



Corporate Human Rights Benchmark 2023 Company Scorecard

Company name BP

Sector Extractives
Overall score 40.9 out of 100

Theme score	Out of	For theme
4.5	10	A. Governance and Policy Commitments
12.3	25	B. Embedding Respect and Human Rights Due Diligence
7.5	20	C. Remedies and Grievance Mechanisms
8.3	25	D. Performance: Company Human Rights Practices
8.2	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: International Bill of Human Rights: The Business and Human Rights Policy indicates: 'We respect internationally recognized human rights as set out in the International Bill of Human Rights'. [Business and human rights policy, 05/2020: bp.com] Score 2 • Met: Commitment to UNGPs: The policy also states that 'We recognize our responsibility to respect human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights (UNGPs) and reiterated in the human rights chapter of the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises'. It also adds: 'We will meet our responsibility to respect human rights by implementing the UNGPs and incorporating these principles into the internal processes, policies or guidance that support our business activities'. [Business and human rights policy, 05/2020: bp.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental		The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles: The Business and Human Rights Policy indicates: 'We respect internationally recognized human rights as set out in [] the core labour standards recognized by the International Labour Organization (ILO), as set out in the ILO Declaration on Fundamental Principles and Rights at Work'. [Business and human rights policy, 05/2020: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		• Met: Explicitly lists all four ILO core principles: The Company's Business and Human Rights Policy covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for these last two, it indicates: 'We will abide by applicable domestic laws concerning non-interference in our workers' right to form or join a trade union or to bargain collectively, as well as their right not to do so. Where our employees wish to be represented by trade unions or works councils, we will co-operate in good faith with the bodies that our employees collectively choose to represent them. In situations where freedom of association is restricted or prohibited by law, we will be open to and supportive of alternative means of worker representation and engagement'. [Business and human rights policy, 05/2020: bp.com] Score 2 • Met: Expects BPs/JVs to commit to ILO core principles: The document BP's Expectation of its Suppliers indicates: 'We are committed to respecting workers' rights, in line with International Labour Organisation Core Conventions on Rights at Work and expect our contractors, suppliers and joint ventures we participate in to do the same'. [Supplier Expectations, 2019: bp.com] • Met: Explicitly lists all four ILO core principles for BPs/JVs: The document BP's Expectation of its Suppliers indicates: 'Our expectation is that workers in our operations, joint ventures and supply chains are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination, or harassment'. As for freedom of association, it states: 'In conformance with local law, where workers choose to be represented by trade unions or works councils, employers will cooperate in good faith with the bodies that the employees collectively choose to represent them'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (compani
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to respect H&S of workers: The document BP's Commitment to health, safety, security and environmental Performance states: 'Our HSSE goals are simply stated – no accidents, no harm to people and no damage to the environment. [] Nothing is more important to us than the health, safety and security of our workforce and the communities in which we operate, and behaving responsibly towards our shared environment. We must be vigilant, disciplined and always looking out for one another. We are committed to: Complying with applicable laws and company policies and procedures'. [Commitment to health, safety, security and environmental, 05/02/2020: bp.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: Regarding working hours and rest, the document Labour Rights & Modern Slavery Principles indicates: 'Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined leave periods'. The 2021 Modern Slavery and Human Trafficking Statement discloses

Indicator Code	Indicator name	Score (out of 2)	Explanation
			actions taken to tackle extended working hours and rotations. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours, which includes the particularities of extractive sectors (Alternatively, this subindicator also accepts commitments stating that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate, although this commitment might not be feasible for some companies in the extractive sector). [Labour rights and modern slavery principles 2019, 2019: ttps://bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]
			• Met: Expects BPs/JVs to commit to H&S of workers: The document BP's Expectation of its Suppliers indicates: 'Conduct business in a way that supports BP's HSE goals of no accidents, no harm to people and no damage to the environment by taking a systematic approach to managing operating activities and HSE risks, complying with applicable HSE laws and regulations, and seeking to continuously improve health, safety and environmental performance'. [Supplier Expectations, 2019: bp.com]
			• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The document BP's Expectation of its Suppliers indicates: 'Contracts as a minimum contain the following elements: [] expected regular working hours, including overtime hours, rates of pay, lawful wage deductions, pay cycle, benefits, including overtime, leave entitlement and rest days, provisions for repatriation'. The Company has provided comments to CHRB regarding this indicator. It included the BP Labour Rights & Modern Slavery Principles, which states: 'Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined leave periods'. It adds: 'We are committed to respecting workers' rights, in line with International Labour Organisation Core Conventions on Rights at Work and expect our contractors, suppliers and joint ventures we participate in to do the same. [] The below principles are intended to assist our businesses as they work to check performance on this expectation, including with our contractors and suppliers'. It also made reference to the 2021 Modern Slavery and Human Trafficking Statement which discloses actions taken to tackle extended working hours and rotations. However, no evidence found of the Company explicitly requiring to respect ILO conventions on working hours, which includes the particularities of extractive sectors (Alternatively, this subindicator also accepts commitments stating that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate, although this commitment might not be feasible for some companies in the extractive sector). The Company has provided additional comments, however, the content has not been found in publicly available sources. [Supplier Expectations, 2019: bp.com] & [Labour rights]
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	0.5	and modern slavery principles 2019, 2019: ttps://bp.com] The individual elements of the assessment are met or not as follows: Score 1 Not Met: Commitment to respect land ownership/natural resources as in VGGT: The Company has provided comments to CHRB regarding this indicator. However, no evidence found of a commitment to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure of Land, (VGGT) to recognize the importance of communities' right to access to land and other natural resources. Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Business and Human Rights Policy indicates: 'We avoid involuntary resettlement of communities and/or individuals, but if this is not possible our guidance for where we need to access or acquire land for our operating activities is aligned with the principles outlined in International Finance Corporation (IFC) Performance Standard 5'. However, having a 'guidance' that is aligned to IFC PS5 is not considered an equivalent to commit to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the Standard, as it seems to be used as 'guidance'. The Company has provided comments to CHRB regarding this indicator. However, the choice of words of the Company seems to imply that the 'guidance' is aligned to the IFC principles and not the commitment itself. The subindicator looks for a commitment to the IFC Performance Standards. [Business and human rights policy, 05/2020: bp.com] Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Business and Human Rights Policy indicates: 'We respect the rights of indigenous peoples'. [Business and human rights policy, 05/2020: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Expects EX BPs to make these commitments
			Not Met: Expects EX BPs to make these commitments Score 2 Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The document Business and human rights policy indicates: 'Our guidance references IFC Performance Standard 7 and recognizes that it is important that we identify and consult with IPs, seeking to apply the principles of free, prior and informed consent (FPIC) where practical, ideally prior to the commencement of activities'. However, 'seeking to apply' is not considered a formal statement of commitment according to CHRB wording criteria. No commitment to respecting ownership/use of land and natural resources including a commitment to obtain the free prior and informed consent (FPIC) found. The Company has provided comments to CHRB regarding this indicator, however, no further evidence found. [Business and human rights policy, 05/2020: bp.com] Met: Commitment to respect the right to water: The document Business and human rights policy indicates: 'We respect the rights to water and sanitation for people who could potentially be affected by our activities, including our employees, contractors and neighbouring communities'. [Business and human rights policy, 05/2020: bp.com] Not Met: Expects EX BPs to make these commitments: See the subindicator above. The Company has provided comments to CHRB regarding this indicator. It included the Business and Human Rights Policy, which notes: 'We seek to make contractual agreements with our suppliers that require them to respect internationally recognized human rights in their work for bp, consistent with the commitments in this policy, as appropriate to the nature of their work for us. We have standard contract clauses to support this. [] we want to work with business partners that share our commitments to human rights, safety and ethics and compliance and we seek to use our leverage, consistent with the UNGPs, to encourage them to act in a manner consistent with the principles underlying the commitments set out in this policy'. However, as th
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)		to make contractual agreements consistent with the commitments in this policy and that it 'encourages' business partners to act in consistency with this policy, it is
		0.5	international humanitarian law. [Business and human rights policy, 05/2020: bp.com] & [Voluntary Principles on Security and HR, N/A: voluntaryprinciples.org] Score 2 • Not Met: Expects EX BPs to commit to these rights: The Business and Human Rights Policy, which notes: 'We endorse the Voluntary Principles on Security and Human Rights (Voluntary Principles) and are committed to implementing them, as the global standard for the provision of responsible security in our industry. [] We support and implement the Voluntary Principles as a framework for operational due diligence and management of security-related risks to the human rights of people in communities near our sites. The Voluntary Principles inform the way we work with public and private security forces who protect our facilities, to reinforce respect for human rights. We also provide guidance and training to our businesses on implementation of the Principles'. Moreover, 'We seek to make contractual agreements with our suppliers that require them to respect internationally recognized human rights in their work for bp, consistent with the commitments in this policy, as appropriate to the nature of their work for us. We have standard contract clauses to support this. [] we want to work with business partners that share our commitments to human rights, safety and ethics and compliance and we seek to use our leverage, consistent with the UNGPs, to encourage them to act in a manner consistent with the principles underlying the commitments set out in this policy'. However, as the Company indicates it 'seeks' to make contractual

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			agreements consistent with the commitments in this policy and that it 'encourages' business partners to act in consistency with this policy, as well as to commit to respect international humanitarian law (IHL). [Business and human rights policy, 05/2020: bp.com]
A.1.4	Commitment to remedy	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to remedy adverse HRs impacts: The Business and Human Rights Policy indicates: 'Where bp identifies that we have caused or contributed to adverse impacts on the human rights of others, we provide for or co-operate in the remediation of the adverse impacts through legitimate processes intended to deliver effective remedy while not preventing access to other forms of remedy if justified'. [Business and human rights policy, 05/2020: bp.com] • Met: Expects EX BPs to make this commitments: The document BP's Expectation of its Suppliers indicates: 'We ask [] that you: [] Respect the human rights and dignity of all people and meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights including: [] Identifying, avoiding, minimizing or mitigating and remedying any human rights impacts on communities'. [Supplier Expectations, 2019: bp.com] Score 2 • Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Business and Human Rights Policy indicates: 'Where bp identifies that we have caused or contributed to adverse impacts on the human rights of others, we provide for or co-operate in the remediation of the adverse impacts through legitimate processes intended to deliver effective remedy while not preventing access to other forms of remedy if justified. This may include co-operating in good faith in the provision of remedy through state-led mechanisms, such as the OECD national contact points'. [Business and human rights policy, 05/2020: bp.com] • Met: Commitment to work with EX BPs on remedy: The Business and Human Rights Policy indicates: 'Where adverse impacts are directly linked to our activities through our business relationships, we will support our business partners in the remediation of those impacts through their own grievance management processes, or support collaboration to provide for non-judicial remediation through third parties'. [Busi
A.1.5	Commitment to respect the rights of human rights defenders	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Zero tolerance of threats/attacks on HRDs: The Business and Human Rights Policy indicates: 'In respect of our activities, we will not tolerate or contribute to attacks, or physical or legal threats, against those safely and lawfully exercising their human right to freedom of expression, peaceful protest or assembly, including where they are acting as human rights defenders (HRDs)'. [Business and human rights policy, 05/2020: bp.com] • Met: Expects BPs to make this commitment: See above. The Company has provided comments to CHRB regarding this indicator. It included the Business and Human Rights Policy, which notes: 'We seek to make contractual agreements with our suppliers that require them to respect internationally recognized human rights in their work for bp, consistent with the commitments in this policy, as appropriate to the nature of their work for us. We have standard contract clauses to support this. [] we want to work with business partners that share our commitments to human rights, safety and ethics and compliance and we seek to use our leverage, consistent with the UNGPs, to encourage them to act in a manner consistent with the principles underlying the commitments set out in this policy'. The 2020 Modern Slavery and Human Trafficking Statement indicates: 'Our standard contract template require contractors and suppliers to act consistently with our code and Human Rights policy'. [Business and human rights policy, 05/2020: bp.com] Score 2 • Not Met: Commitment to working with HRDs to create safe and enabling environment: The Business and Human Rights Policy indicates: 'Where we believe it could be beneficial to do so, we may choose to act in coordination with other stakeholders and, as appropriate to the nature of any leverage available to us, to support HRDs in the exercise of those human rights'. However, no commitment to working with human rights defenders to create safe and enabling environments for civic e

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			[Business and human rights policy, 05/2020: bp.com] & [2022 Voluntary Principles
			Annual Report, 04/2023: voluntaryprinciples.org

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board level responsibility for HRs: The 2022 Sustainability Report indicates: 'the S&SC [safety and sustainability committee] has oversight oh hrm including modern slavery'. The S&SC is a Board-level committee. [2022 Sustainability Report, 2023: bp.com] • Not Met: Describes HRs expertise of Board member: The Sustainability Report 2022 describes the S&SC responsibilities. Moreover, the webpage section Corporate Governance discloses the individual profile of each Board member. However, no information on the human rights expertise of the Board member or Board Committee tasked with that governance oversight found. [2022 Sustainability Report, 2023: bp.com] & [Corporate governance_web, N/A: bp.com] Score 2 • Met: Board member/CEO signal importance of HRs in their communications: In the video on the COP26 High-Level Dialogue on Business and Human Rights in the Just Transition, the CEO Bernard Looney talks about just transition, highlighting the importance of inclusivity, just transition and the help of the civil society to operate this complex transition. In the CEO's note to bp staff, there is reference to racial injustice. Finally, there is a CEO's letter on Human Rights Day on LinkedIn, talking about Human Rights and bp. [COP26 High-Level Dialogue on Business and Human Rights in the Just Transition_web, N/A: ihrb.org] & [Human Rights Day_Linkedin.Om]
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Process to review HRs strategy at board level: The 2021 Annual Report indicates: 'The role of the Safety and Sustainability Committee (S&SC) is to oversee the execution and review the processes that are established and maintained by the leadership team to identify and mitigate significant non-financial risk'. It has met six times in 2021. It also states that 'The S&SC [Safety and Sustainability Committee] also received regular reports from the CEO and SVP S&OR on operational risk, including regular reports prepared on the group's health, safety security and environmental performance []'. [Annual Report and Form 20-F 2021, 18/03/2022: bp.com] • Met: Example of HRs issues/trends discussed in last reporting period: The 2021 Modern Slavery and Human Trafficking St indicates: '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'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] Score 2 • Met: Meets both requirements under score 1: See above • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: At least one board member incentive linked to HRs commitments: Safety and sustainability (30%) is part of the measures for the annual bonus of Executive Officer. The Chief executive officer is also a Board member. Safety represents half of that 30%, and includes the following KPI: Process Safety Tier 1 and Tier 2 events: The Company discloses the threshold of events, the target, the maximum and the actual outcome. [Annual Report and Form 20-F 2021, 18/03/2022: bp.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although the Chief Executive Officer has an incentive for safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. The 2022 Directors Remuneration Report, indicates that the Remuneration committee considers climate-related issues. Also, 'The committee [Remuneration committee] has adopted a combination of performance lenses to ensure alignment to our strategy: Safety and sustainability — to support our fundamental goal of no harm to our people and driving our net zero ambition. Safety and sustainability is a key thread that runs through all of our incentive arrangements either by formal measure or underpin'. The 2022 Sustainability Report notes that Human Rights is included in the Company's sustainability strategy: 'Our aim 12 is to support a just energy transition that

Indicator Code	Indicator name	Score (out of 2)	Explanation
			advances human rights and education'. However, the subindicator looks for evidence that its incentive for safety performance, includes health and safety of local communities and workers of extractives business partners. Which was not found. [2022 Directors Remuneration Report, 2023: bp.com] & [2022 Sustainability Report, 2023: bp.com] Score 2 • Met: Performance criteria linked to HRs made public: See above. Safety represents 15% of the bonus and includes specific metrics and outcome achieved, and the weighting it has in overall bonus achieved (0,19 out of 1,61/2) [Annual Report and Form 20-F 2021, 18/03/2022: bp.com] • Not Met: Review of other board incentives for coherence with HRs policies: The Company has provided comments to CHRB regarding this indicator. It included the 2022 Directors Remuneration Report, however, no evidence found that it has reviewed other Board performance incentives to ensure coherence with its human includes a light that the second content is the second content and performance incentives to ensure coherence with its human includes a light that the second content is the second content and content is the second content and content is the second content and content is the sum of the second content in the second content is the second content in the second content in the second content is the second content in the second content in the second content is the second content in the second c
A.2.4	Business model strategy and risks	0	rights policy commitment. [2022 Directors Remuneration Report, 2023: bp.com] The individual elements of the assessment are met or not as follows: Score 1 Not Met: Board process to review business model and strategy for HRs risks: The 2022 Sustainability Report, explains the following: 'Our aim 12 is to support a just energy transition that advances human rights and education'. It also notes that: 'The S&SC has oversight of human rights, including modern slavery. Our group operations risk committee reviews progress on managing the potential operational and associated supply chain risks of modern slavery. Our human rights working group was consolidated into the sustainability forum from 1 January 2021'. It also provides additional information on Giulia Chierchia, the Executive Vice President, Strategy & Sustainability. However, this subindicator looks for a description of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights. Current evidence seems to refer to responsibility allocation and functions, rather than a process to review business strategy. [2022 Sustainability Report, 2023: bp.com] & [Giulia Chierchia_web, N/A: bp.com] Not Met: Describes frequency and triggers for reviewing business model: See above. The Company has provided comments to CHRB regarding this indicator. It included the 2022 Sustainability Report, which explains how just transition is embedded in its sustainability strategy and its Human Rights management as well as additional information on Giulia Chierchia, the Executive Vice President, Strategy & Sustainability. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights. [2022 Sustainability Report, 2023: bp.com] & [Giulia Chierchia_web, N/A: bp.com] Score 2 Not Met: Meets both requirements under score 1: See above. Not Met: Example of actions resulting from reviews

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of 1 on A.1.2.a: See A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The Company indicates in its Business and Human Rights Policy that 'At the executive management level, the group operations risk committee reviews progress on human rights implementation'. [Business and human rights policy, 05/2020: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Describes day-to-day responsibility for implementing HRs commitments: The webpage section Human Rights indicates: 'Our human rights working group was consolidated from 1 January 2021 into the sustainability forum which, as one of its activities, considers current and emerging human rights risks of potential group significance, defines the overall bp position, and integrates performance across the group with regards to the Human Rights Policy and relevant sustainability aims, including Just Transition (aim 12), Sustainable Livelihoods (aim 13)and Greater Equity (aim 14)'. The Business and Human Rights Policy adds: 'The human rights working group, which is made up of senior representatives from across the business, considers current and emerging human rights risks of potential group significance'. [Business and human rights policy, 05/2020: bp.com] & [Human Rights_web, N/A: bp.com] • Met: Day-to-day resources and expertise allocation in own operations: The Business and Human Rights Policy indicates: 'business functions and local operations are responsible for implementing actions to help meet the commitments in this policy and all relevant group requirements'. The 2022 Sustainability Report indicates that: 'We provide training to help our social practitioners, people & culture and procurement teams identify and manage labour rights and modern slavery risks, and to understand relevant requirements in our operating management system. [] We embedded a systematic approach across our operating management system. [] We embedded a systematic approach across our operating management system. [] We embedded a systematic approach across our operating management system. [] We embedded a systematic approach across our operating management system. [] We embedded a systematic approach across our operating management system. [] We embedded a systematic approach across our operating management system. [] We open defined a systematic approach across our operating management system. [] We open define
B.1.2	Incentives and performance management	0.5	Traffecking St, 24/06/2022: bp.com] The individual elements of the assessment are met or not as follows: Score 1 • Met: Senior manager incentives linked to HRs commitments: Safety and sustainability (30%) is part of the measures for the annual bonus of Executive Officers. Safety represents half of that 30%, and includes the following KPI: Process Safety Tier 1 and Tier 2 events: The Company discloses the threshold of events, the target, the maximum and the actual outcome. [Annual Report and Form 20-F 2021, 18/03/2022: bp.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: The 2022 Annual Report, indicates that Safety and Sustainability [30% weight] includes: 'Process safety tier 1 and tier 2 events [15%]'. Although the Executive Officers have an incentive for safety performance, it is not clear whether it includes health and safety of local communities or workers of extractives business partners. [2022 Annual Report, 10/03/2023: bp.com] Score 2 • Met: Performance criteria linked to HRs made public: See above. Safety represents 15% of the bonus and includes specific metrics and outcome achieved, and the weighting it has in overall bonus achieved (0,19 out of 1,61/2). The 2022 Annual Report adds: 'tragically, during 2022 four people died while working for bp. The committee takes the view – shared by bp's leadership – that at bp safety comes first and thus avoiding workplace safety incidents must be the top priority. [] As such, we have applied additional downward discretion on the outcome for Bernard and relevant members of management which results in a score of 1.51 out of 2.00'. [Annual Report and Form 20-F 2021, 18/03/2022: bp.com] & [2022 Annual Report, 10/03/2023: bp.com] • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: HRs risks integrated as part of enterprise risk system: The impact criteria of its risk management include 'health and safety, [] and non-financial (such as

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			regulatory impact) criteria and are to be used for assessing risks'. Among its Safety and operational risks is: 'Process safety, personal safety and environmental risks exposure to a wide range of health, safety, security and environmental risks could cause harm to people, [] and result in regulatory action, legal liability, business interruption, [] damage to our reputation []'. These risks are part of the Company's risk management system as these are 'Risks for particular oversight by the leadership team, the board and their committees in 2022'. [Annual Report and Form 20-F 2021; bp.com] • Met: Provides an example: Regarding the risks above mentioned, it adds, in its Annual Report and Form 20-F 2021; 'Our operation management system helps us manage these risks and drive performance improvements. It sets out standards and requirements which govern key risk management activities such as inspection, maintenance, testing, business continuity and crisis response planning and competency development'. In addition, The 2022 Sustainability Report indicates: 'Our OMS [operating managing systems] requires projects to identify, engage and consult with affected people and to seek feedback on our proposed or actual activities, potential impacts and mitigation measures. In 2022 an internal review of our operated activities found a high level of conformance with our community requirements'. The 2021 Modern Slavery and Human Trafficking St adds: 'During 2021, we made a concerted effort to build awareness and understanding of the indicators of LRMS [labour rights and modern slavery] 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'. [Annual Report and Form 20-F 2021, 18/03/2022: bp.com] & [2022 Sustainability Report, 2023: bp.com] Score 2 • Met: Risk assesment by Audit Committee or independent third party: The 2022 Sustainability Report and Form 20-F 2021, 18/03/2022: bp.
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of 1 on A.1.2.a: See A.1.2.a • Met: Communicates HRs policies to all workers in own operations: The Business and Human Rights Policy indicates: 'We will meet our responsibility to respect human rights by implementing the UNGPs and incorporating these principles into the internal processes, policies or guidance that support our business activities. This includes: training; []. By doing this, we aim to enable our businesses to identify potential impacts on the rights of individuals in local communities and workers affected by our activities'. The 2021 Modern Slavery and Human Trafficking Statement adds: 'Providing training on our Code of Conduct, which underpins and reinforces elements of our Human Rights policy. This was mandatory to all bp employees'. Training is assumed to take place in local languages. [Business and human rights policy, 05/2020: bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] Score 2 • Not Met: Communicates HRs policies to stakeholders: The 2022 VP Annual Report indicates: 'An awareness session on the Voluntary Principles and International Humanitarian Law was delivered to Teluk Bintuni Military personnel and representatives from Papua Barat Military Command in November 2022. Papua Barat Regional Police and Teluk Bintuni Police, as well as the National Human Rights Commission Papua Chapter, also attended the awareness session. In December 2022, an awareness campaign was conducted to address freedom of expression in the context of the security threats as part of the Tangguh Expansion Project demobilization risk'. It also adds, in its 2021 Modern Slavery and Human Trafficking St that 'LRMS [labour rights and modern slavery] 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Around 300 contractors attended these events'. However, although the Company provides examples of training sections and Human Rights discussions, this subindicator looks for a description of how it communicates its policy human rights commitments to affected stakeholders, including local communities and other groups. Business partners are assessed in the following indicator. [2022 Voluntary Principles Annual Report, 04/2023: voluntaryprinciples.org] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] Not Met: Example of how HRs policies are accessible for intended audience: The 2021 Modern Slavery and Human Trafficking St states that 'LRMS [labour rights and modern slavery] 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'. It adds: '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'. The Company provides addition in its feedback, including its human rights policy, and other related policies such as supplier expectations, in multiple languages. However, this subindicator looks for an example of how it ensures the form and frequency of the information communicated [its policy commitments] is accessible to its intended audience, it needs to include communicating to local communities and potentially affected stakeholders/stakeholders. Communication to business partners is assessed in the following indicator. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]
B.1.4.b	Communication /dissemination of policy commitment(s)		The individual elements of the assessment are met or not as follows: Score 1 • Met: Meets ILO requirement for suppliers on A.1.2.a: See A.1.2.a • Not Met: Describes steps to communicate HRs policies to EX BPs: The 2021
	to business relationships	0.5	Modern Slavery and Human Trafficking St states that 'LRMS [labour rights and modern slavery] 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. However, this subindicator looks for evidence of how the Company communicates HR's requirements for business partners generally. The Company has provided comments to CHRB regarding this indicator. It included the Business and Human Rights Policy, which indicates: 'we seek to use our leverage, consistent with the UNGPs, to encourage them to act in a manner consistent with the principles underlying the commitments set out in this policy'. However, this subindicator looks for a description of the steps it takes to communicate its policy requirements. [Business and human rights policy, 05/2020: bp.com] Score 2
			Met: Describes how HRs policies are contractual/binding for suppliers: The 2020 Modern Slavery and Human Trafficking Statement indicates: 'Our standard contract template require contractors and suppliers to act consistently with our code and Human Rights policy'. [Modern Slavery and Human Traffecking St - 2020, 25/06/2021: bp.com] Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: See above. It also indicates: 'contractors, suppliers and non-operated joint ventures develop and maintain adequate processes and control to implement, communicate, monitor and remediate identified deficiencies with regard the above [Human Rights provisions], including in their supply chain'. [Supplier Expectations, 2019: bp.com]
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of at least 1 on A.1.2.a: See A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: The Business and Human Rights Policy indicates: 'We will meet our responsibility to respect human rights by implementing the UNGPs and incorporating these principles into the internal processes, policies or guidance that support our business activities. This includes: training; []. By doing this, we aim to enable our businesses to identify potential impacts on the rights of individuals in local communities and workers affected by our activities'. The Modern Slavery and Human Trafficking Statement adds: 'Providing training on our Code of Conduct, which underpins and reinforces elements of our Human Rights policy. This was mandatory to all bp employees'. [Business and human rights policy, 05/2020: bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] • Met: Trains relevant managers including security on HRs: The webpage section Human Rights indicates: 'We support the Voluntary Principles on Security and Human Rights, which guide the way we work with security forces. [] We provide

Indicator Code	Indicator name	Score (out of 2)	Explanation
			training on the principles for employees who are accountable for managing security and conduct assessments to identify ways in which we can help them to improve'. [Human Rights_web, N/A: bp.com] Score 2 • Met: Score of 2 on A.1.2.a: See A.1.2.a • Met: Meets both requirements under score 1
			 Not Met: Trains BPs to meet HRs commitments: The 2022 Sustainability Report indicates that 'In 2022 our engagement on sustainability frame issues with NOJVs [non-operated joint ventures] focused on [] human rights, using a variety of approaches including seminars, board resolutions and support for target setting. We believe these activities can help us to become more robust and consistent in our efforts to influence NOJVs on sustainability issues'. The 2021 Modern Slavery and Human Trafficking St adds: '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'. However, it is not clear these are common training practices on its Human Rights commitments aimed at business partners in general, as the first example seems to refer to specific engagement with NOJVs. As for the second example, it is not clear information is shared in the format of training. This subindicator looks for a general description of the training it provides to business partners to help them meet its human rights policy commitments. [2022 Sustainability Report, 2023: bp.com] Not Met: Discloses % suppliers trained: The 2021 Modern Slavery and Human Trafficking St indicates that 'LRMS [labour rights and modern slavery] 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'. The Company
			makes reference to further information to training on its 2022 Sustainability Report. However, the percentage of business partners receiving training on human rights commitments was not found. [2022 Sustainability Report, 2023: bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Score of at least 1 on A.1.2.a: See A1.2.a • Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The 2021 Modern Slavery and Human Trafficking Statement indicates: '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 highrisk'. The 2022 Sustainability Report states that 'In line with our human rights policy commitment, we commissioned an independent third party to assess our conformance with our human rights policy. It included a systematic review of the way we identify and manage human rights issues, in the context of our policies, processes and systems, including grievance mechanisms and remediation. Two sites were also reviewed by the third party to assess how they implement our human rights policy'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] • Not Met: Discloses % of EX BP's monitored • Not Met: Describes how workers are involved in monitoring: The 2021 Modern Slavery and Human Trafficking St indicates that 'top three on-site monitoring activities used were site walkovers and worker interviews, pay roll checks and checks on working hours and overtime. These identified risks in wages, employment terms, working hours and discrimination'. It also explains how workers are aware of our global helpline. However, the indicator looks for evidence of how the Company's own workers are involved in the monitoring process itself. It is not clear if the Company's own workers are conducting monitoring activities, as the Company refers to an independent assessment. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] Score 2 • Met: Score of 2 on A.1.2.a: See A1.2.a
			 Met: Score of 2 on A.1.2.a: See A1.2.a Not Met: Describes corrective actions process: The Company discloses, in its 2021 Modern Slavery and Human Trafficking Statement, the elements of its supplier due diligence. It includes 'agree corrective action plans'. The 2021 Modern Slavery and Human Trafficking Statement that regarding its grievance mechanism: 'If a serious breach is found and no corrective action is taken'. It also adds that 'In building corrective action plans during supplier due diligence processes, information on industry best practice may be shared with suppliers'. The Company makes

Indicator Code	Indicator name	Score (out of 2)	Explanation
			reference to different case studies. However, the subindicator looks for a description of the steps of the corrective action process, no further evidence found. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] • Not Met: Discloses findings and number of correction action processes: The 2021 Modern Slavery and Human Trafficking Statement states the following regarding to its assessments of the effectiveness of their approach: 'In 2021, bp used a groupwide data collection system with 18 of our operated businesses, to collate performance data related to LRMS and help us measure, support and manage performance'. It also discloses example of findings of this assessment. However, the subindicator looks for the findings (non-compliance cases) of the monitoring to its Human Rights policy and the number of corrective action process as a result of this monitoring. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]
B.1.7	Engaging and terminating business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: HRs performance affects selection EX BPs: The 2021 Modern Slavery and Human Trafficking Statement indicates: '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 inhouse assessments'. The 2021 Sustainability Report adds: 'This approach helps us identify whether or not potential suppliers will be able to meet our LRMS [Labour Rights & Modern Slavery Principles] expectations, if additional controls are needed, and how to introduce them if this is the case'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] & [Sustainability Report 2021, 31/03/2022: bp.com] • Met: HRs performance affects ongoing BPs relationships: The 2021 Modern Slavery and Human Trafficking Statement indicates: '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'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] Score 2 • Not Met: Describes positive HRs incentives for business relationships • Met: Works with EX BPs to meet HRs requirements: The 2022 Sustainability Report indicates that 'We have processes for managing our interests in nonoperated joint ventures (NOJV), including ways to encourage sustainability. One example is our eight essentials framework — a system that guides our NOJV portfolio managers in their relationships with NOJVs. The eight essentials framework is accessible through a dedicated cen
B.1.8	Approach to engagement with affected stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how workers and communities identified and engaged in the last two years: The 2021 Sustainability Report indicates: 'We engage with a range of stakeholders to help us progress our aims, deliver safe operations and improve safety for our workforce, local communities and our industry. Our engagement takes many different forms, reflecting the complex, global nature of our business. [] We identify our main stakeholder groups as employees, investors and shareholders, customers, society, government and regulators, and supply chain partners. [] We engage regularly with employees through internal communications and 'Pulse' surveys'. The engagement with employees in 2021 entailed: 'Weekly 'Pulse Live' surveys were sent to a representative sample of employees to gather continuous feedback. Our annual 'Pulse' survey was sent to all employees. Our businesses and leadership regularly communicated with employees through webcasts and virtual events'. However, although the Company explains how it engaged with workers, no evidence found of the process to identify stakeholders with whom to engage in human rights issues, including communities or workers amongst extractive business partners. The 2022 Sustainability Report indicates that 'at our Fowler Wind Farm in Indiana, US, we engage regularly with over 500 families who live and work adjacent to the site. [] We have put in place

Indicator Code	Indicator name	Score (out of 2)	Explanation
			formal and informal feedback mechanisms and we respond promptly to resolve any concerns raised'. Also, it provides details of a pilot project in Trinidad and Tobago:
			'In collaboration with our strategic partner [] we are working to assess the quality
			of our community relations. In Trinidad and Tobago we have piloted a framework
			for evaluating corporate performance from a community perspective. This pilot will inform our approach in other locations'. In addition, The 2021 Modern Slavery and
			Human Trafficking St indicates that 'Our workforce includes bp employees and
			contractor workforces. [] [In response to COVID-19 restrictions] we have trialled
			some remote methodologies to assess suppliers and to interview workers. [] 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'. Finally, '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. However,
			although the Company has provided different examples of recent engagement, no description of the system/process it has in place to identify affected stakeholders.
			[Sustainability Report 2021, 31/03/2022: bp.com] & [2022 Sustainability Report,
			2023: <u>bp.com</u>]
			 Not Met: Discloses stakeholders whose HRs may be affected Met: Provides two examples of engagement with stakeholders: The 2022
			Sustainability Report indicates that 'at our Fowler Wind Farm in Indiana, US, we
			engage regularly with over 500 families who live and work adjacent to the site. []
			We consider how the community may be impacted by our daily work. We have put
			in place formal and informal feedback mechanisms and we respond promptly to resolve any concerns raised'. Also, it also provides details of a pilot project in
			Trinidad and Tobago: 'In collaboration with our strategic partner [] we are
			working to assess the quality of our community relations. In Trinidad and Tobago
			we have piloted a framework for evaluating corporate performance from a
			community perspective. This pilot will inform our approach in other locations'. It also makes reference to the 2021 Modern Slavery and Human Trafficking St, which
			indicates: 'Our workforce includes bp employees and contractor workforces. [] [In
			response to COVID-19 restrictions] we have trialled some remote methodologies to
			assess suppliers and to interview workers. [] 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'. Finally, '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'. [2022 Sustainability Report, 2023: bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]
			Score 2
			Not Met: Analysis of stakeholder views on company's HRs issues: The 2021 Suptainability Report indicates (Translaves and Just that they hallow use are
			Sustainability Report indicates: 'Employees told us that they believe we are progressing with our transformation, but some of them told us they do not fully
			understand our strategy'. However, although the Company provides a summary
			analysis of workers views, it is not clear how these views are connected to Human
			Rights issues. In addition, in case of individual group inputs, another extra case would be expected in order to award this subindicator. The 2022 Sustainability
			Report explains the pilot project in Trinidad and Tobago. However, no summary
			analysis of the input/views given by stakeholders on human rights issues found. The
			2021 Modern Slavery and Human Trafficking St discloses assessment tools and
			examples of findings in its assessments in 18 operated businesses: 'Top three onsite 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'. However, this subindicator
			looks for evidence of the Company summarising stakeholders' views on company's
			human rights issues. It also can accept case studies if there are at least two cases showing analysis of stakeholder views. [Sustainability Report 2021, 31/03/2022:
			bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]
			• Not Met: Describes how stakeholders views influenced company's HRs approach:
			The 2021 Sustainability Report indicates how these views have influenced their

Indicator Code	Indicator name	Score (out of 2)	Explanation
			actions: 'We launched a strategy education campaign and also identified focus areas to build on, strengths that influence engagement, key emerging concerns to address and ways to build greater inclusion'. However, although the Company describes actions taken as a result of workers' feedbacks, it is not clear how these are connected to Human Rights issues. The 2021 Modern Slavery and Human Trafficking St discloses assessment tools and examples of findings in its assessments in 18 operated businesses: 'These identified risks in wages, employment terms, working hours and discrimination'. However, no further description found of how these views have influenced the development or monitoring of its human rights approach. [Sustainability Report 2021, 31/03/2022: bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes process of identifying risks in own operations: The 2021 Modern Slavery and Human Trafficking Statement indicates: '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 the categorized as being either low, medium, or high-risk'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] • Met: Describes process for identifying risks in EX BPs: It also states that: 'Operated businesses are required to risk assess and categorize their key contractors. [] This approach enables our businesses to determine any further due diligence and remedial action required to adequately mitigate supply chain LRMS risks'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com Score 2 • Met: Describes global risk identification system incl. stakeholder consultation: As indicated above, the report statement indicates that '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'. The 2022 Sustainability Report indicates: 'we commissioned an independent third party to assess our conformance with our human rights policy'. Moreover, it makes reference to worker's interviews, which are detailed in the 2021 Modern Slavery and Human Trafficking St: 'Our workforce includes bp employees and contractor workforces. [] [In response to COVID-19 restrictions] we have trialled some remote methodologies to assess suppliers and to interview workers. [] we have trialled a remote methodology for on-site assessment in Azerbaijan. This involved an experienced

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Describes risks identified in relation to new circumstances: The 2022 Voluntary Principles Annual Report indicates that 'We also strengthened our security and human rights risk assessment process by introducing components of the Voluntary Principles Initiative Conflict Analysis Tool for Companies. As of January 2023, our teams have begun to assess conflict risks using this new process which will inform security responses and could help to reduce these risks while taking local conditions into account'. However, this subindicator looks for a description of the risks identified when its global system to identify human rights risks is triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. No further evidence found. [2022 Voluntary Principles Annual Report, 04/2023: voluntaryprinciples.org]
B.2.2	Assessing human rights risks and impacts	1	The individual elements of the assessment are met or not as follows: Score 1 * Met: Describes assessment process and discloses salient HRs risks: The 2021 Modern Slavery Statement indicates: "Risk assessment is included in our operating management system (OMS) processes. We use external labour rights and modern slavery (IRMS) 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'. According to the 2020 Modern Slavery statement: "Since 2016 we have taken a risk-based approach to assessment and identification of modern slavery in our businesses and supply chains, based on business activity, country risk and workforce demographics". The Business and Human Rights Policy indicates: "In identifying, assessing and addressing the human rights impacts of our operations and relationships, we will consult with those who may be affected. [] We will obtain independent third-party assessments of selected sites and business activities on a risk-prioritized basis to assess their conformance with this policy. [] All operating sites are required to conduct security risk assessments, through which they consider security-related human rights risks, and to develop action plans, consistent with the Voluntary Principles, to address any they identify". Finally, the 2021 Sustainability Report indicates: "We are working to further integrate sustainability risks into our risk management process building on both the labour rights and modern slavery assessments that are already in place." [2021 Modern Slavery and Human Traffecking St. 2020, 25/06/2021: bp.com] & Met: Describes how process applies to EX BPS: See above. According to the 2020 Modern Slavery and Human Traffecking St. 2020, 25/06/2021: bp.com] & Met: Describes how process applies to EX BPS: See above. According to the 2020 Modern Slavery and Human Traffecking St. 2020, 25/06/2021: bp.com] *Not Met: Public disclosure of results of HRs risk a

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and acting on human rights risks and impact assessments	o O	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes system to prevent, mitigate and remediate HRs issues: The 2021 Modern Slavery and Human Trafficking Statement indicates that the actions required for its risk mitigation plan include identifying and implementing 'actions to manage risks including due diligence activities'. It also provides possible remedies for themes identified from work on complaints raised by contractor workforces. The 2022 Sustainability Report states that: 'In line with our human rights policy commitment, we commissioned an independent third party to assess our conformance with our human rights policy. It included a systematic review of the way we identify and manage human rights issues, in the context of our policies, processes and systems, including grievance mechanisms and remediation. Two sites were also reviewed by the third party to assess how they implement our human rights policy'. However, these action is refer to an evaluation of the system, the subindicator looks for a description of how the system to take action against salient issues operates. Previous assessment was based on a document which was no longer found. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] & [2022 Sustainability Report, 2023: bp.com] Not Met: Describes how global system applies to EX BPs: See above. In addition, it states that, '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. However, no description found of its global system to prevent, mitigate or remediate its salient human rights issues applied to its extractive business partners. The Company has made reference to 2021 Modern Slavery and Human Trafficking Statement, however, this source has already been u
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	Its content has not been found in publicly available source. The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes system for evaluation effectiveness of actions: The 2020 Modern Slavery statement indicates: 'We know that, if our approach is to be sustainable and effective over the longer term, it will need to be focussed on those areas where our efforts and those of our contractors and business partners can and do successfully address the most severe impacts on the rights of our workforce. In order to help ensure that is the case, we are working to systematize the collection and tracking of information about modern slavery issues – such as worker grievances, risk indicators and corrective actions – so we can effectively support improvements on a rigorously prioritised and data-driven basis. In our 2019 statement, we reported that we were 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 2020, we completed the process of developing KPIs, having tested them in 2019 with priority bp businesses and requested performance data from an initial, targeted cohort of 17 businesses. We intend to use these KPIs – which as of Q4 2020 are being phased into a new group-wide data collection system – to help us measure, support and manage performance. Over time, we hope that collecting and measuring performance information in this manner will help us to track more

Indicator Code	Indicator name	Score (out of 2)	Explanation
			effectively our progress in identifying, managing and remediating labour rights and modern slavery risks'. [Modern Slavery and Human Traffecking St - 2020, 25/06/2021: bp.com • Met: Example of lessons learned from evaluation effectiveness of actions: In its 2019 Slavery and Human Trafficking Statement, the Company states that 'We continue to learn from our risk assessments and our engagement with our business partners []. 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'. [Slavery and human trafficking statement- 2019, 06/2020: bp.com] Score 2 • Met: Meets all requirements under score 1: See above
B.2.5	Communicating on human rights impacts	1	• Not Met: Involves stakeholders in evaluation effectiveness of actions The individual elements of the assessment are met or not as follows: Score 1 • Met: Provides two examples of comms with stakeholders: The Company provides case studies were affected stakeholders contact the Company through their grievance mechanisms: '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'. Another example of engagement happened 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 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'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] Score 2 • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all workers: The Code of Conduct indicates: 'If you want to raise a concern or have a question you need help with, you are not alone, our speak up channels are here for you'. It discloses a series of speak up channels, including a phone line and the Open Talk Channel. [Code of Conduct (Our Code), 01/01/2023: bp.com] Score 2 • Met: Grievance mechanism available in appropriate languages and workers made aware: The webpage section Our Approach to Sustainability indicates: 'Concerns can also be raised anonymously via OpenTalk, the bp global confidential helpline. This is administered by an independent company and is available 24hours a day, seven days a week. It can accommodate calls in more than 75 languages by phone or web'. The 2021 Modern Slavery and Human Trafficking Statement adds: 'Providing training on our Code of Conduct, which underpins and reinforces elements of our Human Rights policy. This was mandatory to all bp employees'. The Code of Conduct contains guidelines on how to use the speak up channels. [Our approach to sustainability_web, N/A: bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 Met: Describes how workers in EX BPs access grievance mechanism: The Business and Human Rights Policy indicates: 'OpenTalk, is available to employees, workers employed by our contractors or suppliers and to other third parties, including communities'. [Business and human rights policy, 05/2020: bp.com] Met: Expects EX BPs to convey expectation to their BPs: The Company has provided comments to CHRB regarding this indicator. It included the Supplier expectations, which indicates: 'We ask that you communicate these expectations to your employees, suppliers and business partners who may provide goods or services to BP, and that you: Promote a "speak-up" culture that does not tolerate retaliation. Provide a means for your employees, your suppliers and your business partners to speak up if they see something that is unsafe, unethical or potentially harmful involving BP's businesses or activities. They may inform a member of BP's management, or use BP's confidential OpenTalk help line'. The Business and Human Rights Policy adds: 'Our confidential and anonymous global helpline, OpenTalk, is available to employees, workers employed by our contractors or suppliers and to other third parties, including communities'. The 2020 Modern Slavery and Human Trafficking Statement indicates: 'Our standard contract template require contractors and suppliers to act consistently with our code and Human Rights policy'. The Supplier expectations adds: 'contractors, suppliers and non-operated joint ventures develop and maintain adequate processes and control to implement, communicate, monitor and remediate identified deficiencies with regard the above [Human Rights provisions], including in their supply chain'. The provisions include a requirement to have a grievance process in place. [Supplier Expectations, 2019: bp.com] & [Business and human rights policy, 05/2020: bp.com]
C.2	Grievance mechanism(s) for external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all external individuals and communities: The Business and Human Rights Policy adds: 'Our confidential and anonymous global helpline, OpenTalk, is available to employees, workers employed by our contractors or suppliers and to other third parties, including communities'. [Business and human rights policy, 05/2020: bp.com] Score 2 • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The webpage section Open Talk indicates: 'OpenTalk is administered by an independent company (NAVEX), is available 24 hours a day, seven days a week, and can accommodate calls in more than 75 languages'. However, it is not clear how affected external stakeholders at its own operations are made aware of it. The 2021 Modern Slavery and Human Trafficking St indicates: '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'. However, this subindicator looks for a description of how it ensures that all affected external stakeholders at its own operations are aware of it. It should include the communities. [OpenTalk_web, N/A: secure.ethicspoint.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] • Not Met: Describes how external individuals/communities access grievance mechanism: The Business and Human Rights Policy which adds: 'Our confidential and anonymous global helpline, OpenTalk, is available to employees, workers employed by our contractors or suppliers and to other third parties, including communities'. The webpage section Our approach to sustainability notes: 'This helpline is available 24/7 in more than 75 languages, by phone or internet, to employees, the wider workforce, communities, business partners and other stakeholders who want to raise a concern'. However, it is not

Indicator Code	Indicator name	Score (out of 2)	Explanation
			provisions include a requirement to have a grievance process in place: 'A grievance process is in place by which workers can make complaints, including anonymously, and receive appropriate responses and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination or harassment'. However, it is not clear the Company expects extractive business partners to convey expectations [to have a channel from which external individuals and communities can access to raise Complaints or concerns about human rights issues at the Company's suppliers] on access to grievance mechanism(s) to their suppliers. [Business and human rights policy, 05/2020: bp.com] & [Supplier Expectations, 2019: bp.com]
C.3	Users are involved in the design and performance of the mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes how users engaged on design and performance: The 2022 Sustainability Report states that 'In collaboration with our strategic partner, Shift [] we are working to assess the quality of our community relations. In Trinidad and Tobago we have piloted a framework for evaluating corporate performance from a community perspective. This pilot will inform our approach in other locations'. However, the pilot project seems to be focusing on the quality of community relations. The subindicator looks for a description of how it engages with potential or actual users on the design and performance of the grievance mechanism. [2022 Sustainability Report, 2023: bp.com] Not Met: Provides user engagement examples (at least two) on design and performance: As above, the sustainability report states that 'In collaboration with our strategic partner, Shift [] we are working to assess the quality of our community relations. In Trinidad and Tobago we have piloted a framework for evaluating corporate performance from a community perspective. This pilot will inform our approach in other locations'. However, this subindicator looks for at least two examples of how it engages with potential or actual users specifically on the design, implementation or performance of the mechanism. [2022 Sustainability Report, 2023: bp.com] Score 2 Not Met: Describes how users engaged on improvement of mechanism: See
			above. However, this subindicator looks for a description of how it engages with potential or actual users (or individuals or organisations acting on their behalf) on the improvement of the mechanism. [2022 Sustainability Report, 2023: bp.com] • Not Met: Provides user engagement examples (at least two) on improvement: See above. However, this subindicator looks for at least two examples of engagement with potential or actual users specifically on the improvement of the grievance mechanism. [2022 Sustainability Report, 2023: bp.com]
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes procedure and timescales for managing complaints or concerns: The webpage section Open Talk indicates: 'Once you submit a question or concern via phone or web, you will receive a report key and password which can be used to follow up on your submission. Then, an electronic summary is sent to an OpenTalk Case Manager in bp's Ethics and Compliance team for review and to determine further action'. However, no further description found of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns. The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. [OpenTalk_web, N/A: secure.ethicspoint.com] Not Met: Describes technical, financial, advisory support to enable equal access Score 2 Not Met: Describe types of outcome to complainant through use of mechanism: The Company has provided comments to CHRB regarding this indicator. It included the 2022 Sustainability Report, which indicates: 'As in 2021 the most frequently raised concerns related to bullying, harassment and discrimination, with these accounting for nearly half of all concerns. The second most common issue was alleged fraud'. Also, the 2021 Modern Slavery and Human Trafficking St discloses 'Themes identified from work on complaints raised by contractor workforces' and 'Example of remedy provided by contractors'. However, although it provides examples of how it remediated specific themes raised, the subindicator looks for a more generic explanation of the types of outcomes to the complainant through use of the grievance mechanisms. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] & [2022 Sustainability Report, 2023: bp.com] Not Met: Describes escalation to senior levels / independent adjudicators

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public statement prohibiting retaliation against workers/stakeholders: The webpage section Open Talk indicates: 'BP does not tolerate retaliation. We consider acts of retaliation to be misconduct. Our commitment to such is stated in the first part of our Code. We seek to provide a safe, healthy and productive workplace for our employees and our business partners who assist us in our business operations. Every report of retaliation is taken seriously'. [OpenTalk_web, N/A: secure.ethicspoint.com] & [Code of Conduct (Our Code), 01/01/2023: bp.com] • Met: Describes practical measures to prevent retaliation: The webpage section Our Approach to Sustainability indicates: 'Concerns can also be raised anonymously via OpenTalk, the bp global confidential helpline'. [Our approach to sustainability_web, N/A: bp.com] Score 2 • Not Met: Specifies no legal action, firing or violence: The Code of Conduct indicates: 'We will not tolerate any form of retaliation against colleagues who speak up'. It expands: 'bp does not tolerate retaliation. We consider acts of retaliation to be misconduct. Retaliation can take many forms, including threats, intimidation, exclusion, humiliation and raising issues maliciously. If you think that you or someone you know has experienced retaliation, contact any of our speak up channels'. It also indicates that it is a member of the VPs. However, beyond what the Company has already indicated it does not tolerate, this subindicator looks for an explicit declaration indicating that it will not retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them as well as the through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it i
C.6	Company involvement with state- based judicial		[Business and human rights policy, 05/2020: bp.com] & [Supplier Expectations, 2019: bp.com] The individual elements of the assessment are met or not as follows: Score 1 • Met: Complainants not asked to waive legal rights: The Business and Human Rights Policy indicates: 'We do not require individuals or communities to permanently waive their legal right to bring a claim through a judicial process as a
	and non- judicial grievance mechanisms	0.5	precondition of raising a grievance through a bp grievance mechanism'. [Business and human rights policy, 05/2020: bp.com] • Not Met: Does not require confidentiality provisions Score 2 • Met: Cooperates with state based non judicial mechanisms: The Human Rights policy states that 'Where adverse impacts are directly linked to our activities through our business relationships, we will support our business partners in the remediation of those impacts through their own grievance management processes, or support collaboration to provide for non-judicial remediation through third parties'. It also adds: 'Where bp identifies that we have caused or contributed to adverse impacts on the human rights of others, we provide for or co-operate in the remediation of the adverse impacts through legitimate processes intended to deliver effective remedy while not preventing access to other forms of remedy if justified. This may include co-operating in good faith in the provision of remedy through state-led mechanisms, such as the OECD national contact points'. [Business and human rights policy, 05/2020: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes approach taken to remedy adverse HRs impacts: The 2021 Modern Slavery and Human Trafficking Statement indicates: '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'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] Score 2 • Met: Describes changes to systems, processes and practices to prevent future impacts: As indicated above, apart from remediating the victims, it has also updated 'terms and conditions, improvements to time and pay records, provision of payslips and improved workplace communication mechanisms'. [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com] • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	identified The individual elements of the assessment are met or not as follows: Score 1 Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2021 Sustainability report indicates: 'More than 1,400 concerns a and enquiries were reported in 2021, around 14% fewer than 2020 []. Concerns reported per 100 employees in 2021 decreased slightly to 2.5 (2.6 2020). The most frequently raised concerns continue to be related to the 'our people' section of the code. This section of the code addresses issues such as harassment, equal opportunity, and diversity and inclusion. In 2021, around 40 employee exits resulted from non-conformance with the code or unethical behaviour, compared with around 80 in 2020. This total excludes dismissals of staff employed at our retail service stations'. The 2022 Sustainability Report, regarding to community complaints in 2022, indicates: 'Our refineries managed 60% of all community complaints and feedback and our production businesses managed 35%. Around 50% of the complaints in 2022 related to operational nuisance, such as odour, noise and dust'. The 2022 ESG Datasheet also discloses figures on community complaints, including: impact on traditional indigenous, recreational or cultural activities: 0; discharges to water: 1; security arrangements: 0. However, no further details found, including overall figures on grievances related to human rights and outcomes. [Sustainability Report 2021, 31/03/2022: bp.com] & [2022 Sustainability Report 2021, 31/03/2022: bp.com] & [2022 Sustainability Report 2021, 31/03/2022: bp.com] & [2022 Sustainability Report 2021, 31/03/2022: bp.com] & [2022 Sustainability report states that 'these reviews [of the way we identify and manage Human Rights issues] highlighted opportunities for improvement, including better risk management performance from a community perspective. This pilot will inform our approac

Indicator Code	Indicator name	Score (out of 2)	Explanation
			However, this subindicator looks for a description of the process to review the
			effectiveness of the grievance mechanism. Moreover, the Company is expected to
			provide an example of changes made to improve it based on the review. [2022
			Sustainability Report, 2023: bp.com]
			Not Met: Decribes procedures to address delays of outcomes agreed with
			stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Indicator name Living wage (in own extractive operations, which includes JVs)	Score (out of 2)	Explanation The individual elements of the assessment are met or not as follows: Score 1 • Met: Pays living wage or sets time-bound target: The Sustainability report indicates that 'Our analysis showed that in 2022, all our employees worldwide were being paid a fair wage'. It adds: 'We conducted reviews across our businesses during 2022, to establish if our employees are being paid fair wages – by which we mean a wage that meets employees' basic needs. These reviews were based on Fair Wage Network benchmark data for a typical-sized family and an average number of workers per family. They also took into account factors such as local market conditions'. [2022 Sustainability Report, 2023: bp.com] • Not Met: Describes how living wage determined: The report also notes that 'We conducted reviews across our businesses during 2022, to establish if our employees are being paid fair wages – by which we mean a wage that meets employees' basic needs. These reviews were based on Fair Wage Network benchmark data for a typical-sized family and an average number of workers per family. They also took into account factors such as local market conditions'. However, no further description found of how it determines a living wage for the regions where it operates. It should include involvement of relevant trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). [2022 Sustainability Report, 2023: bp.com] Score 2 • Met: Achieved paying living wage: The Company indicates that 'Our analysis showed that in 2022, all our employees worldwide were being paid a fair wage'. It adds: 'We conducted reviews across our businesses during 2022, to establish if our employees are being paid fair wages – by which we mean a wage that meets employees' basic needs. These reviews were based on Fair Wage Network benchmark data for a typical-sized family and an average number of workers per family. They also took into account factors such as local market conditions'. [2022
D.3.2	Transparency and accountability (in own extractive operations, which includes	2	Sustainability Report, 2023: bp.com • Not Met: Reviews definition living wage with unions The individual elements of the assessment are met or not as follows: Score 1 • Met: Member of EITI: The webpage section Human Rights indicates: 'bp is a founding member of the EITI'. [Human Rights_web, N/A: bp.com] Score 2 • Met: Reports taxes and revenue by country: The Payment to Governments yearly report breaks down taxes, royalties, fees, bonuses and infrastructure improvements paid by country breakdown.
D.3.3	JVs) Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Measures to prohibit violence/retaliation against workers for joining trade union: The Business and Human Rights Policy indicates: 'Consistent with our commitment to respect ILO core labour standards, we respect freedom of association and collective bargaining'. It also states that 'we will not tolerate or contribute to attacks, or physical or legal threats, against those safely and lawfully exercising their human right to freedom of expression, peaceful protest or assembly, including where they are acting as human rights defenders (HRDs)a, or against workers seeking to exercise their right to freedom of association'. Regarding union engagement, the 2022 Sustainability Report indicates: 'We support our employees' right to make a fully informed choice for collective representation and we work hard to build constructive relationships with unions and works councils. In 2022, we reached contract agreements with unions across a number of our manufacturing sites. We also worked with European Works Council leaders to jointly develop a new contract that will better serve bp and our employees in the European Union in future'. [Business and human rights policy, 05/2020: bp.com] & [2022 Sustainability Report, 2023: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Discloses % of total direct operations covered by CB agreements: The 2021 GRI Index indicates: 'While some bp employees are covered under collective bargaining agreements, we do not have the specific percentage available at this time'. [GRI Content Index 2021, 03/2022: bp.com] Score 2 Not Met: Meets both requirements under score 1
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes process to identify H&S risks and impacts: The document BP's Commitment to health, safety, security and environmental (HSSE) performance indicates: 'We are committed to: [] Systematically managing our operating activities and risks'. However, no further description found of the process it has in place to identify its health and safety risks and impacts. The 2022 Annual Report, regarding safety, indicates: 'We use a 'three lines of defence' model to improve the effective management of all types of risk, including safety. The nature and extent of first, second and third lines of defence activities are based on the type and level of risk'. However, this subindicator looks for description of the process it has in place to identify its health and safety risks and impacts. No further evidence found. [Commitment to health, safety, security and environmental, 05/02/2020: bp.com] Met: Discloses injury rate or lost days for last reporting period: The 2021 ESG Datasheet reports the Recordable injury frequency (RFI) in 2021 for the workforce: 0.164; for the employees: 0.117; for contractors: 0.204. [ESG Datasheet 2021, 03/2022: bp.com] Met: Discloses fatalities for last reporting period: The 2021 ESG Datasheet reports the Recordable injury frequency (RFI) in 2021 for the workforce: 1; for the employees: 0; for contractors: 1. [ESG Datasheet 2021, 03/2022: bp.com] Not Met: Discloses occupational disease rate for last reporting period Score 2 Not Met: Set targets for H&S performance: The 2022 Sustainability Report, which contains the CEO's letter: 'We want zero accidents, zero people hurt - that will always be our goal'. The Report adds: 'The aim we set in 2021, to eliminate fatalities, life-changing injuries and tier 1 process safety events, provided the basis for our strategic focus in 2022 along with our work to embed a consistent safety culture'. Finally, it also discusses community health and wellbeing: 'We made furt
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Process to identify/recognise indigenous rights holders: The Business and Human Rights Policy indicates: 'Our guidance references IFC Performance Standard 7 and recognizes that it is important that we identify and consult with Ips [Indigenous Peoples], seeking to apply the principles of free, prior and informed consent (FPIC) where practical, ideally prior to the commencement of activities'. The document bp backs Australia's energy future explains its Asian Renewable Energy Hub (AREH) project in the Pilbara region of Western Australia, in Indigenous land. It also made reference to the Australia Reconciliation Plan 2023-2026 which contains information on ongoing reconciliation project with Indigenous People in Australia, in the context to the AREH. However, no description of the specific process that the Company follows to identify and recognise affected indigenous peoples was found. [Business and human rights policy, 05/2020: bp.com] & [Australia Reconciliation Action Plan 2023-2026, N/A: bp.com]

		,	
			 Met: Describes how indigenous communities are engage during assessment: The document bp backs Australia's energy future explains its Asian Renewable Energy Hub (AREH) project in the Pilbara region of Western Australia: "Subject to regulatory approvals and entering an Indigenous land use agreement with the Nyangumarta People based on the principle of free, prior and informed consent []. Lucy Nation, bp's Project Director and Vice President of Hydrogen in AsiaPac, said "We're excited to take the next step forward with AREH and work closely with our project partners, community representatives and regulators to better understand the opportunities and challenges associated with the project. Our first priority is to make sure we are working closely with the Nyangumarta People, the Traditional Owners and custodians of the land on which we plan to develop the AREH. It is key that we put the views of the Nyangumarta Traditional Owners at the centre of how the AREH project is planned and developed "'. It also made reference to the Australia Reconciliation Plan 2023-2026 which indicates: "We recognise the cultural significance of Nyangumarta Country and with a dedicated Indigenous Engagement Manager we look forward to working alongside the Traditional Owners and local communities in the development of the 6,500-square kilometre site.' The Indigenous Engagement Manager is responsible to: 'Meet with local Aboriginal and Torres Strait Islander stakeholders and organisations to continuously improve guiding principles for engagement. [] Partner with Traditional Owners of lands on which we operate to develop commitments and programs that create value for communities. [] Take a measured approach to understand needs of communities and develop opportunities to engage communities in procurement and employment programs. [] Ensure our approach and actions are consistent with the principles of free, prior and informed consent (FPIC') (bp backs Australia's energy future, N/A: bp.com] Not Met: Commi
			Renewable Energy Hub (AREH) project in the Pilbara region of Western Australia, in Indigenous land: 'bp has completed the acquisition of a 40.5 percent equity stake and commenced operatorship of the Asian Renewable Energy Hub (AREH) project in the Pilbara region of Western Australia. [] Subject to regulatory approvals and entering an Indigenous land use agreement with the Nyangumarta People based on the principle of free, prior and informed consent, the project plans to deliver
			onshore wind and solar power generation to produce green energy and produce hydrogen and ammonia´. [bp backs Australia's energy future, N/A: bp.com]
D.3.6	Land rights:		The individual elements of the assessment are met or not as follows:
	Land		Score 1 • Not Met: Describes approach to indentifying lang tenure rights holders and
	acquisition (in own extractive	0	negotiating compensation
	operations,		Score 2 • Not Met: Describes approach to compensation including valuation

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Describes steps to meet IFC PS 5 in state deals: The Business and
			Human Rights Policy indicates: 'We avoid involuntary resettlement of communities
			and/or individuals, but if this is not possible our guidance for where we need to
			access or acquire land for our operating activities is aligned with the principles
			outlined in International Finance Corporation (IFC) Performance Standard 5'.
			However, no description found of the steps it has taken to meet the standards with
			respect to legitimate tenure rights holders. [Business and human rights policy,
			05/2020: <u>bp.com</u>]
D.3.7	Security (in		The individual elements of the assessment are met or not as follows:
	own extractive		Score 1
	operations,		Met: Describes security implementation (incl. VPs or ICOC) and provides an
	which includes		example: In the Annual report on the VPs on security and human rights, the
	JVs)		Company reports on the implementation of the VPs in the different countries:
	,		'Throughout 2021, bp continued to deliver VPSHR training and supported VPSHR
			risk assessments and in-country implementation processes in several countries
			including Azerbaijan, Georgia, Indonesia, and Oman'. A brief description of its
			implementation in each country is available in the report. For example: 'The bp
			Georgia security team has assigned an employee responsible for VPs implementation. Their role is to maintain a formal VPs implementation plan and
			perform bi-annual audits of the private security contractor in order to check their
			conformance with the implementation guidelines. 2 audits were carried out in
			2021. In 2021, all newly-hired private security staff assigned to bp-operated
			facilities completed training courses, which include the VPSHR module. The
			refresher course for current staff also includes the VPSHR modules'. [Annual Report
			on the Voluntary Principles on Security and HR 2021, 2022: bp.com
			Met: Ensures Business Partners/JVs follow security approach: The report also
			states that 'We continue to build relationships in our non-operated joint ventures
			which enable us to discuss and share our approach to security and human rights
			with these joint ventures'. Moreover, in Azerbaijan, 'bp's private security
			contractor currently employs one training supervisor to provide VPSHR training and
			refresher training. During 2021 they delivered VPSHR training for 287 employees in
		1.5	total'. In the case of Georgia: 'The bp Georgia security team has assigned an
			employee responsible for VPs implementation. Their role is to maintain a formal
			VPs implementation plan and perform bi-annual audits of the private security
			contractor in order to check their conformance with the implementation
			guidelines. 2 audits were carried out in 2021'. [Annual Report on the Voluntary
			Principles on Security and HR 2021, 2022: bp.com] Score 2
			Not Met: Security and HRs assessment includes input from local communities:
			The Tangguh Independent Advisory Panel Report indicates that: 'BP also has
			instituted another new program in its community engagement strategy: The
			Community Policing Socialization and the Police and Community Partnership
			Forums ("FKPM"). These are primarily presentations conducted in local villages,
			some with adults and others with students, and involve collaboration between BP
			and local police. They are designed to educate local people on issues relating to
			security and safety, including domestic violence, terrorism, the exclusion zone, TEP
			socialization, BOF construction, Tangguh's non-land trespassing policy and
			preventing radicalism. These may all be laudable topics to educate Tangguh's
			neighbors to potential dangers. They also facilitate the police in their collection of
			data and identifying problems to help carry out their general police functions (i.e.,
			gather intelligence)'. However, this subindicator looks for evidence that its security
			and human rights assessments include inputs from the local community, including
			about their security concerns. No further evidence found. [Tangguh Independent
			Advisory Panel
			Report, 05/2020: <u>bp.com</u>]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Two examples of working with local communities to improve security: The Tangguh Independent Advisory Panel Report indicates that 'BP also has instituted another new program in its community engagement strategy: The Community Policing Socialization and the Police and Community Partnership Forums ("FKPM"). These are primarily presentations conducted in local villages, some with adults and others with students, and involve collaboration between BP and local police. They are designed to educate local people on issues relating to security and safety, including domestic violence, terrorism, the exclusion zone, TEP socialization, BOF construction, Tangguh's non-land trespassing policy and preventing radicalism. These may all be laudable topics to educate Tangguh's neighbors to potential dangers. They also facilitate the police in their collection of data and identifying problems to help carry out their general police functions (i.e., gather intelligence)'. In addition, the 2022 VPs Annual Report, notes that in Azerbaijan 'in 2022, 67 community awareness meetings were conducted with the communities and landowners around bp operated facilities and pipelines, where communities raised their questions and concerns, including on topics related to security. During these meetings, communities were made aware of all policies and procedures, means of communication and raising concerns, including a 'hot line' available to communities along the export pipelines'. [Tangguh Independent Advisory Panel Report, 05/2020: bp.com] & [2022 Voluntary Principles Annual Report, 04/2023:
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes preventative/corrective action plans for water and sanitation risks: The 2022 Sustainability Report, regarding improving water efficiency, indicates: 'We introduced detailed, site-based water assessments in 2022, to help identify further operational efficiencies. Our refining business completed an assessment of this type at Castellón, Spain, and assessments are now under way at other refineries. Through our projects organization, we ran water value improvement workshops in the UK, Germany and Spain. The recommendations from these workshops will be carried through to subsequent design phases of relevant projects'. As for water replenishment collaboration, it adds: 'We have contracted with The Freshwater Trust (TFT) to run a pilot project that will assess the potential of TFT's BasinScout Analytics tool to support our corporate water stewardship and sustainability objectives. The tool helps to assess the cost-effectiveness of potential conservation investments. The pilot will focus on two areas of Colorado, US, where we have operations in stressed water catchments. It will assess BasinScout's effectiveness in enabling us to prioritize cost-effective actions that achieve multi-benefit outcomes for freshwater resources, habitats and land-based economies in the region'. However, this subindicator looks for evidence of preventative and corrective action plans for water-related risks. Evidence provided by the Company seems to refer to improvement measures and efficiency gains. It is not clear how it faces water risks. [2022 Sustainability Report, 2023: bp.com] Score 2 Not Met: Sets targets on water stewardship that consider water use by local communities: The 2021 Sustainability Report indicates: 'We aim to replenish more freshwater than we consume in our operations. We will do this by being more efficient in operational freshwater use and effluent management, and by collaboration on the most impactful opportunities to r

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Reports progress in meeting targets and trends demonstrating progress: The 2022 Sustainability Report indicates that 'We saw a 9.8% fall in freshwater withdrawals and a 7.5% fall in freshwater consumption, compared with our 2020 baseline. This was largely due to a decrease at some of our refineries brought about by higher maintenance activity and withdrawal restrictions at Gelsenkirchen because of dry summer weather. This was partially offset by an increase in consumption due to increased drilling and production activity at our bpx energy operations. We actively manage our freshwater demands in areas of stress and scarcity. Based on analysis that utilized the World Resources Institute (WRI) Aqueduct Global Water Risk Atlas, in 2022, five of our 17 major operating sites were located in regions with medium to extremely high water stress. Based on anticipated changes in the areas WRI identifies as water stressed, this number is set to increase by 2030 (assuming a business-as-usual scenario with no portfolio changes)'. However, it is not clear to what extent do these figures represent targets that take into consideration water use by local communities and other users in the vicinity of its operations. [2022 Sustainability Report, 2023: bp.com]
D.3.9	Women's rights (in own extractive operations, which include JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describes processes to stop harassment and violence against women: The webpage section Human Rights states: 'Our expectation is that workers in our operations, joint ventures and supply chains are not subject to abusive or inhumane practices, such as [] or harassment'. The Code of Conduct adds: 'We do not tolerate any physical, verbal or nonverbal forms of abuse or harassment. This includes any unwanted behaviour that could reasonably be considered offensive, intimidating or humiliating, as well as any form of sexual harassment. [] Discrimination, harassment and bullying should be reported to your line manager, P&C, Legal, E&C or OpenTalk'. However, it is not clear if this entails that there's a specific venue within the grievance mechanisms for harassment. The 2021 Diversity, equity & Inclusion Report indicates: 'Analysis of the data collected during our 2021 survey highlighted four key insights: Women don't see enough being done to challenge non-inclusive behaviour. [] Engagement is highest among gay women. [] These insights identify some important areas that we are focused on improving to help make all employees feel included, engaged and comfortable at work. [] As our approach evolves, we will continue to use these insights to inform and improve our action planning, drive accountability and provide transparency around employee sentiment'. However, no description found of the process or measures in place to prohibit and address harassment, intimidation and violence specifically against women. [Human Rights_web, N/A: bp.com] & [Code of Conduct (Our Code), 01/01/2023: bp.com] Not Met: Working conditions take into account gender issues: The 2021 Diversity, equity & Inclusion Report discloses the result of analysis on diversity: 'As our approach evolves, we will continue to use these insights to inform and improve our action planning, drive accountability and provide transparency around employee sentiment'. It

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Measures and steps to address gender pay gap at all levels of
			employment: The 2021 Gender and ethnicity Pay Gap Report, explains actions
			taken: 'In 2021, we continued to take action to improve gender representation and
			support women across our businesses. [] Attraction and recruitment - In 2022 we
			are introducing 'hiring inclusively'. Hiring inclusively is a set of globally consistent
			recruiting principles to support bp's focus on aim 14 of our sustainability frame –
			greater diversity, equity, and inclusion for our workforce – in the hiring process.
			Developing the talent pool - To help build a pipeline of STEM students, the bp
			educational service offers, among other activities, digital resources to help teachers
			bring science to life, with more than 10,000 downloads in January 2021. We run
			events each year to celebrate International Women in Engineering Day. These
			include inviting women into our offices – in person or virtually – to meet female bp
			Engineers. Progression – In 2021, a key inclusion focus was on development and
			progression interventions to support Black and African American colleagues and we
			piloted our Leadership Inclusion for Talent (LIFT) development programme. Of the
			21 individuals who participated, 15 were women. Retention - Our maternity leave
			return rates have been over 88% for the past three years, and we anticipate that
			our adoption of increased flexible working will help improve this. The increase in
			senior female leaders has provided more positive role models, demonstrating the
			opportunities for women to progress at bp´. However, this subindicator looks for a
			description of how it measures and takes steps to address any gender pay gap
			throughout all levels of employment. No further evidence found. [Diversity, equity
			& Inclusion Report 2021, 07/2022: <u>bp.com</u>]
			Score 2
			Not Met: Meets all requirements under score 1
			• Not Met: Provides analysis of trends demonstrating closing gender pay gap: The
			2021 UK Gender and Ethnicity Pay Gap Report indicates: 'Our mean gender pay
			gaps across the five reporting entities have narrowed in all legal entities except for
			bp express shopping, which has shown a slight increase. There is a range from 4.1%
			in bp express shopping to 19.5% in bp pulse, compared to a range of 3.6% to 22.6%
			in 2020. Although there has not been a significant change in the overall range,
			there has been a marked reduction in the gap for two of the legal entities: 6.2%
			decrease for bp oil, 7.6% decrease for bp exploration'. The 2022 UK Gender and
			Ethnicity Pay Gap Report discloses gender pay gap figures: '2022 mean gender pay
			gaps (%): 12.5 bp oil; 14.9 bp exploration; 27.1 bp pulse; 14.9 bp plc; 3.8 bp express
			shopping. However, it is not clear the analysis of trends demonstrating progress on
			closing any gender pay gap is company-wide, as the figures above seem to apply to
			the UK only. [Gender and ethnicity Pay Gap Report 2021, 03/2022: bp.com] &
			[2022 Gender and ethnicity Pay Gap Report, 2023: <u>bp.com</u>]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		Area: Right to a safe, clean, healthy and sustainable environment; Health and Safety
			Headline: BP allegedly emitted illegal amounts of soot at refinery in northwest Indiana
			• Story: On December 2, 2021, press sources reported that BP has agreed to pay USD 500,000 settlement for allegedly emitting illegal amounts of soot at its refinery in northwest Indiana, US.
			Environmental groups, including the Sierra Club, Natural Resources Defence Council, Environmental Law and Policy Center, Environmental Integrity Project, have sued BP for repeatedly violating legal limits on soot at its more-than-century-old Whiting Refinery.
			BP committed to increase its efforts to monitor and reduce fine particle air pollution, which has been related to asthma, heart attacks, and other health problems.
			On September 15, 2022, the press reported that BP has reached a USD 2.75 million settlement to resolve all the environmentalists' claims over air pollution from the Company's refinery in Indiana.
			According to the press, the settlement came after environmentalists complained of repeated emissions violations at the Indiana refinery. The settlement involved industrial boilers that provide steam to production units. As with the catalytic crackers, the boilers are subject to emission ceilings under the federal Clear Air Act. State records showed violations dating since 2015.
			Moreover, the press stated that under the agreement BP would pay USD 1.75 million in civil penalties to a federal fund used for clear air monitoring and enforcement. The Company will also pay USD 1 million for projects intended to boost health and quality of life. The settlement still needs to be approved by court.
			Additionally, the press stated that this is the second agreement involving BP's refinery and advocacy groups after reaching a settlement in 2021, in which the Company agreed to pay USD 512,450 and reduce soot from two large catalytic crackers that convert heavy oils into lighter oils and gases. [AP News, 02/12/2021, "BP agrees to \$500K penalty, soot limits at Indiana refinery": apnews.com] [Chicago Tribune Online, 02/12/2021, "BP settles another lawsuit over lung-damaging soot from Whiting refinery": chicagotribune.com] [AP News, 15/09/2022, "BP reaches \$2.75M deal over Indiana refinery pollution":
			apnews.com] [Chicago Sun Times, 15/09/2022,"Indiana refinery to pay \$2.75 million in air pollution case": chicago.suntimes.com]
E(1).1	The company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public response: "BP is pleased to resolve these issues," spokeswoman Christina Giannelli said. "We remain committed to safe, reliable and compliant operations at the Whiting Refinery and everywhere we operate." [AP News,
			02/12/2021: apnews.com] Score 2 • Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.
E(1).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. Score 2
		5	Not Met: Identified and implemented improvements: The Company states that 'We monitor our air emissions and, where possible, put measures in place to reduce the potential impact of our operational activities on local communities and the environment.' However, this statement does not indicate improvements to the monitoring system after the alleged impacts. [2022 Sustainability Report, 2023: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Provided remedy: BP reached \$2.75M deal over Indiana refinery pollution. Under the agreement, BP would pay \$1.75 million in civil penalties to a federal fund used for clean air monitoring and enforcement. The company also would pay \$1 million for projects intended to boost health and quality of life in the area. They would include \$500,000 to the nonprofit Student Conservation Association for tree planting around the Whiting refinery and along nearby roads. [AP News, 15/09/2022: apnews.com] Score 2 • Met: Remedy satisfactory to stakeholders: The executive director of the Environmental Integrity Project, which sued BP on behalf of the Sierr Club stated ""t's a good penalty, we think, and the environmental projects they're funding are going to be helpful.' [AP News, 15/09/2022: apnews.com] • Not Met: Remedy delivered: No clear information was found as to whether the remedy was delivered. • Not Met: Independent remedy process used

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