

HUMAN RIGHTS DUE DILIGENCE	
FOCUS AREA	GUIDANCE
Impact Assessment	<ul style="list-style-type: none"> • We performed a high-level human rights risk assessment (by country) of its global operations using externally provided human rights risk assessment tools to identify countries of focus for deeper level evaluation of potential human rights issues. Key areas include: security and human rights; land use/relocation; indigenous issues and rights; company and supplier labor standards; access to water; and vulnerable groups. • Environmental and Social Impact Assessments (ESIAs) assess human rights issues where appropriate. • Sustainable Development Scorecards are completed for capital projects including an analysis of human rights issues, and are updated through project phases. • The New Country Entry process evaluates human rights issues and risks. • Human rights risks are identified as part of corporate authorization guidelines for new ventures. • Business unit Stakeholder Engagement and Social Performance plans incorporate assessment of human rights issues, as appropriate.
Integration	<ul style="list-style-type: none"> • Human rights issues are incorporated into Capital Projects and HSE management systems (using a “Plan, Do, Assess, Adjust” approach). • Human rights issues are incorporated into the HSE Due Diligence Standard guidance. • Business units and functions collaborate on human rights due diligence processes and share best practices through working groups and Networks of Excellence. • Business unit, asset or project Stakeholder Engagement plans incorporate an assessment of human rights issues as appropriate, and project Social Performance plans also address such issues as appropriate. Where business units maintain separate social performance plans, human rights issues are also addressed.
Tracking (Issues, Actions)	<ul style="list-style-type: none"> • Human rights issues are tracked at business unit, asset or project level and communicated internally as appropriate based on human rights risks identified at a country level. • Potential human rights risks or issues are identified and evaluated periodically through business unit, asset or project level risk assessments. • Community concerns or grievances related to company activities or human rights are tracked at business unit, asset or project level as appropriate, including responses and resolutions. Mechanisms include community or stakeholder relations contact points at the business unit level, and ConocoPhillips Ethics hotline and email address.
Communication & Training	<ul style="list-style-type: none"> • Our Human Rights position and its implementation are communicated internally and externally. • Training and guidance on human rights concepts, company approach to due diligence and implementation resources are provided to identified leaders and practitioners and made available to all employees through formal training and “Networks of Excellence.”
Grievance Mechanisms	<ul style="list-style-type: none"> • Where appropriate, business units, assets or projects have communicated with and engaged communities and their representatives on how to contact the company, and how to address any concerns or grievances. 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. • Stakeholder relations staff is in close contact with communities and engage in regular two-way dialogue. • Stakeholder relations staff has a process in place to respond to concerns or grievances in a timely manner. • Mitigation measures are informed by issues or concerns identified through engagement with communities or other stakeholders. • Incident management and tracking systems incorporate elements to capture incidents or “near misses” related to the safety and security of company personnel and directly impacted communities.