

Purpose

To restate and reinforce Occidental's policy regarding the protection and advancement of Human Rights and provide guidelines for the implementation and enforcement of this Human Rights Policy.

A. Introduction

1. As stated in Occidental's Code of Business Conduct, Occidental's business shall be conducted in accordance with all applicable laws of the United States and Foreign Governments and in a manner that will always reflect a high standard of ethics.
2. Respect for and the promotion of Human Rights within the spheres of its activity and influence are an integral part of Occidental's ethical standards.
3. Occidental supports the universally recognized rights and freedoms set forth in the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

B. Commitments to Stakeholders

1. Stockholders - Occidental is committed to protecting stockholders' investment, to providing a competitive rate of return, to providing full and transparent financial information in accordance with applicable securities laws, to providing periodic reports on issues related to corporate social responsibility relevant to its operations and to supporting Human Rights in all its operations.
2. Employees - Occidental is committed to providing a workplace that does not use forced or child labor; that respects the rights to freedom of association and collective bargaining; that is free from harassment and discrimination on the basis of race, gender, national origin, sexual orientation, disability or membership in any political, religious or union organization; to protecting the health and safety of all Employees; to compensating its Employees to enable them to meet at least their basic needs; and to promoting personal development through appropriate training.
3. Contractors and Suppliers - Occidental is committed to promoting respect for ethical conduct and Human Rights with its contractors and suppliers. Occidental will communicate its expectations, including its expectations with respect to training and compliance, to contractors and suppliers and will demonstrate a preference for working with those contractors and suppliers who share Occidental's values.
4. Communities - Occidental 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 the laws of the applicable jurisdiction, 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, Occidental is also committed to consulting with, and seeking the pre-approval of, any legitimate local communities affected by its business operations in order to minimize potential negative impacts on such communities as well as its operations.
5. Engagement - Occidental is committed to being attentive to concerns raised by Stakeholders, including with respect to the needs of the communities in which it operates, and to working with Stakeholders to support Human Rights within the spheres of Occidental's activity and influence.

C. Social Impact Assessment

1. Prior to beginning operations in any foreign jurisdiction, Occidental shall perform an assessment consistent with the Voluntary Principles on Human Rights, which will take into consideration the ability of Occidental to have a positive impact in such Jurisdiction and, to the extent applicable, key activities listed on Exhibit A to this Policy.
2. Occidental periodically shall reassess the Security Risks in the foreign jurisdictions in which it operates in order to assure security measures are revised as necessary, from time to time, to protect Occidental's employees and assets and are consistent with Occidental's commitment to promote Human Rights as set forth in this Policy.

D. Foreign Contracts

1. Except as otherwise permitted by Paragraph D.2., Foreign Contracts, including security arrangements with respect to Foreign Activities, shall include provisions with respect to the observance of Human Rights, as well as the laws and professional standards of the host Foreign Government, and provide appropriate and practical monitoring mechanisms. Foreign Contracts for the provision of security services with respect to Occidental's Foreign Activities shall include a commitment by the party providing such services to the United Nations Code of Conduct for Law Enforcement Officials, as applied in the ILO Declaration on Fundamental Principles and Rights at Work. Occidental will seek to include in contracts with public entities for the provision of security services with respect to Occidental's Foreign Activities 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.
2. Each Segment shall adopt guidelines for certain limited exceptions to the requirements of Paragraph D.1. In addition to such other factors as the Segment deems appropriate and which are consistent with the aims of this Human Rights Policy, the guidelines shall consider the Security Risk in the jurisdiction in which the contract is to be performed, the nature of the product or services to be provided, the value of the contract, and the size of the contractor including total number of employees.
3. Failure of a contractor to comply with the provisions in a Foreign Contract concerning respect for Human Rights may be treated as a breach of such Foreign Contract and be subject to appropriate remedies contained therein for breaches, up to and including termination of the Foreign Contract.

E. Hiring, Communication and Training on Human Rights

1. Personnel Hiring:
 - i. The Human Resources and Security Departments, in consultation with the appropriate government authorities and with consideration of input from interested Stakeholders, shall systematically assess the general standards to be required of prospective new Employees.
 - ii. The background of all prospective Employees of the Security Department or contract personnel engaged to provide private security services shall be examined with respect to any record of criminal, Human Rights, International Humanitarian Law, or UN Code of Conduct for Law Enforcement Officials violation. No person who has been found guilty by a court of law of violating Human Rights, International Humanitarian Law, or UN Code of Conduct for Law Enforcement Officials will be hired knowingly for such position and Occidental will request, that any such person engaged by a contractor providing security services not be assigned to perform work for Occidental.
2. Internal Communication and Training:
 - i. This Policy shall be included in the Code of Business Conduct provided to all Employees and shall be available on Occidental's intranet websites.

- ii. Occidental shall provide Human Rights training to Employees selected to receive training as part of its periodic Code of Business Conduct Training. All new Employees of Occidental must participate in an orientation program covering this Human Rights Policy within six months of beginning employment.
 - iii. All Occidental officers and managers shall ensure that the Employees who report to them are familiar with this Human Rights Policy.
3. External Communication and Training:
- i. Subject to any exceptions permitted pursuant to Paragraph D.2., Contractors shall be responsible for providing Human Rights training to their employees in a manner consistent with the standards contained in the applicable contract.
 - ii. With respect to contractors providing private security services to Occidental, such contractors shall provide initial Human Rights training to their employees before they begin their work assignments for Occidental, and shall provide them with refresher course training on an annual basis.
 - iii. Occidental will encourage Human Rights training be provided to public security forces specifically assigned to protect Company personnel and facilities. Where necessary and appropriate, Occidental will provide funding to support training.
 - iv. Human Rights training in paragraphs (i) through (iii) above shall be subject to review by Occidental.

F. Enforcement

- 1. If an Employee witnesses or has knowledge of any incidents with respect to Occidental's operations involving a violation of this Human Rights Policy, that Employee is required to report the alleged incident to either the (A) Legal Manager in the local office, (B) Compliance Officer, (C) Chief Compliance Officer or (D) any member of the Corporate Compliance Committee. In addition, Employees may report suspected violations by calling Occidental's Compliance line. Anonymity will be protected. No discriminatory or disciplinary action will be taken against Employees who make bona fide reports regarding suspected violations of this Human Rights Policy for the reason the Employee has made such report.
- 2. Any Employee found to have willfully violated any provision of this Human Rights Policy shall be subject to dismissal or other disciplinary action.
- 3. The Chief Compliance Officer shall have authority to investigate any report by an Employee or other Stakeholder of any suspected violation of this Human Rights Policy by any Employee or Contractor and may refer such matters as such Officer deems appropriate to the Corporate Compliance Committee.
- 4. The Chief Compliance Officer and the Corporate Compliance Committee shall have authority to report any violation of this Human Rights Policy to the appropriate legal authorities if the Chief Compliance Officer or the Corporate Compliance Committee determines that such a report would further the intent and purposes of this Human Rights Policy or is required by law.

G. Verification and Transparency

- 1. The Chief Compliance Officer periodically shall conduct a review to verify that the processes contemplated by this Human Rights Policy are in place and, following each such review, shall make a certification on that subject to the Committee of the Board of Directors responsible for oversight of this Human Rights Policy.

2. Occidental shall include information on its public website about this Human Rights Policy, the Human Rights documents referred to herein and its actions in implementing this Human Rights Policy.
3. Occidental may seek independent verification at any time in any manner the Committee of the Board of Directors responsible for oversight of this Human Rights Policy deems appropriate.

Definitions

Foreign Activities

Activities or conduct of Occidental occurring outside the United States.

Foreign Contract

Any contract including any material modifications, amendments or renewals thereof (excluding any Consulting Arrangement), between Occidental and any third party (other than a Foreign Government) concerning Foreign Activities.

Foreign Government

The government of any country other than the United States (including any ministry, department, agency, state-owned entity, political subdivision or other instrumentality thereof).

Human Rights

Those rights and freedoms that have been universally recognized in international as well as national law and that are set forth in the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

International Humanitarian Law

The rules contained in common Article 3 to the four Geneva Conventions of 1949.

Security Risks

Those circumstances, actions or policies which may directly or indirectly endanger the lives of employees or contractors, pose a risk to Company operations or compromise Occidental's ability to comply with this Human Rights Policy.