



Modern slavery and human trafficking statement 2021

24 June 2022



About this statement

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

This statement relates to the financial year ending 31 December 2021. It is published by BP p.l.c. and its relevant subsidiaries^a in compliance with the UK Modern Slavery Act 2015.

About bp and our 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 65 countries, employ around 65,900 people and have around 40,000 suppliers. These include contractors, vendors, service providers and contingent labour, many of whom also have further suppliers. Our third-party expenditure was approximately \$51 billion in 2021.

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 teams continue to identify parts of our supply chain as focus areas for their work to manage labour rights risks, including modern slavery.

The case studies in the attachment on [page 15](#) illustrate our approach.

^a References in this statement or the attachment 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. BP p.l.c. and its subsidiaries are separate legal entities. bp subsidiaries included in scope of this statement are: Air BP Ltd, Arco British Ltd LLC, BP (Abu Dhabi) Ltd, BP Amoco Exploration (In Amenas) Ltd, BP Berau Ltd, BP Eastern Mediterranean 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 (El Djazair) Ltd, BP Exploration Operating Company Ltd, BP Gas Marketing Ltd, BP International Ltd, BP Kuwait Ltd, BP Marine Ltd, BP Oil UK Ltd, BP Pension Trustees Ltd, BP Shipping Ltd, BP Wiriagar Ltd, Britannic Trading Ltd, Britoil Ltd, Castrol Ltd, Lubricants UK Ltd and Wiriagar Overseas Ltd.

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More information:

- Previous modern slavery and human trafficking statements are available at: [bp.com/reportingcentre](https://www.bp.com/reportingcentre)
- Our human rights policy and labour rights and modern slavery principles are available at: [bp.com/humanrights](https://www.bp.com/humanrights)
- Our code of conduct is available at: [bp.com/codeofconduct](https://www.bp.com/codeofconduct)

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, human rights policy, labour rights and modern slavery (LRMS) principles and operating management system (OMS). All of our businesses are required to conduct their activities in conformance with the applicable expectations and manage the risks, including modern slavery, associated with them. They often establish local requirements or other processes to help them do this.

Key developments in 2021:

- We refined the pre-contract risk assessment we use in our procurement processes and have completed more supplier due diligence and human rights questionnaires.

➔ Read more about our risk assessment and due diligence processes on [page 5](#)

- In our operated businesses our focus was to support implementation of the LRMS requirements included in our OMS and to build the capability of bp teams with accountabilities relating to engagement with our workforce and communities (these are our social practitioners).

➔ Read more about our OMS on [page 7](#), and our training and capability building on [page 10](#)

- Under aim 12 of our sustainability frame, we have set a target for our high-risk tier 1 suppliers to be evaluated in line with our LRMS principles and for priority findings raised with suppliers to be remedied. Going forward we plan to report our progress related to this objective.

➔ Read more about aim 12 in the [bp sustainability report 2021, page 35](#)

The impact of COVID-19 and supporting our workforce

Our workforce includes bp employees and contractor workforces. We recognize that our responsibilities are different with respect to these two groups.

The COVID-19 pandemic has continued to limit our ability to carry out in-person work on projects and operations, conduct risk management activities, and engage with our contractors in the usual way. In response, we have trialled some remote methodologies to assess suppliers and to interview workers.

➔ Read more about remote assessment methodologies on [page 6](#)

One challenge we continue to face is the potential for unintended impacts on workers, caused by changes to work patterns to accommodate COVID-19 restrictions. These unintended impacts include:

- Hampered communication between workers and managers, especially when work patterns need to be quickly reorganized – resulting in limits to discussions on required changes. Not knowing how long these changes can last, presents a further challenge.

- Updates to new working patterns resulting in a lack of clarity (and in some cases payment issues) for some contractors' workers about which hours are classified as standard hours, overtime, and rest time.
- Increased health risks (for example, fatigue) associated with extended rotations to accommodate shift patterns, implemented for the prevention of cross-infection of COVID-19 across shifts.

Some of these issues were raised through bp's OpenTalk speak-up mechanism and this has enabled our businesses to work with the relevant contractors to provide remedies.

➔ For examples of issues raised see [page 9](#)

Governance of modern slavery

The risk of modern slavery is a serious concern. The board of BP p.l.c. and the bp executive leadership team continue to review our progress in identifying and addressing potential modern slavery issues in higher-risk parts of our businesses and supply chains.

A new simplified governance structure, described in our 2020 modern slavery and human trafficking statement, came into effect on 1 January 2021.

 [Read more about sustainability governance on page 49 of the bp sustainability report 2021](#)

At BP p.l.c. level, in 2022, the board reviewed and approved our modern slavery and human trafficking statement for 2021 and the safety and sustainability 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.

Our LRMS working group includes members of our central teams, and representatives from a cross-section of bp businesses. The group is tasked with developing and trialling tools, processes and other resources that can enable our projects and operations to better implement our LRMS programmes.

In 2021, our internal audit function carried out a review of our central systems for managing LRMS risk. This audit provided insights on some areas for improvement and the internal audit function plans to carry out audits at selected key operating sites to assess implementation of these improvements, as part of its wider audit programme.

Our policies related to modern slavery and human trafficking

We are committed to respecting workers' rights, in line with the International Labour Organization Core Conventions on Rights at Work and we expect our contractors, suppliers and joint ventures to do the same.

We set out more details on our policies, including our code of conduct and human rights policy, in our 2020 modern slavery and human trafficking statement.

 [Find our human rights policy and LRMS principles at \[bp.com/humanrights\]\(https://bp.com/humanrights\)](#)

Our LRMS policies and practices

Our commitments:

Human rights policy
Code of conduct
Our values

Our requirements and guidance:

Operating management system
Labour rights and modern slavery principles
Expectations of suppliers

We seek to implement:

UN Guiding Principles on Business and Human Rights
Voluntary Principles on Security and Human Rights


We respect:

International Bill of Human Rights
ILO Core Conventions on Rights at Work

Grievance mechanisms

We take action when our employees do not adhere to our code of conduct and policies. This may result in disciplinary action, up to and including termination of employment. If contractors or suppliers fail to act consistently with our expectations or with their obligations, we try to work with them to resolve any issues and provide remedy for people affected. If a serious breach is found and no corrective action is taken, we reserve the right to terminate contracts.




We encourage a speak-up culture among our employees, contractors and suppliers. In addition to requiring bp employees to report human rights abuses, we expect them – and encourage contractors, communities and other third parties – to speak-up if they see something which they think could be unsafe or unethical. At our sites we help make sure that contractors and their workers are aware of our confidential and anonymous global helpline OpenTalk and, where relevant, community complaints systems and workforce grievance mechanisms. We promote the use of these channels without fear of retaliation.

 [Read more about access to remedy on page 8](#)



Risk, remedy and capability

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Risk assessment and due diligence

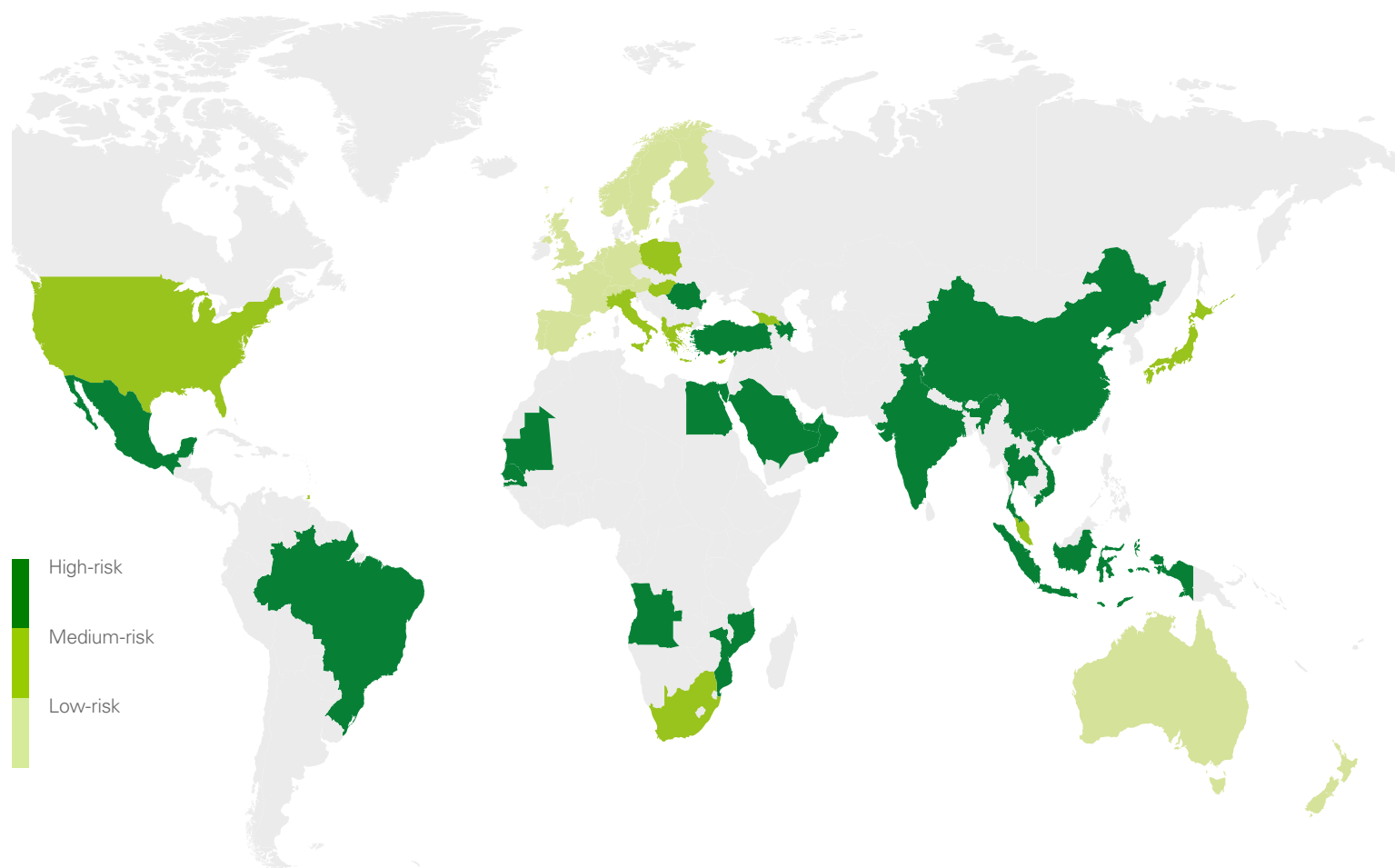
Before contracts are awarded, we consider the supplier's scope of work and their location. This helps us conduct a risk assessment and prioritize our due diligence activities. We have refined the country risk criteria we use to assess new suppliers, and are in the process of determining how best to collate and integrate associated risk data into our procurement systems.

Developing our risk assessment approach

Risk assessment is included in our operating management system (OMS) processes. We use external labour rights and modern slavery (LRMS) data sources, such as Maplecroft risk indices, to generate risk heatmaps for the countries in which we operate. Each country is then categorized as being either low, medium, or high-risk.

Operated businesses are required to risk assess and categorize their key contractors. During 2021, 18% of our operated businesses assessed at least a sample of their contractor base. This approach enables our businesses to determine any further due diligence and remedial action required to adequately mitigate supply chain LRMS risks. Our operated businesses are aiming to increase the breadth of their assessment in 2022.


Risk assessment heatmap of the main countries where bp operates



Risk assessment and due diligence

Supplier due diligence

Under aim 12 in our sustainability frame, we have set a target to assess 100% of our high-risk suppliers on LRMS by 2025. High-risk suppliers are required to provide documentary evidence that they have implemented appropriate policies, processes and practices to manage LRMS risks and must demonstrate having shared these with their workforce. This approach enables us to assess whether suppliers can meet our LRMS expectations. If gaps or concerns are identified, additional commensurate controls may be implemented to help manage and monitor the risk associated with a particular supplier.

 The human rights assessment platform we developed with several of our peers is described on [page 8 of our 2020 modern slavery and human trafficking statement](#)

During 2021, we operationalized our use of this human rights assessment platform and continued to improve our systematic approach to pre-contract due diligence. The process and scoring criteria were streamlined to improve the quality and speed of assessments, increasing the number completed via the human rights assessment platform from eight in 2020 to 66 in 2021. Our sustainability team within procurement also conducted several in-house assessments.


In building corrective action plans during supplier due diligence processes, information on industry best practice may be shared with suppliers, which we believe benefits both bp and the supplier.

Our objective is to gather information about suppliers' policies and processes and discuss what 'good' looks like in terms of eliminating the potential for human rights and modern slavery impacts.

In addition to pre-contract due diligence of new suppliers, LRMS risk assessment is ongoing across our current supplier base. Under OMS, our businesses are required to carry out ongoing monitoring activities, which form a key part of our routine due diligence.

 [Read more about our OMS on page 7](#)

Our operated businesses have started carrying out business-level risk reviews of existing suppliers, to take account of ongoing risks in their day-to-day operations. These assessments are a cornerstone of our OMS process.

 [Read more on our LRMS risk assessment and due diligence process on page 7 of our 2020 modern slavery and human trafficking statement](#)

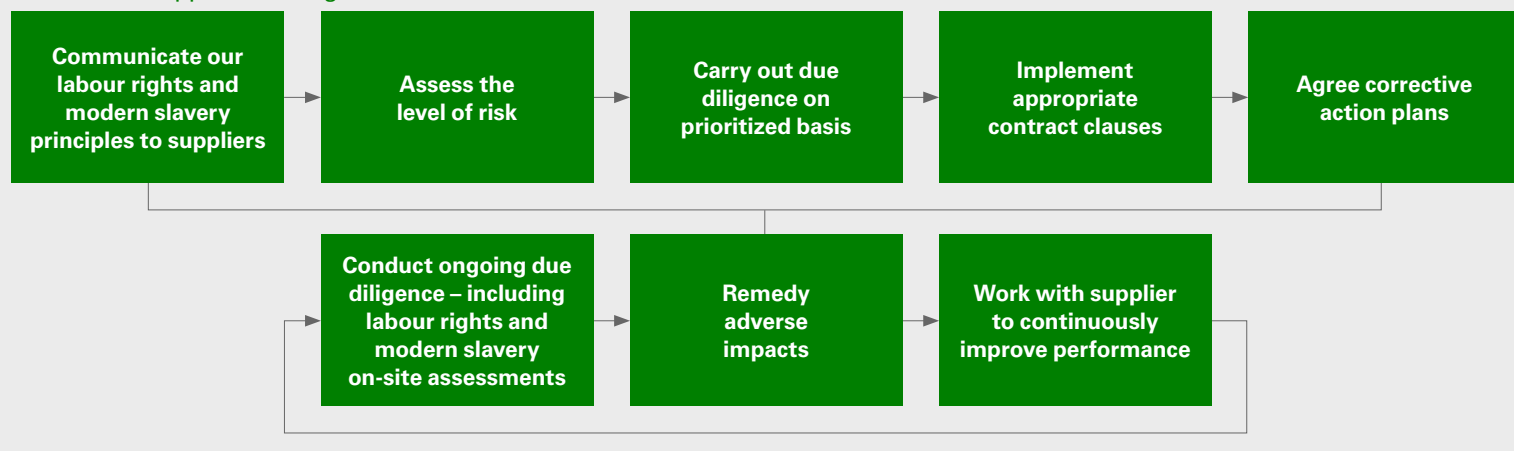
Risk assessment criteria include worker demographics (such as the presence of migrant workforces), use of recruitment agents, workforce skill levels and the number of supply chain tiers. These business risk reviews are helping us to establish the prevalence of specific risks and identify where overall risk is highest. These risk assessments are an ongoing, iterative process and help us to determine where best to deploy resources for on-site assessments.

COVID-19 restrictions have continued to limit our ability to carry out on-site assessments. As a result, we have trialled a remote methodology for on-site assessment in Azerbaijan. This involved an experienced assessor remotely supporting an in-field team to help it engage with local management, review documents and carry out telephone interviews with workers. The trial identified and addressed a number of issues faced by workers that would have been difficult to identify through desktop review alone.

Further, in collaboration with one of our offshore suppliers, we have trialled a remote worker assessment methodology to improve our understanding of workforce perspectives and experiences. Offshore workers are typically more difficult to access for face-to-face interviews, due to the nature of their work. This trial has provided helpful insights into their priorities and ways that bp and our suppliers can meet their needs more effectively.

Both remote methodologies have proved successful, and we are planning how to incorporate them into future due diligence programmes.

Elements of supplier due diligence




Risk assessment and due diligence

Operating management system

Our practices for the management of environmental and social performance are included in our OMS.

Our OMS requires bp operations and projects to assess LRMS risks and to put in place effective controls in a proportionate and systematic way.

During 2021, we made a concerted effort to build awareness and understanding of the indicators of LRMS risk, and to support our operated businesses in implementing effective controls. As issues arise, our central team of experts continues to support the businesses to facilitate remedy for workers.

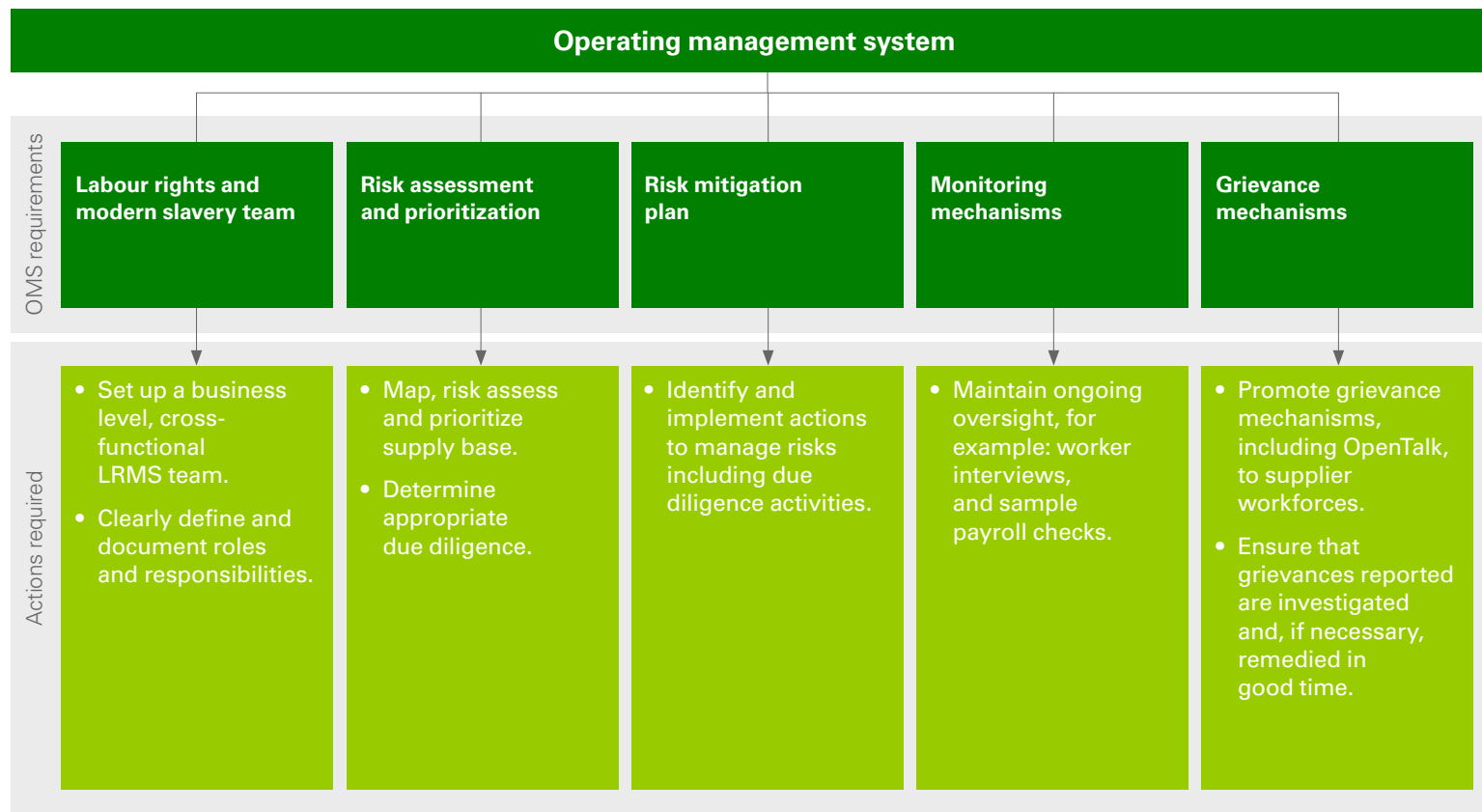
 For more detail read [page 9 of our 2020 modern slavery and human trafficking statement](#)

Progress against OMS requirements

In 2021, business-level LRMS teams were established through formalizing roles and responsibilities, following bp’s organizational restructure in 2020/21, and through encouraging teams to work together. Risk assessments are currently underway, and we anticipate that the majority of our operated businesses will complete initial risk assessments and have risk mitigation plans in place by the end of 2022.

Data from completed or ongoing risk assessments is helping to inform our plans for prioritized on-site assessments in 2022 and onwards.

OMS requirements and progress



Providing our workforce with access to remedy

Our human rights policy states that we do not impede access to state-based judicial processes. If we cause or contribute to adverse impacts on human rights, we provide for or co-operate in their remediation through legitimate processes intended to deliver effective remedy, while not preventing access to other forms of remedy if justified.

Concerns, including those related to human rights, can be raised through OpenTalk, which is available 24 hours a day, seven days a week, in 75 languages. Concerns can be raised anonymously from most locations and any report made will be kept confidential to the fullest extent possible, consistent with law and good business practices. All concerns will be taken seriously and bp will not tolerate retaliation of any kind.

bp employees or contractors and their workforce can submit a report to OpenTalk through the website at opentalkweb.com

OpenTalk is overseen by our ethics and compliance (E&C) team. In 2021, the central LRMS team worked more closely with E&C to:

- better identify complaints related to LRMS issues with a focus on complaints from contractor workforces
- provide support on investigations into complaints, including identifying root causes of issues
- facilitate remedy for workers
- identify further improvements to systems, to prevent issues happening in the future.

Through a number of these collaborative investigations, some consistent themes have been identified across different regions and businesses.

We encourage a speak-up culture among our employees, contractors and suppliers.



Providing our workforce with access to remedy

Along with the attached case studies on page 15, the table below provides examples of instances where bp has worked with our contractors to facilitate remedy of issues identified for more than 960 workers.

We are using this analysis to collate learnings and identify necessary system changes to help reduce the potential for these issues to happen again. Insights will be shared with social practitioners in other bp operated businesses in 2022, through our social community of practice.

Access to remedy: themes and responses

Themes identified from work on complaints raised by contractor workforces	Example of remedy provided by contractors
Non-, late and partial payment of wages, overtime pay and holiday pay	<ul style="list-style-type: none"> Workers repaid monies owed Improvements made in record-keeping systems and processes
Workers did not understand how pay was calculated	<ul style="list-style-type: none"> Rules for standards and overtime clarified, updated in workforce contracts (where appropriate), communicated to workers and incorporated into new systems Payslips updated, explained and provided to workers for each pay period
Extended working hours and rotations	<ul style="list-style-type: none"> Improved timesheet records to include start and finish times Records to include total hours worked and set limits for maximum hours Implemented oversight process to check that limits were maintained
Insufficient communication with workers about the implementation – and subsequent maintenance – of changed patterns of work due to COVID-19	<ul style="list-style-type: none"> Contractors updated workforce contracts to reflect the new work patterns and rules for overtime and rest time
Insufficient workplace communication	<ul style="list-style-type: none"> Implemented grievance process and mechanism to enable workers to raise concerns Held sessions with workers to promote new grievance channel and also invite open conversation between workers and management

Training and capability building

Through training and expert technical guidance, we are continuing to develop and build the capability required to effectively manage risks to our workforce.

Our activities in 2021 included:

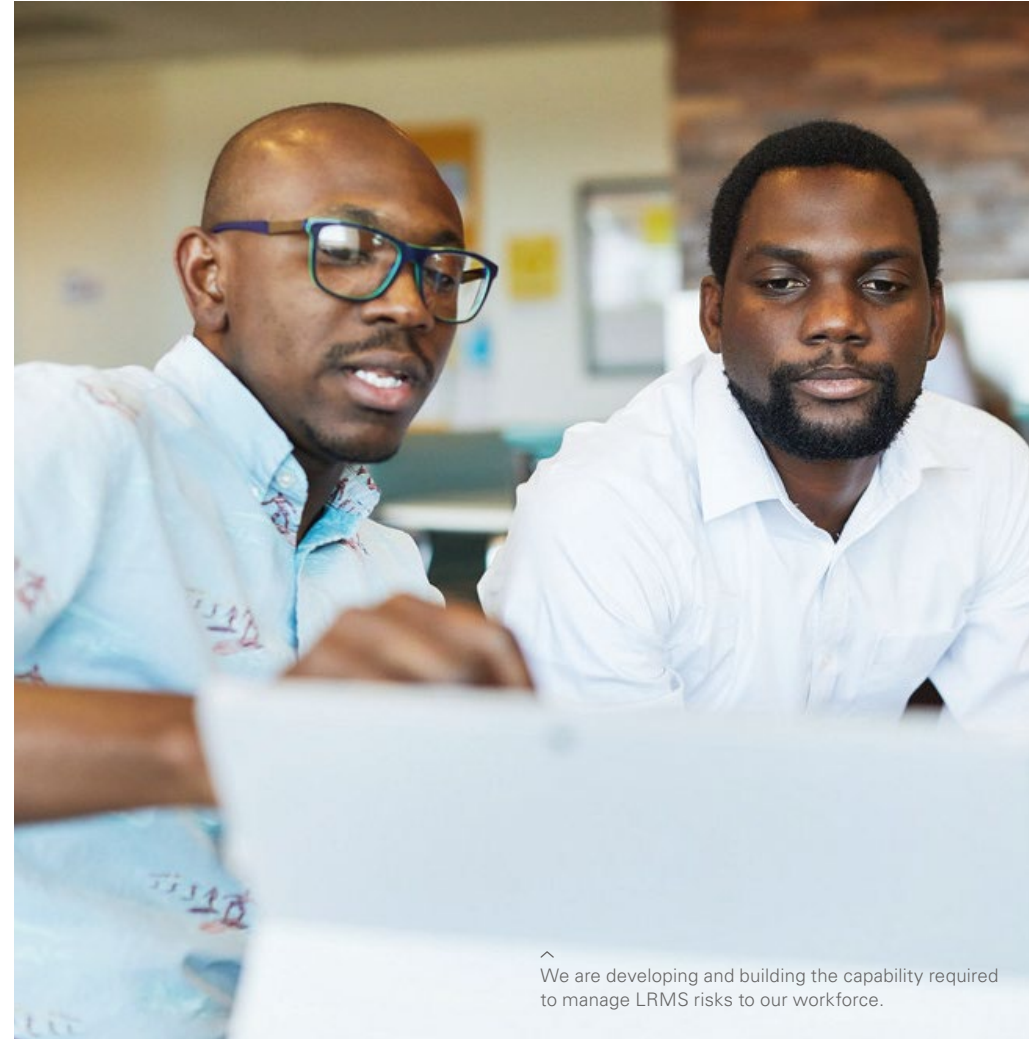
- Providing training on our code of conduct, which underpins and reinforces elements of our human rights policy. This was mandatory for all bp employees.
- Running targeted awareness of LRMS training for the extended leadership team in the health, safety, environment & carbon (HSE&C) team and for other employees, including our 'Women in Wells' network, E&C teams and some of our regional contract account manager teams.
- Targeted training with our sourcing and contracting practitioners and our procurement sustainability ambassador network.
- Around 950 employees, including operations, people and culture, and procurement professionals, took online LRMS training and some also received face-to-face training.

As part of the process to embed LRMS through our OMS, we have identified the need to further build our capability in our operated businesses, specifically to help manage potential risks in contractor workforces.

As a result, we have mapped out the learning journey for social practitioners within bp, who have a role to play in managing contractor workforces, and launched a new 'introduction to social' course, including a LRMS module.

We have also developed a 'good worker interviews' module, which was piloted in 2021. This will enhance our ability to engage more regularly with our contractor workforce on the ground and open up conversations to enable teams to identify issues and red flags that might require further investigation.



LRMS was discussed at contractor forums in Oman, Azerbaijan and Trinidad & Tobago during 2021, to help explain bp's expectations and understand efforts already underway in our contractor base. Around 300 contractors attended these events.



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We are developing and building the capability required to manage LRMS risks to our workforce.

Progress and next steps

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Assessing the effectiveness of our approach

We are taking steps to strengthen our ability to identify, prevent and remedy concerns through the integration of our labour rights and modern slavery (LRMS) principles into our operating management system (OMS), training, risk reviews and enhanced contractual frameworks.

LRMS performance metrics and data

In 2021, bp used a group-wide data collection system with 18 of our operated businesses, to collate performance data related to LRMS and help us measure, support and manage performance.

Measure	Examples of supporting metrics	Purpose	Examples of findings
Systematic approach to identification, prevention and management of LRMS risks	<ul style="list-style-type: none"> Ongoing monitoring activities Types and numbers of issues identified Presence and status of action plans to address issues identified 	Understand trend data on issues found and proportion of issues in progress	Top three on-site monitoring activities used were site walkovers and worker interviews, payroll checks and checks on working hours and overtime. These identified risks in wages, employment terms, working hours and discrimination
Effective workforce grievance management	<ul style="list-style-type: none"> Presence of grievance mechanisms Number of grievances raised and percentage remedied by category 	Understand what is in place and the degree to which it is used by the workforce Understand types of issues raised and trends	Of the 883 grievances raised, 863 were closed as of the end of 2021 – a close out rate of 98%

Consultation and collaboration

Stakeholder collaboration and learning from our peers remains central to our approach as we work to strengthen our ability to assess and address modern slavery risks in our businesses and supply chains.

Throughout 2021, we continued to contribute as members of UN Global Compact UK Network's Modern Slavery Act Working Group and Business for Social Responsibility (BSR) Working Groups.

We also asked BSR to carry out a review and benchmarking of our modern slavery statement and programme. We have used the insights gained from this work to inform this statement, as well as our future LRMS programme.

We continued to play an active role in the social responsibility, human rights and supply chain working group of IPIECA^a. Key focus areas in 2021 included building understanding on worker welfare and encouraging cross-industry discussions on the reimbursement of recruitment fees.

We engaged with the World Benchmarking Alliance throughout 2021 and we have joined the Global Business Initiative on Human Rights. We plan to engage with our peers throughout 2022 to continue the discussion on how best to advance corporate respect for human rights.

We also continue to work with the human rights cross-industry platform to increase the number of LRMS assessments and improve the quality and efficiency of the process.

^a IPIECA is the global oil and gas association dedicated to advancing environmental and social performance across the energy transition. It brings together members and stakeholders to lead in mainstreaming sustainability by advancing climate action, environmental responsibility and social performance across oil, gas and renewables activities.

Looking ahead

We are open to constructive challenge and expect our approach to managing the risk of modern slavery to continue to evolve. We know there is more work to do and that we achieve our best when we address the challenges we face through collaboration.

We have made progress on the focus areas we set out in our 2020 modern slavery and human trafficking statement.

Focus area	Status	Progress
Work with industry and contractors to continue to improve approaches to ethical recruitment, assessment and remedy, including recruitment fees and reimbursement	Progress made	Facilitated initial discussions through IPIECA and these will be further explored in 2022
Expand our use of the cross-industry Human Rights Assessment platform for high-risk suppliers	Progress made	Increased the number of desktop assessments in 2021
Continue to embed our systematic approach through our OMS	Progress made	18% of bp operated businesses completed a risk assessment on at least a sample of suppliers in 2021
Trial and evaluate the use of remote LRMS assessments and worker interview methodologies	Achieved	Methodologies successful and particularly useful in remote locations and where physical access is restricted
Enhance awareness of LRMS risks with key suppliers	Progress made	Training content was finalized, and a pilot developed for intended roll out in 2022
Improve quality of LRMS data and KPIs	Progress made	Due to focused LRMS OMS activity in the operated businesses during 2021, there was some improvement to the availability of data

Our objectives for the future include:

Systems and due diligence

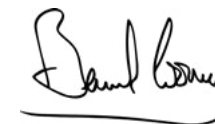
- Further embed our systematic approach through our OMS to increase our understanding of LRMS risk across our supply base.
- Carry out on-site assessments prioritized through risk profiling.
- Continue to progress towards our decent work objective under aim 12 of our sustainability frame by increasing the number of LRMS assessments carried out.

Engaging with workers:

- Build our operated businesses' capability to carry out more routine worker interviews, capture and follow up on findings to reduce risks to and impacts on workers.

Building capability

- Finalize and roll out social practitioner training.
- Train an internal team to carry out on-site LRMS assessments.
- Pilot LRMS awareness training with some suppliers to inform its wider roll-out across our supplier base. This is in collaboration with other IPIECA members.



Bernard Looney

chief executive officer,
24 June 2022

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 2 June 2022.

 Read more in the attached case studies and at [bp.com/sustainability](https://www.bp.com/sustainability) and [bp.com/modernslavery](https://www.bp.com/modernslavery)

Attachment

Case studies

Our businesses around the world are taking measures to assess and address the risk of modern slavery. These are some examples from 2021.

Mexico retail: challenging the status quo

A complaint was raised that bp retail employees were required to be on-shift for up to 30 minutes before start time and for 30 minutes after shift to manage handover and cash in and cash out processes. This time, around 2-3 hours a week in total, was not recorded and so was unpaid. This situation, which is not uncommon in the Mexico retail sector, impacted around 800 bp workers.

Our Mexico People and Culture and Operations teams worked together to address this problem. We agreed to pay workers two hours extra each week to cover this time. We are now training our employees about more efficient practices so that all work can be done in work time.

Acting on workforce grievances in Azerbaijan

A group of workers employed by one of our contractors raised complaints through OpenTalk, bp's confidential speak-up line, about issues that included non-payment of salaries, overtime and holiday working. The average amounts owed were equivalent to three months' salary.

They also reported issues with contracts and lack of resolution when they brought these matters to their employer's attention. The central Health, Safety, Environment & Carbon and Azerbaijan People & Culture teams carried out a

mix of remote and on-site LRMS assessments, which substantiated initial complaints and identified further issues. Over a period of six months, these teams worked with the contractor to address all identified findings. Key improvements included backpay of outstanding wages, updates to terms and conditions, improvements to time and pay records, provision of payslips and improved workplace communication mechanisms – for example, regular group meetings and the use of feedback boxes on-site.

Prolonged offshore rotations in the Gulf of Mexico

During conversations held in our Gulf of Mexico business, concerns were raised over possible extended offshore rotations. Investigation confirmed that a group of 63 workers employed by one contractor had worked offshore rotations of up to 154 days. Root cause analysis identified that this arrangement was agreed to accommodate COVID-19-related changes to work patterns. The bp business has agreed an enhanced process to meet defined limits for the length of offshore rotations with any exceptions requiring leadership sign off.

Give your feedback

Email the corporate reporting team
at corporatereporting@bp.com



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