

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

Findings as of August 2025

ExxonMobil

| Indicator | Finding | Source | Source Link |
|--|---|---|---|
| Policies and commitments | | | |
| General Human rights policy - UNGPs | "The Company strives to have a positive influence on our workforce and in the communities where it operates. ExxonMobil condemns human rights violations in any form and actively expresses these views in its engagements with governments and others. ExxonMobil's commitment to respecting human rights is integrated into its policies, practices, and expectations and is guided by the goals of universally recognized principles, including those of the: -United Nations Universal Declaration of Human Rights -2011 U.N. Guiding Principles on Business and Human Rights (UNGPs) -International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work -Voluntary Principles on Security and Human Rights -U.N. Declaration on the Rights of Indigenous Peoples -ILO Convention 169 Concerning Indigenous and Tribal Peoples in Independent Countries" | Statement on Human Rights. P. 1 | https://corporate.exxonmobil.com/- /media/global/files/sustainability- report/2024/statement-on-human- rights.pdf |
| Human rights policy - ILO Core Labor Standards | See above | | |
| Forced labor & prison labor | "ExxonMobil does not use forced or compulsory labor including prison labor." | ExxonMobil statement on labor and the workplace | https://corporate.exxonmobil.com/s ustainability-and- reports/sustainability/safeguarding- people/statement-on-labor-and-the- workplace |
| Human rights defenders & civic space | "We provide access to remedy through transparent, accessible, and culturally appropriate channels for individuals or communities to raise concerns, consistent with international standards. We make these available through our community and operations-level grievance-management processes, as well as our complaint procedures and opendoor communication for employees. As part of these processes, we seek to support confidentiality and non-retaliation." | Respecting Human Rights | https://corporate.exxonmobil.com/s ustainability-and- reports/Sustainability/safeguarding- people/respecting-human- rights#Integratinghumanrightsintoou rpractices |
| Gender equality and women's empowerment | Our worker housing and accommodations include: Safe and comfortable living spaces without discrimination based on gender, race, origin, or other protected statuses" | Respecting Human Rights | https://corporate.exxonmobil.com/s ustainability-and- reports/Sustainability/safeguarding- people/respecting-human- rights#Embeddinghumanrightsintoo urpolicies |

Indigenous Peoples "Indigenous peoples Managing socioeconomic https://corporate.exxonmobil.com/s In locations inhabited or historically used by Indigenous peoples, we work closely with impacts ustainability-andthese communities to respect their cultures and customs. We support employment reports/sustainability/contributing-toinitiatives and cultural heritage programs through local content development and communities/managingstrategic community investments.(..) We are committed to meaningful engagement and socioeconomicopen consultation with Indigenous peoples. We incorporate traditional knowledge and impacts#Communityengagementan land use practices into our plans and promote community programs that respect dgrievancemanagement traditions and cultures. Meaningful engagement is a key aspect of Free, Prior, and Informed Consent, as recognized in the United Nations Declaration on the Rights of Indigenous Peoples." Natural resources Conflict minerals "No conflict mineral is intentionally added to, or serves as a functional component of, Conflict Minerals Disclosure https://corporate.exxonmobil.com/w products sold by Exxon Mobil Corporation ("ExxonMobil"). However, the manufacturing ho-we-are/policy/conflict-minerals process for certain of ExxonMobil's refined petroleum and petrochemical products utilizes catalysts which include tin, tungsten, or gold compounds as active ingredients. Depending on the type of catalysis process used, trace amounts of such minerals may exist in some of our finished products." Land rights No evidence Free, Prior, and Informed Consent (FPIC) See Indigenous Peoples indicator 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 "Integrating human rights into our practices Respecting human rights https://corporate.exxonmobil.com/s Our due diligence practices help identify and assess potential human rights impacts, and ustainability-andother socioeconomic risks and opportunities, early on in our activities. We aim to avoid reports/Sustainability/safeguardingor reduce risks with thorough planning, effective mitigation, monitoring, and other people/respecting-humanmeasures. For example, as part of our Environmental, Socioeconomic, and Health rights#Embeddinghumanrightsintoo Impact Assessment and Management process, we conduct initial country assessments urpolicies that identify qualitative human rights risks. We also use a human rights risk screening tool to analyze risks at country, project, and operations levels, incorporating elements of global human rights principles.' Heightened human rights due diligence in Conflict Affected and High Risk Areas No evidence (CAHRAs) Affected stakeholder engagement "Wherever it operates, certain principles and expectations apply to the Company's Statement on Human Rights https://corporate.exxonmobil.com/relationships with communities, its employees, contractors, and others working on its /media/global/files/sustainabilitybehalf. In light of applicable laws and specific circumstances, ExxonMobil...Engages with Managing socioeconomic report/2024/statement-on-humanlocal groups and individuals regularly and provides appropriate channels for individuals or impacts rights.pdf communities to raise concerns in a way that seeks to support confidentiality and nonretaliation." [Statement on Human Rights] https://corporate.exxonmobil.com/s ustainability-and-"We believe in meaningful engagement with communities to build positive, long-term reports/Sustainability/contributing-torelationships. We regularly consult with local groups and individuals to ensure their communities/managingvoices are heard and their concerns are addressed. Our engagement process is socioeconomicimpacts#Impactidentificationandass designed to be locally and culturally appropriate. We provide accessible and inclusive channels for exchanging information. This includes activities like open houses, essment community gatherings, and individual meetings." [Managing socioeconomic impacts]

| Human rights requirements in supplier code/requirements | "ExxonMobil holds its suppliers, vendors and contractors to stringent compliance, anti- corruption, nonconflict, safety and other guidelines in order to stay in good standing.() manage activities in a manner that respects human rights and is consistent with the United Nations Guiding Principles on Business and Human Rights in effect as of 2011." | ExxonMobil supplier, vendor and contractor expectations | https://corporate.exxonmobil.com/s ustainability-and- reports/sustainability/contributing-to- communities/supplier-vendor-and- contractor-expectations |
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| Access to remedy | | | |
| Grievance mechanism for own employees | The Corporation provides several confidential mechanisms for reporting, including a 24-hour phone number and a mailing address. A Hotline Steering Committee comprising Security, Audit, Law and Human Resources personnel reviews reports of suspected violations. The Hotline Steering Committee provides a quarterly report to the Audit Committee, including any violations or major issues. Employees can also report violations to their supervisor or through alternative channels such as Controllers, Audit, HR, Law, Global Operations & Sustainability, and Treasurer's Department. Confidentiality is respected throughout the investigation process subject to legal requirements; penalizing or threatening an employee for filing a report is prohibited. Violations lead to disciplinary actions, including dismissal. | Code of ethics | https://corporate.exxonmobil.com/c orporate-governance/code-of- ethics#Overview |
| Grievane mechanism for workers - supply chain | Our grievance-management process offers various platforms for individuals and communities to raise concerns. Depending on the location and nature of our activities, the process may include direct, in-person, and electronic engagement and the use of third-party proxies such as civil society organizations and nongovernmental associations. We have dedicated personnel to map, track, analyze, respond to, and resolve community grievances promptly and in a way that supports confidentiality and non-retaliation. Our grievance-management approach involves five core steps: 1. Publicize the process and support accessibility for stakeholders. 2. Receive, register, and acknowledge grievances, respecting confidentiality. 3. Review and investigate with the help of external input and qualified personnel. 4. Develop resolution options and respond to or close out grievances. 5. Monitor and evaluate outcomes. Our practices are informed by the guidance of International Finance Corporation and Ipieca. Individual processes may be complex or simple, driven by the characteristics of each location, type of activity, local sensitivities, potential impacts, and other factors. Our key performance indicators reflect these attributes. | Managing socioeconomic impacts | https://corporate.exxonmobil.com/s ustainability-and- reports/Sustainability/contributing-to- communities/managing- socioeconomic- impacts#Communityengagementan dgrievancemanagement |
| Grievance mechanism for external individuals & communities | See above | | |
| Governance and staffing | | | |
| Board and/or C-Suite-level oversight | Our Standards of Business Conduct include our "foundation policies." These define the ethical behavior we expect from our directors, officers, and employees. Our Board of Directors adopts and oversees the administration of these policies, which aim to uphold the values of human rights, labor, the environment, and anti-corruption. Our wholly or majority-owned subsidiaries generally adopt policies similar to our foundation policies. | Respecting human rights | https://corporate.exxonmobil.com/s ustainability-and- reports/sustainability/safeguarding- people/respecting-human- rights#Ourapproach |
| Senior level responsibility for human rights | "Our GO&S Vice President reports directly to a member of our management committee. This role is responsible for driving our Protect Tomorrow. Today. guiding principleWithin GO&S, the Sustainability Director manages our sustainability focus areas. This includes our environmental management system and other key processes." | 2025 Sustainability Report | https://corporate.exxonmobil.com/- /media/global/files/sustainability- report/2024/sustainability-report.pdf |

| Reporting and transparency | | | |
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| Human rights reporting (integrated or stand-alone) | Integrated into the sustainability report | 2025 Sustainability Report | https://corporate.exxonmobil.com/- /media/global/files/sustainability- report/2024/sustainability-report.pdf |
| Memberships | | | |
| RBA | No | | https://www.responsiblebusiness.or g/about/members/ |
| EITI | Yes | | https://eiti.org/companies |
| VPI | Yes | | https://www.voluntaryprinciples.org/t he-initiative/ |
| WEPs (signatory) | No | | 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 | "It is the policy of Exxon Mobil Corporation that directors, officers, employees, and third parties acting on its behalf are prohibited from offering or paying, directly or indirectly, any bribe to any employee, official, or agent of any government, commercial entity, or individual in connection with the business or activities of the Corporation. A bribe for purposes of this policy is any money, goods, services, or other thing of value offered or given with the intent to gain any improper advantage for the Corporation." | Anti corruption: Legal compliance guide | https://corporate.exxonmobil.com/- /media/global/files/policy/anti- corruption-legal-compliance- guide.pdf |

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