

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name OMV
Sector Extractives
Overall score 41.1 out of 100

Theme score	Out of	For theme
3.6	10	A. Governance and Policy Commitments
11.3	25	B. Embedding Respect and Human Rights Due Diligence
9.0	20	C. Remedies and Grievance Mechanisms
9.0	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: General HRs commitment: The Human Rights Policy indicates: 'OMV respects human rights as contained in the Universal Declaration of Human Rights'. [Human Rights Policy, 11/2022: omv.com] Score 2 • Met: Commitment to UNGPs: The Human Rights Policy indicates: 'OMV, Borealis and OMV Petrom [...] are fully committed to the UN Guiding Principles on Business and Human Rights'. [Human Rights Policy, 11/2022: omv.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles: The Human Rights Policy indicates: 'OMV is committed to respect worker's rights as set out in the eight Fundamental Conventions and the Declaration on Fundamental Principles and Rights at Work of the ILO'. [Human Rights Policy, 11/2022: omv.com] • Met: Explicitly lists all four ILO core principles: See above. It adds: 'specifically the principles of freedom of association and right to collective bargaining, the elimination of all forms of forced or compulsory labor and modern slavery, the effective abolition of child labor, the elimination of discrimination, and a safe and healthy working environment'. [Human Rights Policy, 11/2022: omv.com] Score 2 • Met: Expects BPs/JVs to commit to ILO core principles: The Human Rights Policy indicates: 'OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>applying our General Purchasing Conditions’. The General Conditions of Purchase has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Human Rights Policy, 11/2022: omv.com] & [General Conditions of Purchase, N/A: omv.com]</p> <ul style="list-style-type: none"> • Met: Explicitly lists all four ILO core principles for BPs/JVs: The General Conditions of Purchase indicates: ‘Contractor will perform, and will instruct its subcontractors to perform, the Scope of Work in full compliance with the Code of Conduct and these ten principles: [...] Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; [...] the elimination of all forms of forced and compulsory labor; [...] the effective abolition of child labor; [...] the elimination of discrimination in respect of employment and occupation’. [General Conditions of Purchase, N/A: omv.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Code of Conduct indicates: ‘Wherever we operate, we behave with the express intention of taking as our model the highest standards for health, safety [...]with the aim of continually improving our performance in these respects. Our health, safety [...] form an integral part of our corporate HSSE policy, from which our Business Segments and Group companies derive their aims’. [Code of Conduct, April 2018: omv.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Human Rights Policy indicates: ‘OMV has mapped its salient human rights responsibilities related to its relevant stakeholders. [...] In meeting our human rights responsibilities, OMV acts in strict compliance with applicable national law. Where national law falls short of OMV standards, based on international human rights law, OMV is guided by its higher standards while complying with applicable laws’. The 2022 Sustainability Report notes: ‘We are committed to comply with applicable local working time and overtime payment provisions, which is essential for a professional working environment. [...]. We offer various forms of long- and short-term breaks from work such as sabbaticals and parental and other care leave’. The Company has provided additional comments to CHRB regarding this indicator on working hours. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states 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. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Policy, 11/2022: omv.com] & [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: See above the provisions for health and safety. The Code of Conduct also indicates: ‘Our Code of Conduct applies to all our operations worldwide. [...] our partners, contractors and all other persons acting in the name of the Group must [...] comply with these principles’. The Company has provided additional comments to CHRB regarding this indicator, however, the core content was already in use. [Code of Conduct, April 2018: omv.com] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The Human Rights Policy indicates: ‘OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by applying our General Purchasing Conditions (“GPC”) in our supply chain and expecting our other partners to comply with their human rights policy. By signing the GPC, our contractors/suppliers undertake to comply with the human rights standards contained in our Code of Conduct’. However, although it expects business partners to comply with General Purchasing Conditions and the Code of Conduct, no reference to respecting working hours found in these two documents. No formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Human Rights Policy, 11/2022: omv.com] & [Code of Conduct, April 2018: omv.com]
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land,	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Human Rights Policy indicates: ‘OMV recognizes and respects legitimate tenure rights related to the ownership and use of land and natural resources (including water) as set out in the IFC Performance Standard 5’. [Human Rights Policy, 11/2022: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	natural resources and indigenous peoples' rights (EX)		<ul style="list-style-type: none"> • Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Human Rights Policy indicates: 'We are committed to community consultation and recognize the principle of free, prior, and informed consent in accordance with International Finance Corporation (IFC) Performance Standard 7, and ILO Convention 169'. [Human Rights Policy, 11/2022: omv.com] • Not Met: Expects EX BPs to make these commitments: The Human Rights Policy indicates: 'OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by applying our General Purchasing Conditions ("GPC") in our supply chain and expecting our other partners to comply with their human rights policy. By signing the GPC, our contractors/suppliers undertake to comply with the human rights standards contained in our Code of Conduct'. The Code of Conduct indicates: 'The OMV Human Rights Management System includes the due diligence process and tools and the Human Rights Matrix. This matrix maps our concrete responsibilities in the fields of equality and non-discrimination, security, work-related rights, local communities and indigenous peoples' rights, and acts as the basis for all our human rights-related activities'. However, it expects business partners to comply with General Purchasing Conditions and the Code of Conduct, no it is not clear it expects business partners 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 VGGT or the IFC Performance Standards. Suppliers are also expected to respecting indigenous peoples' rights or references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No.169 or of the UN Declaration on the Rights of Indigenous Peoples. [Human Rights Policy, 11/2022: omv.com] & [Code of Conduct, April 2018: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Human Rights Policy indicates: 'We are willing to avoid involuntary resettlement and furthermore follow a zero-tolerance policy for illegitimate land grabbing'. [Human Rights Policy, 11/2022: omv.com] • Met: Commitment to respect the right to water: The Human Rights Policy indicates: 'We respect the right to water'. [Human Rights Policy, 11/2022: omv.com] • Not Met: Expects EX BPs to make these commitments: The Human Rights Policy indicates: 'OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by applying our General Purchasing Conditions ("GPC") in our supply chain and expecting our other partners to comply with their human rights policy. By signing the GPC, our contractors/suppliers undertake to comply with the human rights standards contained in our Code of Conduct'. The Code of Conduct states: 'we are reducing the [...] water intensity of OMV Group's portfolio [...]. OMV identifies and effectively manages environmental risks in all operations, and ensures zero harmful discharges of pollutants into the atmosphere, land and water'. However, although it expects business partners to comply with General Purchasing Conditions and the Code of Conduct, it is not clear the Company expects extractive business partners to commit to respect the water to water and to respect ownership/use of land and natural resources also to include a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing. [Human Rights Policy, 11/2022: omv.com] & [Code of Conduct, April 2018: omv.com]
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to Voluntary Principles on Security and HRs: The Human Rights Policy indicates: 'We commit to respecting human rights and International Humanitarian Law (IHL) while maintaining security and safety of our staff and operations by acting in a manner consistent with all relevant laws and international standards or initiatives, including the Voluntary Principles on Security and Human Rights (VPS) and the International Code of Conduct for Private Security Service Providers (ICoC)'. However, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. The 2022 Sustainability Report notes: 'In 2021, the OMV Executive Board took the decision that OMV would join the Voluntary Principles on Security and Human Rights (VPSHR), if feasible'. However, no further evidence found that it is already a VP member, which is a proxy for this subindicator. The Company has provided comments to CHRB regarding this indicator, however, no further evidence found. [Human Rights Policy, 11/2022: omv.com] & [2022 Sustainability Report, 2023: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Uses only ICoCA members as security providers: See above. The Company has provided comments to CHRB regarding this indicator, however, evidence was already in use. No further evidence found. [Human Rights Policy, 11/2022: omv.com] • Met: Commits to International Humanitarian Law: The Human Rights Policy indicates: ‘We commit to respecting human rights and International Humanitarian Law (IHL)’. [Human Rights Policy, 11/2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights: The Human Rights Policy indicates: ‘OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by applying our General Purchasing Conditions (“GPC”) in our supply chain and expecting our other partners to comply with their human rights policy. By signing the GPC, our contractors/suppliers undertake to comply with the human rights standards contained in our Code of Conduct’. However, although it expects business partners to comply with General Purchasing Conditions and the Code of Conduct, no evidence found in any of these two documents indicating that it expects its business partners to respect the Voluntary Principles on Security and Human Rights (VPs) or to only uses security providers who are members of the International Code of Conduct of Private Security Providers Association (ICoCA) as well as to commit to respect international humanitarian law (IHL). [Human Rights Policy, 11/2022: omv.com] & [Code of Conduct, April 2018: omv.com]
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to remedy adverse HRs impacts: The Human Rights Policy indicates: ‘With our OMV Group Human Rights Policy Statement, we commit [...] to take adequate measures for their prevention, mitigation and, where appropriate, remediation’. [Human Rights Policy, 11/2022: omv.com] • Not Met: Expects EX BPs to make this commitments: The Human Rights Policy indicates: ‘OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by applying our General Purchasing Conditions (“GPC”) in our supply chain and expecting our other partners to comply with their human rights policy. By signing the GPC, our contractors/suppliers undertake to comply with the human rights standards contained in our Code of Conduct’. However, although the Company indicates that through its contractual arrangements, it expects business partners to comply with General Purchasing Conditions and the Code of Conduct, no evidence found in any of these two documents indicating that it expects business partners to commit it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Human Rights Policy, 11/2022: omv.com] & [Code of Conduct, April 2018: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Human Rights Policy indicates: ‘Our mechanisms are aimed to offer a channel for identifying potential adverse impacts, resolving grievances and provide where we have caused or contributed to a negative impact remedy to the rightsholders. We recognize that this does not hinder the stakeholders’ right to access judicial or other remedies’. However, this subindicator looks for a publicly available policy statement committing it to collaborate with judicial or non-judicial mechanisms to provide access to remedy. No further evidence found. [Human Rights Policy, 11/2022: omv.com] • Not Met: Commitment to work with EX BPs on remedy: The Human Rights Policy indicates: ‘As part of its Human Rights Policy, OMV has mapped its salient human rights responsibilities related to its relevant stakeholders (especially own employees, contractors and their employees, etc.) in a comprehensive Human Rights Matrix, which constitutes the basis for our activities in the field of human rights and serves as a fundamental tool for their implementation. OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by applying our General Purchasing Conditions (“GPC”) in our supply chain and expecting our other partners to comply with their human rights policy’. However, although the Company indicates that through its contractual arrangements, it expects business partners to comply with General Purchasing Conditions and the Code of Conduct, no evidence found of a policy statement which includes a commitment to work with suppliers to remedy adverse impacts which are directly linked to the company’s operations, products or services. [Human Rights Policy, 11/2022: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to respect the rights of human rights defenders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Zero tolerance of threats/attacks on HRDs: The Human Rights Policy indicates: 'OMV recognizes the specific role and vulnerability of human rights defenders. We strongly oppose any threats, intimidation and physical, verbal, or legal attacks against human rights defenders in relation to our operations'. [Human Rights Policy, 11/2022: omv.com] • Not Met: Expects BPs to make this commitment: The Human Rights Policy indicates: 'OMV commits itself to these salient human rights and expects from its employees as well as from its business partners to adhere to the same principles by applying our General Purchasing Conditions ("GPC") in our supply chain and expecting our other partners to comply with their human rights policy. By signing the GPC, our contractors/suppliers undertake to comply with the human rights standards contained in our Code of Conduct'. However, although it expects business partners to comply with General Purchasing Conditions and the Code of Conduct, no evidence found in any of these two documents indicating that it expects its business partners to commit it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Human Rights Policy, 11/2022: omv.com] & [Code of Conduct, April 2018: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment: The Human Rights Policy indicates: 'We are fully committed to respect, fulfill, and support the fulfilment of human rights in our direct surroundings as well as in wider society and to avoid or mitigate any risk on their health or safety that may arise from project-related activities. A special focus lies on those persons and groups with a high likelihood of being in vulnerable circumstances such as [...] human rights defenders'. However, no evidence found of a commitment to working with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. No further evidence found. [Human Rights Policy, 11/2022: omv.com]

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Annual Report indicates: 'The purpose of the Sustainability and Transformation Committee is to support the Supervisory Board in reviewing and monitoring OMV's strategy with regard to sustainability, and ESG-related standards and performance. It also focuses on processes and performance specifically in HSSE (Health, Safety, Security, and Environment) [...]. Furthermore, the committee serves to support and oversee the transformation process toward a more sustainable business model, including the cultural integration of strategically significant acquisitions'. To clarify, Human Rights is part of its ESG strategy: 'Our Sustainability Framework is built around the three pillars Environmental, Social, and Governance (ESG). [...] Within this sustainability framework, we have established five strategic focus areas: Climate Change; Natural Resources Management; Health, Safety & Security; People; and Ethical Business Practices'. There are Human Rights related targets within the People focus area. The Sustainability and Transformation Committee is a Board Committee. [Annual Report 2021, 2022: omv.com] • Not Met: Describes HRs expertise of Board member: The 2022 Sustainability Report notes: 'The Supervisory Board appoints among its members qualified expert committees that support the decision-making of the Supervisory Board. OMV's management of sustainability issues is overseen and steered by the Supervisory Board's Sustainability & Transformation Committee'. Also, 'In 2022, we took major steps to entrench accountability for human rights in our Company leadership. Our CEO is now the key owner of the topic of human rights. He is personally briefed about our main achievements and challenges related to our human rights impact at least twice a year (and whenever critical concerns arise), was the first participant to complete the revised human rights e-learning, and requested that all employees live up to our human rights commitment in a personal video message'. However, this subindicator looks for a description of background of knowledge/expertise on human rights of the Board member or Board committee tasked with that governance oversight on this matter.. Moreover, the CEO does not seem to be a Board member. [2022 Sustainability Report, 2023: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Board member/CEO signal importance of HRs in their communications: The CEO's statement in the Human Rights Policy indicates: 'We at OMV believe that respecting human rights and upholding the highest ethical business standards are of the utmost importance. Our operations and business activities could impact our stakeholders, including for instance employees, business partners as well as communities. Conducting our business in accordance with the highest ethical standards, to which also the respect for human rights belong, is key to OMV's purpose and strategy. With our OMV Group Human Rights Policy Statement, we commit to honor human rights in all our business activities, to address adverse human rights impacts we are involved in and to take adequate measures for their prevention, mitigation and, where appropriate, remediation'. The 2022 Sustainability Report notes: 'Our CEO is now the key owner of the topic of human rights. He [...] requested that all employees live up to our human rights commitment in a personal video message'. [Human Rights Policy, 11/2022: omv.com] & [2022 Sustainability Report, 2023: omv.com]
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Process to review HRs strategy at board level: The 2022 Sustainability Report notes: 'In 2022, the newly established Sustainability & Transformation Committee started holding regular meetings. This committee meets on a quarterly basis to discuss and steer topics such as regulatory ESG requirements including nonfinancial reporting requirements, ESG-related capital market activities, ESG governance and steering, and critical incidents related to sustainability (e.g., human rights violations and significant HSSE incidents)'. See below further details on specific topics discussed. [2022 Sustainability Report, 2023: omv.com] Met: Example of HRs issues/trends discussed in last reporting period: The 2022 Sustainability Report notes: 'Some critical concerns were discussed by the Sustainability & Transformation Committee of the Supervisory Board in 2022, including the human trafficking violations at PDH Kallo, the shutdown at Schwechat refinery, and media allegations of potential use of Uyghur forced labor in a project that OMV purchased upstream emission reduction (UER) certificates from'. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Meets both requirements under score 1: See above. Not Met: Describes how affected stakeholders / HRs experts inform board discussions: The 2022 Sustainability Report notes: 'OMV is committed to stakeholder engagement and convinced that mutual respect, transparent behavior, and open dialogue are the best foundations for a good relationship with the various stakeholders we interact with. In our stakeholder engagement approach, we identify and manage relationships with persons, groups, or organizations who might be affected by our activities, or who might have an impact on our business. [...] OMV is an active member of and holds leadership positions in numerous national, regional, European, and international associations and organizations [...]. They also provide a valuable platform for engagement with governments, regulators, and communities on topics such as energy, climate action, and trade. OMV participates in industry associations and consortia to support our understanding of issues, share knowledge, help develop standards, and provide input to regulatory authorities on behalf of the sector'. However, the Company is expected to describe how the experiences of affected stakeholders or external human rights experts informed the Board discussions. No further evidence found. [2022 Sustainability Report, 2023: omv.com]
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: At least one board member incentive linked to HRs commitments: The Company has provided comments to CHRB regarding Executive Board remuneration, however, this subindicator focuses on Board members [Supervisory Board in this case] incentive or performance management scheme linked to the Company's human rights policy commitment or strategy. [2022 Sustainability Report, 2023: omv.com] Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: The Company has provided comments to CHRB regarding Executive Board remuneration, however, this subindicator focuses on Board members [Supervisory Board in this case] incentive or performance management scheme linked to the Company's human rights policy commitment or strategy. In specific, it looks for additional human-rights related topics being included in incentives or evidence that health and safety also covers health and safety of workers of extractive

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>business partners or local communities. [2022 Sustainability Report, 2023: omv.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The Company has provided comments to CHRB regarding Executive Board remuneration, however, this subindicator focuses on Board members [Supervisory Board in this case] incentive or performance management scheme linked to the Company's human rights policy commitment or strategy. In specific, this subindicator looks for the criteria linking Board remuneration to human rights performance. [2022 Sustainability Report, 2023: omv.com] • Not Met: Review of other board incentives for coherence with HRs policies: The Company has provided comment to CHRB regarding this indicator. However, evidence was not material as it was regarding Executive Board remuneration. [2022 Sustainability Report, 2023: omv.com]
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks: The 2022 Sustainability Report notes: 'Our CEO is now the key owner of the topic of human rights. He is personally briefed about our main achievements and challenges related to our human rights impact at least twice a year [...]. The OMV Group has developed due diligence tools and techniques to assess the risk of human rights violations related to our business, even before we launch or acquire business in a new country. Human rights are one of the components considered when making the decision to engage in a new country. The relevant human rights risks are presented to the respective Executive Board member to factor into the decision on whether or not to enter a country. We use these assessments to derive concrete measures to reduce the risk of direct and indirect involvement in potential human rights violations. We also conduct regular assessments of our current operations to determine their exposure to the risk of human rights and labor rights violations'. However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Supervisory Board level. [2022 Sustainability Report, 2023: omv.com] • Not Met: Describes frequency and triggers for reviewing business model: The Company has provided comments to CHRB regarding this indicator regarding its risk assessment and materiality analysis. 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 at Supervisory Board level. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1: See above. • Not Met: Example of actions resulting from reviews: The Company has provided comments to CHRB regarding its risk assessment and its results and follow up actions taken. However, no example found of an action taken as a result of a discussion and review of its business model and strategy for inherent risks to human rights at Board level or a Board committee. The Company is expected to provide an example that reflects a change in strategy or business model because of specific human rights inherent risk. [2022 Sustainability Report, 2023: omv.com]

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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Senior responsibility for HRs implementation and decision making: The 2022 Sustainability Report indicates: ‘In 2022, we took major steps to entrench accountability for human rights in our Company leadership. Our CEO is now the key owner of the topic of human rights. He is personally briefed about our main achievements and challenges related to our human rights impact at least twice a year (and whenever critical concerns arise), was the first participant to complete the revised human rights e-learning, and requested that all employees live up to our human rights commitment in a personal video message’. However, being a CEO the only Senior Executive pointed out as responsible for implementation and decision making on human rights within a Company is not considered sufficient by CHRB methodology, as the CEO already held different responsibilities. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The 2022 Sustainability Report notes: ‘Below Board level, accountability for our compliance with human rights lies with the respective countries’ business heads. [...] Action plans and mitigation measures are implemented and reported by the respective functions, depending on which aspect of human rights is in question. Thus, the People & Culture (P&C) department deals with human rights issues related to labor rights, the Procurement department is responsible for managing human rights issues in the supply chain, the HSSE department is responsible for health, safety, and security-related human rights issues, and the corporate Community Relations and Development function oversees OMV responsibilities related to the human rights impact on communities and indigenous peoples’. [2022 Sustainability Report, 2023: omv.com] • Met: Day-to-day resources and expertise allocation in own operations: See above. In addition, the 2022 Sustainability Report notes: ‘Locally based human rights focal persons conduct due diligence at the operating facilities with the support of six human rights experts at Group level (at OMV, SapuraOMV, OMV Petrom, and Borealis)’. [2022 Sustainability Report, 2023: omv.com] • Not Met: Resources and expertise allocation with EX BPs: The 2022 Sustainability Report notes: ‘Among these were spot checks and HSSE walks, the inclusion of human rights in service quality meetings and evaluation criteria with our contractors, the confirmation of contractor employees’ employment registrations with local labor offices, detailed checks of framework contracts, and intensified promotion of our human rights training options. Furthermore, all business entities developed short- and mid-term plans to intensify human rights management in contractor relations. OMV Petrom has set up a task force comprised of representatives from Compliance, Procurement, HSSE, Sustainability, HR, and Legal and developed a human rights violations prevention plan for OMV Petrom sites, both with the objective of intensifying human rights management in our business relationships. Some of the measures are the inclusion of human rights in quarterly meetings with contractors, awareness campaigns for our own staff and contractors, and the training of HSSE auditors on human rights. SapuraOMV has developed a plan of short- and long-term measures to improve our human rights performance in business relations, covering the topics of contractors’ agreements and work permits, wages, working and break times, working and housing conditions, access to grievance mechanisms, and training’. However, no specific evidence found on human resources and expertise allocation to handling human rights in extractive business partners. [2022 Sustainability Report, 2023: omv.com]
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives linked to HRs commitments: The 2022 Sustainability Report indicates that ‘Selected employees at senior management level are also eligible to participate in the Long-Term Incentive Plan (LTIP). The variable remuneration – LTIP and the annual bonus – includes performance criteria related to the Company’s sustainability and greenhouse gas (GHG) performance. [...] the Remuneration Committee decided to reduce the Remuneration Policy’s complexity by [...] implementing a standardized health and safety malus instead of the current sustainability multiplier in the annual bonus and the HSSE malus in the LTIP. [...] 15% of the annual bonus depends on the achievement of an ESG target, namely the reduction of net absolute GHG emissions. 30% of the LTIP is also based on the achievement of ESG targets. [...] Based on predefined criteria (e.g., fatalities, TRIR, process safety – also in comparison to industry benchmarks), a health and safety malus of between 0.8 and 1.0 is applied to the overall target achievement for both the annual bonus and the LTIP. In the event of severe incidents, the Remuneration Committee may reduce the payout to zero. This malus considers OMV’s commitment to health and workplace safety’. The 2022 Remuneration

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Report adds explains that the performance criteria for Health & Safety Malus is: 'Based on predefined criteria (e.g., fatalities, TRIR, process safety – also in comparison to industry benchmarks), a Health & Safety Malus between 0.8 and 1.0 is applied to the overall target achievement. In case of severe incidents, the Remuneration Committee may reduce the payout to zero. This malus considers OMV's commitment to health and workplace safety'. It is not clear the weighting of it. [2022 Sustainability Report, 2023: omv.com] & [2022 Remuneration Report, 2023: omv.com]</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although the Executive Board remuneration has an incentive for health and safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. The Company has provided comments to CHRB regarding this indicator, however, no further evidence found. [2022 Sustainability Report, 2023: omv.com] & [2022 Remuneration Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: See above. The Company indicates that it has a 'health and safety malus of between 0.8 and 1.0' which 'is applied to the overall target achievement for both the annual bonus and the LTIP'. [2022 Sustainability Report, 2023: omv.com] • Not Met: Review of other senior management incentives for coherence with HRs policies: The 2022 Sustainability Report notes: 'environmental, social, and governance (ESG) targets are weighted more strongly in the variable remuneration. The Remuneration Committee has established an OMV specific catalogue of criteria derived from the Company's Sustainability Strategy. The Remuneration Committee chooses the ESG targets and their weighting for each LTIP tranche based on this catalog'. However, it is not clear it has reviewed other Senior management performance incentives to ensure coherence with its human rights policy commitment. [2022 Sustainability Report, 2023: omv.com]
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs risks integrated as part of enterprise risk system: The Company explains its Risk Management system and discloses its Operational risks, among which: 'The nature of OMV's business operations exposes the Group to various health, safety, security, and environmental (HSSE) risks'. It indicates: 'All operational risks are identified, analyzed, monitored, and mitigated following the Group's defined risk management process. Control and mitigation of assessed risks take place at all organizational levels using clearly defined risk policies and responsibilities. The key Group risks are governed centrally to ensure the Group's ability to meet planning objectives through corporate directives, including those relating to health, safety, security, environment, [...] human resources, and sustainability. [...] OMV puts a special emphasis on five Sustainability Strategy areas: HSSE, [...] Employees, Business Principles, and Social Responsibility'. [Annual Report 2021, 2022: omv.com] • Met: Provides an example: The 2022 Sustainability Report notes: 'The full spectrum of risks relating to OMV's business, including economic, environmental, and social issues, is analyzed using either a semi-qualitative or quantitative approach and documented in a centralized risk repository. The resulting corporate risk profile provides a holistic view of issues that could affect the Company's medium- and long-term performance. The profile is therefore integrated into OMV's decision-making processes. According to the OMV risk taxonomy, the following risk categories are considered based on key risk drivers: Financial risks [...]. Operational risks, including all risks related to [...] HSSE [...]. Strategic risks arising, for example, from [...] risks to reputation'. As for its Specific Sustainability Risks and Opportunities, it indicates the threats to the communities: 'Risk of human rights abuse against communities stemming from the OMV Group's operations. This risk is equally about failing community consultation, compensation, and reparation, as well as the negative impact on local employment, skills development, education, local livelihood, and culture. Also, negative impacts on communities' environment, health, safety, quality of life, or access to basic needs are reflected'. An its mitigation measures: 'Training for all OMV employees and the internal communications team to raise general human rights awareness In-depth training for employees in specific functions to develop skills Integration of human rights in business processes, e.g., HSSE contractor management, project management, supplier prequalification and monitoring Human Rights Country Entry Check before launching operations in a country, as well as regular human rights assessments in our countries of operation, including labor rights aspects Highest-level commitment to human rights by the Boards Development and implementation (or supporting

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>development of OMV's business partners) of grievance mechanism Professional Human Rights and Social Impact Assessment Professional Community Relations & Development Management'. [2022 Sustainability Report, 2023: omv.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The report also states that 'The Executive Board is responsible for risk oversight, ensuring that management has put in place a rigorous process for identifying, prioritizing, managing, and monitoring the critical risks affecting the Company. [...] The Group Risk Committee, which is composed of the OMV Group CFO and members of senior management, meets at least four times a year, ensuring that risk awareness and prevention are firmly integrated into decision-making processes. The Committee validates the key nonfinancial and financial risks identified with respect to OMV's short-, medium-, and long-term objectives. [...] Potential human rights related or risk matrices are used to support the assessment process and serve to identify probability ranges and the related consequences if risks were to materialize. [...] The results of an intensive reporting exercise are discussed at the OMV Executive Board level through the Group Risk Report and further presented to the OMV Audit Committee'. However, this subindicator looks for a description of how it assesses the adequacy of the enterprise risk management system specifically in managing human rights during the Company's last reporting year. [2022 Sustainability Report, 2023: omv.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Met: Communicates HRs policies to all workers in own operations: The 2021 Sustainability Report indicates: 'We conduct trainings on human rights, which equip our employees with an understanding of our human rights management process and give them a space to work on concrete operational issues and local challenges. [...] All employees are strongly encouraged to complete an interactive e-learning course, which is part of the training curriculum for all employees worldwide and guides them through human rights norms and situations'. Local languages are assumed in training. [Sustainability Report 2021, 2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders: The Company has provided comments to CHRB regarding this indicator regarding human rights training. It also provided a webpage where its Social Media Channels can be found. However, it is not clear how it actively communicates its policy commitments to affected stakeholders, including local communities and other groups in general. Publishing policies on the website is not considered a direct communication with affected stakeholders. [2022 Sustainability Report, 2023: omv.com] & [Social Media Channels_web, N/A: omv.com] • Not Met: Example of how HRs policies are accessible for intended audience: The Company has provided comments indicating it Human Rights Policy is publicly available. However, publishing policies on the website is not considered a direct communication. The Company is expected to provide an example of how it actively ensures the form and frequency of the information communicated is accessible to its intended audience. [Human Rights Policy, 11/2022: omv.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a • Met: Describes steps to communicate HRs policies to EX BPs: The Human Rights Policy indicates: 'Our Human Rights Policy Statement is published on our website, and we report on our performance in various channels, ranging from direct dialogue with our stakeholders to formal reporting in the annual Sustainability Report in line with legal requirements and international reporting standards. [...] OMV commits itself to these salient human rights and expects from its [...] business partners to adhere to the same principles by applying our General Purchasing Conditions ("GPC") in our supply chain and expecting our other partners to comply with their human rights policy. By signing the GPC, our contractors/suppliers undertake to comply with the human rights standards contained in our Code of Conduct'. The GCP notes: 'Contractor will perform, and will instruct its subcontractors to perform, the Scope of Work in full compliance with the Code of Conduct and these ten [human rights] principles'. [Human Rights Policy, 11/2022: omv.com] & [General Conditions of Purchase, N/A: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Human Rights Policy indicates: 'By signing the GPC [General Conditions of Purchase], our contractors/suppliers undertake to comply with the human rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			standards contained in our Code of Conduct'. [Human Rights Policy, 11/2022: omv.com] <ul style="list-style-type: none"> • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: The 2022 Sustainability Report indicates: 'To mitigate supply chain risks, including forced labor, slavery, human trafficking, and corruption, the OMV Group imposes the legal requirements and internal rules and standards applicable to OMV on its suppliers. Our suppliers are obligated to fully comply with the content of the OMV Code of Conduct, and our supply chain partners are required to sign the OMV Code of Conduct. In addition, our suppliers must accept the OMV General Conditions of Purchase, which further detail our business standards (e.g., labor rights), as an integral part of our contractual agreements'. The GCP notes: 'Contractor will perform, and will instruct its subcontractors to perform, the Scope of Work in full compliance with the Code of Conduct and these ten [human rights] principles'. It is not clear extractive business partners are required to cascade the contractual or other binding requirements down their supply chain, as it indicates it 'will instruct subcontractors'. [2022 Sustainability Report, 2023: omv.com] & [General Conditions of Purchase, N/A: omv.com]
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: The 2021 Sustainability Report indicates: 'We conduct trainings on human rights, which equip our employees with an understanding of our human rights management process and give them a space to work on concrete operational issues and local challenges. [...] All employees are strongly encouraged to complete an interactive e-learning course, which is part of the training curriculum for all employees worldwide and guides them through human rights norms and situations. This module is an interactive 30-minute training session that teaches a basic understanding of human rights in general and their relevance to our business specifically. It provides an opportunity for employees to test their knowledge using real-life examples'. The Company has provided additional comments to CHRB regarding this indicator, however, the core content was already in use. [Sustainability Report 2021, 2022: omv.com] • Met: Trains relevant managers including security on HRs: The report also indicates: 'We provide human rights training to local security employees and third-party contractors'. [Sustainability Report 2021, 2022: omv.com] Score 2 <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments: The 2022 Sustainability Report notes: 'OMV works together with its suppliers to improve overall sustainability performance. For instance, in 2022, individual meetings and webinars were offered to our suppliers to help them better understand the requirements of the [...] the TfS Assessment, and why this information is important to OMV. Additionally, the topics of sustainable procurement and low-carbon procurement were also included in the agenda of our annual strategic supplier meetings. [...] In Yemen, OMV conducted awareness building for local contractors on grievance management and Community Grievance Mechanisms (CGMs). OMV supported four local contractors working on establishing their own CGMs and is currently supporting a fifth contractor. [...] We provide human rights training to local security employees and third-party contractors. [...] In 2022, we conducted several virtual classroom training sessions, for example for OMV Libya, OMV UAE, PARCO, OMV Tunisia, and other teams. The "We Care" portal was launched and SapuraOMV conducted awareness training for the staff and main contractors of SapuraOMV in Kuala Lumpur, Miri (offshore crew of B15), Labuan (Supply Base), and Pasir Gudang (Jerun Development project team) on the use, procedures, and availability of the Community Feedback Mechanism via the portal'. However, although the Company describes some specific trainings for business partners, no description found of general human rights training [policy commitments] conducted for them. [2022 Sustainability Report, 2023: omv.com] • Not Met: Discloses % suppliers trained: The Company has provided comments to this indicator pointing out the percentage of buyer that received sustainable procurement training and the percentage of A suppliers assessed on their carbon footprint. However, this subindicator looks for the percentage of business partners trained in human rights expectations. [2022 Sustainability Report, 2023: omv.com]
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of at least 1 on A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The 2022 Sustainability Report notes: ‘Locally based human rights focal persons conduct due diligence at the operating facilities with the support of six human rights experts at Group level (at OMV, SapuraOMV, OMV Petrom, and Borealis). [...] At corporate level, we analyzed the HSSE and Procurement directives for contractor management and prepared a detailed checklist for human rights compliance to be used at site level. [...] At local level, individual monitoring initiatives were implemented to ensure our business partners’ compliance with human rights. Among these were spot checks and HSSE walks, the inclusion of human rights in service quality meetings and evaluation criteria with our contractors, the confirmation of contractor employees’ employment registrations with local labor offices, detailed checks of framework contracts, and intensified promotion of our human rights training options. [...] In 2022, we began the assessment for Tunisia, which provided assurance to the OMV Group that the assessed CGMs are aligned with the criteria. [...] We additionally conduct dedicated country risk assessments regarding labor rights to determine and monitor the legal situation and future development. As well as monitoring relevant labor rights risks, we work closely with employee representatives depending on the type of risk and potential impacts. [...] In 2022, we conducted a Human Rights Self-Assessment at Pak-Arab Refinery Limited (PARCO) with the support of external human rights experts’. [2022 Sustainability Report, 2023: omv.com] • Not Met: Discloses % of EX BP's monitored: The 2022 Sustainability Report notes: ‘35% of A suppliers (suppliers covering >80% of Procurement spend) assessed’. The 2022 GRI Content Index adds: ‘7% of the 328 suppliers assessed via TFS were assessed as having negative social impacts. Negative potential or actual social impacts related to, for example, not having human rights policies, including policies on child and forced labor. For all of these, we identified improvement measures. No supplier relationships were terminated due to negative social impacts in 2022’. However, it is not clear the total proportion of its business partners that had its human rights compliance monitored. [2022 Sustainability Report, 2023: omv.com] & [2022 GRI Content Index (partial), 2023: reports.OMV.com] • Not Met: Describes how workers are involved in monitoring: See above. The Company has provided comments regarding this subindicator where it indicates different efforts to manage its human rights risks. It includes information on a Task Force at OMV Petrom. However, no evidence found of how the Company’s workers are involved in the monitoring process for human rights compliance. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process: The 2022 Sustainability Report notes: ‘Due diligence starts with an initial risk ranking at country level: every country we operate in (or plan to operate in) is assessed based on comprehensive human-rights-related data and in consultation with internal and external experts. The countries are rated as low, medium, and high risk, countries with the greatest manageable risk, and “no-go” countries with unmanageable risk. Based on this rating, we develop our yearly work plan, defining further due diligence actions and human rights training. Internationally recognized third-party experts support the OMV Group in conducting due diligence on the Company’s exposure to human rights risks’. The Company has provided additional comments. However, no subindicator looks for the standard process it has in place to implement corrective action plans where non-compliances are found as part of the monitoring process. [2022 Sustainability Report, 2023: omv.com] • Not Met: Discloses findings and number of correction action processes: The Company has provided comments to this indicator regarding its human rights risk assessment efforts as well as its TFS. and Ecovadis monitoring. The 2022 GRI Index indicates: ‘7% of the 328 suppliers assessed via TFS were assessed as having negative social impacts. Negative potential or actual social impacts related to, for example, not having human rights policies, including policies on child and forced labor. For all of these, we identified improvement measures. No supplier relationships were terminated due to negative social impacts in 2022’. However, no further evidence found the findings of its human rights monitoring process and number of corrective action processes as a result of the monitoring. [2022 GRI Content Index (partial), 2023: reports.OMV.com]
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs performance affects selection EX BPs: The 2021 Sustainability Report indicates: ‘Supplier prequalification is part of precontractual activities during which OMV collects information from a potential supplier for the purpose of evaluating

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compliance with our HSSE and other sustainability requirements. The goal of the prequalification process is to screen potential suppliers before bringing them on board or during the tender stage to ensure that only those suppliers who meet our HSSE and sustainability standards can be considered for future collaboration. The prequalification is based on a standardized list of elements and objectives according to the OMV Group's HSSE Management System (e.g., HSSE Policy; ISO 9001, 14001, 45001) and our Sustainability Strategy (e.g., Sustainability Policy, Human Rights Policy, Grievance Mechanisms)'. [Sustainability Report 2021, 2022: omv.com]</p> <ul style="list-style-type: none"> • Met: HRs performance affects ongoing BPs relationships: The Code of Conduct states: 'OMV reserves the right to terminate the relationships with its suppliers, if issues of non-compliance with OMV's Code of Conduct are discovered or non-compliance is not addressed in a timely manner'. The Code contains the Company's Human Rights provisions. [Code of Conduct, April 2018: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Met: Works with EX BPs to meet HRs requirements: The 2022 Sustainability Report notes: 'OMV works together with its suppliers to improve overall sustainability performance. [...] the topics of sustainable procurement [...] were also included in the agenda of our annual strategic supplier meetings. [...] In Yemen, OMV conducted awareness building for local contractors on grievance management and Community Grievance Mechanisms (CGMs). OMV supported four local contractors working on establishing their own CGMs and is currently supporting a fifth contractor. [...] We provide human rights training to local security employees and third-party contractors. [...] In 2022, we conducted several virtual classroom training sessions, for example for OMV Libya, OMV UAE, PARCO, OMV Tunisia, and other teams. The "We Care" portal was launched and SapuraOMV conducted awareness training for the staff and main contractors of SapuraOMV in Kuala Lumpur, Miri (offshore crew of B15), Labuan (Supply Base), and Pasir Gudang (Jerun Development project team) on the use, procedures, and availability of the Community Feedback Mechanism via the portal'. [2022 Sustainability Report, 2023: omv.com]
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Discloses stakeholders whose HRs may be affected: The 2021 Sustainability Report indicates: 'In our stakeholder engagement approach, we identify and manage relationships with persons, groups, or organizations who might be affected by our activities or who may have an impact on our business'. It discloses its stakeholders groups, including: Employees, Local communities. The Company also provides examples of engagement with each group and 'Examples of Key Topics and Concerns Raised by Stakeholders'. The webpage section Ethical Principles adds: 'Our community relations and development management. The 2022 Sustainability Report notes: 'The OMV Group holds itself responsible for protecting the human rights of our employees, as well as those of people directly impacted by or involved with our business, for example our suppliers, communities, indigenous peoples, and the society in which we live and operate our business. [...] We specifically concentrate on the impact of our activities on the human rights of vulnerable groups, such as indigenous peoples, women, and children'. [2022 Sustainability Report, 2023: omv.com] • Not Met: Provides two examples of engagement with stakeholders: The 2022 Sustainability Report notes: 'in the vicinity of our refineries, stakeholders such as local authorities and neighbors are proactively informed in advance of any work that may cause a disturbance (e.g., noise from turnarounds) by way of stakeholder meetings, social media, leaflets, and other channels as appropriate. An example of this in action is the "green phone" at the Schwechat refinery, which has ensured 24/7 direct contact for all neighbors for several years now. Every call is answered by the shift supervisor in charge, and in cases of perceived noises or odors, the shift supervisor checks immediately for potential sources in the refinery so that the issue can be resolved as quickly as possible'. However, it is not clear it took place in the last two years. Moreover, 'all OMV E&P projects require community consultation in the development phase. In 2022, 5 out of 17 projects were in the process of community consultation'. However, no further description of these consultations found, showing the dialogue held with affected stakeholders regarding human rights. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: The Company has provided comments to this indicator making reference to 'Examples of Key Topics and Concerns Raised by Stakeholders'. It has also provided additional

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>comments regarding its materiality analysis. However, the Company is expected to provide either a summary of stakeholders' views on Company's human rights or at least two case studies. No further evidence found. [2022 Sustainability Report, 2023: omv.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how stakeholders views influenced company's HRs approach: The Company has provided comments to this indicator where it discloses changes in human rights policy and management. However, this subindicator looks for a description of how stakeholders views on human rights issues [from stakeholder engagement] have influenced the development or monitoring of its human rights approach. No further evidence found. [2022 Sustainability Report, 2023: omv.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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process of identifying risks in own operations: The 2021 Sustainability Report indicates: 'The Human Rights Due Diligence Process includes assessing the human rights risk associated with our current and future business activities, and taking risk management actions. This ongoing process makes use of external resources and expertise, and includes external stakeholders, in particular impacted groups. [...] At all stages of the human rights due diligence process, we use the OMV Human Rights Matrix as a common standard, mapping reality on the ground against the concrete responsibilities as defined in the matrix and identifying any gaps we need to focus on. This approach ensures that any potential human rights impact of our business activities is identified – whether this relates to non-discrimination and diversity, labor-related issues (e.g., minimum wage, adequate rest times), indigenous peoples' rights, or human rights in the supply chain'. Moreover, 'OMV has developed due diligence tools and techniques to assess the risk of human rights violations related to our business, even before we launch or acquire business in a new country.[...] Due diligence starts with an Initial Risk Ranking at country level'. [Sustainability Report 2021, 2022: omv.com] • Met: Describes process for identifying risks in EX BPs: As indicated above, it also includes suppliers. [Sustainability Report 2021, 2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes global risk identification system incl. stakeholder consultation: The webpage section Ethical Principles indicates it conducts a Social Impact Assessment (SIA): 'The purpose of an SIA is to ensure that the views of the local communities, especially of indigenous peoples, are incorporated and addressed throughout all phases of the project life cycle and its design: commencement, operational phase, and decommissioning or abandonment'. Moreover, regarding its Human Rights Due Diligence Process, the 2021 Sustainability Report adds: 'This ongoing process makes use of external resources and expertise, and includes external stakeholders, in particular impacted groups. [...] Internationally recognized third-party experts support OMV in conducting the due diligence on the Company's exposure to human rights risks. In 2020, for example, an external human rights expert assessed the human rights risks related to OMV's business activities in UAE. The rights of workers – especially migrant workers – in the supply chain were identified as a critical issue and due diligence measures recommended'. [Sustainability Report 2021, 2022: omv.com] & [Ethical Principles_web, N/A: omv.com] • Met: Describes how risk identification system is triggered by new circumstances: The 2021 Sustainability Report indicates: 'OMV has developed due diligence tools and techniques to assess the risk of human rights violations related to our business, even before we launch or acquire business in a new country. Human rights are one of the components considered when making the decision to engage in a new country. The relevant human rights risks are presented to the respective OMV Executive Board member to factor into the decision on whether or not to enter a country. We use these assessments to derive concrete measures to reduce the risk of direct and indirect involvement in potential human rights violations'. Also, the webpage section Ethical Principles notes: 'Our community relations and development management process starts by conducting a Social Impact Assessment (SIA), which integrates human rights issues and builds on free and prior informed consultation with and consent of local stakeholders. The SIA is conducted when we enter a new area, or there is a material change in our operations'. [Ethical Principles_web, N/A: omv.com] & [Sustainability Report 2021, 2022: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes risks identified in relation to new circumstances: The 2022 Sustainability Report notes: ‘our journey in 2022 focused on performing human rights assessments more consistently in existing high-risk assets and new projects. A Human Rights Self-Assessment for OMV Libya was initiated in December 2022 and will be completed in the first Quarter of 2023’. The Company has provided comments to CHRB regarding this indicator; however, its content has not been found in publicly available sources. This indicator looks for a description of their 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. [2022 Sustainability Report, 2023: omv.com]
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Describes assessment process and discloses salient HRs risks: The 2021 Sustainability Report indicates: ‘Since 2008, we have mapped our human rights responsibilities in a comprehensive Human Rights Matrix designed to serve as the foundation for our activities in this area. We use this tool to assess our human rights challenges and activities, and prioritize our actions as essential, expected, or desirable in defence of human rights. [...] OMV has developed due diligence tools and techniques to assess the risk of human rights violations related to our business, even before we launch or acquire business in a new country. Human rights are one of the components considered when making the decision to engage in a new country. The relevant human rights risks are presented to the respective OMV Executive Board member to factor into the decision on whether or not to enter a country. [...] We also conduct regular assessments of our current operations to determine their exposure to the risk of human rights and labor rights violations. Due diligence starts with an Initial Risk Ranking at country level: Every country we operate in (or plan to operate in) is assessed based on comprehensive human-rights-related data and on consultation with internal and external experts. The countries are ranked by low, medium, and high risk, countries with the greatest manageable risk, and “no-go” countries with unmanageable risk’. [Sustainability Report 2021, 2022: omv.com] • Not Met: Describes how process applies to EX BPs: As indicated above, the Company used a Human Rights Matrix to assess our human rights challenges and activities and it includes Human Rights issues in the supply chain. However, it is not clear how geographical, economic, social and other factors are taken into account when assessing its human rights risks. The Company has provided comments to this indicator explaining different efforts to manage human rights risks, including: a human rights self assessment of PARCO; spot checks and HSSE walks; OMV Petrom and Sapura OMV [two segments] initiatives. However, these actions seem to refer to compliance monitoring activities rather than part of an assessment process to determine which are the salient issues it faces through extractive business partners. No further information of a process to assess its human rights risks in its business partners found, including how social, geographic, economic or other factors are taken into account. [Sustainability Report 2021, 2022: omv.com] & [2022 Sustainability Report, 2023: omv.com] • Met: Public disclosure of results of HRs risk assessment: The Human Rights Policy indicates: ‘As part of its Human Rights Policy, OMV has mapped its salient human rights responsibilities related to its relevant stakeholders (especially own employees, contractors and their employees, etc.) in a comprehensive Human Rights Matrix, which constitutes the basis for our activities in the field of human rights and serves as a fundamental tool for their implementation’. The webpage section People discloses what the Company considers to be ‘its human rights responsibilities’: ‘Equality and non-discrimination; Security; Health & safety; Labor related rights; Employee representation; Provisions against forced labor, child labor and human trafficking; Education; Property, land rights & standard of living; Local communities’ and indigenous peoples’ rights; Privacy and family life’. The 2021 Sustainability Report adds: ‘We regularly review the priorities in our matrix and redefine them in accordance with international best practice and the latest developments in the human rights field’. [Sustainability Report 2021, 2022: omv.com] & [People_web, N/A: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders: The Company has provided comments to this indicator explaining different efforts to manage human rights risks, including information on a human rights self-assessment of PARCO (business partner company in Pakistan) that involved external experts and PARCO managers. It also provided explanation on the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			importance of community engagement in high-risk countries. However, the Company is expected to describe how it involves affected stakeholders during the assessment processes of due diligence. No further evidence found. [2022 Sustainability Report, 2023: omv.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes system to prevent, mitigate and remediate HRs issues: The 2021 Sustainability Report indicates: ‘Due diligence starts with an Initial Risk Ranking at country level. [...] Based on this ranking, we develop our yearly work plan, defining further due diligence actions and human rights training’. Regarding its risk assessment, the 2022 Sustainability Report notes: ‘We inform the respective General Managers and Human Rights Focal Persons about the elevated risk levels in their countries and recommend specific mitigation measures, for example human rights training for employees and the integration of the mentioned human rights issues in contractor meetings’. The Human Rights Policy adds: ‘Following the UN Guiding Principles on Business and Human Rights, our Human Rights Due Diligence (DD) encompasses the following four steps [...] 2. integrating and acting upon the DD findings in our activities;[...]’. The Company has provided comments to this indicator further explaining its human rights matrix and how it prioritizes our actions as ‘essential, expected, or desirable in defense of human rights’, according to this tool and it names its due diligence steps, which includes, as indicated in the Human Rights Policy: ‘integrating and acting upon the DD findings in our activities’. [Sustainability Report 2021, 2022: omv.com] & [2022 Sustainability Report, 2023: omv.com] • Not Met: Describes how global system applies to EX BPs: The Company has provided comments to this indicator explaining different efforts to manage human rights risks, including information on: its human rights matrix; business partners' expectations; a Human Rights Self-Assessment at Pak-Arab Refinery Limited (PARCO); individual monitoring initiatives; different OMV Petrom and SapuraOMV human rights related initiatives, the steps taken for its DD process. However, while these are preventive actions, the subindicator looks for a description of its global system to prevent, mitigate and remediate its salient human rights issues detected during its assessment at its business partners. [2022 Sustainability Report, 2023: omv.com] & [Human Rights Policy, 11/2022: omv.com] • Not Met: Example of actions decided on at least 1 salient HRs issue: The Company has provided comments to this indicator explaining different efforts to manage human rights risks, including information on: a Human Rights Self-Assessment at Pak-Arab Refinery Limited (PARCO) training sessions to prepare for the Self-Assessment; its CGM [Community Grievance Mechanism], a tool for prevention. However, no example has been found of the specific actions taken or to be taken on at least one of its salient human rights issues as a result of the assessment processes in at least one of its activities/operations in the last three years. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Describes how stakeholders involved in decisions about actions taken: See above. It adds: ‘In terms of labor rights, we work closely with employee representatives depending on the type of risk and potential impacts’. [Sustainability Report 2021, 2022: omv.com]
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes system for evaluation effectiveness of actions: The 2021 Sustainability Report indicates: ‘The Human Rights Self-Assessment is one of the tools we use to assess the effectiveness of our human rights due diligence approach. Such assessments create internal awareness, capture our self-perception of our human rights performance, and facilitate the definition of gaps and further actions’. [Sustainability Report 2021, 2022: omv.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions: The Company has provided comments to this indicator explaining a CGM review and the launch of the ‘We Care’ portal together with an awareness training on it. However, none of the examples given are examples of salient Human Rights risks identified during its Human Rights assessments. No example found of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Involves stakeholders in evaluation effectiveness of actions: The Company has provided comments to this indicator explaining how the Company assess the degree of alignment of the CGMs with the UN Effectiveness Criteria and the importance of community engagement for security mitigation. However, this subindicator looks for a description of how it involves affected stakeholders in evaluation of whether the actions taken [in the context of a due diligence process, to address Human Rights risks and impacts] have been effective. No further evidence found. [2022 Sustainability Report, 2023: omv.com]
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company has provided comments to this indicator explaining that it maintains regular communication with the communities and the different means it has to inform the vicinity of its refineries. It has also provided information on its different grievance mechanisms and human rights training. However, this indicator looks for two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf, in the first place. It focuses on how the Companies ensure meaningful information reaches affected stakeholders, how it responds, in communication terms, to issues raised by stakeholders and about their access to those communications. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them: The Company has provided comments to this indicator explaining the origin of the majority of the grievances raised through its grievance channels, and that the Company will continue to assess them to identify its root causes. However, this subindicator looks for description of any challenge to effective communication it has identified and how it is working to address them. [2022 Sustainability Report, 2023: omv.com]

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The 2021 Sustainability Report indicates: 'We offer our employees various channels for bringing forward issues, concerns, and grievances. This includes the PetrOmbudsman at OMV Petrom, where employees and management can have confidential, off-the-record, informal discussions and address issues related to the workplace. Moreover, employees can bring forward their concerns in direct dialogue with human rights managers, human resources business partners, and works council members. At Borealis, such concerns can also be raised with Group Ethics and Compliance and with ethics ambassadors. In case of legal or other changes (e.g., restructuring, pension issues), we offer interactive communication sessions with employees regarding working conditions'. The Code of Conduct adds: 'we have established effective operational-level grievance mechanisms and aim to contribute to fulfill human rights through our activities'. [Sustainability Report 2021, 2022: omv.com] & [Code of Conduct, April 2018: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made aware: See above. It is assumed that these operational-level grievance channels are created in local languages. Employees receive Human Rights training, everyone receives training on 'the key concepts of OMV Human Rights Management'. The Code of Conduct adds: 'The OMV Human Rights Management System includes the due diligence process and tools and the Human Rights Matrix'. The Grievance management is part of its Management and Due Diligence Processes. [Sustainability Report 2021, 2022: omv.com] & [Code of Conduct, April 2018: omv.com] • Met: Describes how workers in EX BPs access grievance mechanism: The Code of Conduct indicates: 'we have established effective operational-level grievance mechanisms and aim to contribute to fulfill human rights through our activities'. The Code also applies to extractive business partners. [Code of Conduct, April 2018: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Expects EX BPs to convey expectation to their BPs: The Code of Conduct indicates: ‘we have established effective operational-level grievance mechanisms and aim to contribute to fulfill human rights through our activities’. The Code also applies to extractive business partners. The General Conditions of Purchase remarks that business partners are expected to have their ‘subcontractors to perform, the Scope of Work in full compliance with the Code of Conduct and these ten principles’. [Code of Conduct, April 2018: omv.com] & [General Conditions of Purchase, N/A: omv.com]
C.2	Grievance mechanism(s) for external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The 2021 Sustainability Report indicates: ‘We strive to conduct our operations in a way that reduces any disruption to our neighboring communities to a minimum; however, grievances may still arise. We manage these grievances through localized Community Grievance Mechanisms (CGMs)’. [Sustainability Report 2021, 2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: As these channels are locally based, local language is assumed. Moreover, the 2022 Sustainability Report notes: ‘SapuraOMV will share the availability of the Community Feedback Mechanism with the communities in the vicinity of its operations – i.e., Pasir Gudang in Johor, Miri in Sarawak, and Labuan. We will send employees periodic reminders about the availability of access points for any feedback on the Community Feedback Mechanism and provide an induction to new SapuraOMV staff’. However, it is not clear how communities are made aware of it company-wide, as this procedure only seem to apply to a segment of the Company. [Sustainability Report 2021, 2022: omv.com] & [2022 Sustainability Report, 2023: omv.com] • Met: Describes how external individuals/communities access grievance mechanism: The webpage section Our dialogue-based approach to handling Community Grievances indicates: ‘We define grievances as an expression of dissatisfaction stemming from a real or perceived impact of a company’s business activities through its own actions or through actions of its suppliers’. These grievances are covered by the Community Grievance Mechanism. [Our dialogue-based approach to handling CommunityGrievances_web, N/A: omv.com] • Met: Expects EX BPs to convey expectation to their BPs: See above. Regarding community relations, the Code of Conduct indicates: ‘OMV has a consistent approach in receiving, registering and solving grievances’. Extractive business partners are expected to comply with the Code. [Our dialogue-based approach to handling CommunityGrievances_web, N/A: omv.com] & [Code of Conduct, April 2018: omv.com]
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance: The 2022 Sustainability Report notes: ‘OMV has set a target to assess the CGMs [Community Grievance Mechanisms] at all sites against the UN Effectiveness Criteria for Non-Judicial Grievance Mechanisms by 2025. The UN Effectiveness Criteria require the grievance mechanism to be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue. During these assessments, internal and external stakeholders are consulted on the current performance of CGMs and design improvements that may be necessary. The CGM Assessment reviews the existing processes and practices in place, and identifies practical improvement measures. It also involves conducting interviews with selected stakeholders’. However, no actual details found on how (and which) affected stakeholders are being effectively consulted as part of this process. [2022 Sustainability Report, 2023: omv.com] • Not Met: Provides user engagement examples (at least two) on design and performance: See above. However, this subindicator looks at least two examples of how it engages with potential or actual users specifically on the design, implementation and performance of the mechanism. No further evidence found. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism: See above. However, it is not clear potential or actual users are among these stakeholders. [Sustainability Report 2021, 2022: omv.com] • Not Met: Provides user engagement examples (at least two) on improvement: See above. However, this subindicator looks for at least two examples of

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>engagement with potential or actual users on the improvement of the grievance mechanism. [Sustainability Report 2021, 2022: omv.com]</p> <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns: Regarding the Integrity Platform, the 2021 Sustainability Report indicates: 'The report will be analyzed, and an answer provided through the same platform within ten days'. However, this channel only seems to be open to the following topics: 'corruption and bribes, conflict of interest, cartels/unfair competition, capital market law, public procurement, environmental protection, product/ food safety and consumer protection, corporate tax regulations and data protection'. Regarding the community grievance channels, the webpage section Our dialogue-based approach to handling Community Grievances notes: 'We aim to solve all grievances quickly. Depending on the severity level of a grievance and the type of issue raised, the response to the complainant can take anywhere between first 24 h in cases where immediate resolution is necessary and/or possible up to a maximum of 45 days in cases where detailed investigations or resolutions are required'. However, timescales seem to only apply to communities. Moreover, it is not clear how the Company will inform complainants. The Company has provided additional sources to this subindicator, however, core information was already in use and no additional evidence found in the latest Sustainability Report. No further information on grievance channels, other than community ones, found. [Our dialogue-based approach to handling CommunityGrievances_web, N/A: omv.com] & [Sustainability Report 2021, 2022: omv.com] • Not Met: Describes technical, financial, advisory support to enable equal access: The Company has provided sources to this indicator, however, no evidence found. This subindicator looks for the technical, financial or advisory support available to complainants to enable equal access to and participation in the grievance process [it could be for instance, could be training, access to a fund, etc]. [Our dialogue-based approach to handling CommunityGrievances_web, N/A: omv.com] & [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: The Company has provided sources to this indicator, however, no evidence found. This subindicator looks for an explanation of the type of outcome to the complainant through use of the grievance mechanisms. [Our dialogue-based approach to handling CommunityGrievances_web, N/A: omv.com] & [2022 Sustainability Report, 2023: omv.com] • Not Met: Describes escalation to senior levels / independent adjudicators: The webpage section Our dialogue-based approach to handling Community Grievances indicates: 'Once we receive a grievance, we assess its severity and assign an OMV employee, who will follow through to ensure that the issue is investigated by departments that are best suited to do so, and that the complainant is responded to in due course. Grievances with high severity levels are escalated to senior management levels'. However, it is not clear how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant's discretion. [Our dialogue-based approach to handling CommunityGrievances_web, N/A: omv.com]
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation against workers/stakeholders: The 2021 Sustainability Report indicates: 'The internal Whistleblowing Directive lays out how employees and externals can confidentially and anonymously make a whistleblower report regarding corruption and bribes, conflicts of interest, competition law, and capital markets law. The Directive also specifies how cases are handled and defines special protection for whistleblowers against any form of retaliation'. The Integrity Platform adds: 'you do not have to fear any negative consequences either'. However, it only seems to be open to the following topics: 'corruption and bribes, conflict of interest, cartels/unfair competition, capital market law, public procurement, environmental protection, product/ food safety and consumer protection, corporate tax regulations and data protection'. Regarding the community grievance, it notes: 'Our grievance management system is based on dialogue with our stakeholders first and foremost and is designed to prevent any retaliation risks'. However, it is not clear it prohibits retaliation against workers for raising human rights related complaints or concerns, as the Whistleblowing Directive and Integrity Line mechanism do not seem to include the possibility to report on Human Rights issues and the former is a community-

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>oriented system. The 2022 Sustainability Report adds: ‘OMV’s CGMs do not hinder or prevent affected stakeholders, including local communities, from accessing judicial solutions or other remedies for their complaints or grievances. What they do offer is a channel for resolving grievances out of court and, depending on the case, a remedy for community members’. However, as indicated above, no evidence found of a prohibition of retaliation against workers for raising human rights related complaints or concerns. [Sustainability Report 2021, 2022: omv.com] & [Integrity Platform_web, N/A: omv-group.integrityplatform.org]</p> <ul style="list-style-type: none"> • Met: Describes practical measures to prevent retaliation: The Human Rights Policy indicates: ‘Following the UN Effectiveness Criteria, we aim to address all grievances received, regardless of whether they stem from real or perceived issues and whether the complainant is identified or anonymous’. The Company has provided comments to this indicator, however, core information was already in use. [Human Rights Policy, 11/2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence: The Human Rights Policy indicates: ‘We regard grievance mechanisms as a key tool for preventing and managing adverse impacts on local communities, employees, and other stakeholders. Following the UN Effectiveness Criteria, we aim to address all grievances received, regardless of whether they stem from real or perceived issues and whether the complainant is identified or anonymous. Our mechanisms are aimed to offer a channel for identifying potential adverse impacts, resolving grievances and provide where we have caused or contributed to a negative impact remedy to the rightsholders. We recognize that this does not hinder the stakeholders’ right to access judicial or other remedies’. However, no further evidence found explicitly indicating that it will not retaliate against workers and stakeholders through the specific ways required by this subindicator. [Human Rights Policy, 11/2022: omv.com] • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Company has provided comments to this indicator explaining its grievance mechanism. However, it is not clear it has prohibition of retaliation which also covers individual stakeholders and communities at extractive business partner level. [Human Rights Policy, 11/2022: omv.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Complainants not asked to waive legal rights: The Human Rights Policy indicates: ‘We recognize that this [access to grievance mechanisms] does not hinder the stakeholders’ right to access judicial or other remedies’. [Human Rights Policy, 11/2022: omv.com] • Not Met: Does not require confidentiality provisions: The Company has provided comments to this indicator on not asking complainants to waive legal rights [see above]. However, this subindicator looks for evidence that the Company does not require confidentiality provisions (e.g., non-disclosure agreements) with respect to human rights grievances. [Human Rights Policy, 11/2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms: The Human Rights Policy indicates: ‘Our [grievance] mechanisms are aimed to offer a channel for identifying potential adverse impacts, resolving grievances and provide where we have caused or contributed to a negative impact remedy to the rightsholders. We recognize that this does not hinder the stakeholders’ right to access judicial or other remedies’. However, no further details found, including the process by which it would collaborate with state-based non-judicial mechanisms. [Human Rights Policy, 11/2022: omv.com] • Not Met: Example of issue resolved (if applicable): The Company has provided comments to this indicator explaining that in 2022 it ‘30 human rights grievances received from externals’, out of which all of them were resolved. ‘All 30 human rights grievances were in the context of alleged human trafficking practices by the (sub)contractor’. Borealis [a Company segment] took actions, involving: ‘Local authorities’ investigations are fully supported, and all requested information has been provided to the authorities, in full transparency’. However, this subindicator looks for an example of an issue resolved in which the Company cooperated with a state-based non-judicial grievance mechanism, and no further information on the type of investigation. [2022 Sustainability Report, 2023: omv.com]
C.7	Remedying adverse impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes approach taken to remedy adverse HRs impacts: The 2022 Sustainability Report explains a case of alleged Human Trafficking Practices in Belgium by a subcontractor, for which it received ‘30 human rights grievances

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>received from externals’, out of which all of them were resolved. It discloses the measures taken by Borealis [a Company segment] including: ‘Borealis has offered – to the extent legally allowed – its financial aid to support the organizations in charge, to provide impacted workers with physical and mental health support, safe shelter, help gaining official work permits, or, if they prefer, relocation’. [2022 Sustainability Report, 2023: omv.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes changes to systems, processes and practices to prevent future impacts: See above. Measures taken by Borealis also include: ‘Borealis has created the new position of Group Social Compliance Manager, who reports directly to the Group Compliance & Ethics Officer and is responsible for monitoring the proper and legal business conduct of Borealis’ contractors and all other supply chain partners. This function cooperates closely with colleagues from compliance, procurement, and internal audit functions. In addition, a local Social Compliance Manager is responsible for audits, spot checks, investigations, due diligence and vetting, and contract review in Kallo. Borealis strengthened its speak-up campaign to encourage reporting of suspected or witnessed misconduct. The campaign is specifically targeted at workers of contractors, who are invited to contact Borealis directly in the event of such misconduct. Processes for the vetting, due diligence, and monitoring of supply chain partners have been improved and involve enhanced due diligence requirements for contractors who assign personnel to Borealis sites. Additional training has been provided to raise awareness among internal project teams and contractors and address the detected issues’. [2022 Sustainability Report, 2023: omv.com] • Not Met: Describes approach to monitoring/implementing agreed remedy: See above. The Company has provided comments to this indicator however, no description found its approach to monitoring implementation of the agreed remedy. [2022 Sustainability Report, 2023: omv.com] • Met: Describes approach to learning from incidents if no adverse impacts identified: The webpage section Our dialogue-based approach to handling Community Grievances states: ‘A key step in the process is regular review and extraction of lessons learned from the grievances received. Grievance trends are regularly discussed with senior management at operated sites. They inform the adaptation of operations to prevent future repetition of the same community concerns, or improvements to the grievance management process itself’. [Our dialogue-based approach to handling CommunityGrievances_web, N/A: omv.com]
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The webpage section People indicates: ‘In 2021, OMV registered 884 grievances (2020: 812) from the community grievance mechanisms’. The 2021 Annual Report adds: ‘In 2021, seven incidents of human rights grievances were reported (2020: 0), related to aspects such as working hours and rest times and alleged cases of bullying, harassment, defamation, unfair treatment and disrespectful behavior’. [Sustainability Report 2021, 2022: omv.com] & [Annual Report 2021, 2022: omv.com] • Not Met: Example of how lessons from mechanism improved HRs management system: The Company has provided comments to CHRB regarding this indicator, however, no example found of how lesson learnt from mechanism have contributed to improving the company's human rights management system. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes process to evaluate mechanism and changes made as a result: The 2021 Sustainability Report indicates: ‘The alignment of CGMs [Community Grievance Mechanisms] with the UN Effectiveness Criteria is assessed by conducting a review of management processes and consulting with internal and external stakeholders. The assessments result in recommendations and tailored action plans to improve grievance management at site level. The action plans are implemented by local management and monitored by the Corporate function. The sites already assessed account for 99% of all registered grievances at OMV in 2021. In 2019 and 2020, such assessments were completed in, for example, New Zealand, Malaysia, and E&P Austria, where follow-up actions are in the process of being implemented as per the findings’. It also provides various examples of improvement in it CGMs, including: ‘OMV Petrom’s Petrobrazzi refinery CGM procedure and E&P OMV Petrom’s CGM procedure have been reviewed based on the Company’s new community grievance management standards in recent years. A new CGM database has been developed and implemented to ensure the traceability and predictability of grievance management. In 2021, the Petrobrazzi

Indicator Code	Indicator name	Score (out of 2)	Explanation
			refinery also stepped up its external outreach to local communities by enhancing the call center service that facilitates the communication between the Petrobrasi refinery and all stakeholders interested in submitting complaints or requesting information. The optimal functioning of the call center service is very important in managing the community grievances in order to strengthen the relationships between the refinery and the local community'. [Sustainability Report 2021, 2022: omv.com] <ul style="list-style-type: none"> • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders: The Company has provided comments to CHRB regarding this indicator, however, no description found of the procedures it has in place to address delays or non-implementation of outcomes agreed with stakeholders. [2022 Sustainability Report, 2023: omv.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets time-bound target: The Human Rights Policy indicates: 'We ensure compliance with locally applicable decent living wage standards, working and rest time and overtime payment provisions'. The 2021 Sustainability Report adds: 'We ensure compliance with locally applicable minimum wage standards, for example, as laid down in collective bargaining agreements'. However, it is not clear the Company has a time bound target for paying all workers a living wage or that it pays all workers a living wage, as it also refers to applicable minimum wage standards. A living wage should include basic needs for employee and his/her family or dependents, plus some discretionary income. The Company has provided comments to CHRB regarding this indicator however, no evidence found. [Human Rights Policy, 11/2022: omv.com] & [Sustainability Report 2021, 2022: omv.com] • Not Met: Describes how living wage determined: The Company has provided comments to CHRB regarding this indicator however, no evidence found. Score 2 <ul style="list-style-type: none"> • Not Met: Achieved paying living wage: The Company has provided comments to CHRB regarding this indicator however, no evidence found. • Not Met: Reviews definition living wage with unions: The Company has provided comments to CHRB regarding this indicator however, no evidence found.
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Reports of taxes and revenues beyond legal minimums: The Tax Strategy indicates: 'From 2016 onwards, OMV makes mandatory disclosures in its Consolidated Report on the Payments Made to Governments (according to Section 267c of the Austrian Commercial Code) which is published in the OMV Annual Report. In addition, OMV reports payments made to governments such as taxes and royalties related to extractive activities in countries that are part of the Extractive Industries Transparency Initiative (EITI). We also file a Country-by-Country Report (CbCR) with Austrian tax authorities for OMV Group which is part of the OECD's Base Erosion and Profit Shifting (BEPS) Action Plan 13. The CbCR is an annual tax return that breaks down key elements of the financial statements by tax jurisdiction'. [Tax Strategy, 12/2019: omv.com] Score 2 <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: See above. It indicates it a Country-by-Country Report. [Tax Strategy, 12/2019: omv.com]
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Measures to prohibit violence/retaliation against workers for joining trade union: See below. High union recognition, in this case 95.08%, is taken as a proxy for not intimidating or retaliating. [Sustainability Report 2021, 2022: omv.com] • Met: Discloses % of total direct operations covered by CB agreements: The 2021 Sustainability Report indicates the percentage of employees represented by local trade unions or works council in 2021: 95.08%. [Sustainability Report 2021, 2022: omv.com] Score 2 <ul style="list-style-type: none"> • Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The HSSE Policy discloses its HSSE Performance and Risk Management: 'We have an integrated management system based on continuous improvement and verification of our performance against specific goals, measure and benchmark; We develop the competence of all our employees on relevant HSSE matters; We are committed to eliminate hazards and threats by identifying them to prevent, control or reduce risks to an acceptable level'. The 2021 Sustainability Report expands: 'OMV applies its own risk management standard which provides for a thorough assessment of possible risks, including health-related risks. We have therefore developed guidelines – based on international guidelines from IOGP/IPIECA – for health risk assessments covering such risks as harm from chemical agents, psychological strain, physical injuries, and others. [...] Audit findings serve as the basis for identifying areas for further improvement and analyzing the effectiveness of our health management approach'. Finally, 'Process safety management comprises the systematic use of uniform instructions, practices, and specifications to achieve and maintain safe and reliable production. The fundamental components include our organization, resources, management processes, people and equipment performance, the prevailing safety culture, and documented regulations and practices [...]. It covers management of the hazards associated with the chemical and physical properties of the substances we handle in our oil, gas, and chemical activities'. [HSSE Policy, 04/2021: omv.com] & [Sustainability Report 2021, 2022: omv.com] • Met: Discloses injury rate or lost days for last reporting period: The Company discloses it lost-time injury rate for 2021: 0.7 for employees and 0.51 for contractors. [Sustainability Report 2021, 2022: omv.com] • Met: Discloses fatalities for last reporting period: There were 3 fatalities in 2021. [Sustainability Report 2021, 2022: omv.com] • Not Met: Discloses occupational disease rate for last reporting period: The Company has provided comments to CHRB regarding this indicator, and indicates that it had 13,822 occupational health examinations in 2022, however, no occupational disease rates for the last reporting period found. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The 2022 Sustainability Report notes that one of its commitments, which are central for the Company's Sustainability Framework, is: 'Health, safety, and security have the highest priority in all activities, and OMV is fully committed to proactive risk management to realize its HSSE Vision of "ZERO harm – NO losses"'. It also indicates some specific 2025 targets: 'Achieve a Total Recordable Injury Rate (TRIR) of around 1.0 per 1 mn hours worked' and 'Achieve zero work-related fatalities'. However, although the Company indicates it has a "ZERO harm – NO losses" commitment, it also discloses other quantifiable targets and no specific target found in relation to disease/illness. [2022 Sustainability Report, 2023: omv.com] • Met: Met targets or explains why not or actions to improve H&S management systems: The 2021 Sustainability Report indicates: 'We continued to investigate incidents and accidents using the knowledge of our incident investigator pool members and other technical experts. Our aim was to find the root causes of incidents and carry out suitable and necessary measures to prevent the occurrence of more severe incidents. At the same time, we remained focused on verifying the effectiveness of actions implemented in the past years after severe and high-potential incidents (HiPos), including process safety incidents. We also further developed the incident investigation process and established a subprocess to share HSSE information and promote our lessons learned as an organization. Our Incident Investigation Panel met on a quarterly basis to obtain a clear overview regarding the whole process and to implement practical actions for its improvement'. [Sustainability Report 2021, 2022: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to identify/recognise indigenous rights holders: The webpage section Ethical Principles indicates: 'The SIA [Social Impact Assessment] is conducted when we enter a new area, or there is a material change in our operations. The purpose of an SIA is to ensure that the views of the local communities, especially of indigenous peoples, are incorporated and addressed throughout all phases of the project life cycle and its design: commencement, operational phase, and decommissioning or abandonment. SIAs include a baseline study, community needs assessments, stakeholder analyses, and a study of social risks (incl. human rights) associated with the project'. The 2022 Sustainability Report notes: 'We are committed to community consultation based on free, prior, and informed consent (FPIC) in accordance with IFC Performance Standard 7 and ILO Convention 169. We are aware of indigenous communities in the proximity of our operations in Māui, Pohokura, and Maari in New Zealand, as well as in the Arma district in Yemen'. However, no description found of process it has in place to identify and recognise affected indigenous peoples. [Ethical Principles_web, N/A: omv.com] & [2022 Sustainability Report, 2023: omv.com] • Met: Describes how indigenous communities are engage during assessment: See above. It adds: 'Where possible, SIAs are conducted in a participatory manner by directly consulting with potentially affected communities or their representatives'. [Ethical Principles_web, N/A: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment to FPIC: The Human Rights Policy indicates: 'We are committed to community consultation and recognize the principle of free, prior, and informed consent in accordance with International Finance Corporation (IFC) Performance Standard 7, and ILO Convention 169'. [Human Rights Policy, 11/2022: omv.com] • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The Company has provided comments to CHRB regarding this indicator, however, no evidence found. The Company is expected to provide the most recent example where it has obtained free prior and informed consent (FPIC) or where it decided not to pursue the land or resources impacting on indigenous peoples.
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach to indentifying lang tenure rights holders and negotiating compensation: The Human Rights Policy indicates: 'In case of OMV interference with the rights of local communities, especially those of indigenous peoples, we are committed to develop adequate mitigation, reparation, and compensation plans, in close consultation with all relevant stakeholders, including the host government'. The 2022 Sustainability Report notes: 'We adhere to international best practices, which require avoiding involuntary resettlement, or at least keeping it to a minimum. Where resettlement is unavoidable, all people affected should be compensated fully and fairly. In 2022, the countries in which we did business did not report any community relocation/resettlement due to our business activities. [...] If exploration, development, or production activities have the potential to impact communities, and/or their land, we consult with all relevant stakeholders ahead of time and obtain permission to use the land either temporarily or permanently'. As for its Local Communities and Indigenous Peoples: 'We are committed to community consultation based on free, prior, and informed consent (FPIC) in accordance with IFC Performance Standard 7 and ILO Convention 169'. However, it is not clear the process by which it identifies legitimate tenure rights holders, including through engagement with the affected or potentially affected communities in the process, with particular attention to vulnerable or marginalised tenure rights holders and how it negotiates with them to provide adequate compensation or requested alternatives to financial compensation. [Human Rights Policy, 11/2022: omv.com] & [2022 Sustainability Report, 2023: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation: The Human Rights Policy indicates: ‘we are committed to develop adequate mitigation, reparation, and compensation plans, in close consultation with all relevant stakeholders, including the host government. [...] OMV recognizes and respects legitimate tenure rights related to the ownership and use of land and natural resources (including water) as set out in the IFC Performance Standard 5. We are willing to avoid involuntary resettlement and furthermore follow a zero-tolerance policy for illegitimate land grabbing, and we respect the right to water. In case of OMV interference with the rights of local communities, especially those of indigenous peoples, we are committed to develop adequate mitigation, reparation, and compensation plans, in close consultation with all relevant stakeholders, including the host government’. However, no description found of how it provides financial compensation or other compensation alternatives, including its valuation methods and how legitimate tenure rights holders were involved in the determining the valuation for any new or on-going land resettlements. [Human Rights Policy, 11/2022: omv.com] • Not Met: Describes steps to meet IFC PS 5 in state deals: The Human Rights Policy indicates: ‘OMV recognizes and respects legitimate tenure rights related to the ownership and use of land and natural resources (including water) as set out in the IFC Performance Standard 5’. The 2022 Sustainability Report notes: ‘We adhere to international best practices, which require avoiding involuntary resettlement, or at least keeping it to a minimum. Where resettlement is unavoidable, all people affected should be compensated fully and fairly. In 2022, the countries in which we did business did not report any community relocation/resettlement due to our business activities. We are committed to a fair and transparent procedure for land use and compensation to local communities or authorities. If exploration, development, or production activities have the potential to impact communities, and/or their land, we consult with all relevant stakeholders ahead of time and obtain permission to use the land either temporarily or permanently’. However, no description found of the steps it takes to follow IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement with respect to legitimate tenure rights holders. [Human Rights Policy, 11/2022: omv.com] & [2022 Sustainability Report, 2023: omv.com]
D.3.7	Security (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The 2022 Sustainability report notes: ‘The OMV Group’s human rights policies and actions remain crucial to guaranteeing a secure and harmonious working environment. We provide human rights training to local security employees and third-party contractors. Effective community engagement at a local level remains a powerful security mitigation measure in regions experiencing conflict or instability. [...] OMV’s security risk assessment platform continues to provide real-time oversight of OMV’s asset risk exposure levels and can be quickly adjusted in response to geopolitical or security events, as well as enabling the dissemination of security-critical information in real time. [...] In 2021, the OMV Executive Board took the decision that OMV would join the Voluntary Principles on Security and Human Rights (VPSHR), if feasible. This set of tools provides guidance on risk assessment, public safety and security, human rights abuses, and the interaction between companies and private and public security. [...] During 2022, OMV Corporate Security conducted a VPSHR gap analysis using a third-party consultancy company to ensure independence’. It provided additional information in its Security Management Standard. However, it is not clear how it implements its security approach, including implementing its commitment to the Voluntary Principles on Security and Human Rights or the International Code of Conduct for Private Security Providers. [2022 Sustainability Report, 2023: omv.com] • Not Met: Ensures Business Partners/JVs follow security approach: The Company has provided comments to this indicator explaining the importance to collect and assess security information for its Corporate Security strategy. It also indicates it conducted a VPSHR gap analysis that it will join the VP, if feasible and that it provides human rights training to third-party contractors. However, it is not clear how the Company ensures its business partners, including joint ventures, implement an equivalent approach to security management that ensures respect for human rights. No further evidence found. [2022 Sustainability Report, 2023: omv.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Security and HRs assessment includes input from local communities: The 2021 Sustainability Report indicates: 'Effective community engagement at a local level remains a powerful security mitigation measure in regions experiencing conflict or instability. In high-risk countries, OMV's local security and community engagement strategies are tightly integrated, promoting effective policies, mutual respect, and transparency with all local stakeholders. In turn, they contributed directly to OMV's stable and secure operating environment in 2021. This cooperation encourages a precautionary approach in early detection and resolution of local grievances of local grievances'. [Sustainability Report 2021, 2022: omv.com] • Not Met: Two examples of working with local communities to improve security: The 2022 Sustainability Report notes: 'In high-risk countries, OMV's local security and community engagement strategies are tightly integrated, promoting effective policies, mutual respect, and transparency with all local stakeholders. In turn, they contributed directly to OMV's stable and secure operating environment in 2022. This cooperation encourages a precautionary approach to early detection and resolution of local grievances'. No examples found of proactively working with community members to improve security or prevent or address tensions related to its operations. The Company is expected to provide two of such examples. [2022 Sustainability Report, 2023: omv.com]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes preventative/corrective action plans for water and sanitation risks: The 2021 Sustainability Report indicates: 'OMV's Group-wide Water Strategy was drafted in 2014 [...] High-level water stress assessments are conducted on an annual basis. [...] Results from these water risk assessments are used as input for assessing climate change-related water stress risk. Water-management-related risks are closely linked with the topic of spill prevention. Offshore operations may lead to oil spills with significant impact on marine water resources and ecosystems. The response strategy aims to minimize the probability of such risks and maximize readiness so that we can provide timely remediation measures in the unlikely event of an oil spill. OMV allocates significant resources to prevention and mitigation measures. [...] Operating facilities located in places that are affected or are likely to be affected by water scarcity issues and operations utilizing significant water resources (e.g., Tunisia) are prioritized when developing and implementing water management plans. These plans aim to allow sustainable long-term production with minimal effects on the environment. One measure to reduce freshwater withdrawal to a minimum is the installation of recirculating cooling systems'. [Sustainability Report 2021, 2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities: The 2022 Sustainability Report discloses the Company's 2025 water targets: 'Reduce freshwater withdrawal'. However, it is not clear how these targets on water stewardship that take into consideration water use by local communities and other users in the vicinity of its operations. The Company has provided further goals, but they did not seem water related. [2022 Sustainability Report, 2023: omv.com] • Not Met: Reports progress in meeting targets and trends demonstrating progress: The 2022 Sustainability Report indicates the Status of its water target in 2022: 'Freshwater withdrawal: 279,983 megaliters'. However, as indicated above, it is not clear to what extent do these targets take into consideration water use by local communities and other users in the vicinity of its operations. [2022 Sustainability Report, 2023: omv.com]
D.3.9	Women's rights (in own extractive operations, which include JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women: The Human Rights Policy states: 'We are fully committed to respect, fulfill, and support the fulfilment of human rights in our direct surroundings as well as in wider society and to avoid or mitigate any risk on their health or safety that may arise from project-related activities. A special focus lies on those persons and groups with a high likelihood of being in vulnerable circumstances such as children, women, [...]'. The 2021 Sustainability Report indicates: 'OMV is committed to ensuring fair treatment and equal opportunities for all employees, and has zero tolerance for discrimination and sexual and nonsexual harassment. However, no description found of its processes to prohibit and address harassment, intimidation and violence against women. [Sustainability Report 2021, 2022: omv.com] & [Human Rights Policy, 11/2022: omv.com] • Not Met: Working conditions take into account gender issues

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Measures and steps to address gender pay gap at all levels of employment: The Code of Conduct indicates: ‘OMV is committed to supporting women’s advancement to managerial positions. The strategic objective is to achieve the best diversity mix at the senior management level and to continuously improve within the coming years’. The 2021 Sustainability Report discloses some of its targets for 2025: ‘Increase share of women at management level to 25%’. Also, ‘We designed and implemented targeted training programs, such as SHEnergy, a blended-learning program for women at OMV, to support women’s leadership skills. The program focuses on active inclusion skills and also emphasizes the power of mentoring and networking in developing female leaders. As a result, the percentage of women in the Group is about 27%’. The 2022 Sustainability Report notes: ‘We have embedded diversity targets into our people processes such as recruitment, talent and succession planning, learning, and leadership development. There is a preference for female candidates when identifying top talent. In order to strengthen our pipeline of diverse leaders, we have introduced the following measures: Providing advanced mentoring for women [...]; Running career aspiration talks across all our divisions in the OMV Group with the goal of giving talented female employees greater visibility and ensuring we better understand their support needs and individual career plans; [...] Covering unconscious bias in our leadership programs (in its broadest sense, so not only gender but also generational, people with special needs, background, etc.)’. However, it is not clear these measures address gender pay gap throughout all levels of employment. This subindicator looks for evidence of the steps taken to specifically to address gender pay gap throughout all levels of employment and how it measures it. [Code of Conduct, April 2018: omv.com] & [Sustainability Report 2021, 2022: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap: The 2022 Sustainability Report notes: ‘In 2023, we will measure our gender pay gap for the first time across the OMV Group’. No analysis of trends demonstrating progress on closing any gender pay gap found. [2022 Sustainability Report, 2023: omv.com]

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		<ul style="list-style-type: none"> • Area: Forced Labour • Headline: OMV's subsidiary Borealis halted plant construction in Belgium over concerns of human trafficking linked to its contractor IREM-Ponticelli • Story: On August 1, 2022, Borealis, a subsidiary of OMV, announced that it would continue halting the construction of its propane dehydrogenation (PDH) plant in Kallo, Belgium, over suspicions of human trafficking linked to one of its contractors, IREM-Ponticelli. <p>The construction has been in stand still since July 27, 2022, after labour auditors uncovered "irregularities" when processing the files of workers on the plant. According to various press sources, IREM-Ponticelli, which the Company's subsidiary contracted for fitting its piping mechanical works, was found to have reportedly issued two types of agreements with workers, one that was "official", and one that was "not shown" to the Department of Work and Social Economy. 55 men of Filipino and Bengali origin were found to have been earning "just EUR 650 a month while working six days a week".</p> <p>The ongoing investigation, conducted by the Company's subsidiary, resulted in the suspension of its contract with IREM-Ponticelli. The Flemish Minister of Economy, Jo Brouns, stated that "if it is determined that the employees were hired under a false contract, it means that permission to work were issued under false pretences", adding that he would "not hesitate to review all 314 permits", should any infringements be confirmed.</p> <p>Allegedly, the labour auditor had filed a complaint with the social inspectorate and informed Borealis HR department manager of the social irregularities on the construction site, who promised him in May 2022 that the company would investigate the matter. However Borealis did not halt construction until July.</p> <p>On August 4, 2022, press sources reported that since the discovery of 55 victims of human trafficking on the Borealis sites (a subsidiary of OMV) in Antwerp earlier this year, the total had risen to 174 victims - 17 Bengali nationals, 52 Filipinos as well as 105 Turkish people. According to these sources, victims from other countries could have been identified in future.</p> <p>The director of Payoke, a non-governmental organisation combatting trading and exploitation of people, described these findings as a "catastrophe", adding that "historically, there has never been a human trafficking case in Belgium this big. I even think this might even be one of the biggest European cases".</p> <p>The workers in question were reportedly paid EUR 650 a month while working six days a week in addition to carrying out the work illegally in Belgium and being poorly housed.</p> <p>An earlier investigation suggested that Borealis had been alerted to these irregularities in May, which prompted an inspection of its premises in June, which enabled authorities to identify the victims. [The Brussels Times, 04/08/2022, "Catastrophe": Aid organisation unable to help all Borealis human trafficking victims": brusselstimes.com] [The Brussels Times, 27/07/2022, "Human trafficking: Borealis knew about worker exploitation since May": brusselstimes.com] [Process worldwide, 26/08/2022, "Borealis to Re-tender Contracts for New PDH Plant in Belgium": process-worldwide.com]</p>
E(1).1	The company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In response to the allegation, Borealis (OMV's subsidiary) stated: "In light of recent developments and media reports of alleged misconduct by its contractor IREM at the construction site for the new propane dehydrogenation (PDH) plant in Kallo, Belgium, on July 27 Borealis decided to halt the construction of its Kallo PDH for three days and suspended the contract with IREM-Ponticelli, the contractor responsible for the piping and mechanical work for the construction of the new PDH project. As the thorough investigation and implementation of additional compliance measures is ongoing, Borealis decided on 1 August 2022 to extend the shutdown for its PDH construction site in Kallo until further notice. Project work will be resumed step by step".

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Furthermore, the OMV published a detailed case study (Alleged Human Trafficking Practices by (Sub)contractor at the Propane Dehydrogenation Plant Construction Site in Kallo, Belgium) in its Sustainability Report 2022, which there is a public response stated by the company. [Borealis, 04/08/2022, "Borealis suspends construction in Kallo after serious allegations against contractor and continues to support Belgian authorities in investigation": borealisgroup.com] [2022 Sustainability Report, 2023: omv.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: See indicator S1.A [Borealis, 04/08/2022, "Borealis suspends construction in Kallo after serious allegations against contractor and continues to support Belgian authorities in investigation": borealisgroup.com] [2022 Sustainability Report, 2023: omv.com]
E(1).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: Borealis encouraged both internal and external stakeholders to use the Borealis Ethics Hotline, through which victims can also submit their grievances. All reports received via this Hotline were handled with the utmost priority and in line with legal requirements. However, it is not clear if the affected stakeholders were engaged with through this process. [Borealis, 23/01/2023, "About the Kallo Case": borealisgroup.com] [2022 Sustainability Report, 2023: omv.com] • Not Met: Identified cause: The Company provided feedback for this indicator. However, it was not material for the assessment. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The company indicated that it has implemented some improvements, as the group created 'the new position of Group Social Compliance Manager, who reports directly to the Group Compliance & Ethics Officer and is responsible for monitoring the proper and legal business conduct of Borealis' contractors and all other supply chain partners. This function cooperates closely with colleagues from compliance, procurement, and internal audit functions. In addition, a local Social Compliance Manager is responsible for audits, spot checks, investigations, due diligence and vetting, and contract review in Kallo'. Furthermore, 'the Group established a Crisis Management team led by Executive Board member Philippe Roodhooft, conducted thorough internal checks, launched audits and inspections of other contractors, and took other actions to improve monitoring and speaking-up related to our contractors' business conduct'. [2022 Sustainability Report, 2023: omv.com] • Not Met: Stakeholder input to steps taken: Borealis has created the new position of Group Social Compliance Manager, who reports directly to the Group Compliance & Ethics Officer. The new manager is responsible for monitoring the proper and legal business conduct of Borealis' contractors and all other supply chain partners, alongside colleagues from the compliance, procurement and internal audit functions. In addition to the Group function, Borealis has recruited a local Social Compliance Manager in Kallo and plans to also install local social compliance cells in other locations and significant projects. The scope of their responsibilities includes, amongst others, audits, spot checks, investigations, due diligence and vetting, contract review and coordination with procurement, health, safety, security and environment, legal, and People & Culture. However, no information was found as to whether OMV engaged with affected stakeholders. <p>Furthermore, the Company provided feedback for this indicator. However, it was not material for the assessment. [Borealis, 23/01/2023: borealisgroup.com]</p>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Provided remedy: The OMV indicated: 'Borealis has offered – to the extent legally allowed – its financial aid to support the organizations in charge, to provide impacted workers with physical and mental health support, safe shelter, help gaining official work permits, or, if they prefer, relocation'. [2022 Sustainability Report, 2023: omv.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: There is no source suggesting that the remedy was not satisfactory to stakeholders. • Not Met: Remedy delivered: The Company provided feedback for this indicator. However, it was not material for the assessment." • Not Met: Independent remedy process used

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