not disclose the processes it has in place to stop harassment against women. [Human Rights Policy, 22/08/2022: <a href="https://cdn.sanity.io">cdn.sanity.io</a>]</li> <li>• Not Met: Working conditions take into account gender issues</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>

## 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 3.31 out of 80 points scored in themes A-D has been applied to produce a score of 0.83 out of 20 points for theme E.

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