

Occidental Human Rights Policy

Key Provisions



POLICY STATEMENT

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.

COMMITMENTS TO STAKEHOLDERS

The Company is committed to being attentive to concerns raised by Stakeholders, including the needs of

the communities in which it operates, and to working with Stakeholders to support Human Rights within the spheres of the Company's activity and influence. The Company has various feedback mechanisms to provide Stakeholders with the ability to raise concerns, when necessary, including through the Company's anonymous hotline available in various languages, as described in the Company's Code of Business Conduct (Code) available at <https://www.oxy.com/investors/Governance/Pages/Code-of-Business-Conduct.aspx>.

- **Oxy Personnel** — 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 political, religious or union organization; to protecting the health and safety of Oxy Personnel; to compensating Oxy Personnel to enable them to at a minimum meet their basic needs; and to promoting personal development through appropriate training.
- **Contractors and Suppliers** — The Company is committed to promoting respect for ethical conduct and Human Rights with its contractors and suppliers.
- **Communities** — The Company is committed to observing the laws in the countries in which it operates; to respecting the cultural values of the communities in which it operates, including the indigenous peoples recognized by applicable law; to giving appropriate regard to the self-sufficiency, sustainability, health, safety and the environment of such communities; and to conducting business as a responsible corporate member of society. To the extent consistent with the laws of the applicable jurisdiction, the Company is committed to consulting with, and seeking the pre-approval of, recognized local communities affected by its business operations in order to minimize, or cooperate in the remediation of, potential negative impacts on such communities of such operations.
- **Stockholders** — The Company is committed to providing the Company's stockholders with information regarding matters of corporate social responsibility, including information regarding the Company's actions to support Human Rights within the spheres of its activity and influence.
- **Non-Governmental Organizations** — The Company is committed to participating in outreach with Non-Governmental Organizations and other entities as appropriate to support Human Rights in specific regions.

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SOCIAL IMPACT ASSESSMENT

The Company will conduct social impact assessments, as necessary, to identify potential Human Rights impacts of the Company's foreign activities, and to evaluate the Company's ability to make a positive impact in the communities where it operates. This assessment will be repeated as needed by changes in the socio-political environment, changes in operations, or other situations.

The Company may periodically reassess the security risks in the existing jurisdictions in which it operates and, based on this assessment, as appropriate, revise its security measures with the aim to protect Oxy Personnel and the Company's assets in a manner consistent with the Company's commitment to promote Human Rights as set forth in this Policy.

DUE DILIGENCE AND FOREIGN CONTRACTS

The Ethical Business Conduct (EBC) Policy and related procedures require due diligence be conducted on all non-U.S. contractors and suppliers. 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.

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. Certain locations and types of activities may have a need for additional or heightened due diligence or training, as discussed in section 4.6. For example, in negotiating foreign contracts for the provision of security services with respect to the Company's foreign activities, the Company will seek to obtain a commitment from the party providing such services to those principles espoused in the United Nations Code of Conduct for Law Enforcement Officials, as applied in the ILO Declaration on Fundamental Principles and Rights at Work.

The Company will seek to include the acknowledgement that the host foreign government is committed to the United Nations Code of Conduct for Law Enforcement Officials, as applied in the ILO Declaration on Fundamental Principles and Rights at Work and ILO Convention 169, in contracts with foreign governments for the provision of security services.

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.

HIRING PRACTICES

The Human Resources and Security Departments will assess the standards required for vetting of prospective Oxy Personnel.

The background of all prospective employees of the Security Department or contingent workers engaged to provide private security services will be screened and vetted with respect to any record of adjudicated violations of criminal or Human Rights laws or the United Nations Code of Conduct for Law Enforcement Officials. No person who has been found guilty by a court of law for violating Human Rights will be hired knowingly for employment or engaged as a contingent worker acting on the Company's behalf.

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INTERNAL COMMUNICATION AND TRAINING

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.

EXTERNAL COMMUNICATION AND TRAINING

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.

DEFINITION OF HUMAN RIGHTS

For the purpose of this Policy, this term denotes those rights and freedoms that have been universally recognized in international as well as national law and that are described in the following guidelines and principles:

- **International Labour Organization (ILO) Convention 169** — ILO Convention No. 169 Concerning Indigenous and Tribal Peoples in Independent Countries.
- **ILO Declaration on Fundamental Principles and Rights at Work** — The declaration adopted by the ILO in June 1998, regarding the respect for and promotion and realization of freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labor; the effective abolition of child labor; and the elimination of discrimination in respect of employment and occupation.
- **Universal Declaration of Human Rights** — The declaration adopted by the United Nations General Assembly on December 10, 1948 as a common standard of achievements for all peoples and all nations, which sets out fundamental human rights to be universally protected.
- **United Nations Declaration on the Rights of Indigenous Peoples** — The declaration adopted by the United Nations General Assembly on September 13, 2007 which establishes a universal framework of minimum standards for the survival, dignity, well-being and rights of the world's indigenous peoples.
- **United Nations Guiding Principles on Business and Human Rights** — The instrument entitled "Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework," which was developed by the Special Representative of the Secretary-General of the United Nations and endorsed by the United Nations Human Rights Council in its resolution 17/4 on June 16, 2011, and which seeks to enhance standards and practices with regard to business and human rights.
- **Voluntary Principles on Security and Human Rights** — The principles for oil and mining companies developed by the U.S. and U.K. governments as a result of discussions with companies and non-governmental organizations as released by the Bureau of Democracy, Human Rights, and Labor, U.S. Department of State, on December 20, 2000.

This policy was approved by Vicki Hollub, President and Chief Executive Officer of Occidental.