



Policy statement on BP Europa SE's¹ human rights strategy

Covering human rights and environmental due diligence in accordance with the German Supply Chain Act

This policy statement sets out our approach to respect for internationally recognized human rights and to management of specified environmental risks in our company and along our supply chain. Taking into account the requirements of the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (*Lieferkettensorgfaltspflichtengesetz – LkSG*), it describes the procedure we use to comply with the legally defined human rights and environment-related due diligence obligations. In addition, this policy statement provides information on the priority human rights and environment-related risks identified based on a risk analysis and expresses our human rights and environment-related expectations of our employees and suppliers in the supply chain.

1. Our commitment to human rights and management of environmental risks

As an internationally operating company, we source a variety of products and services every day via supply chains from all over the world. We regard the protection of human rights as a central element of our corporate responsibility. From our point of view, it is our task as well as the task of our business partners to achieve the observance of human rights and management of environmental risks as a fundamental obligation together and holistically. We are committed to respect internationally recognized human rights and respect them in our business activities and along our supply chain.

In accordance with the United Nations Guiding Principles on Business and Human Rights, we are committed to respecting the following internationally recognized human rights standards:

- the United Nations Universal Declaration of Human Rights
- the United Nations International Covenant on Civil and Political Rights
- the United Nations International Covenant on Economic, Social and Cultural Rights
- the International Labour Organization (ILO) core conventions and protocols on labour standards

¹ References to “we”, “our” and similar terms in this statement are to BP Europa SE. “bp Group” or “bp” refers to the wider bp Group.

In addition, we respect the principles and requirements established in the following environment-related frameworks:

- the Minamata Convention on Mercury
- the Stockholm Convention on Persistent Organic Pollutants
- the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

We consider these international frameworks and standards as the basis for our commitment and the way we want to conduct our business. We also expect them to be followed by our employees and suppliers in our supply chain.

2. Our approach to human rights and environmental due diligence

For us, respect for human rights and management of environmental risks is a continuous process in which we consider the human rights and environment-related risks and due diligence obligations of the LkSG as the guideline for our actions. The aforementioned due diligence obligations are covered by our comprehensive risk management, which is incorporated in our business processes through our implementation of the “bp Group Policy on Risk Management” and additional internal process instructions. Our risk management serves to prevent, mitigate or resolve human rights or environment-related risks. The multi-stage process described in chapters 2.1 to 2.4 forms the basis of our risk management.

The Management Board of BP Europa SE is responsible for our risk management and delegates the corresponding tasks to the responsible business units and functions. The Executive Board member holding the remit for “Procurement & Supply Chain Management” is responsible for LkSG human rights and environment-related due diligence obligations. The Human Rights Officer of BP Europa SE is responsible for monitoring the risk management in the field of LkSG human rights and environment-related due diligence obligations.

We examine the effectiveness of our risk management process as part of annual and ad hoc effectiveness reviews. In our reviews, we particularly focus on priority risks.

Reviewing and monitoring the risk management process helps us to identify changes, ensure the effectiveness of existing risk management measures and track the progress of additional measures.

2.1 Risk analysis

In order to identify human rights and environment-related risks and violations in our own business area and at our direct suppliers, we conduct risk analyses once a year and on an ad hoc basis. With the implementation of a regularly updated risk analysis process, we identify and evaluate the relevant human rights as well as environmental issues and potentially affected persons by our own business activities and our direct business partners. The aforementioned process also takes place for our indirect business relationships on an ad hoc basis. As part of the risk analysis process, we first identify potential risks in our own business area and supply chains based on general industry-

, commodity- and country-specific category assessments. Vulnerable groups are given special consideration. In the second step, those suppliers and companies with a higher risk disposition are examined for priority human rights and environment-related risks as part of a more detailed risk analysis.

The risks identified in this process are weighted, prioritized and examined for their probability of occurrence. We focus on human rights or environmental issues that have been identified as significant by the risk analyses. The effects on health, safety and the environment are given particular consideration.

In addition, human rights risks relating to the workforce are analysed as part of bp Group Labour Rights & Modern Slavery (“LRMS”) risk assessment, with reference to the bp LRMS Principles, which also serve as a basis for assessing and setting expectations for our business partners.

Based on an initial risk analysis, in our own business area we have identified, as priority areas for further analysis and continued focus, the general human rights-related risk areas of income and working hours as well as soil, water and air pollution, noise emissions and excessive water consumption and the environment-related issues of waste storage and disposal, use of persistent organic pollutants and export of hazardous substances. In our supply chains, we have identified the human rights-related issues income, working hours, discrimination and upholding freedom of association as particularly sensitive areas.

The results of the risk analyses are regularly considered within our decision-making processes regarding supplier selection and management as well as product selection. The risk analysis provides the basis for the identification of appropriate preventive and mitigation measures. In 2023, we will further expand our risk assessment to continuously improve our understanding of specific human rights and environment-related risks in our business area and supply chains.

2.2 Preventive measures

We implement measures to prevent and mitigate adverse human rights and environment-related impacts and risks that we have identified and prioritized. An important instrument for strengthening human rights, improving working conditions and promoting good governance are the bp Group corporate guidelines, which constitute a framework for action for our employees and expectations of our business partners, including our suppliers. These are, inter alia, the following:

- Code of Conduct
- bp's expectations of its suppliers
- bp's Labour Rights & Modern Slavery Principles
- bp's Business and human rights policy
- bp's Environmental policy
- Environmental Management System Certification ISO 14001:2015 for individual locations

In addition, we note that these bp Group corporate expectations, and the processes that underpin them, reflect steps taken to implement national laws and official regulatory requirements that apply

to BP p.l.c. and set expectations for what it does across the bp Group, e.g. the Modern Slavery Act (UK).

We expect our own employees to base their daily decisions on the bp Group Code of Conduct. They are regularly trained on the principles of the Code of Conduct, in particular on proper conduct in the workplace, ethical decision-making and compliance with laws and regulations. We also encourage our employees to report suspected violations of human rights and environment-related obligations through our complaints procedure.

Our business partners are required to meet our contractual requirements, in which we aim to include binding criteria for responsible conduct according to ethical and legal standards. The bp expectations of suppliers are a supplier-facing explanation of the bp Group Code of Conduct. We also expect our suppliers and business partners to pass on our human rights and environment-related expectations to their suppliers and business partners in the supply chain.

In our supplier agreements, we seek to ensure compliance with human rights and environment-related obligations through appropriate contractual clauses, including the requirement to pass on obligations in the supply chain. The agreement of appropriate control mechanisms, such as structured on-site inspections of business partners or pre-contractual reviews with regard to compliance with the LRMS criteria, ensures the implementation of the relevant requirements. To audit waste disposal companies, we have also implemented specific processes that serve to fulfil the legal requirements.

The bp Group also participates in international initiatives that support human rights. This includes the United Nations Global Compact, the Extractive Industries Transparency Initiative and the Voluntary Principles for Security and Human Rights. bp takes a constructive and progressive role in human rights-related multi-stakeholder initiatives and believe that multi-stakeholder efforts are an effective instrument for promoting sustainable standards for human rights practices at the operational level.

2.3 Complaints procedure

bp has established a group-wide and cross-thematic reporting system for internal and external complaints with various contact channels under the label "Speak Up".

To enable individuals to report human rights and environment-related risks or violations in our own business area or supply chain, an independent complaints procedure called "OpenTalk" (NAVEX Global) is available. OpenTalk is available 24 hours a day and in 75 languages. Open Talk is accessible to everyone and allows to report complaints (anonymously if desired) by telephone (Germany 0800-2255288/ UK 0800-9173604) or via a web form (www.opentalkweb.com). All reported indications and reasonable suspicions about possible human rights and the environment-related violations are dealt with within a process that is designed to be a transparent, balanced and comprehensible process for all parties involved. The reports submitted within the complaints procedure are treated confidentially. It is designed to ensure that there are no disadvantages for the whistleblowers because of their reports. The persons entrusted with processing the reports and

discussing the facts of the whistleblower's report are obliged to act impartially. They fulfil their duties independently and without being bound by instructions. They are bound to secrecy. We have established rules of procedure for the complaints procedure and published them on the internet. [Link to be added once available.]

Furthermore, the neighbourhood of our refineries has the possibility to contact our plant fire brigades at our refineries via our environmental telephone if they detect unusual emissions such as noise, odours, torchlights or other indications of possible malfunctions in our plants. For more information, please contact us using our [contact form](#).

2.4 Mitigation action

We take all incidents and concerns seriously, regardless of whether they are brought forward by our employees, external auditors, business partners, the media or other stakeholders. In the event that we suspect that our business activities are causing or contributing to human rights or environmental violations, we will investigate, address, respond to the reports submitted and take appropriate remedial action. If there is a reasonable suspicion or concrete report of possible human rights or environmental violations along our supply chain, it will be carefully and consistently investigated. Depending on the severity of the violation, we reserve the right to respond appropriately to our business partners, from requesting immediate elimination of the violation to taking legal action and up to terminating the business relationship.

3. Documentation and reporting

We will regularly review and adapt the policy statement to reflect changes in circumstances and processes. We document the fulfilment of our human rights and environment-related due diligence obligations on an ongoing basis. The documentation will be stored for at least seven years. The report in accordance with the requirements of the LkSG will be established for the first time for the year 2023 and will be submitted to the Federal Office for Economic Affairs and Export in accordance with the legal requirements and will be published on our website. bp Group also reports annually on sustainability performance, including human rights and environmental matters in the bp Group **sustainability report**, which is published [on the Group website](#).

4. Outlook

We are aware that human rights and environment-related due diligence is a responsibility that we must continuously address. Therefore, we regularly examine in which business areas and situations a risk of violations of human rights and environment-related concerns could exist. We also regularly review how we can improve and strengthen our approach to respect human rights and environmental aspects. This includes reviews of our standards and guidelines at appropriate intervals.

BP Europa SE
Management Board