



Policy Statement of BP Europa SE on  
Respect for

# *Human Rights and Environmental Standards*

## Policy Statement of BP Europa SE<sup>1</sup> on Respect for Human Rights and Environmental Standards<sup>2</sup>

As an international company, BP Europa SE is aware of the importance and significance of respecting human rights. Corporate governance in accordance with ethical principles and the principle of sustainable development is a natural part of this aspiration for us.

bp has long been committed to the protection and promotion of human rights at various levels. For example, bp is committed to respecting the rights set out in the Universal Declaration of Human Rights and is one of the founding members of the United Nations Global Compact Initiative, whose ambition is to promote sustainable and ethical corporate governance worldwide.

bp's guiding values and bp's Code of Conduct oblige everyone at bp to behave respectfully and in accordance with the rules towards employees, partners, suppliers, customers, and neighbours. bp firmly believes that respect for human rights is an essential foundation for a sustainable and future-oriented business.

BP Europa SE

Management Board

<sup>1</sup> BP Europa SE policy statement pursuant to Section 6 (2) of the Supply Chain Due Diligence Act (SCDDA) to Prevent Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG)

<sup>2</sup> References to "we", "our" and similar terms in this Policy Statement are to BP Europa SE. "bp" refers to the wider bp Group.

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### Important links

-  [BP Europa SE - Grievance Mechanism](#)
-  [bp's Expectations of it's Suppliers](#)
-  [BP Labour Rights & Modern Slavery Principles](#)
-  [bp's Websites on Human Rights and Environmental Protection](#)
-  [Chart of Diversity \(German\)](#)
-  [Code of Conduct](#)
-  [humanrightsofficer@bp.com](mailto:humanrightsofficer@bp.com)
-  [Sustainability Report](#)
-  [OpenTalk](#)
-  [Business and human rights policy](#)

## Our commitment to respect human rights and environmental standards

As an internationally operating company, BP Europa SE sources a variety of products and services via supply chains from all over the world. In doing so, we regard the respect for 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 implement the appropriate respect for human rights and the management of environmental risks as a fundamental obligation together and holistically. 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 Political and Civil Rights
- the United Nations International Covenant on Economic, Social and Cultural Rights
- the International Labour Organization (ILO) core convention and protocols on labour standards

In addition, we comply with 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 to be the basis of our commitment and the way we conduct our business. We also expect them to be followed by our employees and suppliers in our supply chain.

## Human rights and environmental related risks

Our risk processes are designed to identify human rights and environmental risks in connection with our business activities and to assess them in terms of their probability of occurrence and the possible severity of the breach. We differentiate between risks in our own business area that are directly related to our business activities and risks in our global supply chains in connection with our direct suppliers. We conduct further enquiries if we identify potential human rights or relevant environmental violations. As part of our human rights and environmental due diligence processes, we have identified the following key risks for BP Europa SE:

### **Working conditions and working hours**

Work-life balance is a high priority for BP Europa SE. Our working time principles (applicable to our own business area) consider both operational and individual concerns. We respect the right to rest and leisure, including paid leave, as well as the right to family life. For this purpose, we offer various working models in the countries in which we operate that may include parental leave, part-time work and similar arrangements. This also includes compensation for overtime, e. g. in the form of time off or appropriate remuneration. In addition, we adhere to the applicable national working time regulations and are guided by the ILO core labour standards.

### **Society and neighbourhood**

In its business activities, BP Europa SE considers the livelihoods and health of society in neighbourhoods where we work. As part of our decision-making processes, we actively address issues related to soil, water and air pollution, noise emissions, excessive water consumption, the environment-related issues of waste storage and disposal, use of persistent organic pollutants, and export of hazardous substances. Moreover, we act in accordance with the Minamata Convention on Mercury. It is our declared goal to minimize disruption for our neighbourhood during our ongoing business operations. In addition, we oppose any kind of unlawful and human rights violating deprivation of land.

### Child labour

We firmly oppose unlawful child labour in all aspects of our business operations by adherence to EU law, the International Labour Organization's fundamental labour standards, and the United Nations Global Compact's principles. Accordingly, the dignity of children must always be respected, and their safety and health protected.

### Security and occupational health and safety

The subject of security and occupational health and safety includes health, safety, security, environment (HSSE), the proper conduct of assigned security staff, and the protection of individual rights and personal data. HSSE is of central importance to bp. The corresponding bp HSSE standards are summarized in bp's Operating Management System and, together with bp's Safety Leadership Principles, form the basis for safe, responsible, and efficient work. BP Europa SE aims to diligently comply with the applicable occupational health and safety regulations, and bp's standards. We do not tolerate unlawful conduct on the part of security personnel toward employees or third parties. We contractually oblige our security service providers to comply with [bp's Code of Conduct](#) and [Business and Human Rights Policy](#). Protecting the individual rights

of employees and business partners and the compliance with applicable local data privacy laws is of highest priority for us.

### Dealing with risky raw materials

We are aware that some of the raw materials we use to manufacture our products can be dangerous to people and the environment in sourcing and processing, so we take appropriate precautions. In doing so, we always adhere to all legally binding international conventions and the applicable local laws.

### Freedom of association and collective bargaining

We are committed to respecting freedom of association. BP Europa SE employees are free to organize themselves in employee representative bodies and to engage in bargaining through these organizations and trade unions to negotiate working conditions within the framework of the respective legal requirements. In addition, we maintain a trusting, open and constructive relationship and appropriate dialogue with the elected employee representatives and employees. Even when we have different perspectives, we strive to promote sustainable cooperation for the benefit of employees and the company. We treat all employees equally in this context,

regardless of whether they are members of a trade union or employee representative body or are involved in such activities.

At our sites in countries where internationally recognized standards may not be fully enforced, BP Europa SE takes an appropriate approach to ensure compliance with the principles of internationally recognized human rights. We consider our [Code of Conduct](#) as well as the regular exchange between employees, their elected representatives (where available) and management to be suitable measures to live up to this.

### Diversity, Equity & Inclusion

Important principles of [bp's Code of Conduct](#) are diversity, equity, and inclusion, which we also expect our suppliers to respect appropriately. In BP Europa SE business activities, we are dedicated to preventing any form of discrimination, favouritism, or exclusion under the law, based on characteristics including but not limited to gender, skin colour, religious beliefs, national identity, political or other convictions, ethnic background, association with a national minority, disability, age, sexual orientation, or any other legally protected traits. In addition, we actively promote diversity and an open, inclusive corporate culture. Diversity, equity and inclusion is also supported by the

[German Diversity Charter](#), which has been initiated and signed by BP Europa SE in Germany.

### Forced labour

bp supports the elimination of forced and compulsory labour. In the context of our business activities, bp's expectations for itself and its business partners are formalized in [bp's Labour Rights and Modern Slavery Principles](#).

## Our approach to implementing human rights and environmental due diligence

Respecting human rights and management of environmental risks is a continuous process for us. In addition to the ongoing review of our due diligence obligations, we take changes in conditions, changes in the nature and scope of our business activities as well as findings from our grievance mechanism as an opportunity to review our due diligence processes and adapt them internally and along our supply chains where appropriate.

### Scope

In addition to BP Europa SE's own business unit, the scope of the corporate due diligence obligations extends to all affiliated enterprises over which BP Europa SE exercises a decisive influence. From January 01, 2024, Ruhr Oel GmbH, a 100 percent subsidiary of BP Europa SE, will be subject to an independent reporting obligation in accordance with the Supply Chain Due Diligence Act (SCDDA) due to its number of employees. All introduced corporate due diligence obligations and risk processes described in this policy statement will also apply to Ruhr Oel GmbH.

### BP Europa SE and employees

Respect for human rights is an integral part of BP Europa SE's corporate culture. We expect our own employees to be guided by the [Code of Conduct](#) in their daily decisions. They receive regular training on the principles of the [Code of Conduct](#), in particular on correct behaviour in the workplace, ethical decision-

making, and compliance with laws and regulations. We also train specialised departments on the requirements of the SCDDA. We also encourage our employees to report suspected and observed violations of human rights and environmental due diligence obligations via our grievance mechanism.

### Dealing with suppliers

In our relationships with our suppliers, we maintain an open and reliable dialog on BP Europa SE's expectations for sustainable cooperation and appropriate respect for human rights and environmental due diligence obligations. We communicate our expectations in BP Europa SE's General Terms and Conditions of Purchase, in bp's Expectations of its Suppliers, in a supplier oriented explanation of the [bp Code of Conduct](#), and also in regular exchanges with our suppliers.

In addition to the obligation to comply with human rights and environmental requirements, including the obligation to pass on these obligations and requirements in the supply chain, our due diligence with suppliers also includes appropriate control mechanisms such as risk based pre-contractual checks and/or on-site inspections of suppliers with regard to how they meet [bp's Labour Rights & Modern Slavery Principles](#).

We have also implemented special processes for certain areas, such as waste disposal, which serve to ensure compliance with any additional legal requirements that may apply.

### Affected and potentially vulnerable groups of people

Due to BP Europa SE's broad range of business activities and its complex global supply and value chains, there is a possibility that individual groups of people may be exposed to potential violations of their human and environmental rights. These groups of people are a particular focus of our due diligence obligations:

- Employees of BP Europa SE including trainees, interns, working students, and temporary staff
- Employees of service providers, direct and indirect suppliers, and joint venture partners
- Neighbourhoods and local communities in the physical vicinity of BP Europa SE-sites or the locations of service providers and direct suppliers
- Legal entities and other associations of individuals (e. g. trade unions)

To implement our due diligence obligations in a targeted manner, we have identified sub-groups for which there is a higher risk of discrimination against their protected legal positions. These groups include people who

have special needs due to physical or other characteristics, who are socially excluded, who do not receive sufficient protection from state institutions or who find it difficult to have their concerns heard:

- Elderly people
- Members of national, ethnic, religious, or linguistic minorities
- Women
- Whistleblowers
- Children
- Sick people and people with disabilities
- People in a weak or unregulated environment
- People with limited access to education
- People who belong to the LGBTIQ+ community (lesbian, gay, bisexual, transgender, intersex, queer and non-binary)
- People who hold roles in the works council
- Precarious or informal workers

## Risk Management and responsibilities

At BP Europa SE, we take the protection of human and environmental rights very seriously. We want to make sure that we and our suppliers respect and protect these rights appropriately. For this reason, we have defined our human rights and environmental due diligence obligations through a holistic risk management process and are continuously working to further improve them. Together with our business partners, the operating units of BP Europa SE are responsible for implementing due diligence obligations in their respective areas. In order to support and monitor these due diligence requirements and processes, the Management Board of BP Europa SE has appointed a Human Rights Officer. The Human Rights Officer works closely with the various departments responsible for implementing and complying with our due diligence obligations. The Management Board is regularly informed about the work of the person or persons responsible, particularly with regard to risk management. In addition, the results of the performed risk analyses are communicated to the relevant decision-makers, such as the Management Board or the purchasing department.

### **Risk management process**

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 event driven. With the implementation of a regularly updated risk analysis process, we identify and evaluate the relevant human rights as well as environmental risks. The aforementioned process also takes place for our indirect business relationships on an event-driven basis, for example if substantiated knowledge is available.

As part of the risk analysis process for our own business area, all shares in scope of the SCDDA are subject to a detailed risk analysis process in regard to priority human rights and environment-related risks independently of an abstract risk analysis. For our supply chains, we first identify abstract risks before those suppliers 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. The process is as follows:

### **Risk identification**

To assess our human rights and associated environmental risks, we analyse and systematically evaluate internal and external data sources. In our own business area, we refrain from an abstract risk identification and generally examine the entire population. For our direct suppliers, we use external data sources on country, industry, product group and service risks for the abstract risk analysis. The risk identification is supplemented by additional information resulting from our grievance mechanisms and the implementation of measures.

### **Risk analysis**

If we identify abstract risks in our own business area or at our direct suppliers as part of the risk identification process, we perform a concrete risk analysis. Our goal is to use additional information, which we collect via questionnaires and direct communication with potential risk carriers, to substantiate the risk exposure and to identify actual negative effects on people and the environment.

### **Risk assessment**

Subsequently, the risks are evaluated according to severity and probability of occurrence. For this purpose, we use the bp standard risk matrix, which has been specifically adapted to the risk requirements in connection with human rights and environmental risks. The results of this risk assessment are used in the selection of suppliers. They also serve as a basis to adapt internal standards, processes, and trainings if necessary.

## Prevention and remedial measures

We follow a risk based approach and prioritise these measures based on the results of the risk analysis. Our goal is to protect (potentially) affected persons and to ensure that negative human rights and environmental impacts are avoided, or at least reduced. We have established standardised processes for systematic implementation and developed various measures that are carried out both regularly and event driven.

### Preventive measures

Our defined preventive measures aim to prevent violations of protected human rights and environmental standards. The individual preventive measures are derived directly from the provisions of the SCDDA and related local and global standards, this applies in particular to:

- this Policy Statement on Respect for Human Rights and Environmental Standards
- the [bp Code of Conduct](#) and [bp's Expectations of its Suppliers](#)
- the established and specially protected whistleblowing mechanisms
- bp's human rights and environmental rights related education and training measures

The above mentioned risk analyses apply to our own business area and our direct suppliers. For each identified risk, we simultaneously identified existing preventive measures as part of the data collection, checked them for plausibility and documented them as preventive measures. In the future, we will also incorporate the results of the effectiveness checks of implemented remedial measures and findings from the evaluation of reports generated via the grievance procedure into the development of new or the adaptation of existing preventive measures.

### Remedial actions

Preventing the abuse of human rights and environmental violations is a primary goal of bp. BP Europa SE therefore emphasizes the development of effective preventive measures as part of its defined due diligence obligations. However, if a violation of rights is only identified after it has occurred, our remedial measures are aimed at minimising the impact and remedying the violation promptly. If, despite our best efforts, we discover violations of human or environmental rights within our own business area or our direct or indirect suppliers we aim to provide remedy or use our influence to encourage the provision of remedy.

BP Europa SE's suppliers are contractually obliged to cooperate in the investigation of (potential) human rights or environmental violations and to cooperate fully in the implementation of measures. If the violation is within the sphere of influence of our supplier, we reserve the right, depending on the severity of the violation, to initiate further measures in addition to requesting the immediate elimination of the violation. These may include the assertion of claims for damages against the supplier, the temporary suspension or, ultimately, the termination of the business relationship.



## Effectiveness check

At least once per financial year and event driven, where deemed necessary, we evaluate the effectiveness of the SCDDA specific measures to avoid and mitigate negative human rights or environmental impacts that could potentially arise from our own business area or along our supply chains. To this end, we have set up key performance indicators, which we will continue to develop and expand consistently. We also assess the effectiveness of our preventive measures and remedial actions in our supply chain based on the results of our annual risk analysis. Our grievance management and the correct allocation and processing of complaints are reviewed on a quarterly basis with the responsible departments for the individual grievance channels. In this way, we ensure that we follow up on indications of human rights and environmental violations.

## Grievance mechanisms

Appropriate grievance management is an integral part of our due diligence processes so that we can effectively prevent and remediate negative human rights and environmental impacts. The grievance management system consists of various reporting systems, which we refer to in the [Code of Conduct](#) and on our [websites on human rights and environmental protection](#). [OpenTalk](#) is our primary grievance channel for internal and external indications on human rights and environmental risks or breaches of duty in our own business area or in our supply chain. [OpenTalk](#), operated by NAVEX Global, an independent, external service provider, is available 24 hours a day, seven days a week, in more than 75 languages, and is accessible to everyone. Information and violations can be submitted anonymously if desired by telephone (Germany 0800 181 7761/UK 0800 917 3604) or via a [web form](#). The independent, impartial and confidential handling of complaints is described in detail in the BP Europa SE – Grievance Procedure Documentation, which is available [online](#). Furthermore, some BP Europa SE operating sites additionally implemented neighbourhood complaints mechanisms to facilitate raising of environmental issues.

## Reporting

We will regularly review and adapt this Policy Statement to account for changing circumstances and processes. We continuously document the execution of our human rights and environmental due diligence obligations. This documentation is kept for at least seven years. From the fiscal year 2023 onwards, we will report annually to the German Federal Office of Economics and Export Control (BAFA). This report will be published on our website.

In addition, bp reports annually on its sustainability performance, including human rights and environmental issues, in the bp Sustainability Report, which is published on the [bp website](#).

## About this policy statement

This policy statement was developed in dialogue with the relevant departments of BP Europa SE and the Group Works Council. As the challenges for companies to respect human and environmental rights are constantly changing, we will continuously review our human rights position and its implementation to ensure that they are up-to-date and effective. Important changes in the immediate environment of BP Europa SE can thus be incorporated and internal processes can be adapted accordingly. No individual or third-party rights can be derived from this policy statement. We review this policy statement annually and event driven and will update it without delay if we detect any changes or increase in risk. With the publication of this policy statement, the previous version loses its validity.



## Contact

For questions and comments, as well as complaints or reports about non-compliance with this Policy Statement or other human rights and environment-related issues, please contact [humanrightsofficer@bp.com](mailto:humanrightsofficer@bp.com) by email or use our reporting system [OpenTalk](#) as described in the grievance mechanisms section. Further information on the contents described in this document can be found online at [BP Europa SE's human rights and environmental protection website](#).

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March 2024