



Slavery and human trafficking statement 2019

June 2020

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This statement relates to the financial year ending 31 December 2019. It is published by BP p.l.c. and its relevant subsidiaries¹ in compliance with the UK Modern Slavery Act.

¹ BP p.l.c. and its subsidiaries are separate legal entities. References to "bp", "we", "our" and similar terms are to BP p.l.c. and its subsidiaries generally, to one or more of them, or to those who work for them. Relevant BP subsidiaries in scope of the Act's disclosure requirement and making this statement for the financial year 2019 are as follows: Air BP Ltd; ARCO British Limited, LLC; BP+Amoco International Ltd; BP (Abu Dhabi) Ltd; BP Amoco Exploration (In Amenas) Ltd; BP Aromatics Ltd; BP Berau Ltd; BP Chemicals Ltd; BP Commodities Trading Ltd; BP Eastern Mediterranean Ltd; BP Exploration (El Djazair) Ltd; BP Energy Europe Ltd; BP Exploration (Alpha) Ltd; BP Exploration (Angola) Ltd; BP Exploration (Azerbaijan) Ltd; BP Exploration Beta Ltd; BP Exploration (Caspian Sea) Ltd; BP Exploration (Delta) Ltd; BP Exploration (Epsilon) Ltd; BP Exploration Operating Company Ltd; BP Exploration (Psi) Ltd; BP Gas Marketing Ltd; BP International Ltd; BP Kuwait Ltd; BP Marine Ltd; BP Middle East Ltd; BP Oil UK Ltd; BP Shipping Ltd; BP Wiriagar Ltd; Britannic Energy Trading Ltd; Britannic Marketing Ltd; Britannic Strategies Ltd; Britannic Trading Ltd; Britoil Ltd; Castrol Ltd; Lubricants UK Ltd and Wiriagar Overseas Ltd.

1. Introduction

bp supports the elimination of all forms of modern slavery. Modern slavery is a term used in policy and law to describe forms of exploitation that constitute serious violations of human rights, including human trafficking and forced labour. This type of exploitation is contrary to our commitment to respecting the rights of our workforce.

At group level, we set expectations for how our businesses conduct their activities, including through our code of conduct (code), human rights

policy and operating management system (OMS). Each of our businesses are required to conduct their activities in conformance with these expectations and manage the risks, including modern slavery, associated with them. Often, they establish local requirements or other processes to help them do this.

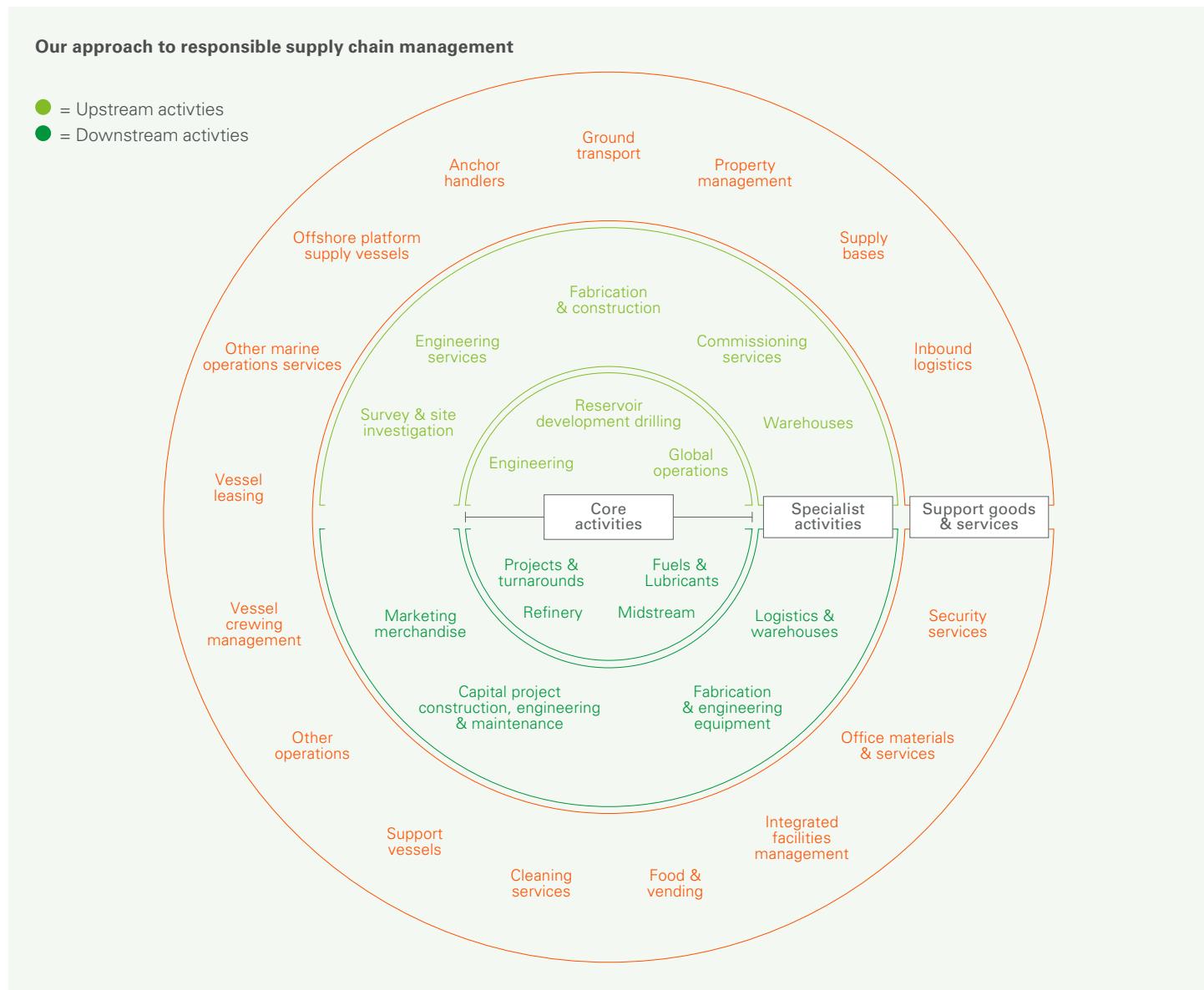
i Read more at bp.com/codeofconduct, bp.com/humanrights, bp.com/oms and bp.com/modernslavery

2. About our business and supply chain

We are a global energy business with operations in Europe, North and South America, Australasia, Asia and Africa. We currently operate in more than 70 countries and have more than 50,000 suppliers. These include contractors, vendors, service providers and contingent labour, many of whom also have further suppliers. Our procurement expenditure in the upstream, downstream and through our global business services procurement organization was approximately \$36 billion in 2019. We recognize the potential for labour rights violations in our industry and

supply chain, and we focus our efforts where we believe that risk is greatest.

Our procurement teams have identified parts of our supply chain as focus areas for their work to identify and manage labour rights risks, including modern slavery. For more information on our procurement teams' activities, see page 6.



3. Our code and human rights policy

Taken together, our code and human rights policy reinforce our support for the elimination of all forms of modern slavery, such as human trafficking, forced labour and child labour.

Our code is based on our values and clarifies the principles and expectations for how we work at bp. It applies to all bp employees and members of the board. Employees are required to report any human rights abuse in either our operations, or those of our contractors and other business partners. The code makes explicit reference to the role all parties can play in the elimination of human trafficking, forced labour and child labour.

Our human rights policy commits us to respect internationally recognized human rights as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We recognize our responsibility to avoid complicity in human rights abuses – including modern slavery – as described in the UN Guiding Principles on Business and Human Rights (UNGPs) and continue to incorporate these principles into our business processes. In 2019 we published our labour rights and modern slavery principles (see page 5) which will support our businesses to meet our human rights policy commitments and systematically manage modern slavery risk.

We address failures by our employees to adhere to our code and policies. This may involve disciplinary action, up to and including termination of employment. Similarly, if a contractor or supplier fails to act in a manner consistent with our expectations or their contractual obligations, we look to work with them to resolve the issue to provide remedy to the people affected. If a serious breach is found and no corrective action is taken, we reserve the right to terminate contracts.

Reviewing our human rights policy

In 2019 we began a review of our human rights policy. This was supported by a third party and included consultations with NGOs, subject matter experts and investors, to ensure our policy continues to clearly articulate our human rights commitments and reflect our current practice. We published our revised policy in May 2020.

 Read more at bp.com/humanrights

In addition to requiring employees to report human rights abuses, we expect them, and encourage contractors, communities and other third parties to speak up if they see something they think could be unsafe or unethical. At our worksites we help make sure people are aware of our confidential and anonymous global helpline, OpenTalk, and, where relevant, community complaints systems and workforce grievance mechanisms.

We encourage a 'speak up' culture among employees and with our contractors and suppliers in their work for us. Fostering a culture of 'seeing something and saying something' is one important way in which we can strengthen our ability to respect the rights of our employees and others who work for us. In light of these efforts and the steps that we continue to take in relation to raising awareness of human rights and issue-specific training on labour rights and modern slavery, we expect that bp employees, our contractors and suppliers will be increasingly aware of the signs that labour rights abuses may be occurring and will speak up if they see them.

4. Governance

We take the risk of modern slavery seriously. The board and executive management of BP p.l.c. continue to be engaged in reviewing our progress in identifying and addressing potential modern slavery issues within higher-risk parts of our businesses and supply chains. At BP p.l.c. board level in 2019, the main board reviewed and approved our 2018 slavery and human trafficking statement and through its safety, environment, and security assurance committee reviewed our approach to assessing and managing risks associated with modern slavery. At executive management level, the group operations risk committee reviewed progress on managing the risks of modern slavery and approved our labour rights and modern slavery principles (see page 5).

Our human rights working group, which is made up of representatives from across the business, considers current and emerging human rights risks of potential group significance. In 2019, as in previous years, this included reviewing progress in the management of modern slavery risks and our disclosure under the Modern Slavery Act.

We continue to use targeted audits to test our approach: in 2019 our internal audit function conducted an audit of the design effectiveness of the guidance, practices and procedures used by our global project organization (GPO) to manage risks to the labour rights of our contracted workforce. This work considered the clarity of bp accountabilities, oversight and contractor performance management. Two other audits – of our major projects Tortue (Mauritania & Senegal) and Ghazeer (Oman) – also tested the operating effectiveness of GPO practices to manage risks to the rights of our contracted workforce as part of wider project audits.

5. Training

We provide training on our code of conduct, which underpins and reinforces elements of our human rights commitments. We train bp employees about how to apply the code in their daily work. Training is available in 18 languages and in 2019 around 39,000 employees completed it in full.

We know that, if we are to effectively manage risks to our workforce and engage contractors on this important issue, we must continue to develop the appropriate capability and resources for our operational teams and support them with expert technical guidance. We continue to provide targeted face-to-face and online training to relevant parts of our businesses and functions on how to manage the risk of labour rights and modern slavery.

In 2019 we provided online awareness-level labour rights and modern slavery risk management training to 1152 employees and intermediate-level training to a further 574. This training is open to any bp employee, although it is primarily aimed at people who work on projects, in operational roles and in functions such as human resources and ethics

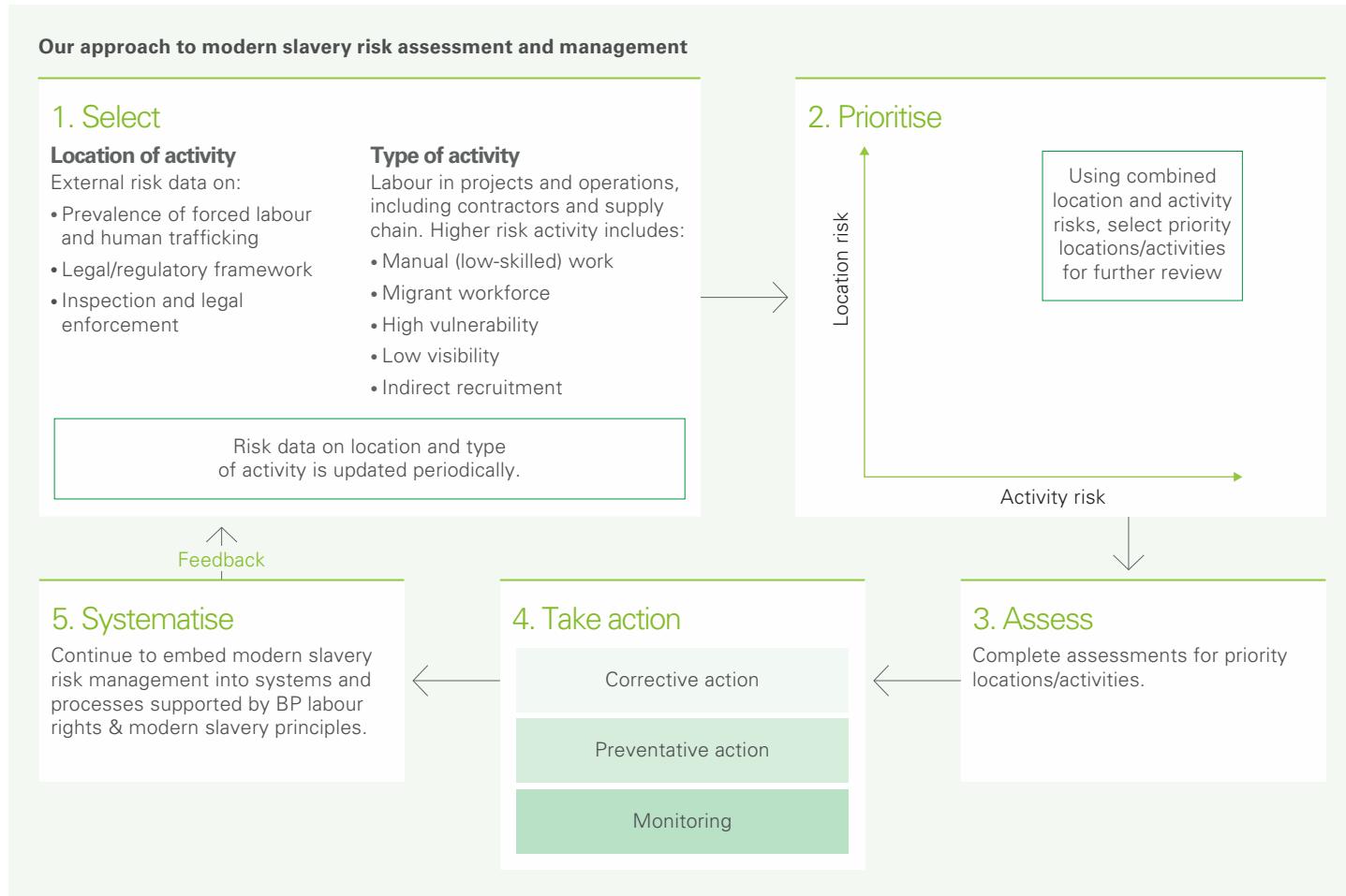
and compliance. For those employees who work at site level on projects or operations, the training helps them to identify potential labour rights issues and modern slavery in practice and what steps to take. The training covers: awareness of labour rights, modern slavery and labour practices associated with increased worker vulnerability; how modern slavery risk indicators may occur in our industry or supply chains; and how to identify warning signs. It also provides role-specific information on how employees can help identify and manage the risks of modern slavery, including by implementing effective prevention measures and remedies.

In 2019 we also rolled out a new labour rights and modern slavery curriculum for our procurement teams. It is designed to help employees identify and manage modern slavery risks they may encounter during the procurement process, including during pre-contract supplier due diligence and contracting and aims to strengthen our capacity to verify delivery of corrective actions agreed with our business partners. Completion of the training was mandatory for our procurement teams. By the end of 2019, 1164 procurement employees had completed it.

6. Risk assessment

Since 2016 we have taken a systematic approach to reviewing the risk of modern slavery in our businesses and supply chains, applying the risk assessment methodology described in our first annual statement. Our subsequent statements, relating to 2017 and 2018, provided further information on our approach, as we have sought to continuously improve our understanding and risk-management processes in relation to modern

slavery. This approach is illustrated below, and we expect the new requirements we introduced in our OMS in 2019 (see page 5) to bring further coherence and focus to businesses' efforts to manage modern slavery risk.



We continue to maintain central oversight and support the steps taken by our businesses to assess risk, within the approach described in our previous statements. We work with our businesses to: prioritize the services, commodities or activities and the countries in which we operate, or from which we source, that present the highest risks to the rights of the relevant workforce; support assessments as necessary at those sites which may present higher risk; and support implementation of corrective or preventive actions in response to any findings. Our businesses continue to implement corrective actions and oversight for assessments that took place in previous years, including, where appropriate, with expert third-party support.

To date, our on-site assessments have found indicators of modern slavery risk to be higher in certain activities: some are more specialist (e.g. construction, maintenance, logistics and warehousing); others are more general goods and services (e.g. security services, ground transport,

catering and cleaning); and we have also found higher risk in some marine services (e.g. ship-building, maintenance and dry docking). These findings continue to inform our focus areas for further work (see page 8).

In 2019, 19 businesses were under review of which eight were monitoring corrective or preventive actions by the end of 2019. We provide more detail on some of these in the document attached to this statement which gives examples of measures that specific bp businesses took in 2019.

Where we identify areas for improvement in our processes, we put in place preventative controls, such as supplier labour rights due diligence pre-contract and induction checks. In line with the commitments we make in our human rights policy, if we find that we have caused or directly contributed to adverse impacts on workforce rights, we are committed to provide for, or co-operate in, the remediation of those impacts.

7. Our operating management system

Our OMS sets expectations for how our businesses conduct their activities, including in relation to labour rights and modern slavery. We screen our major projects early in the development stages, to help identify and prevent potential impacts. Where we find an issue, including once project work has begun, we seek to remedy it. In 2019 we strengthened our operational risk management approach to modern slavery.

- We issued our labour rights and modern slavery principles, which build on and add to the existing high-level requirements and expectations in our code of conduct, human rights policy and supplier expectations. We first disclosed their development and trial use in our 2018 statement. The principles reiterate our commitment to respecting workers' rights and our expectation that our contractors, suppliers and joint ventures we participate in do the same. They state our expectation that workers in our operations, joint ventures and supply chains are not subject to abusive or inhumane practices, including child labour, forced labour, trafficking, slavery or servitude. They clarify our position on a range of issues, including workers having clear employment contracts, employer-pays principles in relation to recruitment fees, and not withholding worker passport or identity documents. The principles also include our contractors, suppliers and joint ventures having in place adequate processes and controls to implement them and to remediate any labour rights issues, including in their own supply chains.

- We introduced new requirements and guidance on identifying and managing labour rights and modern slavery risks into OMS to support conformance to the principles. This will help our businesses to assess the risk and put in place effective controls in a proportionate and systematic way, working with relevant business functions and building on existing processes such as supplier pre-contract due diligence, supplier assessment, worker induction and working with contractors to deliver their contractual obligations. These new requirements mandate businesses to implement risk management plans to address any potential adverse labour rights impacts. The guidance provides further support to businesses' implementation, including on the identification of labour rights risks, recruitment of the contracted workforce, conducting labour rights site assessments, delivery of corrective actions and remedy.

The integration of new requirements on labour rights into OMS provides a framework which will operationalize our labour rights and modern slavery principles. It sets out a consistent approach to the identification and mitigation of labour rights impacts in project development and operational delivery, which reflects our human rights policy and commitment to managing modern slavery risks.

i Read more at bp.com/modernslavery

8. Responsible supply chain management

Our procurement teams are working towards convergence across bp on a standardized model of due diligence, to assess labour rights – including modern slavery – risks in our supply chain, as illustrated below.

We expect all our contractors and suppliers to act consistently with our code and human rights policy. In support of this, the standard model contracts used by our procurement teams when agreeing new contracts require our contractors and suppliers, in their work for bp, to respect internationally recognized human rights, including those relating to modern slavery. If these contractual terms are not adhered to, we are prepared to take appropriate action.

In 2019 we continued working with our contractors and suppliers in response to the labour rights issues and modern slavery indicators identified during modern slavery risk reviews in previous years. Our labour rights and modern slavery principles will also assist in communicating our expectations in respect of labour rights to our businesses, contractors and suppliers. The principles have been used to support engagement with our partners in priority businesses (including, for example, in Malaysia, Oman, Mauritania and Senegal) to address labour rights issues. They will be communicated to our contractors and suppliers through our procurement processes. We also continue to integrate bp's supplier expectations into processes for sourcing and contracting for goods and services.

i Read more at bp.com/supplierexpectations

In 2019 we held supplier events to communicate our expectations on labour rights in a number of locations, including Oman (see page 10). These events provide an important forum where we can engage with our business partners in priority locations, to raise awareness of modern

slavery risks and to communicate our requirements and our labour rights and modern slavery principles.

Lessons learned in modern slavery risk management

We continue to learn from our risk assessments and our engagement with our business partners. We analyse and share the findings and lessons from those activities, to refine our approach and increase awareness in our businesses. Many of the key warning signs that our assessments address, such as recruitment or other fees, wage deductions and lack of freedom of movement, are symptomatic of systemic challenges in the countries where we work – such as, widespread outsourcing of recruitment. Other issues, including resource constraints and low levels of contractor or supplier resource and capability to prevent and remedy issues, are common to a number of countries and supply chains.

Where systemic and supply chain management issues coincide – for example in respect of the reimbursement of recruitment fees paid by workers to secure employment, where there are multiple layers of sub-contracting – they can present particular difficulties. Our experience of remedying issues we have identified through our risk assessments demonstrates that many will require sustained and collaborative efforts to resolve, including helping contractors and suppliers to develop their capability and business processes and systems.

Our approach to responsible supply chain management



9. Our priority activities in 2019

We continue to strengthen our businesses' processes and controls, including the way in which we assess suppliers and contractors on labour rights across our businesses, as well as mitigation and monitoring over the lifetime of a contract. In 2019 we took action in a number of areas to enhance our practices, consistent with our group approach to prioritizing activity where we believe there is a higher risk to the rights of our workforce. This included:

- Implementing the modern slavery risk management strategy that we agreed in 2018 in our upstream business. This involves implementing a business-led approach to systematic risk management and building knowledge and skills to support activity at operational level, by raising awareness and the delivery of more advanced training. We continue to take specific actions, following earlier risk assessments, focussed on eight upstream priority businesses (see the attached examples for discussion of our actions in three of these: Oman; Indonesia; and Mauritania-Senegal). We began systematically issuing our human rights due-diligence questionnaire (see box) across our upstream supply chain in January 2019, as part of requests for proposals for prioritized regions (Mauritania-Senegal, Mexico and Brazil) and supplier categories (marine; warehouses and supply bases; facilities management; engineering; fabrication and construction; inbound logistics and survey; and site investigation). Our procurement function supports broader modern slavery risk management activity in the upstream through their multi-year sustainability strategy, which includes due diligence on suppliers and contractors to priority projects and training.
- In our downstream business, we developed multi-year plans to assess and manage labour rights and modern slavery risk, based on the lessons we have learned from assessments conducted since 2016. In 2019 we established cross-functional working groups, with central technical support, in our regional fuels, lubricants, petrochemicals and Air BP businesses, to collaboratively improve their understanding of the issue in their business, undertake high-level risk mapping, identify priorities and develop multi-year plans to address them. The working groups' plans for 2020 address a number of core

Human rights due diligence

We aim to identify, highlight and mitigate labour rights risks in our supply chain, including modern slavery. Our approach to assessing supplier performance on this issue is built on a due diligence questionnaire. The questionnaire requires the submission of evidence in support of supplier responses in focus areas which include child labour, forced labour, human trafficking, ethical recruitment and management of sub-contractors. Responses are evaluated by our central procurement sustainability team, who support engagement with suppliers on clarifications or – if the bidder is successful – development of any corrective actions, where necessary, to address and close any gaps we identified. In 2019 we conducted this due diligence on 85 upstream supplier entities, using the results to inform purchasing decisions.

activities, including: awareness raising within the businesses, training for key roles, contractor engagement on our labour rights and modern slavery principles, site-level assessments at priority locations and supplier due diligence. Where we previously conducted on-site assessments, we continued to work with contractors and suppliers to support the implementation of corrective actions required to meet bp's expectations (see the attached examples of action in our downstream businesses in China, Malaysia and our JV in Saudi Arabia).

- In our shipping business, we strengthened contractual controls in respect of labour rights. All the standard contract templates and purchase order terms and conditions used by bp Shipping procurement teams now require suppliers to respect internationally recognized human rights in their work for bp; these standard contracts include a prohibition on the use of forced, trafficked and exploitative child labour.

10. Assessing the effectiveness of our approach

Through awareness raising, risk reviews and enhanced contractual frameworks, we have taken – and will continue to take – steps to strengthen our ability to prevent or remedy abuses. Our risk-prioritized approach aims to focus our cross-functional efforts on the higher-risk parts of our business and supply chain, by enhancing our ability to identify and manage modern slavery risks and addressing issues where we find them.

In situations where an on-site assessment identifies specific indicators of modern slavery risk or other labour rights issues, we expect our business partners to develop appropriate corrective action plans to address them. Our businesses and functions then engage to monitor delivery of those plans (see the attached example of this work in Malaysia).

More broadly, we are developing a measurement framework to help us assess, through the use of key performance indicators (KPIs), the quality and effectiveness of the actions we are taking to manage labour rights risks – including modern slavery – and to track the completion of corrective or remedial actions. In 2019, we developed draft internal KPIs and tested them with priority bp businesses. Once these are finalized and adopted by our priority businesses, we expect them to help us to start measuring more effectively our progress in identifying, managing and remediating labour rights and modern slavery risks.

11. Working with others

We recognize the importance of multi-stakeholder collaboration and learning from our peers as we seek to strengthen our ability to assess and address modern slavery risks in our businesses and supply chains. In 2019 we participated at group level in the UN Global Compact UK Network's Modern Slavery Act Working Group and Business for Social Responsibility's Human Rights Working Group. As in previous years, we engaged with several leading civil society organizations on our group approach to managing and reporting on modern slavery and have sought to reflect their views and priorities in this statement.

We continued to provide guidance to help bp businesses and functions in their dialogue and collaboration with civil society organizations and other third parties, in support of risk management or capability development activities relating to modern slavery in our priority countries. In 2019 we joined the Fair Labour Alliance. Membership will give us access to expert advice on labour rights risk management and the opportunity to learn from good practice in other industries.

We collaborate with IPIECA, our industry association for environmental and social issues, to develop guidance and tools to support the industry and our contractors to address labour rights risks, including modern slavery, at large operating sites. We co-led IPIECA's labour rights project in 2019 and will continue to support cross-industry learning and risk management approaches. This includes work – which began in 2019 – to develop IPIECA contractor training focused on the risks associated with the construction of large projects, with vulnerable workers, in locations

presenting higher modern slavery risks. This project involves collaboration between industry, contractors and other actors, including the Building Responsibly initiative, of which we are a stakeholder. When available, this training may help to address some of the issues, such as lack of awareness and contractor capability, that we've identified through our own assessments and engagement.

i Read more at www.ipieca.org/our-work/social and www.building-responsibly.org

We continue to work with a number of our peers to find ways of standardizing our human rights due diligence and assessment processes, by developing a system that enables participating energy companies to share contractors' responses to a standard human rights due diligence questionnaire. This approach encourages a focus on shared industry expectations for labour-rights performance and means contractors need to make just one, rather than multiple, submissions to energy companies. It also enables us and other participants to improve due diligence and respect for human rights in our supply chains. In 2019 we appointed a third-party consultancy, NOROG, to manage the tendering process for expert providers of supplier human rights due diligence and audits. The next phase aims to quantify the financial and non-financial benefits of the approach and to pilot it. The system, once implemented, will provide participating companies with access to assessment and audit services for both the questionnaire and site-level human rights assessments.

12. Our strategy

We remain committed to improving our understanding and management of modern slavery risks over time. We used what we learned from the onsite assessments undertaken as part of our risk-prioritized modern slavery risk management in 2018 to inform the development of a more systematic approach to managing labour rights and modern slavery risk, throughout 2019. We're embedding modern slavery risk management into existing systems (including into our OMS) and issued our labour rights and modern slavery principles. bp businesses continue to develop multi-year plans for implementation and clearer accountabilities, reflecting our cross-functional approach to managing risks. These plans will direct and co-ordinate our activities locally, building a more systematic approach into local and business-level processes.

We know that there is more work to do and we cannot achieve this on our own. We expect our approach to managing the risk of modern slavery to continue to evolve as we learn from our risk reviews, refine our practices and continue to build capability in our business. We will also continue to collaborate with, and learn from, others.



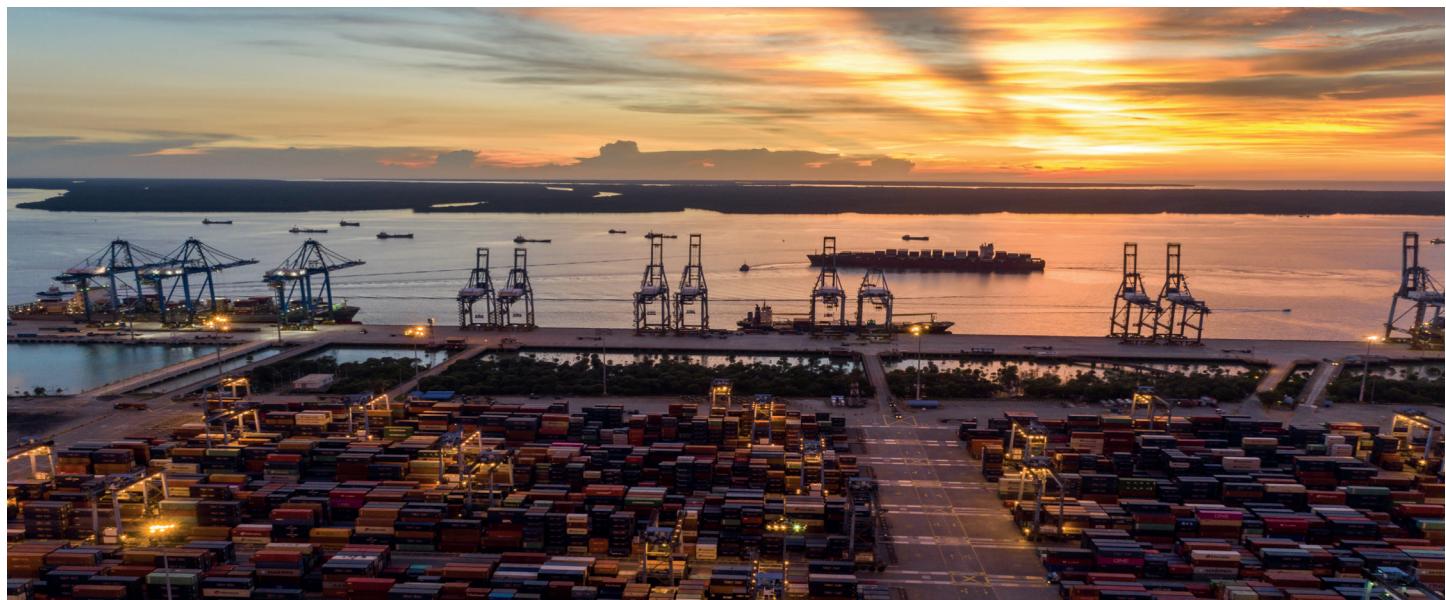
Bernard Looney
Chief executive officer
29 June 2020

This statement has been approved by the board of BP p.l.c. and of each of its relevant subsidiaries, in compliance with the UK Modern Slavery Act. It was approved by the board of BP p.l.c. on 29 May 2020.

bp businesses around the world are taking measures to assess and address the risk of modern slavery. See the attached document for examples illustrating bp's approach.

i Read more at bp.com/sustainability and bp.com/modernslavery

Our businesses around the world are taking measures to assess and address the risk of modern slavery



Taking action at our Port Klang plant, Malaysia

Following an on-site assessment in 2017, which identified a number of issues relating to the labour rights of foreign workers employed by five third-party service companies, the bp Port Klang lubricants plant in Malaysia has taken positive and effective action to rectify these issues.

Around 90 bp employees and 250 contractors work at the plant of which, at the time of the assessment, fewer than 30 were foreign workers. The audit highlighted issues faced by the foreign workers at the plant including unlawful recruitment fees, salary deductions and unclear or a lack of formal recruitment policies, processes and terms of employment. It also highlighted the need for greater oversight of these service companies.

In response a number of new measures were introduced. These included including modern slavery and labour rights risks training for plant management and daily site walkovers by bp site supervisors to engage with workers, inform them of their rights and encourage them to speak out about issues.

The service companies identified in the audit were required to attend two days of modern slavery and labour rights training provided at the plant to understand the local context and discuss how some existing site processes could be used to support improved labour rights management.

These service companies were also required to make certain commitments on modern slavery and labour rights. The plant has made efforts to ensure that bp labour rights principles are made clearer to contractors, by explaining the principles during induction sessions, and including them in the specialist training introduced for high risk contractors in 2019.

Downstream labour rights assessments

In 2018, we said that we had undertaken labour rights assessments at a number of downstream sites, including in China and Saudi Arabia, and had put in place corrective action plans to address the issues those assessments identified. In 2019, at our petrochemicals business in China, we continued to work with our contractors towards completion and verification of the corrective actions we agreed with them. The corrective actions address issues such as wage payments and working hours). We also formalized a reporting process to monitor implementation. Our partner, Verité, supported our efforts in China by delivering training to contract managers, to strengthen our capacity to monitor and verify delivery of corrective actions.

In Saudi Arabia where a bp lubricants joint venture (JV) company was building a blending plant, bp engaged with two third-party contractors involved in the construction of the plant, to support action to address the findings of the 2018 assessment, including by having these contractors put in place a corrective action plan. Preventative measures are being implemented, consistent with bp's principles, to ensure appropriate risk management controls are in place in procurement, HR and other processes when the JV takes over and starts operating the blending plant facility.

Corrective action in Dubai

In our 2018 statement, we disclosed that an assessment by our partner, Verité, of a dry dock yard in Dubai that provides maintenance and repair services to bp Shipping, had uncovered several findings. The yard has agreed a corrective action plan to address issues among their contractors including in relation to the payment of recruitment fees and passport retention. bp continues to monitor progress on the delivery of those actions.

Oman: our evolving, collaborative approach to workforce welfare

In our 2018 statement, we reported on steps taken by our business in Oman to work with contractors. This included agreed corrective actions to address the issues identified in independent assessments of labour conditions, such as passport retention, recruitment fees and worker grievance mechanisms. Having worked with contractors to put in place policies prohibiting forced labour and develop action plans to reduce the risk of modern slavery, we strengthened our own controls, monitoring conditions and raising worker awareness of rights at work.

We continue to make progress and refine a collaborative approach. This is built on regular, structured dialogue with contractors, and enhanced contractor management – based on review of workforce welfare data from strengthened local oversight. We also maintain dialogue with other actors (including industry and government) to support efforts at building consensus around industry standards that respect workforce welfare and labour rights.

Systematic monitoring processes were put in place, including pre-deployment checks and site walkovers, to enhance oversight. We also used the results of worker surveys, conducted by an independent third party to validate data we gather from site HSSE inductions of the workforce. We continued to address the issues identified by the original assessments: the number of workers charged recruitment fees in the last two years when mobilized to the site has been significantly reduced. Reimbursement plans have been agreed with each contractor and reimbursements to workers have begun. In addition, a contractor self-verification process to assess conformance with bp Oman's worker welfare and human rights policy has been put in place and is regularly reviewed by bp.

Our experience to date in Oman illustrates several of the challenges discussed in our statement (see page 6) – developing contractor capability to address labour rights issues which are often reflective of deeper, systemic problems or unethical practice, in the transnational labour supply chains which bring workers to the Gulf. It also suggests some useful lessons – on the importance of sustained engagement and communication of clear policies and principles to our contractors, agreeing focused corrective actions to address context-specific risks to workers and strengthened contractor management and oversight – which will continue to inform our broader approach.

Monitoring workforce welfare in Tangguh

At our Tangguh expansion project, which has a substantial contracted workforce on site, our workforce management team meets regularly with the primary contractor to monitor workforce welfare, grievances, trends and resolutions. The team has put in place practices to prevent labour rights issues relating to salary payments, following a series of contractor employee grievances relating to payment of salaries, which were received through the operational-level grievance management process.

A programme has been developed to check that payment of salaries is timely and correct: each of our contractor companies provides their workforce salary payment schedule and reports their compliance. Any deviations must be noted, explained and accompanied by actions to address them.

The bp team, working with their project consortium counterparts, review this with the relevant contractor during workforce forums, along with validating the contractor's records. By formalising the accountability of contractor companies for timely payment of salaries, the programme has improved accounting processes to ensure the necessary funds are available, reducing the number of salary-related concerns. Communication protocols have been developed to address concerns where payments to individuals vary from the expected salary.



Supporting workforce welfare in our Mauritania & Senegal business's supply chain

Senegal and Mauritania – where we are developing our cross-border Tortue project – is one of the priority upstream locations where we are focusing our efforts to systematize the identification and ongoing management of modern slavery risks.

The regional business in 2019 focused on mitigation of modern slavery risks through a cross-functional approach, based on local collaboration between human resources, ethics and compliance, procurement and our major project management organization, to support the management of risks to labour rights in our contracted workforce and local supply chain.

The business also adopted a more structured approach to developing the skills of relevant personnel through the roll-out of labour rights training modules tailored to support awareness raising and enhance role-specific capability.

In the region (as in all our upstream procurement priority locations), from January 2019, all first-tier suppliers were required to complete a human rights questionnaire. Our due diligence assessed local suppliers as well as international suppliers interested in supporting our work in the region. It identified some areas of concern, including low levels of awareness among local suppliers of labour rights and under-developed organizational systems for the mitigation and monitoring of any human rights abuses.

Building on that initial due diligence and in order to improve our understanding of potential labour rights and modern slavery risks associated with local workforce practices, we undertook a series of workforce welfare and labour rights reviews of four local services providers in 2019, in both countries. These addressed people management processes, practices and compliance with bp standards and included document review as well as worker and management interviews, followed by engagement with contractors and sub-contractors of bp's relevant requirements and recommended corrective actions. The reviews found open and constructive engagement with the process on the part of local suppliers in both countries; issues identified included lack of grievance procedures, poor communication of employment policies and practices and unclear wage information. Corrective actions were agreed with the suppliers and since the second quarter of 2019, we have maintained dialogue with them to follow up on their implementation of the recommendations. Constructive, ongoing engagement and support to capacity building in our regional supply chain will not only help us to improve labour rights performance, consistent with our human rights policy, but also support our commitment to local employment in both countries.