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Canada Fighting Forced Labour and Child Labour in Supply Chains Act Report 2025

May 2026

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Introduction

This joint report has been prepared in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("The Act"), which came into force on January 1, 2024, on behalf of the bp reporting entities set out below[a] ("reporting entities", "bp", "we", "our", or "us"). This report lays out the steps taken by the reporting entities during the financial year ending December 31, 2025, to prevent forced labour and child labour in our business operations and supply chains. This joint report has been prepared in collaboration with relevant corporate functions and representatives from each relevant reporting entity.

Structure, activities and supply chains

The reporting entities are part of the bp group of companies, which is a global energy business. The reporting entities' Canada-based activities focus on buying and selling energy commodities as well as offshore energy exploration activities in Newfoundland and Labrador. US-based reporting entities are also involved in buying and selling energy commodities in Canade, the United States and elsewhere, as well as refining and operating retail fuel supply networks in the United States.

Canada-based activities rely on supply chains that focus on sourcing materials and services for transportation and storage of energy commodities , support of the offshore drilling program, and other materials and services incidental to our business.

We procure goods and services from a range of third parties in different businesses including information technology, telecommunications, real estate management, human resources firms, transportation, storage, mail services, research and analytics, consulting services, and office supplies.

[a] The reporting entities are as prescribed by The Act. BP p.l.c. and its subsidiaries are separate legal entities. References in this report to "bp group" or "bp group of companies" are to BP p.l.c. and its subsidiaries generally, to one or more of them, or to those who work for them. BP p.l.c. publishes a Modern Slavery and human trafficking statement under the UK Modern Slavery Act, which can be found at https://www.bp.com/en_gb/united-kingdom/home.html under regulatory information.

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Reporting entity	Description of structure / activities
BP Canada Energy Group ULC (BPCEG)	BPCEG is a Nova Scotia unlimited liability company with its principal operating office in Calgary, AB and an office in St. John, Nfld. BPCEG is the main operating entity in Canada. Its activities include the purchase and sale of natural gas and other commodities within Canada, export and import to/from the United States and the provision of related gas management services, as well as oil and natural gas exploration offshore Newfoundland and Labrador.
BP Products North America Inc. (BPPNA)	BPPNA is a Maryland company with its principle operating office in Chicago, IL. Its primary activities include the purchase and sale of crude oil, condensate and refined products from / to suppliers and customers throughout the Americas. It also refines crude oil at its two crude oil refineries in the United States located at Whiting, Indiana and Cherry Point, Washington. BPPNA also operates convenience stores and retail fuel supply networks in the United States, including the supply of fuel, foods and other services to bp-branded, independently operated retail sites.
BP Lubricants USA Inc. (BPLUSA)	BPLUSA is a Delaware company with its principle operating office in Wayne, NJ. Its activities include the development, manufacturing, distribution and marketing of lubricating oils, fluids, and greases, as well as provision of related services in the United States and sales in Canada.
Air bp Canada LLC (Air BPC)	AirBPC is a Delaware company with its principle operating office in Houston, TX. Its activities include the purchase and sale of jet fuel from suppliers in Canada and the United States for sale to airline customers in Canada.
Archaea Energy Marketing LLC (Archaea Marketing)	Archaea Marketing was formed on 9 November 2021, as a Delaware limited liability company, and is a direct, wholly owned subsidiary of Archaea Energy. Its principal operating office is located at 201 Helios Way, Floor 6, Houston, Texas 77079. Archaea Marketing's activities in Canada are limited to the transportation and sale of renewable natural gas (RNG).
Assai Energy, LLC (Assai)	Assai was formed on 1 April 2020, as a Delaware limited liability company, and is an indirect subsidiary of Archaea Energy. Its principle operating office is located at 201 Helios Way, Floor 6, Houston, Texas 77079. Assai's activities in Canada are limited to the transportation and sale of RNG.
Seneca Energy II, LLC (Seneca)	Seneca was formed on 24 February 2000, as a New York limited liability company and is an indirect subsidiary of Archaea Energy. Its principal operating office is located at 201 Helios Way, Floor 6, Houston, Texas 77079. Seneca's activities in Canada are limited to the transportation and sale of RNG.

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Policies and due diligence processes

bp supports the elimination of forced labour and child labour in line with the International Labour Organization Core Conventions on Rights at Work[b]. This type of exploitation is contrary to our commitment to respecting the rights of our workforce.

Each of the reporting entities is a member of the bp group of companies and is required to conduct its activities in conformance with bp group policies and procedures applicable to their activities. These policies and procedures set expectations of our interactions within bp and with external partners, suppliers, and communities where we operate.

We describe here a framework of policies and controls underlying the activities undertaken by the reporting entities in 2025 and related to mapping, assessing, developing and implementing the due diligence process related to identifying and addressing labour rights and modern slavery (LRMS) risks in our supply chains.

Our processes for assessing and managing modern slavery risks are risk-prioritized globally based on geography and work activity. Since the business activities of the reporting entities in Canada and the United States are in many areas lower risk for modern slavery, relative to business activities in some other geographies, specific actions pursuant to these processes taken for the reporting entities' business activities may accordingly be relatively limited.

[b] In this report we also refer to modern slavery. This is a termed used in policy and law, for example in the UK Modern Slavery Act, to describe forms of exploitation that constitute serious violations of human rights, including forced labour, human trafficking, and child labour.

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Key controls supporting modern slavery prevention[c]

bp group control	Description	How it supports mitigation of modern slavery risks
Code of Conduct and Human Rights Policy	Establish principles and expectations for how we work. Code of Conduct underpins and reinforces our Human Rights Policy. These policies apply to all employees.	These policies reference recognized human rights and core labour standards as established by the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. In addition to requiring employees to report human rights abuses, we expect them, and encourage contractors, communities and other third parties, to speak up if they see something they feel to be potentially unsafe, unethical or harmful. The policies are supported by a variety of channels to facilitate this speak up culture, such as line managers, supporting teams, ethics and compliance, human resources, or via bp's confidential helpline OpenTalk.
bp Labour Rights & Modern Slavery (LRMS) Principles	The principles are intended to assist our businesses as they work to check performance against our expectations relating to LRMS.	These principles lay out our expectation that workers in our operations and supply chains are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination, or harassment. Other bp key controls and policies in the LRMS space align with these principles and expectations.
Operating Management System (OMS)	Governs our activities where bp operates	Our OMS provides a framework for delivering safe, reliable, and compliant operations in bp. It brings together bp requirements on health, safety, security, environment, social performance (including LRMS) and operational reliability, as well as related areas such as maintenance, working with contractors and organizational learning, into a common management system.

[c] For recently acquired businesses, there is typically a transition period while bp's policies, management systems and process are integrated or aligned.

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Key controls supporting modern slavery prevention *(continued)*

bp group control	Description	How it supports mitigation of modern slavery risks
Procurement and Supply Chain Management Processes	Supports procurement minimum standards, methodology, vendor vetting and management processes. Applies to bp procurement activities.	These processes set out expectations on how bp procures goods and services in relation to LRMS due diligence. Supported by training and guidance to build awareness of LRMS risks and how to engage with suppliers. Our expectations of suppliers[d] are a tool for communicating the expectations in the code to our suppliers, including contractors, vendors and providers of services such as contingent labour.
Counterparty Due Diligence	Sets minimum KYC (Know Your Counterpart) requirements to contract with any third party wishing to do business with bp.	Risk assessment and due diligence of third parties bp contracts with, including corporate structure vetting, assessment of sanctions, criminal activity, negative media coverage for reputational risks (including modern slavery), assignment of risk rating and ongoing dynamic monitoring for updates and red flags.
The Group Investment Assurance and Approvals Process (GIAAP)	Governs the evaluation, documentation, and approval of investment projects.	For projects above pre-determined thresholds, sustainability professionals are included in the assurance process, to assess impacts and opportunities, including LRMS risks, arising from the proposed investments.

[d] bp's expectations of its suppliers articulates the core expectations of our shared commitments with suppliers based on our code of conduct, which can be found at www.bp.com/supplierexpectations.

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Assessing and managing our risk

bp has taken a risk-based approach to the assessment and identification of modern slavery in our businesses and supply chains, based on business activity, country risk and workforce demographics.

Assessment tools and approach

We use external labour rights and modern slavery (LRMS) data sources, such as Maplecroft risk indices, to generate risk heatmaps for the countries in which we operate. Each country is then categorized as being either low, medium, or high risk. Canada is identified as low risk by Maplecroft. Country level risk is used in conjunction with the scope of work conducted and workforce composition to perform risk assessments.

Risk assessment is included as a requirement in our operating management system (OMS) processes. This approach intends to enable our businesses to determine any further due diligence or actions required to adequately mitigate supply chain LRMS risks.

Our trading business assesses and seeks to address potential LRMS risks through a combination of counterparty due diligence, risk management processes, and relevant staff training. Counterparty due diligence of third parties includes corporate structure vetting, assessment of sanctions and any criminal activity, along with the monitoring of negative press and social media coverage. LRMS risks may also be identified, assessed and appropriate actions taken as part of trading's risk management processes. This includes in new business investment cases where these are required based on the scale and value of the opportunity.

Supplier due diligence

Before contracts are awarded through our procurement teams processes, we consider suppliers scope of work, location, and workforce composition. This helps us conduct risk assessments and prioritize our due diligence activities.

In 2024 we amended our existing pre-contract LRMS evaluation process to include a new self-assessment questionnaire (SAQ). All potential first tier suppliers who are assessed to be potentially high risk for LRMS are required to complete this SAQ in the bidding process. For the preferred bidder, we review their responses to determine alignment with bp's LRMS principles on areas such as recruitment practices, as well as pay and rest periods. We also issue a corrective action plan to address any gaps identified.

OMS requires our businesses to carry out contractor risk assessments and regular monitoring activities of active contractors, which form a key part of our routine due diligence. We supplement the risk assessment process with information sourced through our speak up channels.

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Where our assessment and monitoring activities identify gaps or concerns, we work with suppliers to devise prioritized corrective action plans to make ongoing improvements and review their performance during contract review meetings.

Remediation measures / assessing effectiveness

We encourage a speak up culture among employees and with our contractors and suppliers in their work for us. Concerns can be raised through Open Talk, which is available 24 hours a day, seven days a week and in 75 languages. Concerns can be raised anonymously from most locations including Canada and the United States, and reports are kept confidential to the fullest extent possible, consistent with the law and good business practices. Concerns are taken seriously and bp does not tolerate retaliation of any kind.

If we find that we have caused or directly contributed to adverse impacts on workforce rights, we are committed to provide for, or cooperate in, the remediation of those impacts and work with our contractors and suppliers to encourage them to do the same, in line with our human rights policy. As stated in the policy, we do not impede access to state-based judicial processes or require individuals to permanently waive their legal right to bring a claim through a bp grievance mechanism. Where adverse impacts are directly linked to our activities through our business relationships, we will support our business partners in the remediation of those impacts through their own grievance management process, or support collaboration to provide for non-judicial remediation through third parties.

We review LRMS controls and assess effectiveness of associated measures to mitigate modern slavery risks in accordance with bp group processes applicable to the relevant business in each reporting entity.

Training

Code of conduct training is mandatory for all bp employees.

bp group also makes available training for use by bp businesses including reporting entities, designed to develop and build the capability needed to effectively identify and manage LRMS risks. This training focuses on three specific needs: (i) raising awareness of LRMS issues amongst employees across bp; (ii) building capability to meet our LRMS due diligence requirements through targeted training for specific groups of employees, for example, certain procurement and contracting teams; and (iii) developing the specialist skills required by a small group of employees to carry out more in-depth LRMS due diligence.

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Approval and attestation

This report was approved pursuant to subparagraph 11 (4)(a) of the Act by the board of directors of each of BP Canada Energy Group ULC, BP Products North America Inc., Air BP Canada LLC, and BP Lubricants USA Inc. as it relates to the activities of each applicable reporting entity.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned , attest that I have reviewed the information contained in this report for the entity named above my signature. Based on my knowledge, having exercised reasonable due diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

BP Canada Energy Group ULC

I have the authority to bind BP Canada Energy Group ULC

Signature: DocuSigned by: Scott David Schaeffer 8D0B439A88784E1...

Name: Scott David Schaeffer

Title: Director

Date: May 27, 2026

BP Products North America Inc.

I have the authority to bind BP Products North America Inc.

Signature: Signed by: Dawn Constantin BFA2E8EE8C344D9...

Name: Dawn Constantin

Title: Director

Date: May 27, 2026

Air BP Canada LLC

I have the authority to bind BP Canada Energy Marketing Corp.

Signature: Signed by: Laura Lyons 36A311BB651E497...

Name: Laura Lyons

Title: Director

Date: May 27, 2026

BP Lubricants USA Inc.

I have the authority to bind BP Lubricants USA Inc.

Signature: DocuSigned by: Hortensia Perez E83ADE1A0A0740F...

Name: Hortensia Perez

Title: Director

Date: May 28, 2026

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Approval and attestation

This report was approved pursuant to subparagraph 11 (4)(a) of the Act by the board of directors of each of Archaea Energy Marketing LLC, Assai Energy, LLC, and Seneca Energy II, LLC, as it relates to the activities of each applicable reporting entity.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity named above my signature. Based on my knowledge, having exercised reasonable due diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Archaea Energy Marketing LLC

I have the authority to bind Archaea Energy Marketing LLC

Signature: Signed by: Aimee DiTommaso B6ED5C5F55204E6...

Name: Aimee Patel DiTommaso

Title: Vice President and Chief Commercial Officer

Date: May 27, 2026

Assai Energy, LLC

I have the authority to bind Assai Energy, LLC

Signature: Signed by: Aimee DiTommaso B6ED5C5F55204E6...

Name: Aimee Patel DiTommaso

Title: Vice President and Chief Commercial Officer

Date: May 27, 2026

Seneca Energy II, LLC

I have the authority to bind Seneca Energy II, LLC

Signature: Signed by: Aimee DiTommaso B6ED5C5F55204E6...

Name: Aimee Patel DiTommaso

Title: Vice President and Chief Commercial Officer

Date: May 27, 2026