



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

February 27, 2018

Christopher A. Butner
Chevron Corporation
cbutner@chevron.com

Re: Chevron Corporation
Incoming letter dated January 18, 2018

Dear Mr. Butner:

This letter is in response to your correspondence dated January 18, 2018 concerning the shareholder proposal (the "Proposal") submitted to Chevron Corporation (the "Company") by Azzad Asset Management et al. (the "Proponents") for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders. We also have received correspondence on the Proponents' behalf dated February 12, 2018. Copies of all of the correspondence on which this response is based will be made available on our website at <http://www.sec.gov/divisions/corpfin/cf-noaction/14a-8.shtml>. For your reference, a brief discussion of the Division's informal procedures regarding shareholder proposals is also available at the same website address.

Sincerely,

Matt S. McNair
Senior Special Counsel

Enclosure

cc: Joshua Brockwell
Azzad Asset Management
joshua@azzad.net

February 27, 2018

Response of the Office of Chief Counsel
Division of Corporation Finance

Re: Chevron Corporation
Incoming letter dated January 18, 2018

The Proposal requests that the board publish a report evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body.

We are unable to concur in your view that the Company may exclude the Proposal under rule 14a-8(i)(3). We are unable to conclude that the Proposal, taken as a whole, is so vague or indefinite that it is rendered materially misleading. Accordingly, we do not believe that the Company may omit the Proposal from its proxy materials in reliance on rule 14a-8(i)(3).

Sincerely,

Evan S. Jacobson
Special Counsel

DIVISION OF CORPORATION FINANCE
INFORMAL PROCEDURES REGARDING SHAREHOLDER PROPOSALS

The Division of Corporation Finance believes that its responsibility with respect to matters arising under Rule 14a-8 [17 CFR 240.14a-8], as with other matters under the proxy rules, is to aid those who must comply with the rule by offering informal advice and suggestions and to determine, initially, whether or not it may be appropriate in a particular matter to recommend enforcement action to the Commission. In connection with a shareholder proposal under Rule 14a-8, the Division's staff considers the information furnished to it by the company in support of its intention to exclude the proposal from the company's proxy materials, as well as any information furnished by the proponent or the proponent's representative.

Although Rule 14a-8(k) does not require any communications from shareholders to the Commission's staff, the staff will always consider information concerning alleged violations of the statutes and rules administered by the Commission, including arguments as to whether or not activities proposed to be taken would violate the statute or rule involved. The receipt by the staff of such information, however, should not be construed as changing the staff's informal procedures and proxy review into a formal or adversarial procedure.

It is important to note that the staff's no-action responses to Rule 14a-8(j) submissions reflect only informal views. The determinations reached in these no-action letters do not and cannot adjudicate the merits of a company's position with respect to the proposal. Only a court such as a U.S. District Court can decide whether a company is obligated to include shareholder proposals in its proxy materials. Accordingly, a discretionary determination not to recommend or take Commission enforcement action does not preclude a proponent, or any shareholder of a company, from pursuing any rights he or she may have against the company in court, should the company's management omit the proposal from the company's proxy materials.

February 12, 2018

Office of Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

Via email to shareholderproposals@sec.gov

Re: Chevron Corporation
Stockholder Proposal of Azzad Asset Management et al.
Securities Exchange Act of 1934 - Rule 14a-8

Dear Counsel:

I am writing on behalf of Azzad Asset Management; Benedictine Sisters of Baltimore; Benedictine Sisters of Boerne, Texas; Dana Investment Advisors; First Affirmative Financial Network; Mercy Investment Services; and Ursuline Sisters of Tildonk, U.S. Province (collectively the "proponents") in response to the letter from Chevron Corporation ("Chevron" or the "Company") dated January 18, 2018.

In that letter, Chevron seeks no-action relief from a shareholder proposal submitted by the proponents for inclusion in the proxy materials for its 2018 annual shareholder meeting. For the reasons set forth below, the proponents respectfully request the Division to deny Chevron's request for relief.

The Proposal

The proponents' shareholder proposal requests the Company's board to "publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body."

Response to Chevron's objections

The proponents submitted a materially similar proposal to Chevron in December 2016 for its 2017 annual shareholder meeting; the Company accepted that proposal. The only difference between the resolved clause of that first proposal and this one is the addition of the phrase "as defined by the U.S. Department of State or the appropriate international body."

To mitigate concerns about this part of the sentence, the proponents are willing to remove those 13 words, returning the phrasing of the resolved clause to the phrasing we submitted last year, which the Company accepted.

If this solution is not acceptable, we maintain that the new wording of the resolution is still consistent with Rule 14a-8.

The "vague and indefinite" objection

In its argument for exclusion, Chevron contended that the proposal "is impermissibly vague and indefinite so as to be inherently misleading." The proponents maintain that neither phrasing of the resolved clause is vague or misleading.

The Company states that Securities and Exchange Commission staff have permitted the exclusion of stockholder proposals in the past "that reference a particular set of external standards but fail to sufficiently describe or explain the substantive provisions of these standards."

The United States Department of State is listed as an objective third-party standard in this case—and absent that, an appropriate international body as determined by the Board. In the case of Myanmar, where the Company maintains a production sharing agreement with the ruling regime, the State Department has already determined that crimes against humanity are being committed.

According to Human Rights Watch, the International Criminal Court in the Hague has jurisdiction over crimes against humanity. Ethnic cleansing, like what is taking place in Myanmar according to the U.S. State Department, falls under that designation.

Crimes against humanity and genocide were both given specific legal meanings during the 20th century. Both were first referred to in 1915. Under U.S. law since 1987, the designation of genocide requires action. Crimes against humanity are recognized by international law.

Since then, the notion of crimes against humanity has evolved under international law and through the jurisdictions of international courts such as the International Criminal Court, the International Criminal Tribunal for the former Yugoslavia and the International Criminal Tribunal for Rwanda. Many states have also criminalized crimes against humanity in their domestic law.

The 1998 Rome Statute establishing the International Criminal Court reflects the latest consensus in the international community on this matter. It is also the treaty that offers the most extensive list of specific acts that may constitute the crime.

The Company also stated that "[b]y looking at the information in the proposal ... a stockholder would be unable to determine which governments are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body."

Invest with faith

This objection appears disingenuous in light of a substantially similar, though less defined, version of the proposal's resolved clause that the Company received and published without objection in its proxy materials in 2017. The slightly revised version for the 2018 annual general meeting was intended to further sharpen the human rights questions at issue and provide direction to the Company as to how a determination could be made.

Further, the fact that six percent of stockholders voted in favor of the resolution in 2017 is a noteworthy indication that the resolution in its less definitive though materially similar form was clear in its intent.

Conclusion

For these reasons, we respectfully submit that Chevron has not successfully demonstrated that the proponents' resolution may be omitted from the Company's 2018 proxy materials, and we ask the Division to concur in this view.

Please do not hesitate to contact me at 571-551-6865 with any questions in connection with this matter.

Yours truly,



Joshua Brockwell
Investment Communications Director

Cc:

Chris Butner, Chevron Corporation (cbutner@chevron.com)
Sr. Patricia Kirk, Benedictine Sisters of Baltimore (bensrs@emmanuelosb.org)
Sr. Susan Mika, Benedictine Sisters of Boerne, Texas (by fax: 210-341-4519)
Ann Roberts, Dana Investment Advisors (annr@danainvestment.com)
Holly Testa, First Affirmative Financial Network, (htesta@firstaffirmative.com)
Sr. Valerie Heinonen, Mercy Investment Services (vheinonen@mercyinvestments.org)
Sr. Valerie Heinonen, Ursuline Sisters of Tildonk, U.S. Province (vheinonen@mercyinvestments.org)



Christopher A. Butner
Assistant Secretary and Managing Counsel

January 18, 2018

VIA E-MAIL

Office of Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Chevron Corporation
Stockholder Proposal of Azzad Asset Management et al.
Securities Exchange Act of 1934—Rule 14a-8

Ladies and Gentlemen:

This letter is to inform you that Chevron Corporation (the "Company") intends to omit from its proxy statement and form of proxy for its 2018 Annual Meeting of Stockholders (collectively, the "2018 Proxy Materials") a stockholder proposal (the "Proposal") and statements in support thereof received from Azzad Asset Management, Benedictine Sisters of Baltimore, Benedictine Sisters of Boerne, Texas, Dana Investment Advisors, Mercy Investment Services, and Ursuline Sisters of Tildonk, U.S. Province (collectively, the "Proponents").

Under Rule 14a-8(j), we have filed this letter with the Securities and Exchange Commission (the "Commission") no later than eighty (80) calendar days before the Company intends to file its definitive 2018 Proxy Materials with the Commission, and we have concurrently sent copies of this correspondence to the Proponents.

Rule 14a-8(k) and Staff Legal Bulletin No. 14D (Nov. 7, 2008) ("SLB 14D") provide that stockholder proponents are required to send companies a copy of any correspondence that the proponents elect to submit to the Commission or the staff of the Division of Corporation Finance (the "Staff"). Accordingly, we are taking this opportunity to inform the Proponents that if the Proponents elect to submit additional correspondence to the Commission or the Staff with respect to this Proposal, a copy of that correspondence should be furnished concurrently to the undersigned pursuant to Rule 14a-8(k) and SLB 14D.

Chevron currently intends to file its definitive 2018 Proxy Statement with the Commission on or about April 10, 2018.

THE PROPOSAL

The Proposal states:

BE IT RESOLVED:

The shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body.

A copy of the Proposal, the supporting statements and related correspondence with the Proponents, is attached to this letter as Exhibit A.

BASIS FOR EXCLUSION

We respectfully request that the Staff concur in our view that the Proposal may properly be excluded from the 2018 Proxy Materials under Rule 14a-8(i)(3) because the Proposal is impermissibly vague and indefinite so as to be inherently misleading.

ANALYSIS

I. Rule 14a-8(i)(3) Background

Rule 14a-8(i)(3) permits the exclusion of a stockholder proposal if the proposal or supporting statement is contrary to any of the Commission's proxy rules, including Rule 14a-9, which prohibits materially false or misleading statements in proxy soliciting materials. For the reasons discussed below, the Proposal is so vague and indefinite as to be misleading and, therefore, is excludable under Rule 14a-8(i)(3).

The Staff consistently has taken the position that vague and indefinite stockholder proposals are inherently misleading and therefore excludable under Rule 14a-8(i)(3) because "neither the stockholders voting on the proposal, nor the company in implementing the proposal (if adopted), would be able to determine with any reasonable certainty exactly what actions or measures the proposal requires." Staff Legal Bulletin No. 14B (Sept. 15, 2004) ("SLB 14B"). See also *Dyer v. SEC*, 287 F.2d 773, 781 (8th Cir. 1961) ("[I]t appears to us that the proposal, as drafted and submitted to the company, is so vague and indefinite as to make it impossible for either the board of directors or the stockholders at large to comprehend precisely what the proposal would entail."). In this regard, the Staff has permitted the exclusion of stockholder proposals—similar to the Proposal—that reference a particular set of external standards but fail to sufficiently describe or explain the substantive provisions of those standards. In *Chevron Corp.* (avail. Mar. 15, 2013), the Staff concurred with the exclusion of a proposal requesting that the board adopt a policy that the board's chairman be "an independent director according to the definition set forth in the New York Stock Exchange listing standards" but failed to describe or explain the substantive provisions of the standard. The Staff noted "[i]n evaluating where a proposal may be excluded on this basis, we consider only the information contained in the proposal and supporting statement and determine whether, based on that information, shareholders and the company can determine what actions the proposal seeks." See also *Dell Inc.* (avail. Mar. 30, 2012) (concurring with exclusion of a proposal to provide proxy access to any stockholders who

"satisfy SEC Rule 14a-8(b) eligibility requirement" without explaining the eligibility requirements, with the Staff noting that "the specific eligibility requirements represent a central aspect of the proposal.")

Moreover, the Staff has on numerous occasions concurred that a stockholder proposal was sufficiently misleading so as to justify exclusion where a company and its stockholders might interpret the proposal differently, such that "any action ultimately taken by the [c]ompany upon implementation [of the proposal] could be significantly different from the actions envisioned by shareholders voting on the proposal." *Fuqua Industries, Inc.* (avail. Mar. 12, 1991). See also *Bank of America Corp.* (avail. June 18, 2007) (concurring with the exclusion of a proposal calling for the board of directors to compile a report "concerning the thinking of the Directors concerning representative payees" as "vague and indefinite"); *Puget Energy, Inc.* (avail. Mar. 7, 2002) (concurring with the exclusion of a proposal requesting that the company's board of directors "take the necessary steps to implement a policy of improved corporate governance").

Under these standards, the Proposal is so vague and indefinite as to be misleading and therefore is excludable under Rule 14a-8(i)(3) for the reasons discussed below.

II. Analysis

The Proposal is vague and indefinite because a central aspect of the Proposal is defined by reference to external standards, and the Proposal fails to describe the substance of these standards. Specifically, the Proposal requests a report "evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body." By looking solely at the information in the Proposal, including the supporting statements—the standard the Staff clearly set forth in *Chevron Corp.* (avail. Mar. 15, 2013)—a stockholder would be unable to determine which governments are complicit in genocide and/or crimes against humanity "as defined by the U.S. Department of State or the appropriate international body." Without being able to make this determination, a stockholder is unable to reasonably determine which governments are within the scope of the policy request by the report.

The Staff has concurred with the exclusion of a variety of stockholder proposals under Rule 14a-8(i)(3) that, similar to the Proposal, rely upon a reference to a particular set of external standards but fail to sufficiently describe or explain the substantive provisions of the external standards. For example, the Proposal is similar to the stockholder proposal in *Exxon Mobil Corp. (Naylor)* (avail. Mar. 21, 2011), where the Staff concurred with the exclusion under Rule 14a-8(i)(3) of a proposal requesting "a report . . . on the community and environmental impact of [the company's] logistics decisions, using guidelines from the Global Reporting Initiative." The company argued that the proposal was vague and indefinite because it did not adequately describe the "highly complex" guidelines or the "additional descriptive materials on the [Global Reporting Initiative] website" relating to the guidelines. The Staff agreed that the company could exclude the proposal, noting "in particular [the company's] view that the proposal does not sufficiently explain the 'guidelines from the Global Reporting Initiative' and that, as a result, neither stockholders nor the company would be able to determine with any reasonable certainty exactly what actions or measures the proposal requires." See also *AT&T Inc.* (avail. Feb. 16, 2010, *recon. denied* Mar. 2, 2010) (concurring with the exclusion of a proposal that sought a report on, among other things, "grassroots lobbying communications as defined in 26 C.F.R. §

56.4911-2"); *The Boeing Co.* (avail. Feb. 5, 2010) (concurring with the exclusion of a proposal as vague and indefinite where the proposal requested the establishment of a board committee that "will follow the Universal Declaration of Human Rights" but the proposal failed to adequately describe the substantive provisions of the standard to be applied); *Johnson & Johnson (Gen. Bd. of Pension and Health Benefits of the United Methodist Church et al.)* (avail. Feb. 7, 2003) (concurring with the exclusion of a proposal requesting the adoption of the "Glass Ceiling Commission's business recommendations" without describing the recommendations); *Alcoa Inc.* (avail. Dec. 24, 2002) (excluding a proposal calling for the implementation of "human rights standards" and a program to monitor compliance with these standards as "vague and indefinite"); *Occidental Petroleum Corp.* (avail. Mar. 8, 2002) (concurring with the exclusion of a proposal requesting the implementation of a policy "consistent with the 'Voluntary Principles on Security and Human Rights,'" where the proposal failed to adequately summarize the external standard despite referring to some, but not all, of the standard's provisions); *Kohl's Corp.* (avail. Mar. 13, 2001) (concurring in reliance on Rule 14a-8(i)(3) in the exclusion of a stockholder proposal requesting implementation of the "SA8000 Social Accountability Standards").

In contrast, in *Mondelez International, Inc.* (avail. March 15, 2016), the Staff did not concur in exclusion for a proposal requesting that the company participate in mediation for alleged human rights violations if mediation is offered by a governmental National Contact Point for the OECD Guidelines. The *Mondelez* proposal differs from the Proposal in three significant respects: (1) the *Mondelez* proposal and supporting statements discussed the substance of the OECD Guidelines; (2) the *Mondelez* proposal provided a hyperlink to the OECD guidelines for easy reference; and (3) stockholders did not need to fully understand the OECD Guidelines in order to determine the substance of the proposal. Thus, while a reader of the *Mondelez* proposal could determine with "any reasonable certainty what actions or measures the proposal requires," a reader of the Proposal would not have the same certainty due to the lack of explanation in the Proposal, including the supporting statements, or hyperlinks to the relevant standards. Further, unlike in *Mondelez*, where the OECD Guidelines were simply provided for the sake of example, understanding which governments are "complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body" is central to determining which governments are within the scope of the policy requested by the report.

The Staff frequently has concurred that a proposal is excludable under Rule 14a-8(i)(3) where it "may be subject to differing interpretations" since "neither the shareholder voting on the proposal, nor the Company, would be able to determine with any reasonable certainty what measures the Company would take in the event the proposal was approved." *Hershey Foods Corp.* (avail. Dec. 27, 1988). For example, in *General Motors Corp.* (avail. Apr. 2, 2008), the Staff concurred with the exclusion of a proposal under Rule 14a-8(i)(3) that requested that executive pensions be adjusted pursuant to a formula that was based on changes compared to "the six-year period immediately preceding commencement of GM's restructuring initiatives," where the company argued that shareholders would not know what six-year period was contemplated under the proposal, in light of the company having undertaken several "restructuring initiatives." Similarly, in *Northrop Corp.* (avail. Mar. 2, 1990), the Staff concurred with the exclusion of a proposal that requested the immediate "appointment" of a "qualified outside director" meeting a number of particular qualifications. The company argued that appointing a director could be accomplished in a number of different manners and that because the proposal provided no guidance, the company would be unable to determine which of the alternative actions implied by the proposal would be required. The Staff concurred, noting that

"the proposal does not specify which corporate actions, from among a number of legally possible alternatives, would be chosen to effect the 'appointment' of the 'qualified outside director.'" Likewise, the Proposal is susceptible to multiple interpretations because, as discussed above, the Proposal is unclear regarding which definition the Proposal intends for defining governments that are "complicit in genocide and/or crimes against humanity." Further, the Proposal gives no explanation or guidance as to the "appropriate international body" it discusses, which leaves a stockholder unable to reasonably discern which international body is being referenced. For example, an "appropriate international body" could be a country, an intergovernmental organization, or a non-profit organization. Moreover, there is no guidance as to the term "appropriate". Thus, like the proposals in *General Motors* and *Northrop*, the Proposal is excludable under Rule 14a-8(i)(3) since the Company and its stockholders can easily interpret the Proposal differently, such that "any action ultimately taken by the [c]ompany upon implementation [of the proposal] could be significantly different from the actions envisioned by shareholders voting on the proposal." *Fuqua Industries, Inc.* (avail. Mar. 12, 1991).

Thus, consistent with Staff precedent, because a central aspect of the Proposal is defined by reference to external standards, and because the Proposal fails to describe the substance of these standards, the Company's stockholders cannot be expected to make an informed decision on the merits of the Proposal given that they will be unable "to determine with any reasonable certainty exactly what actions or measures the proposal requires." SLB 14B. In this respect, the Proposal's reference to "governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or appropriate international body" is no more informative to stockholders than the reference in *Exxon* to the "guidelines from the Global Reporting Initiative" or the reference in *AT&T* to "grassroots lobbying communications as defined in 26 C.F.R. § 56.4911-2." Accordingly, we believe the Proposal is impermissibly vague and indefinite and, therefore, excludable under Rule 14a-8(i)(3).

CONCLUSION

Based upon the foregoing analysis, we respectfully request that the Staff concur that it will take no action if the Company excludes the Proposal from its 2018 Proxy Materials.

We would be happy to provide you with any additional information and answer any questions that you may have regarding this subject. If we can be of any further assistance in this matter, please do not hesitate to call me at (925) 842-2796 or Elizabeth A. Ising at Gibson, Dunn & Crutcher LLP at (202) 955-8287.

Sincerely,



Christopher A. Butner

Enclosures

cc: Joshua Brockwell, Azzad Asset Management (joshua@azzadfunds.com)
Sr. Patricia Kirk, Benedictine Sisters of Baltimore (bensrs@emmanuelosb.org)
Sr. Susan Mika, Benedictine Sisters of Boerne, Texas (by fax 210-341-4519)
Ann Roberts, Dana Investment Advisors (annr@danainvestment.com)
Valerie Heinonen, Mercy Investment Services (vheinonen@mercyinvestments.org)
Valerie Heinonen, Ursuline Sisters of Tildonk, U.S. Province
(vheinonen@mercyinvestments.org)



FOLIO*fi* Investments, Inc
8180 Greensboro Drive
8th Floor
McLean, VA 22102

p 888-485-3456
f 703-980-7313
folioinstitutional.com

December 1, 2017

Mary A. Francis
Corporate Secretary and Chief Governance Officer
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583

RE: Shareholder resolution filed by Azzad Asset Management
Account ***

Dear Ms. Francis,

Folio*fi* Investments, Inc. (DTC participant #0728) serves as the corporate custodian and is the record holder for 717 shares of common stock of Chevron Corporation (the "Company") for the benefit of Azzad Asset Management. Azzad Asset Management has been the beneficial owner of at least \$2,000 in aggregate market value of the Company's common stock continuously for at least a one-year period preceding and including December 1, 2017, the date of the shareholder proposal submitted by Azzad Asset Management pursuant to Rule 14a-8 of the Securities and Exchange Commission. Azzad Asset Management continues to hold the above referenced shares of the Company's common stock as of the date hereof.

Sincerely,

Joseph F. Gerdes
President
Folio*fi* Investments, Inc.
8180 Greensboro Drive
8th Floor
McLean, VA 22102
gerdesj@folioinvesting.com
T: 703-245-4855

Folio*fi* Investments, Inc. is a Depository Trust Company (DTC)

WHEREAS:

Chevron, in partnership with Total and Myanmar Oil and Gas Enterprise (MOGE), holds equity in one of the largest investment projects in Burma (Myanmar): the Yadana gas field and pipeline that generates billions of dollars for the Burmese government.

In Burma, foreign participation in the energy sector takes place through joint ventures with the state-owned MOGE. U.S. lawmakers have stated that "MOGE's operations lack transparency, that it remains overly influenced by the Burmese military, and that the large amounts of foreign investment flowing into MOGE are not sufficiently accountable to the Burmese people or its parliament."

In March 2015, Chevron entered into an additional production sharing contract with MOGE to explore in the Rakhine Basin.

Rakhine state is home to the Rohingya people, an ethnic minority that has been subject to a government-sanctioned campaign of repression and violence. Although they have lived in Burma for generations, the Rohingya are denied citizenship and voting rights, freedom of religion, and other basic rights. In 2012, Burmese security forces moved more than 120,000 Rohingya from their homes into detention camps where access is restricted to basic services, such as food, healthcare, and education.

In August 2017, a new military crackdown caused an estimated 620,000 Rohingya, half of them children, to flee to neighboring Bangladesh. In November 2017, following a visit to the region and an analysis of the facts, U.S. Secretary of State Rex Tillerson described the Burmese army's offensive against the Rohingya as "ethnic cleansing" and called for a "credible, independent investigation" of the military's reported human rights abuses. Tillerson also signaled possible U.S. sanctions against Burma's army.

The U.S. Holocaust Memorial Museum has reported that the Rohingya are "at grave risk of additional mass atrocities and even genocide." In November 2017, Amnesty International issued a report detailing how Rohingya in Myanmar are subject to a "vicious system of state-sponsored, institutionalized discrimination that amounts to apartheid," meeting the international legal definition of a crime against humanity.

The International Coalition for the Responsibility to Protect (ICRtoP) monitors countries worldwide for instances of serious crimes under international law including genocide, war crimes, ethnic cleansing, and crimes against humanity. ICRtoP lists several countries, cited by the United Nations and civil society organizations, in which Chevron is currently producing oil and gas: Burma (Myanmar), Democratic Republic of Congo, and Nigeria.

BE IT RESOLVED:

The shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body.

SUPPORTING STATEMENT:

As shareholders, we believe that our company has the duty to avoid the moral, legal, financial, reputational, and operational risks posed by doing business with governments complicit in genocide or crimes against humanity. It is incumbent that our board adopt policies that protect shareholder value from these risks.



BENEDICTINE SISTERS of BALTIMORE
Emmanuel Monastery

MAF
DEC 12 2017

▶ Fax

From: JANE HEIL
Phone: 410-821-5792
Fax: 410-296-9560
Company Name: Benedictine Sisters of Baltimore

To: MARY A FRANKS
Phone:
Fax: 925 842-6017
Company Name: CHEVRON CORP

Comments:

RESOLUTION ON ROMANIA CRISIS IN BURMA

pg 1 of 3, incl cover sheet

Urgent For Review Please Comment Please Reply Please Recycle



2.5 Co filer via Fax
 BENEDICTINE SISTERS of BALTIMORE
 Emmanuel Monastery

MAF
 DEC 12 2017
 Via Fax

December 12, 2017

Mary A. Francis
 Corporate Secretary
 Chevron Corp.
 6001 Bollinger Canyon Road
 San Ramon, CA 94583

Email: corpgov@chevron.com
 Fax: 925-842-6047

Dear Ms. Francis:

I am writing you on behalf of the Benedictine Sisters of Baltimore to co-file the stockholder resolution on Rohingya Crisis In Burma (Myanmar). In brief, the proposal states **RESOLVED**, the shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State.

I am hereby authorized to notify you of our intention to co-file this shareholder proposal with Azzad Asset Management. I submit it for inclusion in the 2018 proxy statement for consideration and action by the shareholders at the 2018 annual meeting in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934. We are the beneficial owner, as defined in Rule 13d-3 of the Securities Exchange Act of 1934, of 125 number of Chevron Corp shares

We have been a continuous shareholder for one year of \$2,000 in market value of Chevron Corp stock and will continue to hold at least \$2,000 of Chevron Corp stock through the next annual meeting. Verification of our ownership position will be sent by our custodian. A representative of the filers will attend the stockholders' meeting to move the resolution as required by SEC rules

We truly hope that the company will be willing to dialogue with the filers about this proposal. We consider Azzad Asset Management the lead filer of this resolution and as so is authorized to act on our behalf in all aspects of the resolution including negotiation and withdrawal. Please note that the contact person for this resolution/proposal will be Joshua Brockwell of Azzad Asset Management who may be reached by phone 703-207-7005 x 109 or by email: joshua@azzad.net. As a co-filer, however, we respectfully request direct communication from the company and to be listed in the proxy.

Sincerely,

Sr. Patricia Kirk, O.S.B.

Sr. Patricia Kirk, Prioress

MAF

DEC 12 201

**Rohingya Crises In Burma (Myanmar)
2018 – Chevron Corp.**

WHEREAS:

Chevron, in partnership with Total and Myanmar Oil and Gas Enterprise (MOGE), holds equity in one of the largest investment projects in Burma (Myanmar): the Yadana gas field and pipeline that generates billions of dollars for the Burmese government.

In Burma, foreign participation in the energy sector takes place through joint ventures with the state-owned MOGE. U.S. lawmakers have stated that "MOGE's operations lack transparency, that it remains overly influenced by the Burmese military, and that the large amounts of foreign investment flowing into MOGE are not sufficiently accountable to the Burmese people or its parliament."

In March 2015, Chevron entered into an additional production sharing contract with MOGE to explore in the Rakhine Basin.

Rakhine state is home to the Rohingya people, an ethnic minority that has been subject to a government-sanctioned campaign of repression and violence. Although they have lived in Burma for generations, the Rohingya are denied citizenship and voting rights, freedom of religion, and other basic rights. In 2012, Burmese security forces moved more than 120,000 Rohingya from their homes into detention camps where access is restricted to basic services, such as food, healthcare, and education.

In August 2017, a new military crackdown caused an estimated 620,000 Rohingya, half of children, to flee to neighboring Bangladesh. In November 2017, following a visit to the region and an analysis of the facts, U.S. Secretary of State Rex Tillerson described the Burmese army's offensive against the Rohingya as "ethnic cleansing" and called for a "credible, independent investigation" of the military's reported human rights abuses. Tillerson also signaled possible U.S. sanctions against Burma's army.

The U.S. Holocaust Memorial Museum has reported that the Rohingya are "at grave risk of additional mass atrocities and even genocide." In November 2017, Amnesty International issued a report detailing how Rohingya in Myanmar are subject to a "vicious system of state-sponsored, institutionalized discrimination that amounts to apartheid," meeting the international legal definition of a crime against humanity.

The International Coalition for the Responsibility to Protect (ICRtoP) monitors countries worldwide for instances of serious crimes under international law including genocide, war crimes, ethnic cleansing, and crimes against humanity. ICRtoP lists several countries, cited by the United Nations and civil society organizations, in which Chevron is currently producing oil and gas: Burma (Myanmar), Democratic Republic of Congo, and Nigeria.

BE IT RESOLVED:

The shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State.

SUPPORTING STATEMENT:

As shareholders, we believe that our company has the duty to avoid the moral, legal, financial, reputational, and operational risks posed by doing business with governments complicit in genocide or crimes against humanity. It is incumbent that our board adopt policies that protect shareholder value from these risks.



BNY MELLON | PERSHING

One Pershing Plaza
Jersey City, New Jersey 07399
pershing.com

December 12, 2017

Mary A. Francis
Corporate Secretary
Chevron Corp.
6001 Bollinger Canyon Road
San Ramon, CA 94583

Re: Co-filing of shareholder resolution: Rohingya Crisis In Burma (Myanmar)

Dear Ms. Francis,

As of December 12, 2017, the Benedictine Sisters of Baltimore held, and has held continuously for at least two years, 125 shares of Chevron (common stock). These shares have been held with The Bank of New York, DTC #8420.

If you need further information, please contact us at 1-855-233-4091.

Best Regards,

Patrick Ng
Senior Representative
BNY Mellon, N.A.
Pershing Advisor Solutions LLC, a BNY Mellon company

2.4 L. Filer



Benedictine Sisters

285 Oblate Drive
San Antonio, TX 78218

210-348-6704 phone
210-341-4519 fax

December 11, 2017

MAF

DEC 11 2017

Ms. Mary Francis
Corporate Secretary and Chief Governance Officer
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324
Sent by Fax: 925-842-6047 Email: corpgov@chevron.com

Dear Ms. Francis,

I am writing you on behalf of the Congregation of Benedictine Sisters of Boerne, Texas to co-file the stockholder resolution on Rohingya Crisis In Burma (Myanmar). In brief, the proposal states:

RESOLVED, the shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State.

I am hereby authorized to notify you of our intention to co-file this shareholder proposal with Azzad Asset Management. I submit it for inclusion in the 2018 proxy statement for consideration and action by the shareholders at the 2018 annual meeting in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934. We are the beneficial owner, as defined in Rule 13d-3 of the Securities Exchange Act of 1934, of \$2,000 worth of the Chevron Corporation shares

We have been a continuous shareholder for one year of \$2,000 in market value of Chevron Corporation stock and will continue to hold at least \$2,000 of Chevron Corporation stock through the next annual meeting. Verification of our ownership position will be sent by our custodian. A representative of the filers will attend the stockholders' meeting to move the resolution as required by SEC rules.

We truly hope that the company will be willing to dialogue with the filers about this proposal. We consider Azzad Asset Management the lead filer of this resolution and as so, is authorized to act on our behalf in all aspects of the resolution, including negotiation and withdrawal. Please note that the contact person for this resolution/proposal will be Joshua Brockwell of Azzad Asset Management who may be reached by phone 703-207-7005 x 109 or by email: joshua@azzad.net.

As a co-filer, however, we respectfully request direct communication from the company and to be listed in the proxy.

Sincerely,

Sr. Susan Mika

Sr Susan Mika, OSB
Corporate Responsibility Program

2.4 Co Filer

MAF

**Rohingya Crisis In Burma (Myanmar)
2018 – Chevron Corp.**

DEC 11 2017

WHEREAS:

Chevron, in partnership with Total and Myanmar Oil and Gas Enterprise (MOGE), holds equity in one of the largest investment projects in Burma (Myanmar): the Yadana gas field and pipeline that generates billions of dollars for the Burmese government.

In Burma, foreign participation in the energy sector takes place through joint ventures with the state-owned MOGE. U.S. lawmakers have stated that "MOGE's operations lack transparency, that it remains overly influenced by the Burmese military, and that the large amounts of foreign investment flowing into MOGE are not sufficiently accountable to the Burmese people or its parliament."

In March 2015, Chevron entered into an additional production sharing contract with MOGE to explore in the Rakhine Basin.

Rakhine state is home to the Rohingya people, an ethnic minority that has been subject to a government-sanctioned campaign of repression and violence. Although they have lived in Burma for generations, the Rohingya are denied citizenship and voting rights, freedom of religion, and other basic rights. In 2012, Burmese security forces moved more than 120,000 Rohingya from their homes into detention camps where access is restricted to basic services, such as food, healthcare, and education.

In August 2017, a new military crackdown caused an estimated 620,000 Rohingya, half of children, to flee to neighboring Bangladesh. In November 2017, following a visit to the region and an analysis of the facts, U.S. Secretary of State Rex Tillerson described the Burmese army's offensive against the Rohingya as "ethnic cleansing" and called for a "credible, independent investigation" of the military's reported human rights abuses. Tillerson also signaled possible U.S. sanctions against Burma's army.

The U.S. Holocaust Memorial Museum has reported that the Rohingya are "at grave risk of additional mass atrocities and even genocide." In November 2017, Amnesty International issued a report detailing how Rohingya in Myanmar are subject to a "vicious system of state-sponsored, institutionalized discrimination that amounts to apartheid," meeting the international legal definition of a crime against humanity.

The International Coalition for the Responsibility to Protect (ICRtoP) monitors countries worldwide for instances of serious crimes under international law including genocide, war crimes, ethnic cleansing, and crimes against humanity. ICRtoP lists several countries, cited by the United Nations and civil society organizations, in which Chevron is currently producing oil and gas: Burma (Myanmar), Democratic Republic of Congo, and Nigeria.

BE IT RESOLVED:

The shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State.

SUPPORTING STATEMENT:

As shareholders, we believe that our company has the duty to avoid the moral, legal, financial, reputational, and operational risks posed by doing business with governments complicit in genocide or crimes against humanity. It is incumbent that our board adopt policies that protect shareholder value from these risks.

The Quantitative Group
755 E Mulberry Ave
Suite 300
San Antonio, TX 78212
tel 210 277 4400
fax 210 735 1150
toll free 800 733 1150

Graystone
Consulting™

December 11, 2017

Mary Francis
Corporate Secretary
6001 Bollinger Canyon Rd
San Ramon, CA 94583

Sent by Fax: (925) 842-6047
Sent by email: corpgov@chevron.com

Re: Co-filing of shareholder resolution: Rohingya Crisis in Burma (Myanmar)

As of December 11, 2017, the Congregation of Benedictine Sisters held, and has held continuously for at least one year, 53 shares of Chevron stock. These shares have been held with Morgan Stanley with DTC # 0015.

If you need further information, please contact us at 210.366.6660.



Heidi Siller
Registered Associate
The Quantitative Group at Graystone Consulting
A Business of Morgan Stanley

2.3 Co filer



MAF

December 8, 2017

DEC 11 2017

Ms. Mary A. Francis
Corporate Secretary and Chief Governance Officer
Chevron Corporation
6001 Bollinger Canyon Rd.
San Ramon, CA 94583

Dear Ms. Francis,

Dana Investment Advisors currently holds 25,000 shares of Chevron Corporation on behalf of clients (including the Dana Large Cap Equity Fund) for whom we integrate environmental, social, and governance analysis (ESG) into investment decision-making. Dana Investment Advisors is an investment manager with \$7.3 billion in assets under management. We have been a continuous Chevron shareholder for more than one year, holding at least \$2,000 shares of stock, and will continue holding at least \$2,000 worth of Chevron stock through the stockholders' meeting.

Dana believes the ongoing humanitarian and migratory crisis in Myanmar exposes Chevron to regulatory, reputational, and financial risk. We ask for a report that examines the feasibility of adopting policies that would protect shareholders from these risks. We are co-filing the enclosed shareholder proposal for inclusion in the 2018 proxy statement, in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934. Verification of ownership is enclosed. A representative of the filers will attend the stockholders' meeting to move the resolution as required by the SEC rules.

Azzad Asset Management will act as primary filer of this resolution, and the primary contact will be Joshua Brockwell. We hereby deputize Azzad to act on our behalf.

Sincerely,

Ann Roberts
ESG Analyst
annr@danainvestment.com

Cc: Joshua Brockwell (joshua@azzadfunds.com)

Enclosure

WHEREAS:

Chevron, in partnership with Total and Myanmar Oil and Gas Enterprise (MOGE), holds equity in one of the largest investment projects in Burma (Myanmar): the Yadana gas field and pipeline that generates billions of dollars for the Burmese government.

In Burma, foreign participation in the energy sector takes place through joint ventures with the state-owned MOGE. U.S. lawmakers have stated that "MOGE's operations lack transparency, that it remains overly influenced by the Burmese military, and that the large amounts of foreign investment flowing into MOGE are not sufficiently accountable to the Burmese people or its parliament."

In March 2015, Chevron entered into an additional production sharing contract with MOGE to explore in the Rakhine Basin.

Rakhine state is home to the Rohingya people, an ethnic minority that has been subject to a government-sanctioned campaign of repression and violence. Although they have lived in Burma for generations, the Rohingya are denied citizenship and voting rights, freedom of religion, and other basic rights. In 2012, Burmese security forces moved more than 120,000 Rohingya from their homes into detention camps where access is restricted to basic services, such as food, healthcare, and education.

In August 2017, a new military crackdown caused an estimated 620,000 Rohingya, half of children, to flee to neighboring Bangladesh. In November 2017, following a visit to the region and an analysis of the facts, U.S. Secretary of State Rex Tillerson described the Burmese army's offensive against the Rohingya as "ethnic cleansing" and called for a "credible, independent investigation" of the military's reported human rights abuses. Tillerson also signaled possible U.S. sanctions against Burma's army.

The U.S. Holocaust Memorial Museum has reported that the Rohingya are "at grave risk of additional mass atrocities and even genocide." In November 2017, Amnesty International issued a report detailing how Rohingya in Myanmar are subject to a "vicious system of state-sponsored, institutionalized discrimination that amounts to apartheid," meeting the international legal definition of a crime against humanity.

The International Coalition for the Responsibility to Protect (ICRtoP) monitors countries worldwide for instances of serious crimes under international law including genocide, war crimes, ethnic cleansing, and crimes against humanity. ICRtoP lists several countries, cited by the United Nations and civil society organizations, in which Chevron is currently producing oil and gas: Burma (Myanmar), Democratic Republic of Congo, and Nigeria.

BE IT RESOLVED:

The shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State.

SUPPORTING STATEMENT:

As shareholders, we believe that our company has the duty to avoid the moral, legal, financial, reputational, and operational risks posed by doing business with governments complicit in genocide or crimes against humanity. It is incumbent that our board adopt policies that protect shareholder value from these risks.

December 8, 2017

MAF

DEC 11 2017

Ms. Mary A. Francis
Corporate Secretary and Chief Governance Officer
Chevron Corporation
6001 Bollinger Canyon Rd.
San Ramon, CA 94583

Dear Ms. Francis,

Please be advised that The Huntington National Bank (Depository Trust Company Participant ID 2305) held 25,000 shares of Chevron Corporation (CVX) (CUSIP 166764100) as of December 8, 2017 for our client and beneficial owner, the Dana Large Cap Equity Fund, of which at least 22,000 shares have been continuously held since November 1, 2016 by the Dana Large Cap Equity Fund.

Please feel free to contact me if you have any questions.

Sincerely,



Rob Puma
Staff Officer
The Huntington National Bank
7 Easton Oval EA5W72
Columbus, OH 43219
614-331-9742
Rob.puma@huntington.com



MAF
DEC 07 2017

December 6, 2017

Mary A. Francis, Corporate Secretary and Chief Governance Officer
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324

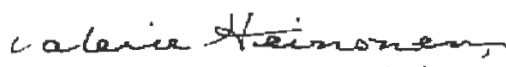
Dear Ms. Francis:

Mercy Investment Services, Inc., the investment program of the Sisters of Mercy of the Americas, has long been concerned not only with the financial returns of its investments, but also with the social and ethical implications of its investments. We believe that demonstrated corporate responsibility in matters of the environment, social and governance concerns fosters long term business success.

Mercy believes that corporations must review human rights policies, corporate values and business standards to ensure that human, environmental and governance impacts of all corporate operations are addressed. For this reason, we are requesting the Board to publish a report on the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity.

Mercy Investment Services, Inc. is co-filing the enclosed shareholder proposal with Azzad Asset Management for inclusion in the 2018 proxy statement, under Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934. Mercy Investment Services, Inc. has been a shareholder continuously for more than one year holding at least \$2,000 in market value, and will continue to invest in at least the requisite number of shares for proxy resolutions through the annual shareholders' meeting. A representative of the filers will attend the Annual Meeting to move the resolution as required by SEC rules. The verification of ownership is being sent to you separately by our custodian, a DTC participant. Azzad Asset Management may withdraw the proposal on our behalf. We respectfully request direct communications from Chevron Corporation, and to have our supporting statement and organization name included in the proxy statement.

Yours truly,


Valerie Heinonen

Valerie Heinonen, o.s.u.
Director, Shareholder Advocacy
vheinonen@mercyinvestments.org
212 674 2542

WHEREAS:

Chevron, in partnership with Total and Myanmar Oil and Gas Enterprise (MOGE), holds equity in one of the largest investment projects in Burma (Myanmar): the Yadana gas field and pipeline that generates billions of dollars for the Burmese government.

In Burma, foreign participation in the energy sector takes place through joint ventures with the state-owned MOGE. U.S. lawmakers have stated that "MOGE's operations lack transparency, that it remains overly influenced by the Burmese military, and that the large amounts of foreign investment flowing into MOGE are not sufficiently accountable to the Burmese people or its parliament."

In March 2015, Chevron entered into an additional production sharing contract with MOGE to explore in the Rakhine Basin.

Rakhine state is home to the Rohingya people, an ethnic minority that has been subject to a government-sanctioned campaign of repression and violence. Although they have lived in Burma for generations, the Rohingya are denied citizenship and voting rights, freedom of religion, and other basic rights. In 2012, Burmese security forces moved more than 120,000 Rohingya from their homes into detention camps where access is restricted to basic services, such as food, healthcare, and education.

In August 2017, a new military crackdown caused an estimated 620,000 Rohingya, half of them children, to flee to neighboring Bangladesh. In November 2017, following a visit to the region and an analysis of the facts, U.S. Secretary of State Rex Tillerson described the Burmese army's offensive against the Rohingya as "ethnic cleansing" and called for a "credible, independent investigation" of the military's reported human rights abuses. Tillerson also signaled possible U.S. sanctions against Burma's army.

The U.S. Holocaust Memorial Museum has reported that the Rohingya are "at grave risk of additional mass atrocities and even genocide." In November 2017, Amnesty International issued a report detailing how Rohingya in Myanmar are subject to a "vicious system of state-sponsored, institutionalized discrimination that amounts to apartheid," meeting the international legal definition of a crime against humanity.

The International Coalition for the Responsibility to Protect (ICRtoP) monitors countries worldwide for instances of serious crimes under international law including genocide, war crimes, ethnic cleansing, and crimes against humanity. ICRtoP lists several countries, cited by the United Nations and civil society organizations, in which Chevron is currently producing oil and gas: Burma (Myanmar), Democratic Republic of Congo, and Nigeria.

BE IT RESOLVED:

The shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body.

SUPPORTING STATEMENT:

As shareholders, we believe that our company has the duty to avoid the moral, legal, financial, reputational, and operational risks posed by doing business with governments complicit in genocide or crimes against humanity. It is incumbent that our board adopt policies that protect shareholder value from these risks.



MAF
DEC 08 2017

December 6, 2017

Mary A. Francis, Corporate Secretary and Chief Governance Officer
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324

Re: Mercy Investment Services Inc.

Dear Ms. Francis,

This letter will certify that as of December 6, 2017 The Bank of New York Mellon held for the beneficial interest of Mercy Investment Services Inc., 42 shares of Chevron Corporation.

We confirm that Mercy Investment Services Inc. has beneficial ownership of at least \$2,000 in market value of the voting securities of Chevron Corporation and that such beneficial ownership has existed continuously for at least one year including a one year period preceding and including December 6, 2017 in accordance with rule 14a-8 of the Securities Exchange Act of 1934.

Further, it is Mercy Investment Services Inc., intent to hold at least \$2,000 in market value through the next annual meeting.

Please be advised, The Bank of New York Mellon is a DTC Participant, whose DTC number is 0901.

If you have any questions please feel free to give me a call.

Sincerely,

A handwritten signature in blue ink that reads "Thomas J. McNally".

Thomas J. McNally
Vice President, Service Director
BNY Mellon Asset Servicing

Phone: (412) 234-8822
Email: thomas.mcnally@bnymellon.com



Ursuline Sisters of Tildonk

United States Province

December 1, 2017

Mary A. Francis, Corporate Secretary and Chief Governance Officer
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324

corpgov@chevron.com

Dear Ms. Francis:

On behalf of the Ursuline Sisters of Tildonk, U.S. Province, I am authorized to submit the following resolution, which requests the Board to publish a report evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity, filed for inclusion in the 2018 proxy statement under Rule 14 a-8 of General Rules and Regulations of the Securities Exchange Act of 1934.

The Ursuline Sisters of Tildonk believe that corporations must review human rights policies, corporate values and business standards to ensure that risks related to human, environmental and governance impacts of all corporate operations are addressed. Today, more so than in the past, we see persons fleeing their homes under threat of losing their lives or those of their children, refugees in their own countries or others, because they are of the wrong religion, political party, tribe, race, gender—and the government in place conducting business as usual.

The Ursuline Sisters of Tildonk is the beneficial owner of required shares of Chevron stock. Verification of ownership from a DTC participating bank will follow. We have held shares for at least one year and will continue to hold the stock through the date of the annual shareowners' meeting to be present in person or by proxy. The Ursuline Sisters of Tildonk is filing with Azzad Asset Management, the lead filer. We agree that Azzad Asset Management may withdraw this proposal on our behalf.

Yours truly,

Valerie Heinonen, o.s.u.
Director, Shareholder Advocacy
Ursuline Sisters of Tildonk, U.S. Province
205 Avenue C, NY NY 10009
vheinonen@mercyinvestments.org

WHEREAS:

Chevron, in partnership with Total and Myanmar Oil and Gas Enterprise (MOGE), holds equity in one of the largest investment projects in Burma (Myanmar): the Yadana gas field and pipeline that generates billions of dollars for the Burmese government.

In Burma, foreign participation in the energy sector takes place through joint ventures with the state-owned MOGE. U.S. lawmakers have stated that "MOGE's operations lack transparency, that it remains overly influenced by the Burmese military, and that the large amounts of foreign investment flowing into MOGE are not sufficiently accountable to the Burmese people or its parliament."

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Rakhine state is home to the Rohingya people, an ethnic minority that has been subject to a government-sanctioned campaign of repression and violence. Although they have lived in Burma for generations, the Rohingya are denied citizenship and voting rights, freedom of religion, and other basic rights. In 2012, Burmese security forces moved more than 120,000 Rohingya from their homes into detention camps where access is restricted to basic services, such as food, healthcare, and education.

In August 2017, a new military crackdown caused an estimated 620,000 Rohingya, half of them children, to flee to neighboring Bangladesh. In November 2017, following a visit to the region and an analysis of the facts, U.S. Secretary of State Rex Tillerson described the Burmese army's offensive against the Rohingya as "ethnic cleansing" and called for a "credible, independent investigation" of the military's reported human rights abuses. Tillerson also signaled possible U.S. sanctions against Burma's army.

The U.S. Holocaust Memorial Museum has reported that the Rohingya are "at grave risk of additional mass atrocities and even genocide." In November 2017, Amnesty International issued a report detailing how Rohingya in Myanmar are subject to a "vicious system of state-sponsored, institutionalized discrimination that amounts to apartheid," meeting the international legal definition of a crime against humanity.

The International Coalition for the Responsibility to Protect (ICRtoP) monitors countries worldwide for instances of serious crimes under international law including genocide, war crimes, ethnic cleansing, and crimes against humanity. ICRtoP lists several countries, cited by the United Nations and civil society organizations, in which Chevron is currently producing oil and gas: Burma (Myanmar), Democratic Republic of Congo, and Nigeria.

BE IT RESOLVED:

The shareholders request the Board to publish a report six months following the 2018 annual general meeting, omitting proprietary information and prepared at reasonable cost, evaluating the feasibility of adopting a policy of not doing business with governments that are complicit in genocide and/or crimes against humanity as defined by the U.S. Department of State or the appropriate international body.

SUPPORTING STATEMENT:

As shareholders, we believe that our company has the duty to avoid the moral, legal, financial, reputational, and operational risks posed by doing business with governments complicit in genocide or crimes against humanity. It is incumbent that our board adopt policies that protect shareholder value from these risks.