

Darren Woods
Chief Executive Officer
Exxon Mobil Corporation
5959 Las Colinas Boulevard
Irving, Texas
USA

August 21, 2023

RE: ExxonMobil business operations in Russia

Dear Mr. Woods,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations working to curtail the financial resources enabling the Russian invasion of Ukraine. In the spirit of respect for the fundamental rights of all people, the rules-based international order, and a prosperous global economy, we expect companies to demonstrate public support for the people, democracy, and territorial integrity of Ukraine, opposition to Russia's war of aggression, and alignment with the UN Guiding Principles on Business and Human Rights (UNGPs).

We request an urgent dialogue regarding potential inconsistencies between ExxonMobil's obligations under international humanitarian and human rights law and the company's ongoing business operations and relationships in Russia that may contribute to, or be linked with, human rights harms.

We urge ExxonMobil to:

- Immediately cease operations and presence in Russia and completely exit the Russian market.
- Refrain from any future business, trade, or investment in Russia until Russia ends its war in Ukraine, territorial integrity of Ukraine is restored, and accountability imposed for war crimes and the destruction of Ukrainian infrastructure and property.
- Establish and implement comprehensive human rights due diligence measures for any responsible exit from or re-engagement with Russia.

It has been 17 months since Russia invaded Ukraine and the devastating impacts continue to shock the global conscience and shake the global economy. Russia is violating international humanitarian law (IHL), including war crimes and crimes against humanity, through attacks on civilians and civilian infrastructure (e.g., mass executions, sexual violence, torture, forcible transfer of civilians). More than 25,000 Ukrainian civilians have been killed and injured and millions more have been forced to flee their homes, creating one of the largest humanitarian and refugee crises of modern times. In recognition of the severity of abuses, in March 2023 the International Criminal Court issued an arrest warrant for Vladimir Putin to answer war crimes charges.¹

¹ International Criminal Court, "Situation in Ukraine: ICC judges issue arrest warrants against Vladimir Vladimirovich Putin and Maria Alekseyevna Lvova-Belova," March 17, 2023, <https://www.icc->

Moreover, recent developments in Russia point to an expanding universe of financial, legal, and reputational risks facing those still conducting business with the country.

In response to this unprovoked and unjustified war² many other companies have already left Russia. According to the Kyiv School of Economics Institute's #LeaveRussia [company tracker](#), ExxonMobil has decided scale back some of its operations in Russia.

In March 2022 ExxonMobil announced that it will discontinue all its Russia operations and that it will significantly phase down its chemical and lubricant businesses in Russia, as well as suspend sales of all chemical and lubricant products into Russia and Belarus.³ In October, after the Russian government expropriated its assets, ExxonMobil has reportedly fully exited Russia.⁴

However, customs data reveals that ExxonMobil still remains the largest provider of lubricants and other chemicals to Russia, with the overall volumes of the company's exports to Russia not decreasing since the start of the invasion. Additionally, most of these exports originated in the United States.⁵

Direct exports to Russia from ExxonMobil have largely ceased, with the landscape becoming considerably fragmented as numerous suppliers, primarily from Turkey but also from various other countries, stepped in.⁶ We are writing to enquire on ExxonMobil's measures to track and limit indirect exports to Russia.

While direct exports have mostly stopped, there are four shipments from ExxonMobil Petroleum & Chemical, BV to OLIMP LLC for the combined amount of \$1.75 million of lubricants for Aircraft Gas Turbines (two shipments in August 2022, one in December 2022, and the last one (from Spain) in February 2023).⁷ Could you elaborate on the due diligence measures that guided the company's choice to persist with exports to Russia despite the ongoing war in Ukraine? Could ExxonMobil provide further clarifications on the continuation of direct exports to Russia as late as February 2023.

Other companies have faced legal, administrative, and ethical challenges and still committed to, and completely exited, Russia. ExxonMobil has decided to continue exporting into the country, even after over one year since the start of the war, over 100,000 reported war crimes, over 25,000 Ukrainian civilians killed or injured, and with the head of the Russian state indicted by the International Criminal Court for alleged war crimes, namely the abduction of Ukrainian children.

[cpi.int/news/situation-ukraine-icc-judges-issue-arrest-warrants-against-vladimir-vladimirovich-putin-and](https://www.cpi.int/news/situation-ukraine-icc-judges-issue-arrest-warrants-against-vladimir-vladimirovich-putin-and) (accessed March 22, 2023).

² The UN General Assembly condemned Russia's "aggression against Ukraine" and demanded that Moscow "unconditionally withdraw all of its military forces from the territory of Ukraine within its internationally recognized borders."

³ Florence Tan and Sabrina Valle, "Exxon declares force majeure on Russian Sakhalin-1 operations," *Reuters*, April 28, 2022, <https://www.reuters.com/business/exxon-declares-force-majeure-russian-sakhalin-1-operations-2022-04-27/> (accessed August 21, 2023).

⁴ Aimee Pichii, "Exxon fully withdraws from Russia after Putin seizes assets," *CBS News*, October 17, 2022, <https://www.cbsnews.com/amp/news/exxon-exits-russia-after-putin-expropriates-sakhalin-1-project/#app> (accessed August 21, 2023).

⁵ Squeezing Putin, "ExxonMobil Exports into Russia," <https://squeezingputin.com/support.html#Exxon24Jul23> (accessed August 21, 2023).

⁶ *Ibid.*

⁷ *Ibid.*

Considering these developments and the rising number of reported human rights abuses and war crimes, has ExxonMobil considered fully exiting Russia so as not to be even indirectly or remotely associated with these crimes?

We request an urgent dialogue with ExxonMobil's relevant senior management and staff to discuss the company's ongoing activities and relationships in Russia and associated risks to the people of Ukraine and the company. Please contact the B4Ukraine Coalition at contact@b4ukraine.org to schedule a call. We kindly ask for your response by 5:00pm CET, September 4th, 2023.

Sincerely,

The B4Ukraine Coalition