

US corporate human rights index: Tracking changes in company commitments to human rights

Findings as of August 2025

ConocoPhillips

Indicator	Finding	Source	Source Link
Policies and commitments			
<u>General</u>			
Human rights policy - UNGPs	"We commit to respecting the human rights of all people and will conduct business consistent with the human rights philosophy expressed in the Universal Declaration of Human Rights (UDHR) and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. Our approach is informed by the UN Guiding Principles on Business and Human Rights."	Human Rights Position	https://www.conocophillips.com/sustainability/integrating-sustainability/sustainable-development-governance/policies-positions/human-rights-position/
Human rights policy - ILO Core Labor Standards	See above		
Forced labor & prison labor	"We regularly communicate with our suppliers regarding our expectations, and in 2024 we specifically reached out to remind them of their obligations under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, providing them with resources and contact details. These communications serve to remind suppliers of their responsibility to prevent and mitigate risks of forced labour and child labour, directly or indirectly, in the provision of their goods or services to ConocoPhillips Canada."	Fighting Against Forced Labour and Child Labour in Supply Chains Act, p.7	https://static.conocophillips.com/files/resources/2024-fighting-against-forced-labour-and-child-labo.pdf
Human rights defenders & civic space	No evidence		
Gender equality and women's empowerment	"The Company's policy is to provide equal employment opportunity for all qualified persons without regard to race, color, religion, sex, sexual orientation, national origin, age, disability, veteran status, gender identity or expression, genetic information, or any other legally protected status. The Company will comply with the letter and spirit of applicable local, state, federal and country law concerning equal employment opportunity. More specifically, this means the Company will not participate in nor condone any unlawful discrimination of any kind."	Equal Employment Opportunity (EEO) Policy	http://hrpdocctr.conocophillips.com/Documents/HR-documents/Equal_Employment_Opportunity_Policy.pdf
Indigenous Peoples	"The company's approach to engagement with indigenous communities, in locations where they are an important stakeholder group for our operations, is consistent with the principles of the International Labour Organization Convention 169, concerning Indigenous and Tribal Peoples, and the United Nations Declaration on the Rights of Indigenous Peoples."	Human Rights Position	https://www.conocophillips.com/sustainability/integrating-sustainability/sustainable-development-governance/policies-positions/human-rights-position/
<u>Natural resources</u>			
Conflict minerals	No evidence		
Land rights	See Indigenous Peoples		
Free, Prior, and Informed Consent (FPIC)	See Indigenous Peoples		

Living wage

Living wage, own operations	No evidence
Living wage in supply chain	No evidence

Human rights due diligence and supply chain

Process for assessing human rights risks and impacts	"We perform high-level human rights risk assessments in our global operations to evaluate potential human rights issues... ...Consistent with our stakeholder engagement approach, operated BUs assess and manage human rights risks. If our operations identify potential human rights concerns, engagement plans and specific actions to manage and mitigate that risk are developed through engagement with the community or other stakeholders. BUs communicate and engage with communities and their representatives on how to contact the company and how to address any concerns or grievances..."	Valuing human rights: Human rights due diligence	https://www.conocophillips.com/sustainability/creating-shared-value/valuing-human-rights/
Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)	No evidence		
Affected stakeholder engagement	"Our stakeholders represent a diversity of communities and organizations. The breadth of the perspectives they provide gives us a greater understanding of concerns and expectations, as well as opportunities to create lasting value. We engage our stakeholders in a range of ways as we work to improve performance. The table below identifies our stakeholders, shared priorities and engagement approach." [Table includes "Communities"]	Key stakeholders	https://www.conocophillips.com/sustainability/integrating-sustainability/key-stakeholders/
Human rights requirements in supplier code/requirements	"Advancing Respect for Human Rights – Supplier will conduct its business consistent with our Human Rights Position, including but not limited to (Page 13): -Not knowingly participating in human trafficking. -Not using child labor or forced labor, such as prison labor, forcibly indentured labor, bonded labor, slavery or servitude. -Recognizing freedom of employees to join, or refrain from joining, legally authorized associations or organizations. -Conducting human rights due diligence in order to identify, prevent, mitigate and account for adverse human rights impacts. Supplier will observe strict requirements for the selection of security contractors to avoid human rights risks in countries where security firms are not properly regulated."	Supplier Expectations	https://www.conocophillips.com/sustainability/integrating-sustainability/sustainable-development-governance/policies-positions/supplier-expectations/

Access to remedy

Grievance mechanism for own employees	<p>"ConocoPhillips is committed to creating an environment in which we can report suspected violations, participate in investigations and engage in any other legally protected activities without fear of retribution or retaliation. Individuals who do retaliate against others will be subject to disciplinary action, up to and including termination." [Code of Business Ethics and Conduct]</p> <p>"In addition, all interested stakeholders may access the ConocoPhillips Ethics Helpline to report a potential violation of our Code of Business Ethics and Conduct, which is publicly available on our website." [Valuing Human Rights]</p>	Code of Business Ethics and Conduct P.6 Valuing Human Rights	https://static.conocophillips.com/files/resources/conocophillips_codeofethics.pdf https://www.conocophillips.com/sustainability/creating-shared-value/valuing-human-rights/
Grievance mechanism for workers - supply chain	In addition, all interested stakeholders may access the ConocoPhillips Ethics Helpline to report a potential violation of our Code of Business Ethics and Conduct, which is publicly available on our website.		
Grievance mechanism for external individuals & communities	See above		
Governance and staffing			
Board and/or C-Suite-level oversight	"The Public Policy and Sustainability Committee (PPSC) is responsible for identifying, evaluating and monitoring SD and climate-related trends and risks that could affect business activities and performance. The PPSC makes recommendations to the board and monitors compliance with the company's policies, programs and practices regarding: ...Human Rights"	Board oversight	https://www.conocophillips.com/sustainability/integrating-sustainability/sustainable-development-governance/board-oversight/
Senior level responsibility for human rights	No evidence		
Reporting and transparency			
Human rights reporting (integrated or stand-alone)	Integrated into the sustainability report	2024 Sustainability Report	https://static.conocophillips.com/files/resources/2024-sustainability-report.pdf
Memberships			
RBA	No	RBA	https://www.responsiblebusiness.org/about/members/
EITI	No	EITI	https://eiti.org/companies
VPI	Yes	VPI	https://www.voluntaryprinciples.org/the-initiative/
WEPs (signatory)	No	WEPs	https://www.weps.org/companies
Lobbying and ethics			
Public statement or endorsement in support of mandatory human rights and environmental due diligence	No evidence		

Anti-bribery and anti-corruption policy

ConocoPhillips will not tolerate bribery in any form. This means that ConocoPhillips employees, agents and representatives will never offer, authorize or promise any sort of bribe or kickback to improperly influence anyone. ConocoPhillips is committed to doing business the right way.

Code of Business Ethics and Conduct

https://static.conocophillips.com/files/resources/conocophillips_codeofethics.pdf

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