

# SUPPLIER CODE OF CONDUCT



## INTRODUCTION

Oxy expects its suppliers to act ethically and follow all applicable laws, rules, and regulations and to conduct business in a manner that reflects the highest ethical standards. This Supplier Code of Conduct sets forth Oxy's specific Ethics & Compliance expectations for its suppliers. Oxy has zero tolerance for the disregard or circumvention of Oxy policies or engaging in unethical dealings in connection with Oxy's business.

## NO BRIBES OR KICKBACKS

Do not give, offer, or accept bribes of any kind, whether directly or indirectly through someone else. A bribe can be anything of value intended to wrongly influence another person – whether that other person is in the government or in the private sector. Kickbacks are also a form of bribery and are strictly prohibited. A kickback occurs when an individual receives anything of value in exchange for improper preferential treatment. "Anything of value" includes cash or cash equivalents (such as gift cards), gifts, hospitality, charitable contributions or donations, discounts on products or services, or other personal favors. Oxy employees are strictly prohibited from receiving commissions in exchange for doing business with a supplier.

## GIFTS & HOSPITALITY

Oxy requires the use of good judgment and moderation when giving or accepting gifts & hospitality in business settings. Gifts & hospitality can include meals, hotels, lodging, travel, and entertainment. All gifts & hospitality must have a legitimate business purpose, be given openly and transparently, and approved in accordance with Oxy policy. Oxy employees may not accept any gift or hospitality over \$150 without approval from Oxy Compliance. Gifts or hospitality given in exchange for an improper business advantage (such as sending work to a certain supplier) are considered bribes and are strictly prohibited. Additionally, Oxy considers gift cards to be cash equivalents and does not permit employees to accept gift cards from suppliers – regardless of the amount.

## NO SOLICITATION

Oxy employees are prohibited from directly or indirectly soliciting gifts, entertainment, hospitality or favors of ANY value from Oxy's suppliers. This includes solicitation for a charity or fundraiser that benefits an Oxy employee or an employee's relative.

Legal Disclaimer: This is a summary of expectations. It does not (i) amend, interpret, modify, supersede, or waive the terms of any contract or work order; (ii) permit or require anything inconsistent with applicable laws; or (iii) create or evidence a contract or third-party beneficiary relationship or expectancy.

## ACCOUNTING RECORDS & CONTROLS

Oxy requires its suppliers to keep accurate and transparent records of expenses, payments, services or equipment provided, and other transactions in reasonable detail. Suppliers cannot charge Oxy for services or equipment not provided or inflate field tickets, invoices, or charges in any way. When working for Oxy, cash is not an acceptable payment method. We also expect suppliers to be registered in Oxy's enterprise resource planning system and to have an approved written contract with Oxy before entering an Oxy worksite, beginning work, or receiving payment.

## HUMAN RIGHTS

Oxy expects its suppliers to respect universally accepted human rights and related applicable laws. Do not rely on forced labor or underage labor in your operations and be mindful of red flags related to human trafficking. Oxy expects its suppliers to maintain robust policies and procedures designed to prevent human rights violations. Oxy suppliers are also expected to treat their workers with dignity and respect and to comply with all applicable employment and workplace safety laws.

## SUBCONTRACTORS & DUE DILIGENCE

If a supplier uses subcontractors, Oxy expects its suppliers will conduct proper due diligence to ensure the subcontractors are registered and legally qualified to conduct business in the relevant location. Oxy suppliers are expected to have a robust risk-based system of internal controls for authorizing payments to subcontractors and to prevent and detect violations of law. Oxy also expects its suppliers' subcontractors to be reputable, obey all applicable laws, and respect human rights.

## SPEAK UP WITH NO RETALIATION

Oxy suppliers are expected to report suspected or actual violations of law, this Supplier Code of Conduct, Oxy policy, or any other ethical concerns related to Oxy employees, contractors, or other suppliers. Suppliers should contact their Oxy business representative with any questions or to obtain more information about Oxy's expectations concerning ethical behavior. Any concerns or misconduct noted by suppliers should be reported directly to Oxy Compliance at [Oxy\\_ComplianceLine@oxy.com](mailto:Oxy_ComplianceLine@oxy.com) or through Oxy's Integrity Hotline ([www.oxy.ethicspoint.com](http://www.oxy.ethicspoint.com) or +1.800.699.7702). Reports can be made anonymously. Oxy prohibits retaliation against anyone raising concerns or reporting misconduct in good faith. Oxy expects its suppliers to also prohibit retaliation.

To read more about Oxy's values and Code of Business Conduct, visit our website: [Code of Business Conduct.pdf\(oxy.com\)](http://Code_of_Business_Conduct.pdf(oxy.com)).