Commitment to the Voluntary Principles

As a participating company, ConocoPhillips is committed to supporting and promoting the Voluntary Principles for Security and Human Rights (VPSHR) in its operations. This commitment is aligned with the company’s Human Rights Position and principles for effective stakeholder engagement.

We also actively participate in the Ipieca Social Responsibility Working Group where companies share best practices and lessons learned on implementing human rights policies and positions.

Policies, Procedures and Related Activities

Implementation of the company’s Human Rights Position, including our commitment to the VPSHR, is done through processes which include human rights issues as part of social considerations at the project and business unit (BU) levels. These processes also reinforce ConocoPhillips’ ongoing actions to meet our sustainable development (SD) commitments.

Risk Assessments

The company identifies and manages key environmental, political and social risks over the life cycle of our operations through our SD Risk Management Standard. The standard is a mandatory, auditable process that guides sustainability-related risk management and integrates a risk register into operating plans. As part of that process, operated assets and major projects are examined against the physical, social and political settings of our operations. Local concerns may influence the potential importance of these environmental and social matters including long-term risks and cumulative impacts. Risks are identified and described by a diverse group of subject matter experts in each BU. Each risk is then assessed using a matrix that evaluates both its likelihood and consequence. In evaluating the consequence level, we consider potential environmental and social risks, such as sociocultural and economic impacts to stakeholders, environmental impact, and reputational and financial implications. Our SD risk assessment tool includes questions on security and human rights and fosters a related understanding within the BU that supports alignment with the VPSHR.

The SD Risk Management Standard ensures that an action plan is developed to track mitigation activities for each significant or high risk and included in the corporate SD Risk Register. These plans include details about our commitments, resources and milestones. Our SD Risk Register and action plans are used to track performance and guide goal setting.

Action plans for significant or high social risks are typically managed at the BU level, along with the ongoing management of SD performance and engagement designed to minimize or avoid other social and environmental risks of our business. For security and human rights risks, these action plans may include local site security plans and supportive engagement strategies, including a stakeholder engagement plan that identifies individuals and groups who may impact or be impacted by our activities and their key concerns and interests, as well as how we can most effectively engage with them.
ConocoPhillips risk assessment process provides a framework to:

- Identify security and human rights risks arising from political, economic and social factors.
- Identify and understand the origins of risks that could lead to the erosion of security conditions and/or human rights protections.
- Assess human rights records, standing policies and applicable reform efforts in areas of potential company operations.
- Evaluate the strength and willingness of legal, judicial and nonjudicial institutions to address human rights concerns, adherence to contracts and other legal expectations.

Security audit and compliance program

The ConocoPhillips security audit and compliance program systematically evaluates company operations at key facilities to assure conformity with government-prescribed security mandates and company-required security policies, procedures and guidelines. This ongoing program identifies and internally reports on, and makes recommendations with respect to, security operation nonconformities including issues associated with security and human rights, if any occur. The company also conducts due diligence investigations of security providers in countries that have been identified as high-risk for human rights violations.

IMPLEMENTATION

Human rights training and awareness

ConocoPhillips developed and maintains human rights training courses, which incorporate Ipieca's guidance on human rights training and include a module on VPSHR. The training is available globally via computer-based modules to our stakeholder engagement practitioners and other operations staff and management as appropriate, based on location. We continue regular training of security providers in priority countries for security and human rights issues.

Country-level implementation

Our commitment to security and human rights continues where we operate or have a working interest. In addition to specific policies on security and human rights, and the company processes and procedures described above, on-the-ground implementation actions include:

- Training for employees, security contractors and other stakeholders, where appropriate.
- Integration of security and human rights commitments in security-provider contracts and related contract monitoring.
- Stakeholder outreach and engagement, including public security forces, where relevant.

The following are specific examples of how ConocoPhillips, through its affiliates, “ConocoPhillips” manages security and human rights in its operations in Colombia, Libya, Canada and the United States. ConocoPhillips had no incidents of pertinence to the VPSHR during the year.
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Colombia

ConocoPhillips’ commitment to implementing the VPSHR in-country and our approach to human rights includes continued engagement with the military, police and security contractors for the adherence and commitment to the VPSHR.

- **Security contracts and agreements.** Security and human rights issues are incorporated into the contract requirements for private security service providers. This includes an agreement that security guard services would comply with the VPSHR and that those ConocoPhillips policies established for VPSHR implementation are communicated to the security contractor. Additionally, ConocoPhillips has agreements with the Colombian government security forces on adherence to human rights expectations.

- **Training.** Training and awareness materials are maintained and when fieldwork is being done employees and contractors receive our corporate human rights and stakeholder engagement training. This training explains the policies and positions in place to handle these issues, as well as the risk factors to be aware of and mitigate accordingly.

Libya

**Security contracts.** The contract requirements for our current and future security service provider in Libya include the management of security and human rights issues. This includes an agreement that security guard services shall comply with the VPSHR and those ConocoPhillips policies established for the implementation of the VPSHR and communicated to the security contractor. Contractors are required to conduct security operations consistent with the elements applicable to the VPSHR.

United States and Canada

We reinforced VPSHR awareness with our security managers and reiterated with our security contractors our company commitment to eliminate bias and injustice in all its forms. Our website reports on ConocoPhillips participation in the VPSHR and our condemning racial inequality, which states that “force should only be used when strictly necessary and to an extent proportional to the threat; and the rights of individuals should not be violated while exercising the right to exercise freedom of association and peaceful assembly.”