

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Occidental Petroleum
Sector Extractives
Overall score 8.0 out of 100

Theme score	Out of	For theme
3.0	10	A. Governance and Policy Commitments
0.5	25	B. Embedding Respect and Human Rights Due Diligence
2.5	20	C. Remedies and Grievance Mechanisms
2.1	25	D. Performance: Company Human Rights Practices
0.0	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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Human Rights (HR) policy states that 'All Oxy personnel must respect human rights and comply with the terms of this policy. An integral part of the Company's ethical standards is to promote human rights within the spheres of the Company's activity and influence'. [Human Rights policy, 19/08/2020: oxy.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Code of conduct indicates that 'The Company respects and promotes human rights within the spheres of our activities and influence. We support those rights and freedoms that have been universally recognized in international as well as national law and that are described in the [...] United National Guiding Principles on Business and Human Rights [Code of Business Conduct, 30/07/2020: oxy.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to ILO core principles: See below. The human rights policy contains commitments regarding each ILO core area. [Human Rights policy, 19/08/2020: oxy.com] Met: Explicitly lists all four ILO core principles: The HR policy states that 'The Company is committed to providing a workplace that does not use forced or child labor; that respects the rights of freedom of association and collective bargaining; that is free from harassment and discrimination on the basis of race, gender, national origin, sexual orientation, religion, disability or membership in any

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>political, religious or union organization' [Human Rights policy, 19/08/2020: oxy.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to ILO core principles: See below. The policy states that 'The Company is committed to promoting respect for ethical conduct and Human Rights with its contractors and suppliers'. 'Failure of a contractor or supplier to comply with contractual provisions concerning respect for Human Rights may be treated as a breach of contract and be subject to appropriate remedies contained therein for breaches, including termination of the applicable foreign contract'. The sustainability report indicates that 'As a part of Oxy's compliance program, Oxy evaluates prospective business partners, contractors, suppliers and agents and conveys our expectation that they must comply with Oxy's policies, including the Code'. [Human Rights policy, 19/08/2020: oxy.com] • Met: Explicitly lists all four ILO core principles for BPs/JVs: See above. The policy includes business partners and commits to each ILO core area. [Human Rights policy, 19/08/2020: oxy.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Code of conduct states that 'keeping our workplace healthy and safe [...] are among the Company's highest priorities throughout our worldwide operations'. The Human rights policy also indicates that 'The Company is committed to [...] protecting the health and safety of Oxy personnel'. • 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 sustainability report indicates that 'As a part of Oxy's compliance program, Oxy evaluates prospective business partners, contractors, suppliers and agents and conveys our expectation that they must comply with Oxy's policies, including the Code'. • 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)	0.5	<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 land ownership/natural resources as in VGGT • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards • Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Code of conduct states that 'The Company respects and promotes human rights within the spheres of our activities and influence. We support those rights and freedoms that have been universally recognized in international as well as national law and that are described in the International Labour Organization (ILO) Convention 169, [...]United Nations Declaration on the Rights of Indigenous Peoples'. [Code of Business Conduct, 30/07/2020: oxy.com] • Not Met: Expects EX BPs to make these commitments: The Company indicates that 'As a part of Oxy's compliance program, Oxy evaluates prospective business partners, contractors, suppliers and agents and conveys our expectation that they must comply with Oxy's policies, including the Code'. No evidence found, however of a commitment to respect land ownership and natural resources as set out in the VGGT or the IFC performance standards. [Sustainability report 2021, 2022: oxy.com] <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 Company describes its management of water resources, no formal commitment was found in a policy document to respect the right to water. • 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)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to Voluntary Principles on Security and HRs: The Code of business conduct states that 'The Company respects and promotes human rights within the spheres of our activities and influence. We support those rights and freedoms that have been universally recognized in international as well as national law and that are described in the [...] Voluntary Principles on Security and Human Rights'. [Code of Business Conduct, 30/07/2020: oxy.com] • Not Met: Commits to International Humanitarian Law

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> Not Met: Expects EX BPs to commit to these rights: Although there are training requirement for security contractors, no particular requirement in relation to the ICoCA or the VPs found in policy documents. [Human Rights policy, 19/08/2020: oxy.com]
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Commitment to remedy adverse HRs impacts Not Met: Expects EX BPs to make this commitments Score 2 <ul style="list-style-type: none"> Not Met: Commitment to collaborate with judicial or non-judicial mechanisms Not Met: Commitment to work with EX BPs on remedy
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Zero tolerance of threats/attacks on HRDs Not Met: Expects BPs to make this commitment Score 2 <ul style="list-style-type: none"> Not Met: Commitment to working with HRDs to create safe and enabling environment

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board level responsibility for HRs: The company's board of directors has a Sustainability and Shareholder Engagement Committee which is oversees the company's stakeholder engagement as well as its social responsibility programs, policies and practices, including the Human Rights Policy. [Sustainability report 2021, 2022: oxy.com] Met: Describes HRs expertise of Board member: One of the Committee members, Carlos M. Gutierrez, is a member of the Human Freedom Advisory Council at the George W. Bush Institute, the Bo'ao Forum for Asia and the Tent Partnership for Refugees Advisory Council. [Board of Directors webpage, N/A: oxy.com] Score 2 <ul style="list-style-type: none"> Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Process to review HRs strategy at board level Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: At least one board member incentive linked to HRs commitments Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> Not Met: Performance criteria linked to HRs made public Not Met: Review of other board incentives for coherence with HRs policies
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"> Not Met: Board process to review business model and strategy for HRs risks Not Met: Describes frequency and triggers for reviewing business model Score 2 <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	<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: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making: The company's Human Rights Policy was approved by Vicki Hollub, President and Chief Executive Officer of Occidental. However, it provides no further detail on the senior manager role(s) accountable for implementation and decision making on human rights issues within the company. [Human Rights policy, 19/08/2020: oxy.com] <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments: The Company states: 'Performance in key areas of HSE and sustainability is directly considered in the annual review and compensation of employees and executive management as well as in the selection of contractors, suppliers and business partners'. However, no further information was found. [Sustainability report 2021, 2022: oxy.com] <p>Score 2</p> <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 • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HRs risks integrated as part of enterprise risk system • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<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: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Company indicates in its Human Rights Policy that 'This Policy is referenced in the Company's Code and available on the Company's intranet. Training and compliance certifications on the Company's Code are periodically provided to Oxy Personnel. Specialized training on this Policy may be provided periodically'. It also states in the 2021 Sustainability Report: 'New employees receive an electronic copy of the Code and are required to acknowledge they have reviewed and understand it. Through a combination of live and virtual platforms, we offer training on the Code. Annually, all employees must certify compliance with the Code and related policies and procedures'. The Code is available in different languages. However, no information is found regarding language accessibility in training. [Human Rights policy, 19/08/2020: oxy.com] & [Sustainability report 2021, 2022: oxy.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<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: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to EX BPs: The Company indicates that 'Certain contractors or suppliers may be responsible for providing Human Rights training to their employees, as required by the terms of foreign contracts with the Company. Private security contractors are responsible for providing initial Human Rights training to their employees before they begin their work assignments for the Company and periodically thereafter, as required in the terms of foreign contracts with the Company. The Company may periodically review the Human Rights training programs of contractors or suppliers'. However, no evidence that these are standard requirements and apply to all business partners was found. [Human Rights policy, 19/08/2020: oxy.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how HRs policies are contractual/binding for suppliers: The Company indicates that 'Oxy works with partners, suppliers and contractors who share our commitment to ethical business practices. We routinely evaluate suppliers and contractors to help ensure they meet our standards of ethics and HSE, as well as human rights. As part of the Compliance Program, we require our suppliers and contractors to comply with the company's policies, including our Code of Business Conduct and Human Rights Policy'. The Company's Human Rights policy states that the Company 'Foreign contracts will include provisions with respect to the observance of Human Rights, as necessary based on the nature and risks of the types of goods or services to be provided, as well as applicable laws relating to Human Rights'. However, it is not clear how these requirements are binding and if they apply to US based partners or to entities where the 'risks of the types of goods or services' may be deemed low. [Human Rights policy, 19/08/2020: oxy.com] & [Sustainability report 2021, 2022: oxy.com] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Company states in its Human Rights Policy that 'This Policy is referenced in the Company's Code and available on the Company's intranet. Training and compliance certifications on the Company's Code are periodically provided to Oxy Personnel. Specialized training on this Policy may be provided periodically', and the Code includes a human rights section. However, no further details about the training were found. [Human Rights policy, 19/08/2020: oxy.com] • Not Met: Trains relevant managers including security on HRs <p>Score 2</p> <ul style="list-style-type: none"> • 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: The Company's Human Rights Policy states that 'The Company is committed to promoting respect for ethical conduct and Human Rights with its contractors and suppliers.' However, no further information is provided on how the Company provides training to extractive business partners to help them meet its human rights policy commitment. [Human Rights policy, 19/08/2020: oxy.com] • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Company states that 'We routinely evaluate suppliers and contractors to help ensure they meet our standards of ethics and HSE, as well as human rights' and that it 'requires due diligence be conducted on all non-U.S. contractors and suppliers'. However, no further information about the monitoring process for partners or the Company's global operations was found. [Sustainability report 2021, 2022: oxy.com] • Not Met: Discloses % of EX BP's monitored • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HRs performance affects selection EX BPs: The Company notes that it has a due diligence process related to the Ethical Business Conduct Policy. It further notes that 'This vetting process includes background checks designed to identify past corruption or fraud, as well as significant Human Rights violations that have been confirmed through publicly available resources in contractors and suppliers'. It also indicates in its Sustainability Report that 'Our international procurement contracts include provisions related to human rights, ethical business conduct and other relevant policies'. However, the due diligence process seems to apply only for already existing business relations, and no evidence that the procurement provisions comprise all possible business partners was found. [Human Rights policy, 19/08/2020: oxy.com] • Met: HRs performance affects ongoing BPs relationships: The Company states that 'Failure of a contractor or supplier to comply with contractual provisions

Indicator Code	Indicator name	Score (out of 2)	Explanation
			concerning respect for Human Rights may be treated as a breach of contract and be subject to appropriate remedies contained therein for breaches, including termination of the applicable foreign contract'. [Human Rights policy, 19/08/2020: oxy.com] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how workers and communities identified and engaged in the last two years • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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: The Company states that it has a 'vetting process' for all non-U.S. contractors and suppliers' that 'includes background checks designed to identify past corruption or fraud, as well as significant Human Rights violations that have been confirmed through publicly available resources.' However, it does not provide further details as to the processes it uses to identify human rights risks and impacts through relevant business relationships, including its supply chain. Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <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
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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The company has an anonymous toll-free compliance hotline maintained by an independent third party that immediately refers all reports to the Chief Compliance Officer. [Code of Business Conduct, 30/07/2020: oxy.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The reports can be made in many languages, including Arabic, English, French and Spanish. However, there is no mention about how the company ensures its workers are made aware of it. [Code of Business Conduct, 30/07/2020: oxy.com] • Met: Describes how workers in EX BPs access grievance mechanism: The Company indicates that its helpline is open to stakeholders and that user can raise any concerns of human rights violations. [Sustainability report 2021, 2022: oxy.com] • Not Met: Expects EX BPs to convey expectation to their BPs
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The company's helpline is available 24 hours a day/7 days a week and can be accessed by anyone wishing to make a report online or via telephone. [Code of Business Conduct, 30/07/2020: oxy.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Helpline is available in multiple languages, however, no information was found regarding how the Company is ensuring communities are made aware of the channel. [Sustainability report 2021, 2022: oxy.com] • Not Met: Describes how external individuals/communities access grievance mechanism • 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: While the Company states it will conduct prompt investigations into the issues raised and commits to reviewing and responding to all matters that may violate its ethical standards, no information was found regarding response timescales or how complainants will be informed. [Code of Business Conduct, 30/07/2020: oxy.com] • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators: The Company indicates that 'Escalation protocols are in place for serious issues to be flagged to the Audit Committee and other applicable Board Committees, as warranted.' However, it is not clear from this statement whether users of the channels have control over the escalation of the cases. [Sustainability report 2021, 2022: oxy.com]
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"> • Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states 'The Company will not tolerate threats or acts of retaliation against employees for asking a question, raising a concern in good faith or cooperating in an investigation.' However, it is not clear from this statement whether the same applies to other stakeholders raising human rights concerns. No further information was found. [Code of Business Conduct, 30/07/2020: oxy.com]

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			<ul style="list-style-type: none"> • Not Met: Describes practical measures to prevent retaliation: The Company's helpline allows for anonymous reporting. [Code of Business Conduct, 30/07/2020: oxy.com] Score 2 • Not Met: Specifies no legal action, firing or violence: The Company indicates 'All forms of retaliation are prohibited, including any form of discipline, reprisal, intimidation or other form of retaliation taken against an employee who has acted in good faith.' However, it is not clear this applies to all stakeholders that raise concerns. [Code of Business Conduct, 30/07/2020: oxy.com] • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions: The Company states that individuals are expected to keep their participation in the investigation confidential. [Code of Business Conduct, 30/07/2020: oxy.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts: The Company discloses remediation costs, however those only apply to environmental damage. [Annual Report 2021, 2021: oxy.com] • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	<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: Pays living wage or sets time-bound target • Not Met: Describes how living wage determined <p>Score 2</p> <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	<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: Member of EITI • Not Met: Reports of taxes and revenues beyond legal minimums <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country • 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

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"> • Not Met: Measures to prohibit violence/retaliation against workers for joining trade union • Not Met: Discloses % of total direct operations covered by CB agreements: The ESG Annual Performance Indicators discloses that in 2021 6,1% of the employees had collective bargaining agreements. However, it is not clear if this represents the total direct operations workforce of the Company. [ESG Performance Indicators 2019-2021, N/A: oxy.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process to identify H&S risks and impacts • Met: Discloses injury rate or lost days for last reporting period: The company discloses quantitative information on health and safety for its workers related to injury rates. For 2021, the Total injury and Illness Incident Rate (IIR) for employees and contractors was 0.31. [Sustainability report 2021, 2022: oxy.com] & [ESG Performance Indicators 2019-2021, N/A: oxy.com] • Met: Discloses fatalities for last reporting period: The company discloses fatalities for the last reporting period, it was 1 in 2021. [Sustainability report 2021, 2022: oxy.com] & [ESG Performance Indicators 2019-2021, N/A: oxy.com] • Not Met: Discloses occupational disease rate for last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance • Not Met: Met targets or explains why not or actions to improve H&S management systems
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: The Company states its commitment to 'Operate in accordance with universally recognized rights and freedoms set forth in [...] the Voluntary Principles on Security and Human Rights'. However, no information was found regarding the implementation of those principles. [Sustainability report 2021, 2022: oxy.com] Score 2 <ul style="list-style-type: none"> • Not Met: Ensures Business Partners/JVs follow security approach • 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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes preventative/corrective action plans for water and sanitation risks: The Company indicates that 'We have a centralized team of engineers and hydrologists that champions best management practices, engages with stakeholders and water users on water management and conservation practices and designs water treatment and recycling projects across our global operations.' [Sustainability report 2021, 2022: oxy.com] Score 2 <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.9	Women's rights (in own extractive operations, which include JVs)	0	<ul style="list-style-type: none"> • Not Met: Reports progress in meeting targets and trends demonstrating progress <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women: The Company states that 'We are committed to providing you with a workplace free from harassment. The Company prohibits harassment of any employee on the basis of any status protected by law, whether the harassment is by an employee or non-employee. Prohibited harassment is unwelcome verbal, visual or physical conduct that is based on an individual's protected status that creates an intimidating, offensive or hostile work environment that interferes with work performance. [...] The Company prohibits violence or threats of violence of any kind in the workplace. We expect employees to resolve their differences through discussion and, if necessary, through the assistance of their Human Resources Representatives. Employees who have been threatened with, or subjected to, physical violence by anyone in the workplace should report it immediately to their Human Resources Representative or the Security Department.' However, there are no descriptions to practical measures to stop harassment/violence against women. [Code of Business Conduct, 30/07/2020: oxy.com] • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Right to safe, clean, healthy and sustainable environment • Headline: Report presents impact of oil spills related to operations by mining firms including Occidental Petroleum • Story: Between 1 January 2020 and 30 April 2022, 630 oil spills were registered in national territory. On average, 22.5 spills occur every month, 5.6 spills every week, according to the Ministry of Environment, Water and Ecological Transition. Ninety-seven per cent of the spills occurred in the hands of Ecuadorian state-owned companies. 125 Level 3 spills constitute environmental emergencies, true catastrophes, where the Operators must respond and compensate for the damage to the environment, health, lack of access to water and even offenses to the human rights of the population [Climate Tracker, 19/07/2022, "A toxic environment: oil spills and remediation in Ecuador": climatetrackerlatam.org]
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: A response by the company is not publicly available. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(1).2	The company has investigated and taken appropriate action	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: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence that the company made changes to its management systems following the events and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders. • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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