Monitoring of Human Rights Principles

Apache Corporation takes the same multi-level approach to implementing and monitoring the implementation of its human rights principles as it does to monitoring its code of conduct.

Implementation starts with each employee's orientation and continues up through the variety of training programs that are required for or made available to employees depending on their job responsibilities. We interpret monitoring broadly to include things such as teaching employees management listening skills to detect indirect or early signals that deserve attention, as well as more standard monitoring systems such as those built into existing human resources, legal, and internal audit functions.

A number of our corporate and regional outward-facing departments have responsibilities to identify important human rights issues and alert appropriate board committees, executives, and managers to them. The multi-departmental and ongoing effort that culminates every year in the publication of a sustainability report plays a significant role in this process.

Our regional quarterly review system in which our senior managers travel in person (or virtually when travel is not possible or advisable) to each region enable us to create settings in which information critical to the monitoring of human rights principles and our code of conduct more generally can be easily, personally, and comfortably conveyed both up and down the chain. Managers ask many varied questions to further this process, and directors often accompany managers to get direct input as well.

Finally, the board of directors and the corporate governance and nominating committee monitor whether we are meeting our conduct standards.

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