



# Our Code

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It's what we  
believe in



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We say  
what is true.  
We do  
what is right.







# I stand for the Code

**Nathan**

Shift Research Technician







# I stand for the Code

**Kavaljeet**  
Assurance Delivery





To be a trusted company, year after year, we need to work to a consistent and higher set of standards and follow them in everything we do and say, every day, everywhere we work





Welcome to our Code of Conduct. This book sets out the basic rules we must all follow in BP and explains how our values should guide all of our decisions. The Code provides information on where to find more detailed standards and guidance on particular subjects. In other words, it helps us do the right thing when we're faced with difficult decisions. This builds trust and has a positive effect on those we touch.

Laws vary from country to country and we must always comply with them, but as a global company, we need to go further. To be a trusted company, year after year, we need to work to a consistent and higher set of standards and follow them in everything we do and say, every day, everywhere we work.

All of us at BP, without exception, are duty bound to follow and uphold our Code of Conduct – and we must all remember that failure to do so can put BP and ourselves at risk.

If you are ever concerned that our Code is not being followed, or simply feel unsure about any situation, it is vital that you speak up and ask a question or share your concern straightaway. Inside you will find details of the different ways to do this, including our confidential helpline, OpenTalk.

Our reputation, and our future success, rests on each of us taking personal responsibility for putting our Code into practice. Together we can show the world that BP is a company united by strong values – a company of which we are proud to be a part.

We say what is true. We do what is right.

A handwritten signature in black ink that reads "Bob Dudley". The signature is written in a cursive, slightly slanted style.

Bob Dudley,  
Group Chief Executive

# What our Code is all about

Our Code gives us the guidance and support we need to conduct our business ethically and to comply with the law. These two things are vital to our success.

Our Code represents our commitment to do the right thing, including respecting the rights of others. By being part of BP you are agreeing to uphold this commitment. If you do not, you could put yourself, your colleagues and BP at risk. Put simply, failure to follow this Code is misconduct, which could result in disciplinary action and even dismissal.

No part of our Code can be waived without prior approval which reflects our wholehearted commitment to it. This will be coordinated by the Group Ethics & Compliance Officer, who will obtain approvals and make sure all appropriate reports and representations are made. This includes those required by law. Waivers will only be granted in exceptional circumstances.

## **Who must follow our Code?**

The short answer to this is everyone. The longer answer is every employee and officer in every BP wholly owned entity, and in joint ventures (JVs) to the extent possible and reasonable given BP's level of participation. In situations where BP does not have overall control of a JV, we will do everything we reasonably can to make sure JVs and JV partners follow similar principles.

We also seek to work with third parties who operate under principles that are similar to this Code. This includes making a contractual commitment where it is feasible to comply with the applicable laws and work in line with our Code. We expect all our contractors and their employees to act in a way that is consistent with our Code, and follow its principles. We will consider terminating contracts where we believe they have not met our standards or their contractual obligations.

### If you supervise others...

You have additional responsibilities under our Code:

- Being a role model for ethical leadership.
- Being a role model for safety leadership and creating the right environment for people to be comfortable living our value of safety.
- Supporting ethics and compliance activities in BP.
- Making sure all your team members understand the requirements of our Code and local legal requirements, and have the resources to adhere to them.
- Holding your team members accountable to behave ethically and follow our Code and legal requirements.
- Enforcing our Code consistently.
- Making sure appropriate compliance controls are implemented in your organization.
- Supporting your people to ask questions and raise any ethical concerns by:
  - Encouraging them to speak up.
  - Dealing with concerns when they are raised.
  - Making sure that no one who speaks up suffers any retaliation.

### Following the law, setting the standard

With BP doing business in more than 80 countries, our Code cannot cover all the different laws, applicable regulations and other legal requirements. It is important for you to be familiar with any that apply where you work.

First and foremost, we must comply with legal requirements. Where there is a difference between a legal requirement and our Code, always apply the most stringent standard. If you have any questions about this, talk to your line manager, HR, Legal, or Ethics & Compliance.

A highly regulated environment exists around BP's trading activities which sometimes interact with other BP businesses. It is essential that all our trading and any associated business activities are conducted within the trading control and compliance framework. The Global Trading Guidelines build on our Code in this area. They set out the standards of behaviour and integrity that apply to everyone who engages in activities in the trading environment at BP. If you need help with this, contact Ethics & Compliance.

Above all, please remember that our Code is only a starting point. It cannot address every situation and is no substitute for using good judgement and doing the right thing.

### Getting the information you need...

To point you in the direction of more detailed information on various topics, there are additional resources highlighted throughout the Code – marked with the symbol.



Links to specific documents/websites are also provided in the Appendix.

### ... And the answers to your questions

To get a feel for how our Code works in practice, you will find Q&As in every section as shown here.

Our Code does not alter the terms and conditions of your employment. It details what is expected of everyone at BP and supports us in being responsible and respectful.

In this document words or phrases such as 'BP', 'our company' and 'company' are used typically to mean the BP group companies.

# Our Code is based on four foundations



## What we do

We deliver energy to the world. We find, develop and produce essential sources of energy. We turn these sources into products that people need everywhere.

The world needs energy and this need is growing. This energy will be in many forms. It is, and will always be, vital for people and progress everywhere.

We expect to be held to high standards in what we do. We strive to be a safety leader in our industry, a world-class operator, a good corporate citizen and a great employer. We are BP.



What we stand for

We care deeply about how we deliver energy to the world. Above everything, that starts with safety and excellence in our operations. This is fundamental to our success.

Our approach is built on respect, being consistent and having the courage to do the right thing. We believe success comes from the energy of our people. We have a determination to learn and to do things better. We depend upon developing and deploying the best technology, and building long-lasting relationships.

We are committed to making a real difference in providing the energy the world needs today, and in the changing world of tomorrow. We work as one team. We are BP.



## What we value

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### Safety

Safety is good business. Everything we do relies upon the safety of our workforce and the communities around us. We care about the safe management of the environment. We are committed to safely delivering energy to the world.

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### Respect

We respect the world in which we operate. It begins with compliance with laws and regulations. We hold ourselves to the highest ethical standards and behave in ways that earn the trust of others. We depend on the relationships we have and respect each other and those we work with. We value diversity of people and thought. We care about the consequences of our decisions, large and small, on those around us.

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### Excellence

We are in a hazardous business and are committed to excellence through the systematic and disciplined management of our operations. We follow and uphold the rules and standards we set for our company. We commit to quality outcomes, have a thirst to learn and to improve. If something is not right, we correct it.

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### Courage

What we do is rarely easy. Achieving the best outcomes often requires the courage to face difficulty, to speak up and stand by what we believe. We always strive to do the right thing. We explore new ways of thinking and are unafraid to ask for help. We are honest with ourselves and actively seek feedback from others. We aim for an enduring legacy, despite the short-term priorities of our world.

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### One Team

Whatever the strength of the individual, we will accomplish more together. We put the team ahead of our personal success and commit to building its capability. We trust each other to deliver on our respective obligations.

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## 4

## Speaking up

We all share a responsibility to speak up whenever we have a question about our Code or think that it may have been violated.

What we do is rarely easy. We need to have the courage to speak up and always strive to do the right thing. This means you must always ask for help when you have a question about our Code or believe it is not being followed.

If you become aware of a breach or potential breach of our Code or other legal requirements, you must report it straightaway – whether it relates to you, your manager, or anyone else. Our Fraud and Misconduct Reporting Standard provides further information on incident reporting – see the Appendix for the link. Report urgent problems like safety hazards locally if you can to get the fastest response.

We are committed to consistently looking into all potential breaches or questions that are raised, and we will deal with them fairly and responsibly. To prevent an issue or concern from turning into a crisis, seek advice or support as soon as you can. You have the choice of:

Talking it through with your line manager – usually the best option.

Taking it to your Ethics and Compliance Leader (ECL).

Getting in touch with Legal, HR or Ethics & Compliance.

Contacting OpenTalk if you are not comfortable contacting any of the people identified above.

OpenTalk offers a confidential way to answer your questions and respond to your concerns in relation to ethics, compliance or any other requirements in our Code. The helpline, operated by an independent company, is available for you anytime day or night, every day of the week. The OpenTalk helpline can accommodate calls in more than 75 languages.

When you contact OpenTalk, which you may do anonymously in most jurisdictions, the operator will listen to your concern or enquiry, ask you clarifying questions if necessary, and then write a summary report of the call. The summary will then be provided to BP's OpenTalk Team for assessment and further action, as appropriate.

**You can reach OpenTalk through the following numbers:**

**+44 (0) 800 917 3604** in the UK

**+1 800 225-6141** in the US

**+1 704 540 2242** – the 'collect call' number which will accept your call without any charge to you

You will find a full list of local numbers at: [http://ethicsandcompliance.bpweb.bp.com/en/Contacting\\_OT.aspx](http://ethicsandcompliance.bpweb.bp.com/en/Contacting_OT.aspx)

You can also submit a report through the website at: [www.opentalkweb.com](http://www.opentalkweb.com)

Breaches of our Code of Conduct must be reported at <https://codeofconductcertification.bpweb.BP.com/Breach/Breach.aspx>

# Zero tolerance on retaliation

Our zero tolerance policy on retaliation goes hand in hand with our belief that speaking up is always the right thing to do.

If you voice a concern or report misconduct in good faith – or take part in an investigation of an ethics and compliance matter – you are following our Code. Under no circumstances will BP tolerate retaliation against you. We consider acts of retaliation to be acts of misconduct which, if substantiated, could result in disciplinary action and even dismissal.

Retaliation can take many forms from being ignored to being unfairly dismissed. It might also involve being bullied with the aim of stopping you from reporting a potential breach of our Code. We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate action.

If you think that you or someone you know has suffered retaliation, contact OpenTalk or the Group Ethics & Compliance Officer, a Human Resources Representative or Legal without delay.

## Q. Should I speak up?

I feel I should call OpenTalk, but I am anxious about it. My line manager told me to do something I feel is dangerous and may even be illegal. I am afraid they could make life difficult for me if I raise this. What should I do?

**A.** It is important that you share your concerns about this potentially serious matter. Rest assured that every call to OpenTalk is confidential. And in the unlikely event of anyone retaliating against you, you should raise this promptly. Retaliation will not be tolerated and swift action will be taken.

## Q. Am I being retaliated against?

Three months ago I contacted OpenTalk anonymously. I was concerned that my team leader might have awarded a contract to a company owned by his friend. It was investigated and I understand some action was taken. Since then my fellow team members have stopped speaking to me and copying me on important communications, and I am worried this will affect my performance. I feel that my colleagues know I reported our team leader to OpenTalk and are retaliating.

**A.** This may well be a case of retaliation, so you need to have it looked into. If you do not feel comfortable raising the issue with your team leader, contact a Human Resources Representative, your team leader's manager, Legal, Ethics & Compliance or OpenTalk. A thorough investigation will take place to find out what has led to your colleagues' behaviour. If the investigation determines that they were retaliating, appropriate action will be taken.

# The role of the Ethics & Compliance Function

BP has an independent function to administer and oversee its ethics and compliance programme under the direction of the Group Ethics & Compliance Officer.

## Ethics & Compliance

- Holds an independent view of the significant ethics and compliance risks faced by BP, where those risks could materialize and the appropriate responses to be applied.
- Assesses the BP leadership tone and ethical culture and ensures that the highest ethical standards are followed.
- Sets expectations for effective BP ethics and compliance programme elements, including frameworks, standards, processes, systems, tools, training and communications.
- Supports BP businesses and functions to implement programmes to meet their ethical and legal obligations and effectively manage/mitigate identified ethics and compliance risks.
- Stops any transaction or activity which could be in breach of the BP Code of Conduct or applicable legal compliance requirements.
- Provides support to help employees and others resolve ethical dilemmas and comply with the BP Code of Conduct, BP Standards and applicable laws.
- Operates OpenTalk and ensures associated investigations conform to the Group Fraud and Misconduct Reporting Standard.
- Conducts independent investigations into ethics and compliance matters, where appropriate.
- Retains and instructs legal counsel to conduct investigations and provide other support to the BP ethics and compliance programme.
- Supports and assists business and functional leaders to enforce consistent disciplinary procedures for breaches of the BP Code of Conduct and the incorporation of ethics and compliance into performance appraisal and other HR processes.
- Objectively monitors and assesses the adequacy of the BP ethics and compliance programme to manage/mitigate the group's significant ethics and compliance risks and, where appropriate, makes recommendations for improvement.
- Objectively assesses the effectiveness of the BP ethics and compliance programme to meet stakeholder (including regulatory) requirements.
- Represents BP with regulators and government officials on matters concerning ethics and compliance.
- Provides periodic assessments and reports on the BP ethics and compliance programme to the Executive Team and the Board of Directors Safety, Ethics and Environment Assurance Committee and Main Board Audit Committee.





# I stand for the Code

**John**  
Despatch





# I stand for the Code

**Lola**

Operations Development Engineer





Operating  
safely,  
responsibly  
and reliably

Everything we do relies upon the safety of our workforce and the communities around us. We make it a top priority to protect our own safety, as well as that of our colleagues and everyone else we come into contact with. We are also committed to protecting the environment and respecting the rights and dignity of communities around the world where we do business.

We operate in hazardous environments, and we are committed to excellence and to the disciplined management of our operations. Our leaders have the responsibility of being role models for safety leadership and creating the right environment for people to be comfortable living the value of safety. Our health, safety, security and environment (HSSE) goals are no accidents, no harm to people and no damage to the environment.



# Protecting health, safety, security and the environment

We all share responsibility for protecting people's health, safety, security and the environment (HSSE). This includes everyone at BP and everyone touched by our activities. This is essential to respecting their rights and to our success.

We work hard to improve our impact on the environment and health by:

- Reducing waste, emissions and discharges.
- Using energy efficiently.
- Reducing workplace exposure to health risks.
- Producing safe, high-quality products.

We also set measurable HSSE performance targets in our business plans, which we are all committed to meeting.

Personal and process safety is about more than following rules. We all need to be alert to safety risks as we go about our jobs. Nothing is so important that we cannot take the time to do it safely.



## Basic rules you must follow **Always**

- Act first to protect the safety and well-being of everyone around you.
- Comply with the applicable laws and follow the requirements set out in your local Operating Management System (OMS) or in Office Safety.
- Stop work that you believe is unsafe, may harm health, or is likely to result in a loss of containment that will damage the environment.
- Only undertake work if you are competent, medically fit, and sufficiently rested and alert to carry it out.
- Make sure you know the emergency procedures that apply where you work.
- Help make sure that those who work with you – employees, contractors and third parties – act consistently with our HSSE and operating commitments.
- Respect the capabilities of those in safety-critical roles.
- Report any accident, injury, illness, unsafe or unhealthy condition, incident, spill, unplanned release of material to the environment, or apparent breach of law or BP requirements to local BP management so that immediate action can be taken. Never assume that someone else will report a risk or concern.
- Ask for help and advice if you are unclear about your HSSE and operating responsibilities, or if you are concerned about a possible or actual breach of a law or BP requirement at work.



Basic rules you must follow  
**Never**

- Work while your performance is impaired by alcohol or any prescription/over-the-counter drug, whether it is legal or illegal.
- Threaten, intimidate or act violently towards anyone at work or in the communities where we operate.
- Bring weapons – including those carried for sporting purposes – onto BP premises, or use weapons anywhere to advance BP business unless you have obtained approval to do so. These prohibitions, and the need for approval, do not apply at any location where their application or enforcement would be inconsistent with the applicable law at that location. The approval process is initiated by written request to the Regional Security Adviser. It requires the approval of the Vice President, Group Security, and the President, BP America for US locations or the Strategic Performance Unit Leader or equivalent outside the US.



We aim to manage our operating and HSSE risks systematically, and improve performance through the Operating Management System (OMS) for operating entities and Office Safety for office workers. Links to OMS and Office Safety are provided in the Appendix.

To find out more about HSSE in BP, OMS and Office Safety (including details of how OMS and Office Safety apply), visit our Safety and Operational Risk website – see Appendix for details.

You will find more on digital security requirements under 'Using our digital systems responsibly and securely' in this Code.

If you have any questions or concerns about safety and operations, there are many different ways to raise them. For example, you can talk to your line manager or another colleague. If you would rather speak to someone independently and in confidence, you can contact OpenTalk.

**Q. Should I stop working?**

Will I be penalized if I stop work when I have concerns about safety or environmental damage?

**A.** No. We want to encourage all employees to feel empowered to stop work that they feel could be unsafe or cause environmental damage. We will not tolerate retaliation against anyone who does this in good faith. We want BP to be a safe place to work for everyone. It is always better to be safe than sorry. If you do not feel comfortable discussing the situation with your line manager, please use OpenTalk or any other resource such as Legal, your local HSSE team, HR or Ethics & Compliance.

**Q. Should I report a small spill?**

We have had a small spill – just a few litres. Should I report it?

**A.** Yes. Report any spill or release of hydrocarbons or chemicals, no matter how small. Tell your line manager straightaway so that we can take action, report it internally and externally as needed, and investigate the causes to prevent similar incidents happening in the future.





# I stand for the Code

**Eugenio**

Control & Instrument ACE Engineer







“

# I stand for the Code

**Frank**  
Site Mechanic

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# Our people

We are one team. Whatever the strength of the individual, we will accomplish more together. We put the team ahead of our personal success and commit to building its capability. We also trust each other to deliver on our respective obligations.

We are committed to creating a workplace that is characterised by respect for people's rights, responsibility, excellence and mutual trust. We value diversity of people and thought.

We believe everyone should have equal opportunity. We recruit, select and develop our people on merit – irrespective of their race, colour, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by the applicable laws.

We work in good faith, within the appropriate legal framework, with trade unions and other bodies that our people collectively choose to represent them.



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# Treating people fairly, with dignity and giving everyone equal opportunity

Our people are one of our greatest strengths. We value diversity of people and thought, and we value every employee as an important member of one BP team.

We aim to make sure that everyone at BP – and everyone we come into contact with – is treated with fairness, respect and dignity, and never unfairly discriminated against.

Our aim is that as a BP employee you:

- Know what is expected of you in your role.
- Have open and constructive performance conversations.
- Get the help you need to develop your capabilities.
- Are recognized and rewarded fairly for your performance.
- Are listened to and involved in improving team performance.
- Are supported in managing your personal priorities.



## Basic rules you must follow **Always**

- Base your decisions about recruitment, selection, development and advancement of employees on merit. Base your decisions on their qualifications, demonstrated skills and achievements.
- Expect other parties you work with (contractors, agents, joint ventures) to act in a way that is consistent with our fair treatment and equal opportunity standards.
- Comply with all the applicable labour and employment laws.
- Report any breaches of law or this Code of which you become aware, and cooperate with company investigations. Seek advice if you have a concern – whether it concerns yourself, direct reports or others.



## Basic rules you must follow **Never**

- Allow race, colour, religion, gender, age, national origin, sexual orientation, gender identity, marital status, disability or any other characteristic protected by any applicable law to influence your judgement when it comes to the recruitment, selection, development and advancement of employees.

### Child and forced labour

We are committed to the elimination of all forms of forced and compulsory labour, and to the effective abolition of child labour.



Basic rules you must follow  
**Always**

- Be alert to any evidence of child labour or forced labour abuse in our own operations or the operations of others working on our behalf. Report them to BP management, HR or Legal.
- Ensure our contractors and other third parties working on our behalf understand our expectation that no child or forced labour will be used in their work for BP.



Basic rules you must follow  
**Never**

- Hire child or forced labour.



To find out more about our diversity and inclusion policies and programmes, visit your local 'People' website.

If you have any questions about equal opportunity or diversity, get in touch with an HR representative.

If you are concerned about a conflict between our Code and the laws, customs and practices of the place where you work, contact your line manager, HR, Legal or Ethics & Compliance. To talk to someone independent in confidence, contact OpenTalk.

### Q. Should we exclude women?

I work in a country where women are not allowed to apply for the jobs we offer at BP. If we put women forward as candidates to the state joint venture partner, we know they will be rejected. Should we exclude them?

- A.** No. Excluding women would imply that we agree with discrimination. You should keep putting the best candidates forward, regardless of the rejections. Leading by example can result in positive change in the future.

### Q. Do I have to interview single parents?

I believe that a vacancy in my team would not be suitable for a single parent, as it involves a lot of travel. This is not about prejudice, but practicality. Am I obliged to interview single parent candidates out of courtesy?

- A.** You are obliged to interview all candidates whose qualifications meet the requirements of the job – not on the basis of personal opinion. Making assumptions like this violates our principles and may even be against the law. Just as important, failing to interview suitably qualified candidates risks missing out on appointing the best person for the job. At BP, equal opportunity means equal opportunity for everyone.

# Creating a respectful, harassment-free workplace

Everyone at BP is entitled to fair treatment, courtesy and respect.

We will not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we deal with.

Using abusive or inappropriate language during performance conversations and reviews is prohibited. However, holding performance conversations and reviews which raise the need for performance improvement or changes in behaviour do not generally constitute harassment or abuse.



Basic rules you must follow  
**Never**

- Behave in a way that could reasonably be considered offensive, intimidating, malicious, discriminatory or insulting.

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- Sexually harass a colleague by making unwanted sexual advances, requesting sexual favours and/or physical contact, or behaving in any other sexually offensive way. Harassment does not have to take place at work or involve a BP employee to violate our Code or even the law.

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- Engage in any form of harassment with the intent or effect of:
  - Creating a hostile or intimidating work environment, including one in which employees may be driven to engage in inappropriate work practices to 'fit in'.
  - Interfering with an individual's work performance in an unreasonable way.
  - Affecting an individual's employment opportunity.

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- Humiliate, denigrate or injure another person.

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- Make insults or tell jokes of a racial, ethnic, religious, disability-related, age-related or sexual nature.

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- Make derogatory remarks about sexual orientation.

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- Remove or deface any sanctioned posting of BP-recognized affinity groups or business resource groups.

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- Distribute or display offensive material, including inappropriate pictures, cartoons and symbols of hatred.
- Misuse anyone's personal information.
- Make untrue statements about another person or BP.
- Spread malicious rumours or share offensive, derogatory or discriminatory information through any means.

These are just examples. Whatever the form of abuse or harassment, put simply it has no place in BP.



You will find more information about our policies on harassment at the HR website – see Appendix for link details.

Please see 'Operating safely, responsibly and reliably' in this Code for guidance on dealing with violence at work.

If you experience or witness any form of abuse or harassment, report it to your line manager or HR, or contact OpenTalk.

We rely on you reporting such serious issues promptly so that we can intervene without delay. Our zero tolerance policy on retaliation protects anyone who makes a report in good faith about an actual or potential violation of our Code or the law.

#### Q. What should I do about my boss?

I feel uncomfortable when my boss asks me out for drinks or talks about extra-marital affairs when no one else is around. What should I do?

- A.** If you are not comfortable about raising the issue with your boss, talk to your HR adviser. They will protect your confidentiality as far as possible while taking steps to stop the offensive behaviour. You could also get in touch with OpenTalk or any local alternative resource you may have.

#### Q. How do I deal with bullying colleagues?

A hearing-impaired member of our team talks in a different way from most of us. Some of my colleagues make fun of them behind their back. I think this is disrespectful and bad for the team, but what can I do about it?

- A.** This sort of behaviour is unacceptable. You could try appealing to your colleagues' sense of fairness and decency. Or you could raise your concerns with an HR adviser who is trained to deal with situations like this. Another alternative is to contact OpenTalk or another local resource.

#### Q. Has my manager breached our Code?

During a performance conversation with my manager yesterday, they told me I need to improve my performance and meet certain goals in the next 60 days or my employment will be terminated. I disagree with their assessment and was intimidated by their threat. Have they violated our Code?

- A.** To help everyone realize their full potential, BP managers are expected to give team members honest feedback in a constructive, respectful way. You need to discuss your particular situation with both your manager and HR representative, so that they can make the concerns and expectations absolutely clear. If, however, your manager used abusive or inappropriate language, this is prohibited and you should report the incident to HR, senior management or OpenTalk.

# Protecting privacy and confidentiality

We are committed to respecting people's privacy and the confidentiality of personal information. We will only acquire and keep personal information that we need to operate BP effectively or to comply with the law.

Because we respect an individual's right to privacy, we do not usually take an interest in what anyone does outside of work – unless it impairs their work performance, or threatens BP's reputation or legitimate business interests.



## Basic rules you must follow **Always**

- Classify personal information as confidential. Limit access to appropriately authorized individuals who have a clear business need for that information.

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- Use personal information that you are authorized to access only for the purposes known to, or expected by, the individuals concerned – that is, fairly and with absolute integrity.

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- Keep personal information no longer than necessary to accomplish the legitimate purpose for which it was collected or to satisfy a legal, regulatory or legitimate business need.

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- Be aware of the existence of local privacy laws, specifically when transferring personal information outside its country of origin. Consult your privacy adviser or data protection co-ordinator to identify any legal requirements that must be observed.

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- Be objective when making written comments about individuals and remember that documents containing comments may be disclosed. All personal information, including your opinions, should be relevant, appropriate, accurate and justifiable.

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- Exercise care and discretion when you use electronic media. Remember, information created or stored on computers or other electronic devices may not be secure or private. It may also be accessed, monitored or audited at any time without notice, subject to local laws and regulations.

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- Process personal information in accordance with the BP data privacy rules which govern how the BP group of companies collectively manages personal information. You will find these at the Legal website – see Appendix for link details.



**Basic rules you must follow**  
**Never**

- Seek access to personal information that you are not authorized to have or when there is not a valid business reason to have it.
- Provide personal data to anyone inside or outside of BP without ensuring that it is appropriate to do so. Make sure you take appropriate security measures.



To find out more about protecting personal information, see 'Protecting BP's assets' and 'Using our digital systems responsibly and securely' in this Code.

You will find more information on privacy under 'Preventing conflicts of interest' and 'Our stance on political activity'.

For more guidance on the personal use of digital systems, see 'Using our digital systems responsibly and securely'.

To find out more about data retention periods, see 'Accurate and complete information, records, reporting and accounting.'

You will find full details and frequently asked questions on privacy compliance at the Legal website – see Appendix for link details.

If you would like further details on privacy requirements, your privacy adviser or data protection co-ordinator can help.

**Q. What should I do about finding confidential records?**

A report I found on the photocopier contains a lot of confidential HR records, including payroll information for our team. I do not want to get anyone into trouble, but I do not think it is right that this kind of information is left for all to see. What should I do?

**A.** You should return the report to HR in confidence straightaway, and report your discovery and actions to your local privacy and data protection co-ordinator. This breach also needs to be recorded in the breach database (see Appendix for link details). Protecting confidentiality and privacy is the personal responsibility of each BP employee. Whoever left the papers in the copier will be counselled on their duty to protect the confidentiality of employee (and customer) data in BP.





# We stand for the Code

**Duncan**  
Area Authority





# I stand for the Code

**Miryam**  
Data Change Analyst





# Our business partners

Everyone benefits from business relationships based on trust and honest discussion. They are vital to our success.

To make sure our business relationships work to everyone's advantage, we need to understand the needs of our stakeholders and work with them honestly, respectfully and responsibly. This includes our customers, contractors, suppliers, joint venture partners and other third parties. While we need to be competitive, everything we do must always be both legal and fair. We are a responsible company committed to meeting our obligations and building long-lasting relationships.



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# Appropriately exchanging gifts and entertainment

## At a glance

We only give or accept gifts and entertainment that are for business purposes and are not material or frequent.

Exchanging gifts and sharing entertainment in connection with a legitimate business purpose can foster constructive relationships with third parties. However, gifts and entertainment should never affect, or appear to affect, impartial decision-making by BP employees or any third party. They should never be offered or received in exchange for preferential treatment in any business dealing.

Certain gifts and entertainment can erode others' trust in BP and must be avoided. These include any gifts or entertainment that appear to be bribes, raise questions about conflicts of interest for you or BP, or would damage BP's reputation.

It is never appropriate to attempt to bias a decision by offering personal benefits to a government official or anyone else. We support laws prohibiting bribery and corruption, which often include stringent rules concerning gifts and entertainment involving government officials and other third parties.

'Hosting' is another strictly regulated activity which involves paying for a third party's (such as a government official or an employee of a commercial entity) travel, accommodation or daily living expenses in conjunction with their visit to a BP office, site or other location for the purposes of promoting, demonstrating or explaining the benefits of BP products or technology. We always follow laws or rules concerning the hosting of government officials and any other of our business partners.



## In detail

'Gifts and entertainment' include anything of value offered to or received by an individual or members of their family.

'Gifts' include cash and non-cash items, some examples of which are:

- Artwork
- Watches
- Jewellery
- Equipment
- Preferential discounts
- Loans
- Favourable terms on a product/service
- Services
- Prizes
- Donations to charities
- Transportation
- Use of another company's vehicles
- Use of vacation facilities
- Stocks or other securities
- Participation in stock offerings
- Home improvements
- Tickets and gift certificates

'Entertainment' is where you accompany a third party to an event and includes, for example, business meals, invitations or tickets to recreational, cultural or sports events and venues, as well as any associated travel, accommodation, meals and refreshment. Entertainment should be treated as a gift if the party who made the offer does not plan on attending.



**Basic rules you must follow  
Always**

- Comply with the most stringent requirements for giving and receiving gifts and entertainment, whether they are the rules set out in this Code, any applicable local internal policies, third party rules, contract terms or applicable legal requirements.
- Obtain appropriate management and where necessary Legal approvals before offering or accepting any gift or entertainment to/from a third party. You must comply with the most stringent approval requirements, whether they are the rules set out in the chart below or an applicable local internal policy.
- Where required, accurately record gifts and entertainment you offer, give or receive in the BP Gifts and Entertainment Register or your approved local gifts and entertainment register. You must comply with the most stringent recording requirements, whether they are the rules set out in the chart below or an applicable local internal policy.

- Immediately return any gift of cash or cash equivalent that you receive from a third party and notify Legal that this has happened.
- If you believe it would be insulting to decline a gift, report it to your line manager who will decide whether it can be retained by you or BP, donated to charity (either itself or the money from its sale), or returned. Return any indecent or improper gift.
- Obtain Legal approval before paying for the 'hosting expenses' – including transportation, lodging or related travel expenses – of a government official, including state company delegations.
- Obtain Legal advice before offering or exchanging any gift or entertainment with a government official, and record all gifts and entertainment offered/ given to or received from government officials in the BP Gifts and Entertainment Register or your approved local gifts and entertainment register.

Gift Value	Entertainment (including meals) value*	Approval Requirements	Recording Requirements
< \$50	< \$150	No pre-approval required.	No recording requirement.
> \$50 and < \$250	> \$150 and < \$1,000	Line manager approval required. Group Leaders may self-approve.	Must be recorded in the Gifts and Entertainment Register.
> \$250	> \$1,000	Group leader approval required. Group Leaders may self-approve.	Must be recorded in the Gifts and Entertainment Register.

**In addition to the requirements above, the following requirements apply when exchanging gifts and entertainment with a government official:**

Obtain Legal *advice* before offering, giving or receiving any gift or entertainment with a government official. Obtain Legal *approval* before offering or paying for the hosting expense of a government official. Record all gifts and entertainment offered/given to or received from a government official, regardless of their value.

\* When using this chart, consider the following:

1. For meals/entertainment you give to others: Use the total value of meals/entertainment that you give to a third party organization at a single event. For example, if you entertain multiple people from the same organization at a specific event, the value is the total amount you spend for the total number of guests' entertainment.
2. For meals/entertainment you accept from others: Include only the value of the meal/entertainment you personally receive (including the value of meals/entertainment that your spouse or other non-BP employed family member receives).

# Appropriately exchanging gifts and entertainment (cont.)



Basic rules you must follow  
**Never**

- Offer, give or receive any gift or entertainment that:
  - Could be construed as a kickback, bribe, payoff or violation of any law or other BP standard.
  - Is cash or a cash equivalent, such as a bank cheque, money order, investment securities, gift certificate/card or negotiable instrument.
  - Was solicited or offered in return for something else.
  - Is indecent, sexually oriented, does not comply with our commitment to mutual respect or could adversely affect our reputation.

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- Offer, give or receive any gifts or entertainment with third parties when you are involved in or could influence a tender or competitive bidding process with them, unless approved by Ethics & Compliance.

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- Personally pay for any gift or entertainment to avoid having to report or seek approval for it.

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- Conceal, or assist in the concealment of, the offering, giving or receiving of gifts and entertainment.

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- Offer, give or receive gifts and entertainment with the same third party more than twice per year without prior approval from your line manager.

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If you have any questions or concerns about gifts and entertainment, contact your line manager, Ethics and Compliance Leader, Legal or Ethics & Compliance.

You'll find more information under 'Eliminating bribery and corruption', 'Preventing conflicts of interest', and 'Dealing with governments' in this Code.

You can also access the BP Gifts and Entertainment Register and the Approval Form for Hosting Government Officials at the links provided in the Appendix.

## Q. May I go to the show?

A supplier offered me two tickets to a top London show. They cannot come with me themselves, but have told me to take a friend. The tickets are not worth more than \$75 each. May I accept them?

- A.** Because the supplier is not accompanying you, the tickets are a gift. The maximum value of gifts you can accept without approval is \$50, so you will need to get approval from your line manager, (unless you are a group leader, in which case you can self-approve).

## Q. May I accept a raffle prize?

I won a weekend away in a raffle held by a supplier. Am I allowed to accept this prize?

- A.** Because this prize is almost certainly worth more than \$50, you must get approval from your line manager (or self-approve if you are a group leader) before accepting it. However, if you are involved in or have an influence on a competitive bidding situation with this supplier, you must also get approval from Ethics & Compliance.

**Q. Should I pay for transport and entertainment?**

The technical manager working for our partner, a national oil company, wants to see BP's latest refinery technology in Germany. They are paying for their own flights and hotel accommodation, but would like us to provide administrative support and local transportation. They also expect us to entertain them in the evening. Is this appropriate?

**A.** You can support visits of government and state company delegations to BP offices and sites, but only if all items are approved in advance by Legal. It is also permissible to promote, demonstrate and explain the benefits of our products or technology to government employees who are decision-makers or potential partners, but you must not try to influence them by offering personal benefits.

**Q. What is the approval limit?**

I plan to entertain 10 engineers who work for the same third party engineering firm. The total cost of entertainment will be \$400. Since the cost is only \$40 per person, do I need my line manager's approval?

**A.** Approval limits are for the total value of the gifts or entertainment offered or given to a particular third party. In this case, you would need to get your line manager's approval, as the total value of entertainment with this firm is \$400. You should follow this same approach when recording gifts and entertainment in the Register.

# Preventing conflicts of interest

## At a glance

We respect the privacy of everyone who works for BP and do not normally take an interest in what people do outside of work.

But conflicts of interest can happen if an employee's personal, social, financial or political activities interfere, or potentially interfere, with their loyalty to BP.

Wherever possible, conflicts of interest should be avoided. If and when they do happen, they must always be carefully managed. Even the appearance of a conflict of interest can be harmful and needs to be addressed.



## In detail

There are many different ways conflicts of interest can arise.

### Outside jobs and affiliations

These situations can create an actual or apparent conflict of interest if they involve you:

- Having a second job.
- Performing services.
- Serving as a director or consultant.
- Holding a financial interest with an existing or potential competitor, customer or supplier of BP.

### Jobs and affiliations of close relatives

These can also create conflicts of interest. In general, a close relative should not have any business dealings with you, anyone who reports to you, or anyone working in your business unit. Close relatives who are government officials could present unique issues and should always be disclosed.

'Close relative' means a spouse, partner, parent, step-parent, child, step-child, sibling, step-sibling, nephew, niece, aunt, uncle, grandparent, grandchild and in-law – or anyone else you have a close personal relationship with.

### Board directorships

Our employees are occasionally asked to become directors on other organizations' boards. Sometimes this can raise conflicts of interest or legal issues. Before you accept a board directorship, you need to follow the non-executive director approval process – see Appendix for details.

### Investments

All employees should make sure that their investments and their close relatives' investments do not create conflicts of interest that could affect their objectivity when making work decisions.

For example, conflicts can arise if you or a close relative invests in a competitor, supplier, or customer of BP. For any substantial interest of this kind, you would need prior written approval from your line manager.

'Substantial interest' means an interest that might influence or appear to influence your judgement. As a guide, if you were to own less than 1% of the shares of a publicly quoted company – or earn less than 10% of your net worth from an investment – this would not normally cause a conflict. If you are in any doubt, check with your line manager or Legal.

Deciding whether or not you have a conflict of interest is down to good judgement.

Ask yourself:

- Would this situation affect any decisions I make for BP?

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- How would it look to my co-workers? Would they think it could affect how I do my job?

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- How would it look to someone outside the company, such as a customer or shareholder?

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- How would it be perceived if it were reported in a newspaper?

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# Preventing conflicts of interest (cont.)



## Basic rules you must follow **Always**

- Disclose any outside jobs and affiliations with competitors, customers or suppliers to your line manager and obtain written approval. If your role with BP involves evaluating potential suppliers or selling to potential customers, you may have to disclose any relationships of this kind to them also.
- Notify your line manager if you learn that a 'close relative' works or performs services for a BP competitor, customer or supplier.
- Get written approval before accepting any board position (including for not-for-profit organizations) in accordance with the non-executive director approval process.
- Notify your line manager if you have any other relationships that could create or appear to create a conflict of interest.



## Basic rules you must follow **Never**

- Hire, supervise, affect the terms and conditions of employment, or influence the management of any close relative unless it has been approved by your line manager. This applies whether they are a BP employee or contractor.
- Work for, or provide services for, anyone that you must deal with as part of your job for BP.
- Invest in a current or prospective supplier if you have any involvement in their selection, assessment or negotiations. This applies equally if you supervise anyone who has such responsibility.
- Invest in a customer if you are responsible for dealings with that customer or supervise anyone who is responsible for them.



If you think you might have a conflict of interest, or that other people might think you do, talk it through with your line manager straightaway.

Conflicts of interest can usually be resolved to everyone's satisfaction, but they always need careful consideration. Not disclosing a conflict could mean disciplinary action.

You will find more information on conflicts of interest in our Global Guidelines on Handling Relationships in the Workplace.

**Q. Can we work with our colleague's son?**

A colleague's son has just joined our team. Is this allowed?

- A.** Unless local policy prohibits it, relatives can work in the same team or operating unit. The only proviso is that no relative must ever be in a position to either hire, supervise, affect the terms and conditions of employment, or influence the management of another relative.

**Q. Do I have a conflict of interest?**

My spouse is an officer in a company that does business with BP. In my job at BP, I also have contact with that company from time to time. Is this a problem?

- A.** Every case is different. You need to talk it through with your line manager so that any issues can be anticipated and avoided. Remember, all actual or potential conflicts must always be disclosed to your line manager.

**Q. Who might pose conflicts of interest?**

Do conflicts of interest include people I have close personal relationships with as well as actual relatives?

- A.** Yes. Our Code covers any close relationships that may create an actual or apparent conflict of interest. It does not list every activity or relationship that could create a conflict. However, it does tell you when you should be concerned; that is, if any activity or relationship interferes with your objectivity and loyalty to BP. If you have any concern at all about any personal relationship, raise it with your line manager without delay.

# Complying with competition and antitrust laws

## At a glance

Everyone at BP must comply with competition laws – known in the US and some other countries as antitrust laws. These are laws that protect competition by prohibiting anti-competitive behaviour. This behaviour may include:

- Entering into anti-competitive agreements with competitors, including price fixing, bid rigging, market allocation and agreements to restrict supply.
- Exchanging competitively sensitive information with competitors.
- Imposing restrictions on customers or suppliers.
- Abusing a position of market dominance.
- Entering into certain mergers and acquisitions.

Even where some behaviours may be lawful (for example, in a country that has not adopted competition laws), we will not enter into any arrangements with competitors that could harm BP's reputation.



## In detail

Most countries in which we do business have competition laws. Some of these apply beyond national boundaries – for example, the rules in the European Union and the US.

The penalties for breaking competition laws are severe. Fines for anti-competitive behaviour can be up to 10% of the BP group's annual global turnover. As well as being fined personally, individuals convicted of the most serious offences can face imprisonment.

### Agreements with competitors

Certain agreements with competitors – price fixing, bid rigging, market allocation and agreements to restrict supply – are almost always illegal. You must never enter into these kinds of agreements, regardless of where you are based, without getting advice from Legal.

Under competition law, 'agreement' has wide meaning and includes informal understandings with competitors.

Any action that appears compromising could trigger an investigation and be used as evidence of anti-competitive behaviour. For example, regular get-togethers with a competitor over coffee could be seen by an authority as providing an opportunity to collude.

### Information sharing

We must be very careful about sharing competitively sensitive information with third parties. This includes current and future prices, marketing and operational strategies, costs, customers and suppliers. You should not share BP's competitively sensitive information with third parties, especially competitors. Nor should you receive such information directly or indirectly from competitors without first obtaining advice from Legal. We must avoid illegal exchanges of information, and we also must avoid the appearance of such activities.

### Trade associations

Trade associations and other industry bodies are a useful way of helping us to achieve business goals – improved safety, for example. Since they bring us together with our competitors, however, we need to take particular care with all our trade association participation.

### Joint ventures

Agreements made between joint venture (JV) members about the operations of the JV are considered to be partner rather than competitor agreements – even if the partners are competitors outside the JV. But anti-competitive agreements between competing JV partners beyond the scope of the JV are prohibited. Also, the exchange of competitively sensitive information between BP, its JVs or JV partners may be problematic; therefore, prior to the exchange of such information, you should consult Legal.

### Dealing with customers and suppliers

Depending on the jurisdiction in which you operate, placing certain kinds of restrictions on your customers or suppliers may be illegal. These include agreements that:

- Restrict your customer's freedom to set the resale price.
- Limit your customer to buying only from you.
- Restrict where, or to whom, your customer can sell.
- Require your supplier to sell only to you.

Always check with Legal before putting any restrictions on distributors, customers, or suppliers.

### Price discrimination

Charging customers different prices can be illegal in some jurisdictions under certain circumstances. If you have the authority to set prices, check with Legal to make sure you know the legal requirements.

### Market power

Activities that are legal for many companies may be illegal for businesses with a large market share. For example, in many countries it is illegal to use certain pricing or contracting strategies to maintain a monopoly or dominant market position. If your business has a large market share, you must consult Legal to understand how the law may apply to you

### Merger control

Mergers, joint ventures, and acquisitions/disposals of assets or shares may require approval from competition authorities before they can proceed. Notification requirements vary throughout the world, and sanctions can include fines, transactions being declared void and divestments being required. Businesses should always seek competition law advice from Legal before entering into such transactions.

# Complying with competition and antitrust laws (cont.)



## Basic rules you must follow **Always**

- Take care when dealing with competitors not to participate in any arrangement that could be construed as anti-competitive collusion. If you find yourself in a meeting, including trade association meetings, where a questionable discussion is taking place, you must make it clear that you believe the discussion is inappropriate, break away from the discussion, and promptly inform Legal.
- Ensure you are familiar with how competition law impacts on your business in your jurisdiction, and consult Legal as appropriate.



## Basic rules you must follow **Never**

Unless you receive advice to the contrary from Legal, never:

- Agree with competitors to fix prices to third parties (including agreeing on the amount or timing of a price increase or level of discount or rebate) or agree on other terms related to prices (pricing formulae, credit terms, etc.).
- Intentionally signal future prices to competitors through customers, industry articles or other means.
- Agree with competitors to divide up customers, territories or markets.
- Discuss competitive bids with competitors or agree on who will win a competitive bid.
- Agree with competing producers to limit or restrict production or capacity (including making agreements to shut down capacity).
- Agree with a competitor to refuse to deal with another competitor, a supplier or a customer.

- Exchange or discuss competitively sensitive information with competitors. This includes:
  - Current or future prices or price-related terms to third parties.
  - Costs.
  - Individual customer details.
  - Production or capacity data.
  - Future expansion or capital expenditure plans.
  - Future commercial strategy.
- Agree with your customer (including your distributors) the price it will charge its customers or minimum resale prices.
- Restrict to whom your customers can sell or the territories in which your customers can sell.
- Enter into joint ventures, mergers, acquisitions, divestments, or joint-marketing, joint-purchasing or similar collaborative arrangements with any third party without seeking legal advice first.



If you have questions or concerns about competition laws, talk to your line manager, Legal or Ethics & Compliance.

For additional information, see the BP Group Competition and Antitrust Standard and other related guidelines – links provided in the Appendix.

**Q. Should I have intervened?**

During a trade association meeting, I was present when two of our competitors were discussing their low profit margins and complaining about deep discounts. I said nothing, but a few weeks later both competitor companies raised their prices. Should I have intervened at the meeting?

- A.** An authority might conclude that everyone at the meeting – whether they took part in the conversation or not – tacitly agreed to price fixing, even though there was never an explicit agreement. If you find yourself in this kind of situation, say that you feel the conversation is inappropriate, leave the meeting and tell Legal straightaway.

**Q. Can I attend a ‘rationalization’ meeting?**

A representative from another energy company wants to discuss ways to ‘rationalize’ the market for a product we both supply. The meeting is outside the US and the UK. Can I attend?

- A.** No. When terms like ‘rationalize’ come up in conversations with competitors, it is a warning sign of anti-competitive activity. Simply attending this meeting could be a serious breach of competition law and a criminal offence. Having the meeting in another country does not make any difference – it can still break the laws of the UK, the EU, the US and other countries that might be involved. Always report any invitations like this to Legal without delay.

**Q. Can I accept a competitor’s price list from a customer?**

During a recent sales visit, a customer gave me a copy of my competitor’s price list to support his opinion that our prices are too high. Should I have accepted the price list?

- A.** If a customer gives you competitor pricing information, write the source name and date at the top of the price list to show that you obtained it legitimately. If you are ever unsure about whether you have received information legitimately, consult Legal.

# Complying with trade restrictions, export controls and anti-boycott laws

## At a glance

BP is a UK-based company with significant business in the US and the EU. We always comply with the applicable laws governing trade restrictions of the countries in which we operate unless those laws conflict with the laws of the US, the UK or other EU countries. Consult Legal in the case of a conflict or if you are not sure if there is a conflict.

We also comply with all legally mandated controls on the export and the end use of certain products, technology, software and services.



## In detail

From time to time some countries impose trade restrictions covering specified countries, entities and individuals. This may include the US, UK and other EU countries. They also periodically impose controls on the export and the end use of certain products, technology, software and services.

The penalties for breaking these laws, which sometimes apply outside the legislating country, can be very serious. Penalties include fines, debarment from working on government contracts, revocation of permits to export, and imprisonment.

Trade restrictions typically cover:

- Exports or re-exports to a prohibited or sanctioned country, entity or individual without the appropriate licence or authorization.
- Imports or property dealings from, or originating in, a sanctioned country.
- Imports or property dealings with a sanctioned entity or individual.
- Business dealings with a sanctioned country, entity or individual.
- The transfer of restricted software, technical data or technology without a licence – by email, download or disclosure to people in or from sanctioned countries.
- The provision of defence-related services or export of articles or services designed or adapted for military or other restricted end use, without a licence or authorization.
- The prohibition of certain boycott activities – for example, US anti-boycott laws.

Product classifications, export controls and lists of restricted individuals, entities and countries change regularly. If you are involved in the sale or shipment of products, technologies or services across country borders, make sure you know the relevant rules, and check with Legal for any updates or advice you might need.



## Basic rules you must follow Always

- Follow the Group Trade Sanctions Standard and any additional requirements that apply to your specific business activities.
- Consult with Legal immediately if you are asked to deal with a sanctioned or restricted country, entity or individual.
- Make sure that products and technology for import or export are classified in advance. Use the relevant country control list to determine licensing requirements. Make sure that all required labelling, documentation, licences and approvals are in place. Contact Legal for assistance and legal advice.
- Ensure that all transaction parties are screened against the relevant restricted party lists.



Breaching trade restrictions and export controls can have serious consequences. If you have any questions about these laws, contact Legal.

For more guidance, please see the 'Preventing money laundering' section of this Code.

For more information, the BP Group Standard on Trade Sanctions and associated frequently asked questions are available – see link in the Appendix.

**Q. Do I need to follow US export laws?**

As the manager of a lubricants business in Australia, I recently received orders from China. To fill these orders I would need to have the products shipped from the US. As I'm not US-based, do I have to follow US export laws?

**A.** Yes. Because the product will be shipped from the US, you will need to follow US export laws. You must check with your US counterparts to find out whether you need export licences for shipping the products from the US to China. Even if you had US origin products in stock in your local country you would still have to follow US export laws as they apply in countries beyond the US.

**Q. Should we be concerned about this request?**

One of my team members, a US-based engineer, has been asked by a colleague in the Middle East to troubleshoot a problem at a joint venture. The JV is part-owned by a US-sanctioned country. Should we be concerned?

**A.** Yes. Before agreeing to the request, the engineer should check with Legal to make sure they would not be providing goods or services to a sanctioned country in breach of US law. In some cases it will be a violation for a US person to facilitate business in any way.

**Q. Are there restrictions on expatriates on contract with BP International Services Company?**

I am a UK citizen on foreign assignment to Spain. My employment contract is with BP International Services Company. My business has asked me to participate in a marketing effort in Cuba. I have never been to the US. Can I participate?

**A.** No. BP International Services Company is a US-registered company. While you are on expatriate assignment you are considered to be a 'US person' and cannot participate in business activities with Cuba.

**Q. Do US sanctions apply – as I'm only visiting?**

I am not a US citizen, but I am currently in the US and have received an important email about a business in a country subject to comprehensive US sanctions. My response will take less than five minutes. Is that okay?

**A.** In this case, the answer is no. You cannot respond while you are in the US as you are considered a 'US person'. For future reference should a similar situation crop up, your ability to respond will depend on the country you are in and the sanctions that are imposed. If you are unsure, check with Legal.

**Q. Laws in conflict – what do I do?**

I am negotiating a contract with a counterparty from a Middle Eastern country. I was asked to supply information about my company's business with Israel. Can I comply with this request?

**A.** This request sounds like a boycott request, because it involves a question specifically mentioning our business relationship with Israel. This is considered a red flag. Depending on other facts, it may be illegal for the company to agree to supply this information. You should check with Legal before agreeing to this request.

# Preventing money laundering

Money laundering is the process of concealing illicit funds or making them look as though they are legitimate. This includes concealing the criminal origin of money or other property – sometimes called the proceeds of crime – within legitimate business activities. It also covers the use of legitimate funds to support crime or terrorism.

We never condone, facilitate or support money laundering, which means:

- We will always comply with anti-money laundering laws and regulations.
- We will seek to minimize money risks through our anti-money laundering policies and practices. These are designed to avoid receiving, or being involved in an arrangement or transaction that relates to, funds that may be the proceeds of crime.
- We take reasonable and appropriate actions to identify and assess the integrity of our business counterparties.

Counterparty means any party that BP does business with now or intends to do business with in the future, either on a regular or one-off basis. Counterparties include customers, contractors, suppliers, agents, professional advisers, JV partners and any other business partners.



Basic rules you must follow  
**Always**

- Follow the BP Group Anti-Money Laundering Standard and any additional requirements that apply to your specific business activities.
- Conduct appropriate risk-based due diligence enquiries about both counterparties and the property (e.g. funds, goods, etc.) that BP receives.
- Take reasonable and appropriate actions to assess the integrity of counterparties.
- Monitor counterparties' dealings and activities with BP for suspicion of money laundering or financial crime.
- Watch out for:
  - Any situation where the counterparty will not provide details of its ownership, or where you cannot identify its ownership.
  - Irregularities in the way payments are made.
  - Counterparties whose behaviour raises questions over their integrity.

- Be wary of either attempts to make, or request, payments:
  - In currencies other than those specified in the invoice or contract.
  - To or from other countries with no apparent connection to the business.
  - In cash or cash equivalents.
  - By or to someone not party to the transaction.
  - To or from an account other than the normal business relationship account.
  - With multiple cheques or drafts.
  - Where you recognize that there are overpayments.
  - Involving unknown or unnecessary intermediaries unless you are clear about their role.
  - With unnecessary complexity or no obvious legitimate business purpose.
  - Involving high-risk countries or counterparties.

- Report concerns about transactions or activities by any counterparty to your line manager and Legal.
- Contact Legal if a potential counterparty refuses to provide information about its identity, ownership or transaction details when they are asked.
- Contact Legal or Ethics & Compliance if you have any concerns about or possible involvement in the types of activities described under 'never' in this section of our Code. Equally, contact Legal or Ethics & Compliance if you have any other questions about money laundering.



**Basic rules you must follow**  
**Never**

- Do business with anyone known or suspected of wrongdoing relating to dealings with BP or third parties, unless those suspicions are appropriately reviewed and resolved.
- Discuss suspicions of money laundering with a counterparty unless you are authorized by Legal to do so. You could impede a proper investigation and/or commit an offence of 'tipping off' in some jurisdictions if you fail to get prior approval from Legal.
- Conceal or disguise monies that may be the proceeds of crime.
- Become involved in an arrangement that may involve criminal property or the proceeds of crime.

The above rules are not a substitute for using good judgement and common sense when assessing the integrity of counterparties.



For further guidance, see the BP Group Anti-Money Laundering Standard – a link is provided in the Appendix.

**Q. Can I accept a combination payment?**

A customer has asked to pay BP from multiple accounts using a combination of cash and various cheques. What should I do?

- A.** This is suspicious money laundering behaviour and you need to escalate the matter to Legal immediately. Do not accept any payment or take any further steps in the transaction until Legal have told you how to proceed. For future reference, the 'Red Flags' Appendix in the BP Group Anti-Money Laundering Standard can help you recognize potential warning signs as soon as possible, so that the right legal steps can be taken.

**Q. Can we refund our customer in cash?**

A customer who has overpaid has asked for a refund in cash, rather than through the normal mechanism. What should I do?

- A.** Contact Legal for advice on how to manage the situation.

# Working with suppliers

Our suppliers are important to us, underpinning our ability to do business and meet our customers' expectations.

That is why we choose them carefully, using a transparent selection process based on objective criteria and evidence.

Fundamental to our relationships with suppliers is that they operate according to principles that are similar to those in this Code. This includes making a contractual commitment where it is feasible to follow the principles of our Code, as well as our ethics and compliance requirements.



## Basic rules you must follow **Always**

- Use an objective process to source and select suppliers.
- Avoid conflicts of interest, inappropriate gifts and entertainment, or any kind of favouritism that might compromise supplier selection.
- Work only with suppliers who comply with all legal requirements. They must willingly make a contractual commitment where it is feasible to operate in line with the principles of this Code and our ethics and compliance requirements.
- Conduct due diligence on new suppliers and agents acting on behalf of BP.
- Screen suppliers against restricted party lists, in line with the 'Preventing money laundering' and 'Complying with trade restrictions, export controls and anti-boycott laws' sections of this Code.
- Help suppliers understand our expectation that they will provide the BP Code and details of OpenTalk to all of their employees working on BP business.
- Be alert and report to your line manager any activity – or any suspicion of activity by suppliers that are inconsistent with BP's expectations concerning our Code.



Basic rules you must follow  
**Never**

- Accept gifts and entertainment from parties engaged in a tender or competitive bidding process that you are engaged in, unless you receive prior approval from Ethics & Compliance.
- Share one supplier's confidential business information (for example, proposed rates, winning bid information or qualification criteria) with any other supplier.

**Note:** There may be further rules covering the way you work with suppliers – for example, laws or regulations, government contract requirements or JV policies. Please make sure you know the rules that apply in your business and country.



Sections in this Code that are also relevant are: 'Appropriately exchanging gifts and entertainment', 'Preventing conflicts of interest', 'Eliminating bribery and corruption', 'Preventing money laundering', and 'Complying with trade restrictions, export controls and anti-boycott laws'.

To help keep our standards high and our supply chain strong, always tell your local procurement manager if any supplier fails to respect our Code. Code breaches should be reported in the breach database – see Appendix for the link.

**Q. Should I question my supplier's plan?**

A representative of one of our suppliers claims they can help us win a contract with a customer. I think they are planning to offer lavish travel and entertainment to one of the customer's vice-presidents, which would break their company's rules. Should I do anything about this?

- A.** Yes. We never acquire contracts in a way that is inappropriate and might even be illegal. We will need to evaluate our relationship with the supplier to make sure that this individual's activities are not indicative of the way the supplier operates. We also need to tell the customer without delay that this supplier does not act for or on behalf of BP. You need to raise the issue with your local procurement manager or Ethics and Compliance Leader immediately.





# I stand for the Code

**Arante**

Instrument and Electrical Technician





# I stand for the Code

**Roger**  
Driver Coach





The  
governments  
and  
communities  
we work with

We respect the world in which we operate. We are committed to our role in society and to meeting our obligations to the countries and communities in which we do business. We depend on the relationships we have, respect the countries and communities we work with, and want them to benefit from us being there. We aim to make real improvements that contribute to sustainable growth by creating wealth and jobs, developing useful skills, and investing our time and money in people. We care about the consequences of our decisions, large and small, on those around us.

One point we cannot stress strongly enough is that we do not engage in bribery or corruption in any form, whether in the private or public sector.

Neither does BP get involved in political activity or make political contributions.

We aim to engage constructively with governments everywhere we operate, as well as to build constructive relationships with the media.



- Eliminating bribery and corruption / **pg 66**
  - Dealing with governments / **pg 70**
- Engaging with communities and respecting their rights and dignity / **pg 71**
  - Communicating with investors, analysts and the media / **pg 72**
  - Our stance on political activity / **pg 74**

# Eliminating bribery and corruption

## At a glance

We do not engage in bribery or corruption in any form, whether in the private or public sector. This means:

- Our employees or anyone acting for us must never offer, solicit, promise, give or accept a bribe, kickback or any other improper payment – including ‘facilitation’ payments.
- We comply with all laws and regulations that prohibit bribery and corruption, and we do everything we can to make sure our suppliers, contractors and joint venture partners do the same.
- All business partners who represent or act on behalf of BP must be asked to comply with applicable bribery and corruption laws. Where appropriate, they must show that they have appropriate programmes to prevent bribery in place.
- We *never* allow ‘facilitation’ or ‘grease’ payments to government officials by anyone who works for BP or anyone acting for us. This applies no matter how small the amounts are. Facilitation payments are payments made to a government official to secure or speed up routine, non-discretionary, legal government actions, such as issuing permits or releasing goods held in customs.
- We also prohibit commercial or private sector bribery.
- Once again, no form of bribery or corruption is permitted, regardless of whether the recipient is a government official or a private business person.



## In detail

The definition of bribery is offering, promising, giving, receiving or soliciting anything of value in order to influence how someone carries out a public, commercial or legal duty. This includes attempts to do any of the above.

Breaching anti-bribery and anti-corruption laws is a serious offence. Companies and individuals breaching these laws may be punished by fines, and individuals also face imprisonment.

Most countries have laws prohibiting bribery and corruption. These often cover actions carried out beyond the country’s borders – such as bribes paid to someone in another country.

Everyone at BP must comply with these laws. Even something that can be perceived to breach anti-bribery or anti-corruption laws can damage our reputation.

Anti-bribery and anti-corruption laws:

- Prohibit offering or providing payments, services, gifts, entertainment or 'anything of value' to government officials and private individuals to improperly influence them, to obtain or retain business, or to gain a business advantage.
- Forbid making improper payments through third parties.
- Require companies to keep accurate books and records – and maintain adequate internal controls – so that payments are honestly described and company funds are not used for unlawful purposes.
- Mean that BP may have committed an offence if it fails to prevent bribery by someone acting on its behalf.

'Anything of value' includes any type of benefit to the recipient. This includes cash, loans, gifts, jobs, tuition, scholarships, entertainment, travel and contributions. It also covers intangible benefits – for example, hiring someone's relative or donating to their favourite charity with an improper intent. The 'Appropriately exchanging gifts and entertainment' section of this Code of Conduct aims to reduce the risk that gifts or entertainment could be perceived as a bribe.

'Someone acting on BP's behalf' could include employees, contractors, agents, joint ventures, suppliers or subsidiaries.

'Government Officials' includes any minister, elected or appointed official, director, officer or employee of any government (whether at a national, state/provincial or local level) or any department, agency or instrument of it, and/or of any enterprise in which a government owns an interest, and/or of any public international organization. This term also includes any person acting in any official, administrative, legislative or judicial capacity for or on behalf of any such government or department, agency, instrument of it, company, or public international organization.

Also included are political party officials and candidates for public office. Any officer or employee of a national oil company, national airline, national railway or national shipping company is deemed to be a government official, as are members of customs, military or police organizations.

# Eliminating bribery and corruption (cont.)



## Basic rules you must follow **Always**

- Follow the Group Anti-Bribery and Corruption Standard and all anti-bribery and corruption procedures operating in your business or function.
- Use due diligence when you are selecting and monitoring agents, consultants, contractors, suppliers, joint venture partners, other business partners or service providers.
- Consider whether the above are suitable counterparties for BP and include appropriate contractual terms in agreements to prevent bribery.
- Obtain approval from Legal before agreeing to pay for or reimburse travel expenses (transportation, lodging, meals, and incidental travel costs) of government officials or agreeing to pay a per diem in connection with a government official's travel.
- Use BP's influence to encourage our agents, consultants, contractors, suppliers, joint venture partners, other business partners and service providers to adopt a similar approach to bribery and corruption as is set out in this Code.



## Basic rules you must follow **Never**

- Offer, authorize, condone, promise, solicit, accept or make an unauthorized or improper payment (in cash or otherwise).
- Attempt to induce a government official or private person to do something illegal.
- Intentionally overlook or fail to report any indication of an improper payment.
- Offer or receive money, gifts, kickbacks, commissions or anything else of value to improperly win business or secure a contract.
- Establish an unrecorded 'slush' fund for any purpose.
- Induce or help coerce someone else to break these rules.
- Permit an agent, representative or other third party acting for BP to take questionable actions or bribe anyone. That is, you should never 'look the other way'.



You can get more detailed information by referring to the Group Anti-Bribery and Corruption Standard and our Anti-bribery and corruption website – or by talking with members of Legal or Ethics & Compliance.

If you are involved in a business where there is a risk of bribery or corruption, you need to contact Legal to make sure you understand the requirements that apply to your business activities.

You will also find more information under 'Accurate and complete information, records, reporting and accounting', 'Appropriately exchanging gifts and entertainment', 'Dealing with governments' and 'Preventing money laundering' in this Code.

**Q. Should I agree to a retainer payment?**

I was authorized to hire a consultant to help us get the permits needed for a new project from a foreign government. They asked for a \$40,000 retainer to 'help move the process along'. Should I agree to this payment?

**A.** No. Before engaging the consultant you need to consult with Legal and do due diligence on the consultant. Before agreeing to make any payment, you need to know how the money will be used. In line with our Code, you must make sure this money is not used as a bribe or facilitation payment. You need to talk to your line manager or Legal about it before you do anything.

**Q. Do I need advance approval from Legal?**

I work for a BP operating company in a country in Africa. My team needs approval from the national oil company to contract with BP's preferred supplier of a major item of equipment. We are considering paying for several employees of the national oil company and their spouses to travel to the UK for a week, to attend a day of meetings followed by shopping and sightseeing. These employees are not considered to be government officials under local law, so do I need to get advance approval from Legal?

**A.** Yes. The US Foreign Corrupt Practices Act and the UK Bribery Act effectively have extraterritorial jurisdiction and can apply to activities of BP's subsidiary companies around the world. The definitions of a government official in the US and UK anti-bribery laws may be broader than local law and therefore could include employees of the national oil company. If this were the case, the proposed hosting of travel of the national oil company employees and their spouses would not be approved.

**Q. Should we take action over a JV payment concern?**

We are a 30% partner in a small but very profitable joint venture (JV). We entered into this to establish ourselves in a country where we are new to the market. The JV is operated entirely by the employees of our partner. We have learned that the JV may have made some questionable payments to a high-ranking government official in order to secure a big contract. I shared my concern over this with a colleague, who said that since BP is just an investor and has no operating control, I do not need to be concerned. Are they right?

**A.** No. Despite our position as a minority partner, BP can never ignore potential misconduct – in this case potential bribery and corruption. It could seriously damage our reputation. You should contact Legal immediately, or call OpenTalk. As a minority partner we must use our good faith efforts to influence our JV partners to follow principles similar to our own. If a JV we are involved in appears to be breaking the law, we need to take more aggressive action to protect BP from legal liability.

# Dealing with governments

Being open and transparent about our business and performance – good and bad – builds trust in BP and encourages people to do business with us.

As a BP employee you must make sure that any information you give to government or regulatory officials is true and accurate, and that our legitimate business interests are protected.

This applies whenever you have contact with government officials during your work. It also applies if you are asked to provide information in connection with a government or regulatory agency enquiry or investigation.



## Basic rules you must follow **Always**

- Co-operate courteously with officials conducting a government or regulatory agency enquiry or investigation.
- Notify and obtain advice from your line manager, Legal and your local Communications and External Affairs team before responding to any non-routine request for information from a government or regulatory agency. This includes any request other than those required by normal government processes such as standard bid award processes and proceedings that are on the public record.
- Make sure that records and information relevant to any government or regulatory agency enquiry or any litigation are preserved. Ensure that any automatic systems, including electronic systems, for record disposal are stopped to avoid the destruction of the relevant records and information relating to such circumstances.



## Basic rules you must follow **Never**

- Mislead an investigator or a government or regulatory official.
- Attempt to obstruct the collection of information, data, testimony or records by properly authorized government or regulatory officials. When in doubt, consult Legal.
- Conceal, alter or destroy documents, information or records that are subject to litigation or an investigation, enquiry or official proceeding. When in doubt, consult Legal.
- Attempt to hinder any employee from providing accurate information.
- Retaliate against anyone who co-operates with the government or regulatory agencies.



Find out more under 'Accurate and complete information, records, reporting and accounting' in this Code.

# Engaging with communities and respecting their rights and dignity

We want to make a positive difference wherever we do business.

We hold ourselves to the highest ethical standards and behave in ways which earn the trust of communities in which we operate. We work hard to create open and sincere relationships with local communities, as well as with bodies such as non-governmental organizations (NGOs) who have a legitimate interest in what we do as a company. We respect the rights and dignity of communities, NGOs and other organizations with whom we interact.



## Basic rules you must follow **Always**

- Comply with local laws and regulations wherever you work.
- Work in a way that is consistent with local cultures and business customs, as long as they do not conflict with this Code and legal requirements.
- Treat community members with dignity and respect their rights. Be sensitive to the unique situation and vulnerability of indigenous peoples.
- Recruit qualified local personnel where it is practical.
- Notify your line manager and your local Communications and External Affairs team before you engage in dialogue or contact with NGOs.

We encourage local community development initiatives and civic causes which create mutual advantage for BP and the community or country. We support employee participation in them, if appropriate. If you are involved in any way, avoid any real or perceived conflicts of interest.

For further information, see the 'Preventing conflicts of interest' section of this Code.

# Communicating with investors, analysts and the media

Communications with investors, analysts and the media require care and a good understanding of legal and media issues.

Anyone contravening regulations – such as those governing the selective disclosure of non-public information – makes themselves and BP liable to prosecution.

Only authorized employees should respond to enquiries from members of the investment community – for example, shareholders, brokers and analysts – or the media.



## Basic rules you must follow **Always**

- Take advice from the Press Office or Investor Relations before talking about company matters with a reporter or analyst, either on or off the record.

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- Report enquiries promptly to the Press Office or Investor Relations as appropriate, and take their advice before you respond.

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- Obtain clearance from senior management, in consultation with your local Communications and External Affairs team, before undertaking any non-financial formal speaking engagements on behalf of the company.

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- Ensure your line manager reviews external presentations, even when the venue seems informal – such as a trade association event.

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- Take care not to cause any harm to the reputation of the BP group in any external communication.

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- Include a simple and visible disclaimer stating, 'These are my personal views and not those of BP', on any personal blog or other website that clearly identifies that you work for BP.

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Basic rules you must follow  
**Never**

- Make any statement of BP's existing financial results and forward-looking financial statements unless you are a properly authorized officer of the company.



It is the job of our Press Office and Investor Relations to make sure we communicate with all our key external audiences in a consistent and co-ordinated way.

If you have any questions or concerns about communications and external affairs, talk them through with your line manager or local Communications and External Affairs team.

**Q. Should I attend this hearing?**

I have been asked to attend a hearing of a government/local authority committee as an expert industry witness. How should I respond?

- A.** Before you do anything, talk to your line manager and local Communications and External Affairs team. They will tell you whether it is appropriate to attend. If it is, they will provide you with further advice regarding the hearing.

# Our stance on political activity

Wherever we do business, our approach to corporate political activity is clear and uncompromising:

- BP will *not* take part directly in party political activity.
- BP will make *no* political contributions – either in cash or in kind.

We recognize our employees' right to take part as individuals in the political process, in ways that are appropriate to each country. Employees who do this must make it clear that they do not represent BP.

Although we do not directly take part in party politics, we do engage in policy debate on subjects of legitimate concern to our company, our staff and the communities in which we operate in various ways, including lobbying. Lobbying activity on behalf of BP's interests is highly regulated and should only be done by authorized people.



## Basic rules you must follow **Always**

- Make it clear that your individual political views and actions are personal and not BP's.
- Inform your line manager if your political activities or a close relative's activities might create a conflict of interest, or the appearance of impropriety.
- Notify your line manager in advance if you plan to seek or accept a public office. Discuss how any official duties might affect your work with BP, and work constructively with your manager to minimize any adverse impact on your job.
- Consult your line manager before any non-routine contact is made with government officials or employees by you or others representing BP's interests. This includes contacts relating to government policy or legal/regulatory changes. This requirement does not apply to contacts required by normal government processes such as standard bid award processes and proceedings that are on the public record.



**Basic rules you must follow**  
**Never**

- Use company time, property or equipment to carry out or support your personal political activities. Ensure that you only engage in the political process in your own time and with your own resources.
- Undertake lobbying activities without authorization.



Contact your line manager or local Communications and External Affairs team if you are not sure whether an activity is appropriate or might be misinterpreted. Or if you would rather talk to someone independent in confidence, get in touch with OpenTalk.

See also 'Preventing conflicts of interest' and 'Dealing with governments' in this Code.

**Q. Can I claim a dinner on expenses?**

I went to a fundraising dinner for a pro-business candidate for a local government office. This candidate takes positions favourable to BP's interests, so can I claim the dinner on my expense report?

**A.** No. If you did this, it would be considered a political contribution, which would contravene our Code. While you are free to attend political fundraising events as an individual, you must not use BP assets or funds. If you think your involvement might create a conflict of interest or appear inappropriate, discuss it with your line manager immediately.

**Q. Are our donations permitted?**

My business has given science training materials, solar education materials and surplus BP equipment to local governments. Are these donations allowed?

**A.** Yes. In-kind contributions to schools or local governments play an important part in our community relations and are allowed by our Code. Because they might be subject to local regulations, they should always be handled by your local Communications and External Affairs team. Donations must always be to a school or government body, rather than to any individual working for it.

**Q. Is our political action committee allowed?**

A political action committee of BP employees operates in my country. Are we breaching BP's standard about not contributing to any political cause?

**A.** In some countries our employees can support their political interests through political action committees. Employees contribute to these committees and their activities under very specific rules. Participation is always voluntary – it is never mandatory to contribute or give support in any other way.





# I stand for the Code

**Gordon**  
Fire Officer







# We stand for the Code

**Hannah and Angela**  
Chemical Engineers



# Our assets and financial integrity

We all share a responsibility and a legal duty to protect BP's property, intellectual property and financial assets. We always take care in using our assets and resources.

We comply with all the applicable laws and regulations in the way we record, retain and report information. These include International Financial Reporting Standards (IFRS) (for group financial reporting) and the relevant Generally Accepted Accounting Principles (GAAP) where we do business.

We are always honest, straightforward and transparent about our operations and performance. We always accurately record and report data and results.



- Accurate and complete information, records, reporting and accounting / **pg 82**
  - Protecting BP's assets / **pg 86**
- Respecting intellectual property and protected information / **pg 88**
  - Avoiding insider dealing / **pg 90**
- Using our digital systems responsibly and securely / **pg 94**

# Accurate and complete information, records, reporting and accounting

## At a glance

We record and report company information honestly, accurately and objectively. This includes financial and non-financial information.

Any information we create will accurately reflect transactions and events. This includes financial data and other information such as HSSE performance information or HR records.

Our books, records and accounts conform to IFRS (for group financial reporting), and other relevant GAAP and BP accounting and reporting policies.

We create, retain, and destroy paper and electronic information in line with the applicable laws and BP requirements.

Falsifying records or misrepresenting facts can never be justified or excused. BP does not tolerate any kind of fraud.



## In detail

Recording and reporting any financial or non-financial company information honestly, accurately and objectively is essential to:

- Protecting our credibility and reputation.
- Meeting our legal and regulatory obligations.
- Meeting our responsibility to shareholders and other external stakeholders.
- Informing and supporting our business decisions and actions.

Any information you create for BP must accurately reflect transactions and events. This information may be in the form of paper or electronic documents, emails or other media. It includes:

- Financial data such as books, records and accounts. These must always conform to IFRS (for group financial reporting), and other relevant GAAP and BP accounting and reporting policies.
- Other information such as HSSE performance information, HR records, quality data, regulatory filings and other essential company information. This must also be accurate and complete.

Any information you create or receive while working for BP belongs to the company. It must be managed and protected properly.

Paper and electronic information must be created, retained and destroyed in line with:

- Applicable law.
- BP's data privacy rules.
- BP's policies on document management, including e-documents and email.
- The Security of Information Handling Standard and Instructions.
- The Digital Systems Acceptable Use Instruction.
- The Operating Management System.

It is against BP policy to fail to keep accurate and complete records, falsify information, or create misleading information. It could constitute fraud or an infringement of human rights which could mean civil and criminal liability for individual employees and BP.



**Basic rules you must follow Always**

- Ensure all transactions are properly authorized and recorded accurately and completely.
- Ensure all counterparties are appropriately authorized and set up in the company's systems. This includes customers, suppliers, agents, professional advisers, JV partners and any other business partners. Be alert to unauthorized payments or invoices as described in the 'Preventing money laundering' section of this Code.
- Ensure that no undisclosed or unrecorded amount, fund or asset is established or maintained.
- Co-operate fully with Internal Audit, Group Control and external auditors providing them with accurate information. If requested allow them unrestricted access to staff and documents (subject to legal constraints).
- Complete and approve expense claims accurately, and in accordance with the BP Travel and Entertainment Expense Policy.
- Report any concerns or irregularities in respect of accounting, auditing or internal controls matters.

Senior financial officers and others responsible for financial and management reports have additional responsibilities to:

- Establish and maintain proper controls to ensure financial and management reports are truthful, accurate, complete, objective, consistent, timely and understandable.
- Ensure that the applicable external and internal reporting standards in BP's Group Reporting Manual (GRM) are followed at all times.
- Understand and follow applicable standards for creating, retaining and destroying BP information.

# Accurate and complete information, records, reporting and accounting (cont.)



Basic rules you must follow  
**Never**

- Make a deliberately false or misleading entry in a report, document, record or expense claim.
- Falsify any document or record, whether it is financial or non-financial.
- Sell, transfer or dispose of company assets without the proper documentation and authorization.
- Try to influence others to do anything that would compromise the integrity of BP's financial records or reports.
- Commit BP to contractual obligations unless you are authorized to do so.
- Conceal, alter, destroy or otherwise tamper with BP information or property relating to actual, pending or threatened litigation or government/regulatory investigations. This requirement also applies in situations where litigation or an investigation is reasonably likely to occur in the future.
- Obstruct or influence the proper administration of any matter within the jurisdiction of any regulator. This might include concealing, altering, destroying or tampering with BP information.
- Remove or destroy records before the specified date without first obtaining permission.



If you are ever concerned about the validity of any information, entry or financial process, or think you might have been asked to create false or misleading information, you need to raise your concern immediately. Talk to your line manager or contact your Chief Financial Officer (CFO) if you are not sure how to record a transaction properly. If they cannot resolve your concern, take it to a subject matter expert in Finance.

If you are worried that a transaction is being, or has been, improperly recorded, you need to tell your CFO without delay so that management can intervene as soon as possible.

If you ever feel the need to talk to someone in confidence who is independent, contact OpenTalk or any alternative local resource you may have.

You will find the Group Reporting Manual (GRM) online – see the Appendix for the link.

## Q. Should I go along with my boss's request?

My boss has asked me to record an unconfirmed sale in the quarterly report to meet our targets. But the sale will not be completed until after the quarter ends. Should I do what they ask?

- A.** No. You must always record costs and revenues in the correct time period. Reporting a sale that is not yet complete would be a misrepresentation. It could be fraud. You need to discuss your concern with your line manager. If you are not comfortable with his or her approach, seek help from Finance, Legal, Ethics & Compliance or OpenTalk.

**Q. Can I put a future invoice into this year's budget?**

My team's year-end results are ahead of budget and an item of equipment is due to be purchased and delivered in the new year. My manager has asked that the invoice for the equipment be accrued from this year's budget. Can I do this?

**A.** No. The status of the budget is irrelevant. Where goods or services have not been received or supplied, the liability must not be recognized. You can get support from Finance, Legal, Ethics & Compliance or OpenTalk.

**Q. Can we skip our weekly tests?**

We are required to complete weekly tests of chemical discharges that are produced when we make a particular product. If we are busy, we sometimes skip the tests, do them later and then backdate the results. This helps manage our workflow, but is it allowed?

**A.** No. As well as being against company policy, this may be illegal – because you are effectively falsifying data. Tests must be carried out at the right time and the results recorded accurately. 'Accurately' includes truthfully recording the actual test date. If your workload makes it hard to find time for the tests, you need to raise this with your line manager.

# Protecting BP's assets

## At a glance

Everyone at BP is responsible for making sure our assets are not misused or wasted. Our assets include property, time, proprietary information, corporate opportunities, company funds, and company equipment.

As a BP employee, this means you must always:

- Make sure any BP property you use, or have contact with, is not damaged, misused or wasted.
- Give the time needed to your work to fulfil your responsibilities.
- Protect BP's confidential and proprietary information and intellectual property.
- Advance BP's legitimate business interests when the opportunities arise.



## In detail

### Company property

You are personally responsible for making sure that any BP property you use, or have contact with, is not damaged, misused or wasted. This includes portable or home-working equipment that BP might issue to you – for example, laptops, personal digital assistants (PDAs) and mobile phones.

You can have limited, occasional or incidental personal use of certain company equipment issued to you. For example, this might include a phone call to check in with a child care provider, or to let your family know you are working late. You must follow any specific rules at your work location as these may include further requirements.

### Company time

As a BP employee you are expected to give the time needed to your work to fulfil your job responsibilities.

### Intellectual property and other protected information

From inventions to trademarks, our intellectual property is valuable to us. Various laws enable us to protect it from abuse by people outside the company.

Intellectual property includes:

- Patented inventions.
- Designs.
- Copyright materials.
- Trademarks and service marks.
- Trade secrets and know-how.

Other confidential business information that also comes under intellectual property includes:

- Sales, marketing and other corporate databases.
- Marketing strategies and plans.
- Research and technical data.
- Business ideas, processes, proposals or strategies.
- New product and/or package design and development.
- Software bought or developed by the company.
- Information used in trading activities including pricing, marketing and customer strategies.

### Corporate opportunities

Everyone at BP shares a responsibility to advance our legitimate business interests when opportunities come up.



**Basic rules you must follow**  
**Always**

- Take reasonable care of BP property at all times, making sure it is not lost or put at risk of theft.
- Report lost or stolen computer or telecommunications equipment to Digital Security.
- Engage fully in BP business while at work and not undertake personal activities.
- Report the time you work truthfully and accurately, if you are required to report your time.
- Protect and never disclose any confidential or proprietary BP information. This obligation applies during and after your employment with BP.
- Understand and follow the BP instructions for the classification and protection of information, which are given in the Security of Information Handling Standard and Instructions.
- Protect personal information – see also the 'Protecting privacy and confidentiality' section of this Code.
- Take the same care of BP funds as you would your own. This includes money advanced to you and any procurement or credit cards. Protect them from misuse, loss, fraud or theft.
- Submit accurate claims, vouchers, bills and invoices within the established times.



**Basic rules you must follow**  
**Never**

- Use any company equipment or facilities for your personal activities except as noted above.
- Share confidential or proprietary information with people outside BP unless you have obtained your manager's prior approval to do so. Even then, you must only share information under a written confidentiality agreement approved by Legal.
- Use BP property, information or position for personal gain.
- Compete with BP.



If you have any questions about protecting BP assets, talk to your line manager or Legal.

You can find out more about our Security of Information Handling Standard and Instructions by talking to your regional security adviser, or visiting the BP Digital security section of the website – see Appendix for details.

You will find details on personal use of BP networks and computers under 'Using our digital systems responsibly and securely' in this Code.

**Q. Can I give information to a former employee?**

A former BP employee has asked me for copies of materials we worked on together when they were with the company. I also discovered that they already have a lot of printed and digital BP materials and data. What should I do?

- A.** Under no circumstances should you give them the information they have asked for, which may be confidential. They breached our Code by taking BP information with them when they left the company, and there could be further issues if they have used or revealed the information to others. The obligation to keep confidential BP information secure applies not only during but also following employment. Talk to your line manager immediately and alert your local security representative and Legal. They will decide what action is needed to protect our information in this case.

**Q. Can I borrow a company truck?**

Can I borrow a BP truck over the weekend to deliver some garden equipment to my friend's house?

- A.** No. BP vehicles are for company business only, not personal activities. In this case, the truck's insurance may not be valid if it is used for non-business purposes.

# Respecting intellectual property and protected information

We are committed to respecting the intellectual property and protected information of others.



## Basic rules you must follow **Always**

- Consult Legal when assigning work to a new employee if there is a risk that the employee might use protected information from a prior employer.

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- Consult Legal to determine whether local copyright law may allow you to copy brief excerpts of documents or materials (including audio, video, software or internet extracts).

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- Seek advice from Legal before adopting new names for our products or services.

---

- Consult Legal for:
  - Significant new or modified products or processes.
  - Interpretation of patents.
  - Patent applications or other intellectual property rights.

---




## Basic rules you must follow **Never**

- Bring confidential information, including computer records, from prior employers into the BP workplace.

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- Load unlicensed software on to a BP computer.

---

- Accept or use anyone else's confidential information without an agreement approved by Legal.

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- Copy documents or materials (including audio, video, software or internet extracts) for which we do not hold the copyright, unless you received permission to do so.

---

- Knowingly act in disregard of the valid intellectual property rights of another party.

---



If you have any questions, discuss them with your line manager or Legal.

**Q. Can I share information from my previous job?**

I have just joined BP from one of our largest competitors. Can I share some important confidential marketing information that I developed while working for that competitor?

**A.** No. This would breach our Code, your obligations to your previous employer, and possibly also the law. You are obliged to protect your past employer's confidential information just as BP employees are obliged to protect ours. You can use the general knowledge and skills you learned in your previous job, but you cannot bring to BP any confidential or protected materials produced by you or anyone else for your former employer. Check with Legal if you have questions about any specific information.

**Q. Can we copy and distribute trade publications?**

To reduce trade publication subscription costs, can I buy one subscription to each publication, and then circulate them to my colleagues with instructions to copy any articles they want?

**A.** No. While you can circulate the original publication, making copies would infringe copyright – as would scanning the pages and circulating copies by email. You should only copy articles with the publisher's permission. Alternatively, you could buy file copies from the publisher.

# Avoiding insider dealing

## At a glance

We are committed to supporting fair, open securities markets around the world. This means that:

- All BP employees are prohibited from directly or indirectly trading securities of BP or any other publicly traded company while having 'inside information'.
- We do not take part in market abuse – spreading false information or engaging in other activities designed to manipulate the price of publicly traded securities.

Our Global Trading Guidelines include specific requirements to protect against market abuse. These apply to anyone involved in trading activities in BP.



## In detail

'Inside information' means any information that is not generally available to the public, and is material. This applies to any information that relates directly or indirectly to BP or its securities or to any other publicly traded company or its securities.

Material information includes information that may have or is likely to have a significant effect on the price of securities. A matter is also material if there is a substantial likelihood that a reasonable person would consider it important in making an investment decision.

Securities include shares (including American Depository Receipts), options, debt, bonds, notes and other investments whose value is determined by the price of such securities – for example, futures or other derivatives, or spread bets.

Here are some examples of what might constitute inside information:

- Group results and dividends.
- Actual or potential material acquisitions, divestments, mergers or joint ventures.
- Major developments in material litigation.
- Actual or potential material discoveries of, or adjustments to, oil and gas reserves.
- Anticipated significant action by governments.

In countries such as the UK, even knowing a rumour is false can mean you have inside information if that rumour would be material if it were true. Always check with your line manager or Legal before trading with knowledge of the accuracy of market rumours.

Insider dealing laws are enforced around the world. Breaches are taken very seriously and the penalties are severe, ranging from substantial fines to imprisonment.

Market abuse is also illegal. This means spreading false information or engaging in other activities designed to manipulate the price of publicly traded securities. Our Global Trading Guidelines include specific requirements to protect against market abuse, which apply to anyone engaged in trading activities in BP.

BP is legally required to keep a list of all employees who have access to inside information about BP or our securities, and we may be required to disclose this list to the regulatory authorities.

# Avoiding insider dealing (cont.)



## Basic rules you must follow **Always**

- Be careful and protect inside information from accidental disclosure.

---

**Note:** Certain BP employees who have access to inside information need approval from the Company Secretary before they engage in any transactions in BP securities. See the Appendix for the link to 'Restrictions on dealing in BP shares and securities'.

---



## Basic rules you must follow **Never**

- Buy or sell BP shares or engage in any other dealings in BP shares while you are in possession of inside information. That is either directly or through family members, or by encouraging others to do so. This applies even if you 'think' you are not relying on it or if you are no longer a BP employee.
- Buy or sell shares of any other publicly traded company, or engage in any other dealings in that company's shares while you are in possession of inside information. That is either directly or through family members, or by encouraging others to do so. This applies even if you 'think' you are not relying on it.
- Buy or sell securities until inside information concerning the company or its securities becomes generally available and investors have had an opportunity to evaluate the information. In some cases, you will need to obtain approval from the Company Secretary (see the note under 'always').

- Disclose inside information to anyone outside BP, including family members, without prior approval. Within BP, disclose inside information only on a need to know basis and with prior approval. If you disclose inside information to another person who then deals in securities on that basis, you will both be guilty of an offence.
- Spread false information or engage in other activities to manipulate the price of publicly listed securities.
- Leak inside information or tip someone off. This can be a violation of insider dealing laws.
- Encourage anyone else to deal publicly listed securities while you have inside information. This can constitute a criminal offence.



If you have any questions or concerns about insider dealing, contact Legal for more guidance.

Answers to frequently asked questions on insider dealing are available on the BP website – see Appendix for link.

**Q. Can I buy stock in a supplier's company?**

A supplier told me about a new product in confidence. We cannot use the product, but I think it has real potential and that shares in the supplier's company will go up fast. Can I buy stock in the company?

**A.** No. You cannot buy the supplier's stock until the information you have is publicly available. You currently have 'inside information' which was given to you in confidence and has not been publicly disclosed. This is information that a reasonable investor would probably consider important in making an investment decision about the company.

**Q. Can I sell BP stock for personal reasons?**

Can I sell BP shares for personal reasons, (e.g. to raise money to put down a deposit on a house) when I have access to potentially insider information?

**A.** No. You still cannot deal, even if you wish to deal for a reason unconnected with the information you have.

# Using our digital systems responsibly and securely

## At a glance

The security of our information and digital systems is essential to our success.

Anyone who uses BP digital assets must know how to keep them secure by following the requirements in BP's Digital Security Acceptable Use Instruction and the Security of Information Handling Standard and Instructions – see Appendix for links.



## In detail

At BP we keep our information and digital assets secure by incorporating security controls into how we manage our people, business processes and technology.

These controls ensure that:

- We can protect the confidentiality, integrity and availability of important information and digital assets.
- Only authorized users are able to access BP's computers and network services such as the internet, email applications and network file directories.
- Authorized users can only access the digital assets they need to fulfil their job responsibilities.
- Access to BP's digital assets can be monitored to prevent misuse of an asset, or unauthorized access to it.
- We comply with all applicable legal, regulatory and contractual requirements relevant to keeping our information and digital assets secure.



Basic rules you must follow  
**Always**

- Keep computer equipment safe and secure at all times. This includes laptops, smart phones and storage devices. This also applies when you are working away from BP premises, for example at home or in a hotel.
  - Protect your user IDs and passwords. Make sure your passwords are difficult to guess and change them regularly. Never share your passwords or personal identification numbers (PINs), or allow anyone else to use your user account.
  - Keep information secure during storage, distribution and disposal. Follow the Security of Information Handling Standard and Instructions to ensure that you know how to classify information correctly.
  - Use email, internet services and BP-issued computer equipment in line with the Digital Security Acceptable Use Instruction.
- Use BP-issued computer equipment and technology services such as email or the internet primarily for business purposes. You can have limited personal use of our digital systems and services. For example, you can use them:
    - To access internet news, weather, holiday planning or travel information sites.
    - To access your personal web-based email account, as long as the email service is approved by BP – see the Digital Security website for a list of approved email providers who have sufficient levels of security.
    - To access social media sites. However, your usage must conform to BP’s Digital Security Acceptable Use Instruction, and the content you post must represent your own personal views only and not those of BP.
  - Report incidents immediately. If you suspect an incident has happened or is about to happen (e.g. suspected virus, suspicious phone call, lost laptop or information), contact the BP helpdesk or Digital Security.

# Using our digital systems responsibly and securely (cont.)



## Basic rules you must follow **Never**

- Copy or transfer BP confidential or secret information onto a portable storage device such as a memory stick, unless that device is approved and you have the permission of the business process owner. If you do have the required approvals and permission, the storage device must be encrypted and handled in line with the Security of Information Handling Standard and Instructions.
  - Use your personal email address to distribute BP information, or use it in place of your BP email account.
  - Discuss BP confidential or secret business information in public places where you might be overheard.
  - Leave BP confidential or secret business documents or storage devices unattended.
  - Install or use unauthorized or banned software.
- Use BP computers for personal use that:
    - Prevents or displaces our business activities.
    - Adversely affects the availability of any BP resources, including networks.
    - Interferes with your productivity, or that of your colleagues.
    - Involves any non-BP enterprise, including soliciting business from other employees.
    - Damages BP's reputation or puts the company in an unflattering light.
  - Deliberately access, store, post or publish any of the following through our digital systems or on our premises:
    - Pornographic, sexually explicit or sexually exploitative images or text.
    - Materials promoting violence, hatred, terrorism or intolerance of others based on their age, race, colour, religion, gender, national origin, sexual orientation or disabilities, or other characteristics protected by applicable law.
    - Material that is harassing, obscene, abusive or inconsistent with our non-harassment and equal opportunities policies – see 'Creating a respectful, harassment-free workplace' in this Code.



Please make sure you know the requirements in our Digital Security Acceptable Use Instruction, and the Security of Information Handling Standard and Instructions – see the Appendix for the link.

If you need more information about digital systems use and security, talk to your line manager or BP Digital Security.

See also the 'Protecting privacy and confidentiality' and 'Protecting BP's assets' and 'Creating a respectful, harassment-free workplace' sections of this Code.

**Q. Can I store confidential information on my laptop or memory stick?**

I frequently work with confidential information. Am I allowed to store this information on my laptop or a memory stick? In particular, can I take my laptop out of the office?

**A.** You may only store confidential information on a portable computer device or storage device such as a laptop or memory stick if the hard disk of the device is fully encrypted. If you are working away from the office you must follow the requirements specified in the Security of Information Handling Standard and Instructions to ensure that you apply the correct level of protection. In some cases you must seek permission from your line manager or the owner of the information before you take it out of the office.

**Q. Can I use my BP computer for my weekend business?**

I run an online greeting cards business from home at the weekend. On days when I finish lunch early, can I use my BP computer to process orders from the previous day?

**A.** No. Our Code prohibits you from carrying out non-BP business on our digital systems. You must only run your home business at home, using non-BP digital systems.

**Q. What should I do about accidentally accessing a prohibited website?**

If, when using a search engine, I accidentally access a website that breaches BP policy, will it show in my computer history? What should I do?

**A.** Exit the site immediately, and do not save the link or send it to anyone else. As the record will appear in your site history, you should explain what happened to your line manager.

# Appendix

Links to further information  
on specific topics

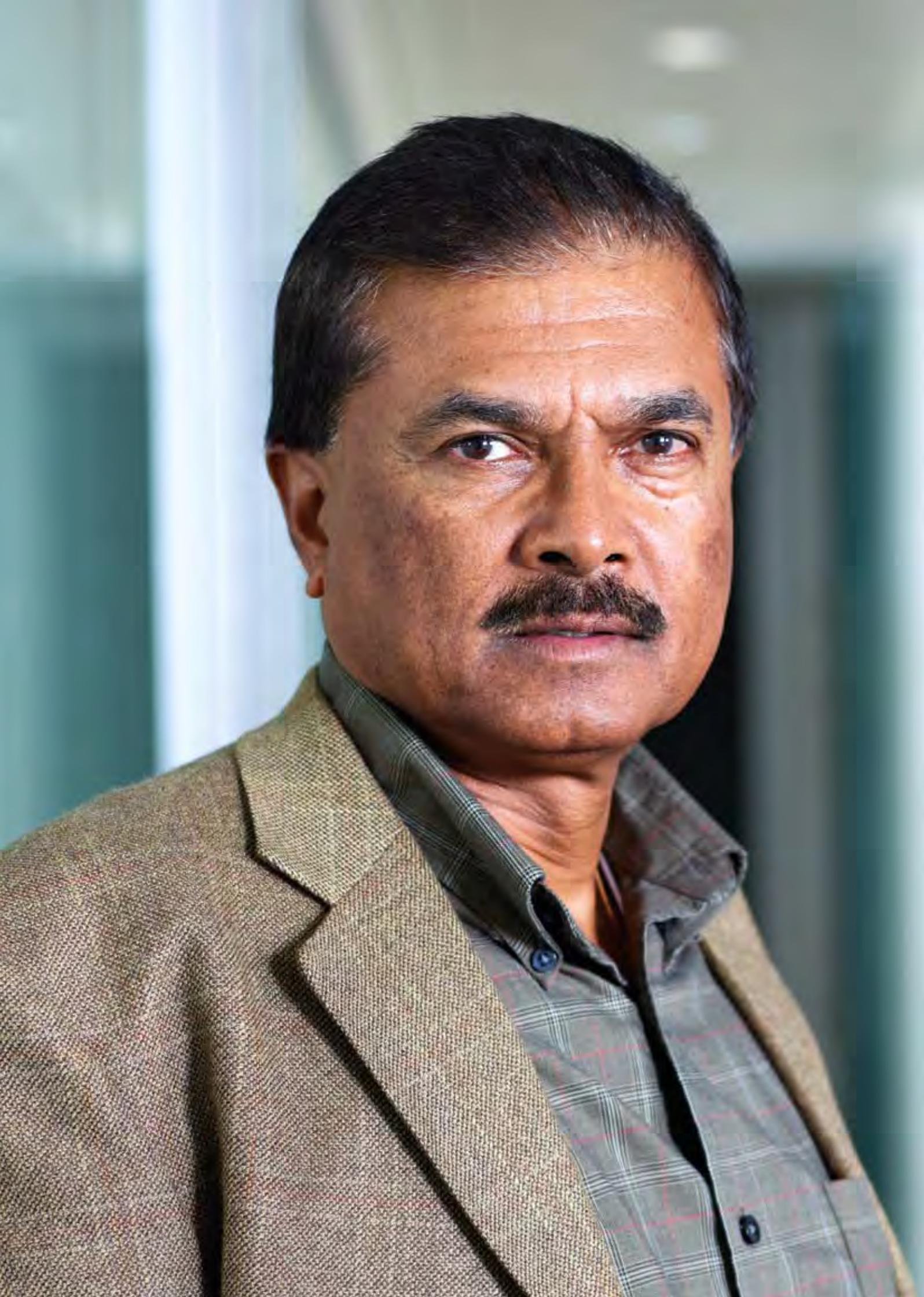
Section	Topic	Link
1. Operating safely, responsibly and reliably	Safety and Operational Risk	<a href="http://safetyandoperations.bpweb.bp.com/">http://safetyandoperations.bpweb.bp.com/</a>
	Operating Management System (OMS)	<a href="http://safetyandoperations.bpweb.bp.com/en/OMS/OMS/OMS.aspx/">http://safetyandoperations.bpweb.bp.com/en/OMS/OMS/OMS.aspx/</a>
	Office Safety	<a href="http://officesafety.bpweb.bp.com/">http://officesafety.bpweb.bp.com/</a>
2. Our people	One HR Global Information (Human Resources)	<a href="http://onehr.bpweb.BP.com/CYP/en/homepage/homepage.aspx">http://onehr.bpweb.BP.com/CYP/en/homepage/homepage.aspx</a>
	BP Data Privacy Rules – General Privacy Rules	<a href="http://legal.bpweb.BP.com/Data_Privacy/DataPrivacy_BPStandardsPolicies_BCRRules.aspx">http://legal.bpweb.BP.com/Data_Privacy/DataPrivacy_BPStandardsPolicies_BCRRules.aspx</a>
	Privacy compliance	<a href="http://legal.bpweb.BP.com/Data_Privacy/DataPrivacy.aspx">http://legal.bpweb.BP.com/Data_Privacy/DataPrivacy.aspx</a>
3. Our business partners	BP Gifts and Entertainment Register website	<a href="http://gifts.bpweb.BP.com/Home.aspx">http://gifts.bpweb.BP.com/Home.aspx</a>
	Hosting Government Officials Approval Form	<a href="http://gifts.bpweb.BP.com/GOH/govthosting.aspx">http://gifts.bpweb.BP.com/GOH/govthosting.aspx</a>
	Non-executive Director Roles – Approval process	<a href="http://cosec.bpweb.BP.com/en/corpgov/neds.aspx">http://cosec.bpweb.BP.com/en/corpgov/neds.aspx</a>
	Global Guidelines on Handling Relationships in the Workplace	<a href="http://onehr.bpweb.BP.com/CYP/en/onehr_relations_relationshipatwork.aspx">http://onehr.bpweb.BP.com/CYP/en/onehr_relations_relationshipatwork.aspx</a>
	BP Group Competition and Antitrust Standard	<a href="http://ethicsandcompliance.bpweb.BP.com/en/local_assets/documents/Risks/CAT_Group_Standard-Final.pdf">http://ethicsandcompliance.bpweb.BP.com/en/local_assets/documents/Risks/CAT_Group_Standard-Final.pdf</a>
	Global Competition and Antitrust Guidelines	<a href="http://legal.bpweb.bp.com/competition_and_antitrust/guidelines_global.aspx">http://legal.bpweb.bp.com/competition_and_antitrust/guidelines_global.aspx</a>
	EU Competition and Antitrust Guidelines	<a href="http://legal.bpweb.bp.com/competition_and_antitrust/guidelines_eu.aspx">http://legal.bpweb.bp.com/competition_and_antitrust/guidelines_eu.aspx</a>
	US Competition and Antitrust Guidelines	<a href="http://legal.bpweb.bp.com/competition_and_antitrust/guidelines_us.aspx">http://legal.bpweb.bp.com/competition_and_antitrust/guidelines_us.aspx</a>
	Trade Sanctions	<a href="http://ethicsandcompliance.bpweb.BP.com/en/Risks/Trade_Sanctions.aspx">http://ethicsandcompliance.bpweb.BP.com/en/Risks/Trade_Sanctions.aspx</a>
	BP Group Anti-Money Laundering Standard	<a href="http://ethicsandcompliance.bpweb.BP.com/en/local_assets/documents/Risks/Group_AML_Standard-Final-2011-July.pdf">http://ethicsandcompliance.bpweb.BP.com/en/local_assets/documents/Risks/Group_AML_Standard-Final-2011-July.pdf</a>
	4. The governments and communities we work with	BP Group Anti-Bribery and Corruption Standard
BP Bribery and Corruption Website		<a href="http://ethicsandcompliance.bpweb.BP.com/en/Bribery_corruption.aspx">http://ethicsandcompliance.bpweb.BP.com/en/Bribery_corruption.aspx</a>
UK Bribery Act		<a href="http://ethicsandcompliance.bpweb.BP.com/en/Risks/UK_Bribery_Act.aspx">http://ethicsandcompliance.bpweb.BP.com/en/Risks/UK_Bribery_Act.aspx</a>
5. Our assets and financial integrity	Group Reporting Manual (GRM)	<a href="http://grm.bpweb.BP.com/">http://grm.bpweb.BP.com/</a>
	Dealing in BP Securities	<a href="http://ethicsandcompliance.bpweb.bp.com/en/Risks/dealing_with_bp_securities.aspx">http://ethicsandcompliance.bpweb.bp.com/en/Risks/dealing_with_bp_securities.aspx</a>
	Security at BP website	<a href="http://securityatBPbpweb.BP.com/">http://securityatBPbpweb.BP.com/</a>
	Security of Information Handling Standard and Instructions	<a href="http://securityatBPbpweb.BP.com/en/Securipedia/Securipedia_DS/Policies_Standards/Security_of_Information_Standard.aspx">http://securityatBPbpweb.BP.com/en/Securipedia/Securipedia_DS/Policies_Standards/Security_of_Information_Standard.aspx</a>
	Digital Security Acceptable Use Instruction	<a href="http://securityatBPbpweb.BP.com/en/secuipedia/secuipedia_ds/policies_standards/digital_security_acceptable_use_instructions.aspx">http://securityatBPbpweb.BP.com/en/secuipedia/secuipedia_ds/policies_standards/digital_security_acceptable_use_instructions.aspx</a>
General	Ethics & Compliance website	<a href="http://ethicsandcompliance.bpweb.BP.com/en/homepage.aspx">http://ethicsandcompliance.bpweb.BP.com/en/homepage.aspx</a>
	Breach Reporting System	<a href="https://codeofconductcertification.bpweb.BP.com/Home.aspx">https://codeofconductcertification.bpweb.BP.com/Home.aspx</a>
	OpenTalk website	<a href="http://ethicsandcompliance.bpweb.BP.com/en/opentalk.aspx">http://ethicsandcompliance.bpweb.BP.com/en/opentalk.aspx</a>
	Fraud and Misconduct Reporting Standard	<a href="http://finance.bpweb.bp.com/en/local_assets/documents/sp/standards/fraud/fraud-rs.pdf">http://finance.bpweb.bp.com/en/local_assets/documents/sp/standards/fraud/fraud-rs.pdf</a>

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# I stand for the Code

**Ram**  
Technicians' Programme







# I stand for the Code

**Gloria**  
Customer Service



# Living our Code

Because our Code covers such a lot of detail and different situations, keeping everything in mind seems a daunting task. But in any situation you're not sure of, just remember these three key things and you'll be well on your way to living our Code.

1

## Know the rules

Make sure you know the legal and company requirements that apply to your job – and always follow them.

2

## Decide what's RIGHT

Refer to the diagram opposite to help you make the RIGHT decisions.

3

## Speak up

Whatever your concern, don't wait until it becomes a serious problem. You can always:

- Talk it through with your line manager
- Take it to your Ethics and Compliance Leader (ECL)
- Get in touch with Legal, HR or Ethics & Compliance
- Or contact OpenTalk to speak to someone independent in confidence. If you're not comfortable with the answer you get, keep asking until you are.

# How do we decide what's RIGHT?

## Preparation

Time out!

How do you feel?

Who's involved

What are the facts?

What sort of dilemma is this?

What are our intentions?

What are our options?

Have we thought creatively?

## Decide what's RIGHT

What are the **R**ules?

Are you acting with **I**ntegrity?

Who is this **G**ood for?

Who could we **H**arm?

What's the **T**ruth?

## Testing our decision

How would you feel in their shoes?

What would be fair and reasonable?

What would be the adult thing to do?

What would build trust and respect?

What would stand the test of time?

Have we the courage to do what's right?

What can we learn from this dilemma?

