

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

B4Ukraine 

September 24, 2025

RE: ExxonMobil business operations in Russia

Dear Mr. Woods and Exxon Mobil Leadership Team,

We write to you again as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations, concerned by recent developments suggesting a potential return of ExxonMobil to Russia through renewed involvement in the Sakhalin-1 project.

We request an urgent dialogue with ExxonMobil regarding reports of the company's potential re-engagement in Russia, which would give rise to significant human rights, sanctions, legal, and reputational risks. We aim to ensure that ExxonMobil is fully complying not only with applicable sanctions and legal obligations, but also with its responsibilities under the United Nations Guiding Principles on Business and Human Rights.

Businesses must not return to the Russian market until:

- Ukraine's sovereignty and complete territorial integrity are restored, as recognized by international law.
- Reparations are paid in full for all damages caused by Russian aggression, covering infrastructure, economic losses, and human suffering.
- Accountability is imposed for violations of international law, including the crime of aggression, war crimes, and crimes against humanity.

We appreciate that ExxonMobil exited the Russian market following the government's [expropriation](#) of its Sakhalin-1 assets in October 2022 and the subsequent [liquidation](#) of the legal entity in Russia in 2024. According to the Kyiv School of Economics Institute's [#LeaveRussia company tracker](#), ExxonMobil has exited the Russian market.

However, recent reports have raised concerns about potential re-engagement in the Sakhalin-1 project. On August 15, 2025, the Russian government issued a [decree](#) inviting foreign investors to regain shares in Sakhalin-1 on the condition that they help enable sanctions relief, supply foreign equipment, and transfer funds into the project. Shortly thereafter, the governor of Sakhalin publicly stated that ExxonMobil's return would be "[beneficial](#)."

Moreover, recent reports indicate that ExxonMobil has been in [confidential discussions](#) with Russia's state oil company Rosneft regarding the possibility of resuming operations at Sakhalin-1, contingent on governmental approvals. These [discussions](#) are said to have involved senior Exxon executives and included seeking U.S. governmental support for re-entry.

We note ExxonMobil CEO Darren Woods's recent public statement in the *Financial Times* that the company has "[no plans to re-enter Russia](#)," and that its engagement with Russian authorities is focused solely on recovering assets expropriated in 2022. While that statement is welcome, we respectfully request that ExxonMobil provides further clarity and assurance regarding how this position will be translated into practice. In particular, we would appreciate confirmation that no form of operational, technical, or financial cooperation with Russian energy entities, including through intermediaries, will be pursued, and that internal company measures are in place to prevent any re-entry under the framework of the August 2025 decree or any future comparable offers.

The most recent [reporting](#) states that Exxon has entered into a non-binding initial agreement with Russia's Rosneft aimed at recouping the \$4.6 billion impairment it took when it lost access to its Russian operations. The media claims that this move represents a tentative step toward restoring commercial engagement.

Under guidance issued by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), a prohibition on providing "petroleum services" to Russia took effect on February 27, 2025, explicitly covering services such as exploration, drilling, refining, maintenance, and transportation (FAQs 1216/1217). In parallel, the European Union adopted its 17th package of sanctions on May 20, 2025, which further expanded restrictions on Russia's energy sector, including designating hundreds of additional vessels in the shadow fleet and extending export controls and asset freezes. These measures show that any form of re-engagement in Russia would carry high legal and reputational risk, as well as contrast the stance of allied governments to isolate Russia's energy sector.

We are therefore concerned that any potential re-engagement in Russia would expose ExxonMobil to serious human rights, sanctions, legal, and reputational risks, and would undermine the company's stated commitments to responsible business conduct.

We ask ExxonMobil to clarify the following points:

- Can ExxonMobil confirm that it will not re-enter the Russian market or resume any involvement in the Sakhalin-1 project until the three conditions outlined above have been fulfilled?
- Can ExxonMobil confirm that it will not seek licenses, exemptions, or other regulatory accommodations to facilitate re-entry into Russia?
- What enhanced human rights due diligence measures has ExxonMobil put in place to ensure that no part of its business activity, directly or indirectly, contributes to or is linked with Russia's violations of international humanitarian law and human rights law?
- How is ExxonMobil applying its responsibilities under the United Nations Guiding Principles on Business and Human Rights (UNGPs) in the specific context of Russia's ongoing aggression and widespread violations of international law?
- Can ExxonMobil clarify the nature and scope of its ongoing discussions with Russian authorities?
- Will ExxonMobil commit not to lobby for sanctions relief related to the Russian energy sector?
- Can you confirm whether the initial agreement with Rosneft is intended to restore commercial engagement in Russia, and will Exxon commit that it will not pursue renewed business ties there given the ongoing war in Ukraine?

Further details of the legal, expropriation, human rights, and reputational risks associated with any potential re-engagement in Russia are outlined in the annex below.

We request an urgent dialogue with ExxonMobil's relevant senior management and staff to discuss the company's activities and relationships with Russia and associated risks to the people of Ukraine. Please contact the B4Ukraine Coalition at contact@b4ukraine.org to schedule a call. We kindly ask for your response by 5:00pm CET, October 08, 2025. Please note that after this date, this letter and any response will be published on the B4Ukraine webpages.

Sincerely,

The B4Ukraine Coalition

Dekleptocracy Alliance

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The Risks of Re-Engaging with the Russian Market

Recent speculation about the potential lifting of sanctions, particularly in the United States, has created uncertainty. However, it is clear that the broader sanctions regime remains intact. The United States has for now maintained its restrictions, while the European Union recently approved its [17th package](#) of sanctions. Even if some policymakers consider relaxing their stance, the reality remains that the EU, UK, Japan, Canada, and numerous other governments and organisations have imposed sanctions on Russia, making it the most sanctioned country in the world, due to its crime of aggression against its sovereign neighbour.

It has been three years since Russia invaded Ukraine, committing the crime of aggression and breaching the UN Charter. Russia is violating international humanitarian and human rights law, committing over 150,000 documented war crimes. In recognition of the severity of abuses, in March 2023 the International Criminal Court issued an arrest warrant for Vladimir Putin to answer charges of war crimes.

At the same time, economic and regulatory conditions in Russia are no longer conducive to stable business operations. Companies re-entering the market would be navigating a landscape of restricted [supply chains, financial barriers, and legal uncertainties](#). Since 2022, Russia has pursued a deliberate strategy of seizing foreign-owned assets, whether through formal expropriations or regulatory coercion. According to a study conducted by the London School of Economics, [over 500 Western firms](#) have seen their assets expropriated under various pretexts, including companies in industries ranging from brewing and consumer goods (e.g., [Danone, Carlsberg](#)) to energy (e.g., [Uniper, Fortum](#)). The scope of legislation and Russian domestic case law showing the readiness for expropriation has skyrocketed since the start of the full-scale invasion. Businesses looking to re-enter must expect that their assets would meet a similar fate.

These patterns show a blatant disregard for property rights, investor and shareholder rights, and are a general indicator of an authoritarian government. Accordingly, any western business seeking re-entry faces the [risk of Kremlin](#) decrees that introduce new fees, taxes, and price controls; limit the repatriation of profits and dividends; restrict asset sales and management decisions; and expropriate private businesses.

Russia's [macroeconomic](#) environment further devalues the case for re-engagement. Interest rates have soared to 20%, labour shortages are worsening, and consumer purchasing power has significantly declined. The country's middle class is shrinking, and the infrastructure that once supported international trade and investment has deteriorated.

Meanwhile, Russia's own officials have stated that returning businesses should [not expect to be treated on equal footing](#) with local firms. As Vladimir Putin confirmed, those seeking re-entry would be [disadvantaged](#) to ensure the competitiveness of local businesses. Many Western brands have already been [replaced](#) by domestic or Chinese alternatives, making it difficult, if not impossible, for companies to regain their former market position. Rebuilding operations in such a climate would require substantial financial investment with little certainty of return, naturally concerning investors. Russian policy is confirmed to be favourable towards domestic production and market share.

The Russian legislative framework continues to pose a high risk of business complicity in the war. Under [Federal Law No. 31-FZ](#) businesses, including international companies that are operating on a full or limited scale in Russia, are required to conduct military registration of the staff if at least one of the employees is eligible for military service. They must also assist with delivering the military summons to their employees, ensure the delivery of equipment to assembly points or military units,

and provide information, buildings, communications, land plots, transport, and other material means of support to the war effort.

Beyond financial and legal exposure, reputational risks remain high. Any company that chooses to return to Russia will be seen as disregarding the human cost of the war in Ukraine. Some Russian officials have even suggested that businesses seeking to re-enter should [contribute financially to the Russian military or establish operations in occupied Ukrainian territories](#). These decisions would directly associate a company's name with a government engaged in an ongoing conflict, one that has been widely condemned for violations of international law. Moreover, they could render the company complicit in violations of international law.

For all these reasons, we strongly urge your company to not re-engage in the Russian market. We ask that you publicly **affirm your commitment to staying out of Russia**, engage with your peers, and use your influence to advocate for continued economic pressure until meaningful conditions for peace and accountability are met.

The financial, legal, and reputational risks outweigh any potential short-term benefits. More importantly, to re-enter the Russian market under current conditions would be to ignore the principles that led to withdrawal in the first place and contradict all principles of ethical business conduct and a business' responsibility to [respect human rights](#).

We urge ExxonMobil to make the responsible decision to refrain from any re-engagement in Russia and to publicly affirm this commitment.

Exxon Mobil Corporation
22777 Springwoods Village Pkwy
Spring, TX 77389

Jennifer Driscoll
Vice President, Investor Relations



VIA EMAIL

September 19, 2023

Dear B4Ukraine Coalition:

Thank you for reaching out directly. We want to address the information referenced in your letter but first, we want you to know that we stand with the people of Ukraine and deplore Russia's military action.

Since the events unfolded in Ukraine, we have discontinued our operations and investments in Russia. We also suspended our chemical and lubricant product sales into Russia and Belarus indefinitely. In addition, an initial review of our records does not reflect any sales of aviation lubricants from ExxonMobil Petroleum & Chemical BV to OLIMP LLC.

Know that we take sanctions compliance seriously, in all instances, and comply with applicable laws in all locations where we operate. We also set standards with our distributors and resellers regarding their expected legal compliance.

We appreciate the opportunity to correct the record here and reiterate our support for Ukraine and its people.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer Driscoll".

Jennifer Driscoll

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 (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