

Policy effective date: 08/30/2002

Last update: 02/01/2019

ConocoPhillips is and always has been deeply committed to fair and non-discriminatory treatment for all employees. The Company's policy is to provide equal employment opportunity for all qualified persons without regard to race, color, religion, sex, sexual orientation, national origin, age, disability, veteran status, gender identity or expression, genetic information or any other legally protected status. The Company will comply with the letter and spirit of applicable local, state, federal and country law concerning equal employment opportunity. More specifically, this means the Company will not participate in nor condone any unlawful discrimination of any kind. This applies to, but is not limited to, recruitment, recruitment advertising, hiring, training, promotion, transfer, demotion, layoff, termination, rate of pay, or other forms of compensation, and all other aspects of employment.

The Company is committed to maintaining a work environment that is free of all forms of unlawful conduct, including sexual or other forms of unlawful harassment. This includes a prohibition of any actions by employees, supervisors, or management that abuse individual dignity through slurs or jokes on the basis of race, color, religion, sex, sexual orientation, national origin, age, disability, veteran status, gender identity or expression, genetic information, or any other legally protected status, or other objectionable conduct, including harassing or discriminating conduct that interferes with another employee's performance. Such conduct is unacceptable and will not be tolerated. The use of e-mail or the Internet, which involves unlawful, obscene, offensive or harassing messages or the accessing of Internet sites of a sexual or otherwise inappropriate nature is prohibited. Violation of the EEO Policy will result in discipline up to and including termination of employment. The company has zero tolerance for violations of this policy and the employment of even first time offenders may be terminated.

Sexual harassment includes but is not limited to, unwelcome sexual advances, requests for sexual favors, displays of graffiti, calendars, cartoons, or magazines containing sexual content, and all other verbal or physical conduct of a sexual nature, especially where: submission to such conduct is made either explicitly or implicitly a term or condition of employment; submission to, or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment on the basis of sex.

In addition, the Company's business is always to be conducted in a way that clearly and consistently communicates respect and value for all employees. Therefore, any business conduct - or participation in any business entertainment - that might be demeaning, devaluing, humiliating, or intimidating to any employee will not be tolerated.

Examples of unacceptable behavior include, but are not limited to, entertainment at exotic dance clubs and meetings at resorts or clubs that exclude people from membership on the basis of race, color, religion, sex, sexual orientation, national origin, age, disability, veteran status, gender identity or expression, genetic information, or any other legally protected status. Any question about the acceptability of a given venue for business entertainment should be discussed in advance with the work unit supervisor or manager, who is ultimately responsible for the business conduct of his/her employees, or a human resources representative.

Any employee who believes that he or she has been subjected to discrimination, harassment, or other prohibited behavior by his/her supervisor, any member of management, co-worker, or in the course of conducting the Company's business, should contact his/her supervisor or manager, human resources representative, or Nikki Benson, Director of Employee Relations. Policy violations may also be reported by calling the Ethics HelpLine at 1-877-327-2272 or accessing the Ethics Web Portal at <http://www.conocophillips.ethicspoint.com>. Any supervisor, manager or human resources representative who is aware of a complaint must ensure that it is promptly reported, investigated and treated confidentially. All employees and all levels of management are expected to provide assistance and support for this policy to assure complete compliance. Failure to cooperate will result in discipline up to and including termination of employment. **Retaliatory treatment of any employee reporting discrimination, harassment, or other prohibited behavior is strictly forbidden and should be reported immediately to his/her supervisor, manager or human resources representative, HR Manager, Advisor of Employee Relations, or the Ethics HelpLine.**

Absent a specific written contract to the contrary, employment with ConocoPhillips, its subsidiaries and affiliates may be terminated with or without cause at any time by the employee or the Company. Nothing contained in this policy shall constitute a part of any employment contract or create a required procedure, practice or policy that must or should be followed in the investigation, evaluation, or disposition of any personnel matter.

Employees may contact HR Connections at 1-877-812-7547 or their local HR representative if they have any questions. Although the Company will generally provide prior notification, the Company reserves the right to change, amend, or terminate the referenced plans, programs, policies and/or procedures at any time, without notice, subject to applicable law. The information provided is not intended to supersede applicable local, state or federal law. In the event of conflict, the law shall prevail.