

## EITI International Secretariat's Final Assessment

### Company progress in meeting the Expectations for EITI supporting companies

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| <b>Company name</b>   | ExxonMobil  |
| <b>Sector</b>   | Oil and gas   |
| <b>Headquarters</b>   | Irving, Texas (headquarters moving to Houston, Texas in June 2023)  |
| <b>Type</b>   | Public  |
| <b>Date of submission to company (month/year)</b>   | June 2023   |
| Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). For information purposes. |   |
| <b>Does the company, directly or through a subsidiary (including joint- ventures) participate in a multi-stakeholder group?</b>   | Yes   |
| <b>If yes, indicate in which countries your company is participating in MSGs?</b>   | ANGOLA, GUYANA, PAPUA NEW GUINEA  |
| <b>Secretariat comment</b>  | The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries. |

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| <b>EXPECTATION 1</b>   |   | Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.   |
| <b>Does the company publish a statement of support for the EITI and the objective of the EITI Association?</b> | Yes   |  |
| <b>URL for Statement Support</b>   | <a href="https://corporate.exxonmobil.com/-/media/global/files/sustainability-report/publication/sustainability-report.pdf">https://corporate.exxonmobil.com/-/media/global/files/sustainability-report/publication/sustainability-report.pdf</a> |  |
| <b>Secretariat's assessment on Expectation 1</b>   | Expectation met   |  |
| <b>Secretariat comment</b>   | Statement of support published. See URL for sustainability report p.32.   |  |
| <b>EXPECTATION 2</b>   |   | Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries. |
| <b>Does the company publish a list of controlled subsidiaries?</b>   | Yes   |  |
| <b>URL for controlled list of subsidiaries</b>   | Annual report:<br><a href="https://investor.exxonmobil.com/company-information/annual-reports-proxy">https://investor.exxonmobil.com/company-information/annual-reports-proxy</a>   |  |

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|   | <p><a href="https://ir.exxonmobil.com/static-files/d74ed1e0-cb0a-4c8f-8a58-af673056d6bc">https://ir.exxonmobil.com/static-files/d74ed1e0-cb0a-4c8f-8a58-af673056d6bc</a></p> <p><a href="https://corporate.exxonmobil.com/who-we-are/our-global-organization/global-operations">https://corporate.exxonmobil.com/who-we-are/our-global-organization/global-operations</a></p>  |
| <b>EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.</b>   | ANGOLA, ARGENTINA, COLOMBIA, GERMANY, GUYANA, INDONESIA, IRAQ, KAZAKHSTAN, MEXICO, MOZAMBIQUE, NETHERLANDS, NIGERIA, NORWAY, PAPUA NEW GUINEA, SURINAME, SÃO TOMÉ AND PRÍNCIPE, TANZANIA, UNITED KINGDOM   |
| <b>Does the company make disclosures with EITI Standard in or in relation to EITI implementing countries? Please see attachment on subsidiaries and complete the information, as requested.</b> | Partial  |
| <b>Secretariat's assessment on Expectation 2</b>  | Expectation met  |
| <b>Secretariat comment</b>  | <p>List of controlled subsidiaries published. See URL for 2022 annual report, Exhibit 21, p.164. Company publishes a "List of significant equity companies" in the Annual Report p. 92.</p> <p>Company assessed to be making partial disclosures in accordance with EITI Standard based on non-comprehensive disclosures in PNG, including non-disclosure of production value from the PNG LNG project. Subsidiaries of company report payment of certain taxes in PNG. However, Secretariat in PNG Validation was unable to match revenues from PNG LNG</p> |

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|  | <p>project to particular subsidiaries without further information.</p> <p>ExxonMobil explained that information reported in PNG EITI Report for taxes paid by subsidiaries was correct. The company explained that confidentiality clauses in contracts for PNG LNG project limit comprehensive disclosure, including for production value.</p> <p>The Secretariat notes partial disclosures in PNG. While certain subsidiaries of ExxonMobil in PNG did not disclose payments of taxes for certain revenue streams, the Secretariat did not have information that those subsidiaries made material payments that were omitted from disclosure. With regard to production, ExxonMobil as the reported operator of the PNG LNG project did not disclose production data due confidentiality clauses in the contracts agreed with the Government of PNG. As a result, the Secretariat assessed Expectation 2 as met and assessed Expectation 8 as not met. Expectation 8 concerns company contribution to public disclosure of contracts and licenses in EITI-implementing countries.</p> |
| <p><b>EXPECTATION 3</b></p>  | <p>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</p>  |
| <p><b>Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where</b></p> | <p>Partial</p>  |



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| <b>the company operates in the oil, gas and mining sectors?</b>                                   |  |
| <b>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</b> | <p>[Register for Commerce and Company in Luxembourg: (B7310, L22012565)]<br/>URL:<br/><a href="https://www.lbr.lu/mjrcs/jsp/secured/ExtractConsultDocumentsActionSecured.action?currentMenuLabel=menu.item.extractrequest&amp;FROM_MENU=true&amp;time=1682523232988">https://www.lbr.lu/mjrcs/jsp/secured/ExtractConsultDocumentsActionSecured.action?currentMenuLabel=menu.item.extractrequest&amp;FROM_MENU=true&amp;time=1682523232988</a><br/>Annual Report 2022:<br/><a href="https://d1io3yog0oux5.cloudfront.net/_53209a15a0d033c74fb7444a42d81ce4/exxonmobil/db/2288/21652/annual_report/2022-Annual-Report.pdf">https://d1io3yog0oux5.cloudfront.net/_53209a15a0d033c74fb7444a42d81ce4/exxonmobil/db/2288/21652/annual_report/2022-Annual-Report.pdf</a></p> <p>[Search ExxonMobil]<br/><a href="https://natural-resources.canada.ca/our-natural-resources/minerals-mining/services-for-the-mining-industry/extractive-sector-transparency-measures-act/links-estma-reports/18198">https://natural-resources.canada.ca/our-natural-resources/minerals-mining/services-for-the-mining-industry/extractive-sector-transparency-measures-act/links-estma-reports/18198</a></p> |
| <b>Are the disclosures disaggregated by project?</b>  | No   |
| <b>Secretariat's assessment on Expectation 3</b>  | Expectation partially met  |
| <b>Secretariat comment</b>  | ExxonMobil partially discloses taxes and payments to governments in non-EITI implementing countries. See URLs. The company publishes an overview of its total tax paid in its "Annual Report 2022" (p. 55) (PDF p. 67). The company discloses taxes and payments to governments (for Angola, Guyana, Germany, Netherlands, Mauritania, Namibia, Cyprus and Ghana) in or in relation to non-EITI implementing countries (Namibia and Cyprus) through the Register for Commerce and Company in Luxembourg.   |

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|  | <p>See URL above re Luxembourg (under Offered Services, search for RCS file number B72560, follow steps, click the pdf icon for filing number L220251824). Company discloses taxes and payments to government in Canada. See URL above re ESTMA (reporting for ExxonMobil Canada entities).</p> <p>The Secretariat notes taxes and payments to governments not disclosed in all non-EITI implementing countries where the company operates, such as United States, Qatar, and other countries.</p> <p>The company partially discloses taxes and payments disaggregated by project in Angola (no EITI report yet) and discloses fees paid for Namibia and Cyprus where the company appears to have single projects. Company discloses taxes and payments to government in Canada disaggregated by project through ESTMA reporting. The Secretariat notes taxes and payments to governments not disaggregated by project in all non-EITI implementing countries where company operates, such as United States, Qatar, and other countries.</p> <p>The company explains that “[i]mplementing new disclosures, including onerous project-level payment disclosures, to report information beyond what is both currently and soon to be required by law, and beyond the practices of similarly situated U.S.- based companies with extensive international operations, risks putting ExxonMobil at a competitive disadvantage to our shareholders’ potential detriment.” (Notice of 2023 Annual Meeting and Proxy Statement, (page 99) (PDF page 105).</p> |
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|  | <p>The Secretariat assesses expectation as partially met as taxes and payments to governments are not disclosed in all non-EITI implementing countries where the company operates, and disclosures not disaggregated by project.</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p> |
| <p><b>EXPECTATION 4</b></p>  | <p>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</p>   |
| <p><b>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</b></p> | <p>Yes</p>   |
| <p><b>If yes, which countries?</b></p>   |  |
| <p><b>Does the company make disclosures in line with the EITI Standard/reporting guidelines?</b></p>                 | <p>No</p>  |
| <p><b>URL for disclosure</b></p>   |  |
| <p><b>Secretariat's assessment on Expectation 4</b></p>  | <p>Expectation not met</p>   |

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| <p><b>Secretariat comment</b></p>   | <p>ExxonMobil buys oil, gas and/or mineral resources from the state in EITI implementing countries.</p> <p>ExxonMobil does not disclose information in line with EITI Standard and EITI reporting guidelines for companies buying oil, gas and minerals from governments.</p> <p>The Secretariat could not locate volumes received and payments made for the company's purchase of oil, gas and/or mineral resources from the state.</p> |
| <p><b>EXPECTATION 5</b></p> <p>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</p>  |  |
| <p><b>Does the company disclose its audited financial statements?</b></p>   | <p>Yes</p>   |
| <p><b>URL audited financial statements</b></p>  | <p><a href="https://d1io3yog0oux5.cloudfront.net/05282863b3dd21b573173d34e512872d/exxonmobil/db/2301/22060/annual_report/2022-Annual-Report.pdf">https://d1io3yog0oux5.cloudfront.net/05282863b3dd21b573173d34e512872d/exxonmobil/db/2301/22060/annual_report/2022-Annual-Report.pdf</a></p>   |
| <p><b>Secretariat's assessment on Expectation 5</b></p>   | <p>Expectation met</p>   |
| <p><b>Secretariat comment</b></p>   | <p>ExxonMobil discloses audited financial statements. See URL for Annual Report p. 87-93 PDF.</p>  |
| <p><b>EXPECTATION 6</b></p> <p>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and</p> |  |



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| otherwise do what is required by applicable regulations and listing requirements.  |   |
| <b>Does the company publish a statement of support for beneficial ownership transparency?</b>  | No  |
| <b>URL statement of support for beneficial ownership</b>   | <a href="https://corporate.exxonmobil.com/-/media/global/files/sustainability-report/publication/sustainability-report.pdf">https://corporate.exxonmobil.com/-/media/global/files/sustainability-report/publication/sustainability-report.pdf</a> |
| <b>Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?</b> | Yes   |
| <b>Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange</b>                 | New York Stock Exchange   |
| <b>URL to stock exchange</b>   | <a href="https://www.nyse.com/quote/XNYS:XOM/QUOTE">https://www.nyse.com/quote/XNYS:XOM/QUOTE</a>   |
| <b>URL for recent beneficial ownership disclosures</b>   | <a href="https://investor.exxonmobil.com/sec-filings/all-sec-filings">https://investor.exxonmobil.com/sec-filings/all-sec-filings</a>   |
| <b>Secretariat's assessment on Expectation 6</b>   | Expectation partially met   |

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| <p><b>Secretariat comment</b></p>  | <p>ExxonMobil does not publish a statement of support for beneficial ownership transparency. The company discloses beneficial owners in line with applicable regulations and listing requirements.</p> <p>ExxonMobil has explained that a statement of support for beneficial ownership transparency will be published by the company in early June.</p> <p>*After assessments were finalized on 7 June 2023, ExxonMobil published a statement of support for beneficial ownership transparency in line with Expectation 6, indicating that the company supports host governments in disclosure of beneficial ownership and stating "As a public company, we support beneficial ownership transparency." [See URL: <a href="https://corporate.exxonmobil.com/news/viewpoints/promoting-fiscal-transparency">https://corporate.exxonmobil.com/news/viewpoints/promoting-fiscal-transparency</a>]</p> |
| <p><b>EXPECTATION 7</b></p> <p>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</p> |   |
| <p><b>Does the company publish an anti-corruption policy?</b></p>  | <p>Yes</p>  |
| <p><b>URL to the policy</b></p>  | <p>"Code of ethics" webpage:<br/><a href="https://corporate.exxonmobil.com/who-we-are/our-global-organization/corporate-governance/code-of-ethics#CodeofEthicsandBusinessConduct">https://corporate.exxonmobil.com/who-we-are/our-global-organization/corporate-governance/code-of-ethics#CodeofEthicsandBusinessConduct</a></p> <p>"Our global supply chain" webpage:<br/><a href="https://corporate.exxonmobil.com/news/reporting-and-publications/sustainability-report/social/socioeconomic">https://corporate.exxonmobil.com/news/reporting-and-publications/sustainability-report/social/socioeconomic</a></p>  |

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|  | <a href="#">mic-management/local-economic-development/sustainable-procurement</a>  |
| <b>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</b> | Yes  |
| <b>Secretariat's assessment on Expectation 7</b>   | Expectation met  |
| <b>Secretariat comment</b>   | <p>The company publishes an anti-corruption policy. See URLs.</p> <p>Exxon'Mobil's anti-corruption framework sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The Secretariat notes that the company has a "Code of ethics" webpage. ExxonMobil's "Our global supply chain" webpage section on "Managing our supply chain" states that "We screen potential suppliers across compliance areas such as sanctions, anti-corruption and human trafficking using third-party information."</p> |

## EXPECTATION 8

Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.

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| <b>Does the company publish a statement of support for contract transparency?</b>   | No  |
| <b>URL for statement of support for contract transparency</b>   | None  |
| <b>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</b> | No  |
| <b>Secretariat's assessment on Expectation 8</b>  | Expectation not met   |
| <b>Secretariat comment</b>  | <p>The company does not publish statement of support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard.</p> <p>ExxonMobil indicated that it will publish a statement of support for contract transparency in early June.</p> <p>Company assessed to not contribute to disclosure of contracts and licenses in all EITI implementing countries. Company reported not to contribute to public disclosure of contracts and licenses in Angola, Guyana, Mauritania, PNG and Suriname.</p> <p>*After assessments were finalized on 7 June 2023, ExxonMobil published a statement of support for contract transparency in line with Expectation 8. [See URL: <a href="https://corporate.exxonmobil.com/news/viewpoints/promoting-fiscal-transparency">https://corporate.exxonmobil.com/news/viewpoints/promoting-fiscal-transparency</a>] The company indicates</p> |

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|   | that it supports host governments in disclosure of contracts and the company states, "where it's permissible, we supporting making contracts that govern the exploration and development of natural resources publicly available."     |
| <b>EXPECTATION 9</b>  | Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender. |
| <b>Does the company publish a commitment/policy on gender diversity?</b>  | Yes  |
| <b>Does the company disclose employment data disaggregated by gender?</b> | Yes  |
| <b>URL for relevant information</b>                                       | <a href="https://corporate.exxonmobil.com/-/media/global/files/sustainability/social/investing-in-people-2022.pdf">https://corporate.exxonmobil.com/-/media/global/files/sustainability/social/investing-in-people-2022.pdf</a>        |
| <b>Secretariat's assessment on Expectation 9</b>                          | Expectation met  |
| <b>Secretariat comment</b>  | ExxonMobil publishes commitment and/or policy on gender diversity. See URL p.13-14.<br>The company discloses employment data disaggregated by gender. See URL p.9, 14 and 17.  |