

BP Europa SE - Grievance Procedure

Rules of Procedure

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Foreword

As an internationally operating company, we source a variety of products and services every day via supply chains from all over the world. We regard the protection of human rights as a central element of our corporate responsibility. From our point of view, it is our task as well as the task of our business partners to achieve the observance of human rights and management of environmental risks as a fundamental obligation together and holistically. Furthermore, we strive to prevent and, if necessary, resolve non-compliant behavior. Therefore, bp has established a group-wide and cross-thematic reporting system for internal and external complaints with different contact channels called "Speak Up". This reporting system serves to prevent, mitigate or resolve risks in bp Group's own business and along the supply chain.

1. General information on the grievance procedure

To enable individuals to report human rights and environment-related risks or violations in our own business area or supply chain, an independent grievance procedure called "OpenTalk" (NAVEX Global) is available. OpenTalk is available 24 hours a day and in 75 languages. Open Talk is accessible to everyone and allows to report complaints (anonymously if desired) by telephone (Germany 0800 181 7761/ UK 0800 917 3604) or via a web form (www.opentalkweb.com). All reported indications and reasonable suspicions about possible human rights and the environment-related violations are dealt with within a process that is designed to be a transparent, balanced and comprehensible process for all parties involved. The reports submitted within the grievance procedure are treated confidentially. It is designed to ensure that there are no disadvantages for the whistleblowers because of their reports. The persons entrusted with processing the reports and discussing the facts of the whistleblower's report are obliged to act impartially. They fulfil their duties independently and without being bound by instructions. They are bound to secrecy. Whistleblowers should submit their reports via OpenTalk before contacting any external reporting channels in order to enable an efficient and appropriate investigation of their complaint.

1.1 Who is responsible for the grievance procedure?

Complaints are submitted via the OpenTalk tool provided by the independent company NAVEX Global. Within bp Group, the Business Integrity (BI) department as part of Ethics & Compliance is responsible for monitoring, managing and reporting on the grievance procedure as well as for handling complaints and investigating risks and violations. If the complaint concerns possible infringements within the scope of sec. 2 of the German Whistleblower Protection Act (HinSchG), the responsibility for remedying or pursuing such infringements remains with the bp Group company to which the complaint relates.



If complaints concern possible violations that fall within the scope of § 2 HinSchG, whistleblowers can also use external whistleblowing systems to submit their reports. External reporting systems are provided, for example, by the Federal Office of Justice at www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html

and by the Federal Cartel Office at

www.bkms-system.net/bkwebanon/report/clientInfo?cin=9okdios845&c=-1&language=ger.

If whistleblowers choose to report to an external reporting office, we respect this. We take the concerns of whistleblowers and their protection very seriously. We therefore suggest that reports should be submitted via OpenTalk first. This allows us to address the concerns of the whistleblowers efficiently and appropriately.

1.2 Who is entitled to file complaints? What is the scope of application of the grievance procedure?

All bp Group employees, employees of direct or indirect suppliers, residents living in the surrounding areas of our refineries or around local sites, and other stakeholders and their representatives are encouraged to report about (potential) risks or violations via OpenTalk.

It is possible to submit either

(i) indications of (potential) human rights and environmental risks or violations that are caused by bp's economic activities in its own business area or by (in-)direct suppliers, as well as

(ii) indications of (potential) infringements (acts or omissions in the course of professional, business or employment activity)

- concerning regulations or legal areas which fall within the scope of application of sec. 2 HinSchG criminal laws or laws sanctioned with administrative fines,
- of regulations or internal company rules and standards such as the bp Code of Conduct, ("Scope of Application").

1.3 Do I have to fear consequences if I complain?

Whistleblowers are particularly protected. This protection applies to all internal and external employees as well as to business partners, applicants and other external third parties. It applies regardless of whether the whistleblower himself is affected by the reported aspects. As a matter of principle, bp does not tolerate whistleblowers experiencing negative consequences as a result of complaints. Negative consequences can take many forms, such as threats, intimidation, exclusion, humiliation, making false accusations, raising issues maliciously or dishonestly.



1.4 What measures are taken to protect whistleblowers?

For the protection of whistleblowers all complaints are handled in accordance with the principles of confidentiality, independence, objectivity and timeliness. Only persons who need to be involved for enabling a proper processing of complaints will be involved.

bp uses the EthicsPoint application from NAVEX - an independent company - to manage OpenTalk. EthicPoint is hosted on NAVEX's secure servers and is not part of bp's website or intranet.

The persons responsible for processing complaints and conducting investigations must act independently and inform the BI department immediately of any circumstances that could impair their independence.

In addition, the complaint processing and related investigations are conducted fairly, objectively and confidentially.

Your data will be collected, stored and processed in accordance with legal requirements. The privacy policy and data protection information of the NAVEX reporting system can be found on the OpenTalk website [EthicsPoint - bp International Limited](#).

1.5 How are access barriers to the grievance procedure avoided?

bp undertakes in particular the following measures to avoid access barriers to the grievance procedure:

- The web-based OpenTalk tool is an online form that is easy to find;
- Information about and access to the complaint channels are provided in numerous languages, especially in German and in English;
- It is also possible to lodge complaints by telephone in numerous languages; and
- the procedure does not involve any costs.

2. Details of the grievance procedure



2.1 Submit a complaint:

Whistleblowers can submit their complaints anonymously or with contact details via the following channels:

- Telephone: 0800 181 7761 (for Germany), the telephone numbers applicable to other regions can be found at [EthicsPoint - bp International Limited](#)



- OpenTalk QR code:
- You also have the option of submitting your report in person at your request. To do so, please contact us via one of the channels listed above. We will then organise a personal appointment with a responsible contact person within a reasonable period of time. Complaints are processed in the chronological order in which they are received according to the predefined processes and requirements.

2.2 Receipt documentation

Every complaint reported through the above-mentioned channels is recorded in OpenTalk as a central documentation tool and documented in the Case Management System (CMS). This applies not only to the receipt but to the entire processing procedure. The data is stored for the legal retention period.



2.3 Confirmation of receipt and communication with the whistleblower

When lodging a complaint by phone or web you will receive a report number and password that can be used to track your complaint. You will also receive a confirmation of receipt immediately, but no later than seven days after receipt of the complaint. In cases where the whistleblower has not provided contact details, no confirmation of receipt can be sent. This does not apply to cases in which the whistleblower has provided an anonymous e-mail address via OpenTalk.

2.4 Designation of a Case Manager (CM)

For each complaint, a case manager from the Business Integrity Team or an independent trained bp internal investigator is designated for the entire process from receipt to completion of the complaint process. The case manager is primarily responsible for ensuring communication with the whistleblower.

Once the complaint is accepted, an electronic summary is sent to the selected case manager for review to determine the next necessary steps. If necessary, the case manager will inform the whistleblower about the status of his/her complaint in due time. In addition, the whistleblower can obtain information on the current status of his/her complaint at any

time by telephone or via the internet using his/her report ID and password.

The investigation and assessment results will be communicated to the whistleblower in a timely manner, unless the whistleblower explicitly requests otherwise.

The case manager may collaborate with others as necessary, while maintaining confidentiality, to ensure that the complaint is properly addressed.

2.5 Checking validity and relevance

In a first step, the case manager checks whether the complaint is valid and relevant according to the Scope of Application. A complaint is valid if it contains concrete and plausible information about a potential incident so that further processing is possible. A complaint is relevant if the review reveals that there are indications of risks or violations within the Scope of Application, especially with regard to human rights or environmental risks or violations in the supply chain or in bp's own business.



2.6 Initial assessment

If, based on the information and any documentation provided, the complaint is valid and relevant, the case manager undertakes an initial assessment to determine what further steps to take. There are no overly high requirements on the validity of the complaints. For example, there does not have to be verified evidence of the reported risks or violations. However, concrete indications must be presented that make a risk or a violation appear at least possible.

2.7 Internal clarification

After conducting the initial assessment, the case manager involves other relevant stakeholders in the internal investigation process, such as representatives from Business Integrity, Ethics & Compliance, People & Culture, etc.

The case manager together with the relevant stakeholders will determine the further steps to be taken for clarifying the facts.

2.8 Measures to be taken

To the extent that after completing the clarification and assessment of the facts the case manager together with the involved stakeholders conclude that there is a risk or a violation within the Scope of Application, appropriate preventive or remedial measures will jointly be decided and taken. These measures are aimed at resolving the reported risks or violations to the extent possible. Furthermore, measures are taken to close any process/control gaps in order to prevent the situation from recurring. The concrete form, implementation and review of the measures is at the discretion of bp and is always subject to the principle of appropriateness.

2.9 Conclusion of the complaint

The whistleblower will be informed about the conclusion and outcome of the process. For reasons of confidentiality, we cannot provide detailed information on the results or measures derived from them in all cases.

Most complaints are processed and concluded within an average of 90 days after receipt. More complex cases may take a longer period of time.