



bp Australia modern slavery and human trafficking statement 2023

28 June 2024

About this statement

This statement relates to the financial year ending 31 December 2023 for the following reporting entities within the meaning of the term set out in the Australian Modern Slavery Act 2018 (Cth):

- BP Australia Group Pty Ltd (ACN 007 412 553)
- BP Australia Pty Ltd (ACN 004 085 616)
- BP Developments Australia Pty Ltd (ACN 081 102 856)
- BP Oil Australia Pty Ltd (ACN 008 428 911)
- BP Australia Investments Pty Ltd (ACN 102 991 551)
- Castrol Australia Pty Ltd (ACN 008 459 407)
- Burmah Castrol Australia Pty Ltd (ACN 003 663 474)
- Castrol Holdings Australia Pty Ltd (ACN 647 117 762)

Unless explicitly stated otherwise, in this statement:

1. a reference to 'bp', 'bp group', 'we' or 'our' and similar terms are to BP p.l.c. and its subsidiaries generally, including bp Australia, to one or more of them, or to those who work for them;
2. a reference to 'BP p.l.c.' is to BP p.l.c. only; and
3. a reference to 'bp Australia' is a reference to the reporting entities and their owned or controlled entities.

Reporting entities

Reporting entity	Function	Registered address
BP Australia Investments Pty Ltd (ACN 102 991 551)	Controlling company for BP Australia Group Pty Ltd	Level 17, 717 Bourke Street, Docklands VIC 3008
BP Australia Group Pty Ltd (ACN 007 412 553)	Holding company for BP Developments Australia Pty Ltd & Holding companies for BP Oil Australia Pty Ltd	Level 17, 717 Bourke Street, Docklands VIC 3008
BP Oil Australia Pty Ltd (ACN 008 428 911)	Holding company for BP Australia Pty Ltd	Level 17, 717 Bourke Street, Docklands VIC 3008
Castrol Holdings Australia Pty Ltd (ACN 647 117 762)	Holding company of Burmah Castrol Australia Pty Ltd	Level 17, 717 Bourke Street, Docklands VIC 3008
Burmah Castrol Australia Pty Ltd (ACN 003 663 474)	Holding company of Castrol Australia Pty Ltd	Level 17, 717 Bourke Street, Docklands VIC 3008
BP Australia Pty Ltd (ACN 004 085 616)	Main operating entity for bp in Australia for bp's customer and products operations including Air Refuel Pty Ltd, 1RQNo.1 Riverside Quay Pty Ltd	Level 17, 717 Bourke Street, Docklands VIC 3008
BP Developments Australia Pty Ltd (ACN 081 102 856)	Main trading entity for bp's gas operations in Australia & Holding companies for BP Oil Australia Pty Ltd	Level 15, 240 St Georges Terrace, Perth WA 6000
Castrol Australia Pty Ltd (ACN 008 459 407)	Main trading entity for bp's lubricant's business in Australia	Level 17, 717 Bourke Street, Docklands VIC 3008

All of the left reporting entities have BP p.l.c. as their ultimate parent company. BP p.l.c. and relevant bp subsidiaries have published annual slavery and human trafficking statements since the introduction of the Modern Slavery Act 2015 (UK).

Each of the operational reporting entities, as well as all their owned and controlled entities, are incorporated in Australia.

About bp and our supply chain

We are a global energy business with operations in Europe, North and South America, Australasia, Asia and Africa. We operate in 61 countries, employ 87,800 people and have around 35,000 direct suppliers. These include contractors, vendors, service providers and contingent labour.

We recognize the potential for labour rights violations in our industry and supply chain, and we focus our efforts where we believe that risk is greatest. Our teams identify parts of our supply chain as focus areas for their work to manage labour rights risks, including modern slavery risks.

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More information




- 📖 Read our previous modern slavery and human trafficking statements at bp.com/reportingcentre
- 📖 Read our human rights policy and labour rights and modern slavery principles at bp.com/humanrights
- 📖 Read our code of conduct at bp.com/codeofconduct

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Introduction

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bp Australia

bp Australia has a history of operations in Australia that reaches back to 1919. From exploration and production of crude oil and natural gas, to refining, marketing and retailing of petroleum products. bp Australia employs more than 5,000 employees and has contractors across Australia. Our operations are in every State and Territory, including major offices in Perth and Melbourne.

bp Australia employs a wide range of employees across its many business units, including customer service representatives at its retail sites, industry professionals employed in engineering and operations, and professional and administrative staff who support our operations and business activities. bp Australia aims to provide its employees and contractors with safe working conditions, market competitive terms of employment (including, in some cases, by way of industrial instruments such as enterprise bargaining agreements), and rigorous induction and pre-employment checks.

bp has set an ambition to become a net zero company by 2050 or sooner. bp in Australia is focused on advancing the role of Australian resources in meeting the region's demand for more energy with fewer, and in time, net zero emissions. Within our group sustainability frame bp has specific objectives and targets with respect to sustainable livelihoods and a just transition, which advances human rights, including objectives on decent work. Being part of the bp group enables bp Australia to share global expertise, research and development with Australian business partners, customers, and community stakeholders.

bp Australia owns import, storage, and distribution infrastructure across Australia. This includes import and storage infrastructure in several major domestic and regional Australian locations. Operation of the bp Kwinana terminal is managed by Australian Terminal Operations Management (ATOM), which operates all bp-owned terminals in Australia.

The bp Kwinana refinery site is transitioning to the Kwinana Energy Hub, subject to internal and government approvals.

In Western Australia, bp is progressing three world-scale hydrogen projects with H2Kwinana within the Kwinana Energy Hub, Geraldton Export-Scale Renewable Investment (GERI) in the Mid-West and the Australian Renewable Energy Hub (AREH) in the Pilbara, a joint venture with CWP Global and Intercontinental Energy. These low carbon projects are in early-stage development.

Our operations and supply chain

bp Australia's operations can be broadly categorized into the following areas of activity:

- The operation of its convenience store and retail fuel supply network, including the supply of fuel, goods, and other services to bp-branded independently operated retail sites in Australia.
- The exploration for and production of crude oil and natural gas.
- The sale of fuels whether through its fuel card offering, or via bulk sales either delivered to sites or from depots or import terminals.
- The sale of aviation fuels.
- The sale of marine fuels.
- The operation and management of major fuel storage and delivery infrastructure.
- The creation of high-performance oils, lubricants, fluids and greases.
- The sale of motor oil and industrial lubricants

These operations are supported by:

- The importation of refined fuels and lubricants from countries around the world.
- The sourcing of other materials used in our operations (including vehicles and specialized equipment).
- The sourcing of indirect products and materials (which are all other materials incidental to our business, including technology hardware and consumables such as tools, personal protective equipment and office supplies).
- The sourcing of food, beverages, and other goods and services offered for sale at bp Australia's retail sites.
- The sourcing of labour and services.

bp Australia's most significant suppliers by spend are related bp-entities that supply fuels from across the globe.

bp Australia's non-related third-party expenditure, excluding fuels, was approximately \$1.17bn in 2023. This includes a supply chain of over 1,400 suppliers, the most material of which are domiciled in Australia, the US, China and Malaysia, although the supply may originate from other jurisdictions.

Across these non-related suppliers, the largest sectors by spend include:

- Construction and engineering
- Oil and gas storage
- Logistics and transportation
- Consumer goods, including food and beverages, for our retail sites
- Inputs into fuels and lubricants

Less material spend categories include:

- Commercial services and supplies
- IT services
- Machinery and electrical equipment
- Professional services
- Real estates.

Automotive fuels are supplied and marketed through bp Australia's national network of more than 1,400 retail service stations. Of that number, approximately 350 retail service stations are wholly owned and operated by bp Australia, and approximately 1,050 are bp-branded and operated by independent businesses known as Dealers and Distributors. Dealers and Distributors within the bp Australia network buy their automotive fuels from bp Australia.

Dealers are also entitled to:

- Participate in the bp Australia buying group (a collective buying group for the procurement of retail shop goods).
- Operate an outlet of bp's wholly owned Wild Bean Café brand.
- Participate in the bp Australia customer and business loyalty program, BP Rewards.
- Accept payment from customers via bp's mobile fuel payment application, BPme.

Each of our Dealers employ their staff directly and are free to set the prices of their automotive fuels independently. A significant proportion of bp Australia's customers are Dealers and Distributors who sell to end-users.

bp Australia partners with bp's Trading & Shipping functional entities, operated out of Singapore for fuel imports. bp Australia also purchases fuel from local market participants. Therefore, this fuel can be sourced from a range of domestically produced suppliers and the international market. Trading & Shipping procures fuel products from a range of third parties in different countries. In 2023, Trading & Shipping sourced fuel imports into Australia from countries primarily in the Asian region

Joint Venture (JV) activity

bp Australia is a participant in many JVs across Australia.

For bp Australia's downstream activities, these JVs predominantly include bp Australia's interests in various bulk fuel storage facilities and delivery infrastructure, including import terminals, airports, and other depots.

For bp Australia's upstream activities, JVs include those which deal in the exploration for and production of crude oil and natural gas.

Risk of modern slavery in our operations and supply chain

Modern slavery is an umbrella term used in policy and law to describe several forms of exploitation that constitute serious violations of human rights, including slavery, servitude, human trafficking, debt bondage, forced labour, forced marriage and the worst forms of child labour.

Operations

bp Australia continued to review and monitor modern slavery risks over the course of 2023 in relation to the sourcing of goods and services, bp Australia's retail networks and workforce.

The following areas within bp Australia's operations may have a greater exposure to potential labour rights and modern slavery risks.

- In the workforce of our company-controlled retail sites.
- The operations and supply chains of non-company-controlled retail sites. The risks may be heightened where businesses operate with potentially less corporate governance and oversight and where workers are vulnerable e.g. low-skilled or migrants holding temporary visas.
- Our selection of goods and services supply chain for retail sites where goods or services are delivered with lower-skilled labour.
- The conduct and activities of bp Australia's business partners – including operated and non-operated JVs, contractors, and suppliers to JVs.

Based on the reasons described in the list below and under the next heading, we consider there to be low overall risk of having caused or contributed to modern slavery in bp Australia's operations:

- bp Australia's workforce is located in Australia, which is considered by various sources, including Maplecroft and the Walkfree Foundation, to be a low-risk jurisdiction for modern slavery due to the strong rule of law and enforcement of industrial relations laws and regulations. However, we do not equate low risk with no risk and recognise that modern slavery occurs in low-risk countries like Australia, particularly in sectors such as agriculture, construction and cleaning.
- bp Australia's employment practices include various protections for employees including the freedom of association and enterprise bargaining, compliance with at least minimum wage, policies and procedures on working conditions.





Supply chain

bp Australia has identified the following risk areas in our supply chain:

- Suppliers operating in, or sourcing from, countries with a higher prevalence of, and vulnerability to, modern slavery.
- Suppliers with a workforce comprising roles with low barriers to entry, lack of job security and low wages, performed by workers with limited bargaining power due to language barriers, temporary visa status or lack of awareness of employment rights. These are factors that make workers more vulnerable. Suppliers providing construction, catering and cleaning services are examples of suppliers with these risk factors.
- Inherent risks in global supply chains for IT and telecommunications hardware, uniforms and Personal Protective Equipment, shipping, vehicles, vessels, machinery, batteries and solar panels.
- The supply chain of goods procured for sale at retail sites, for example: food and beverages, coffee, confectionery, tobacco, fresh fruit, and other merchandise.
- Regional airport operations managed by Airfield Representatives that are contracted to bp to provide management services to an individual airport. Their staff are primarily refuellers and we work with Airfield Representatives in relation to conditions of employment for their staff.

Assessing and addressing modern slavery

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Our approach to mitigating modern slavery risk

bp supports the elimination of all forms of modern slavery. This type of exploitation is contrary to our commitment to respecting the rights of our workforce

BP p.l.c. sets expectations for how our businesses conduct their activities, including through our code of conduct, human rights policy, labour rights and modern slavery (LRMS) principles and Operating Management System (OMS). Our Policy aligns with the UN Guiding Principles on Business and Human Rights. It is underpinned by the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, including its core conventions. These include the rights of our workforce and those living in communities potentially affected by our activities.

Our Australian businesses are required to conduct their activities in conformance with these expectations and manage the risks, including modern slavery. bp Australia's OMS establishes local requirements and processes to manage our operations in Australia.

In all but very limited circumstances, the approaches set out and undertaken by BP p.l.c. have a flow-on effect for bp Australia's operations.

We know that there is more work to do and that steps taken on decent work and the elimination of modern slavery are often more effective when working collaboratively, so we will also continue to work with, and learn from others. We expect our approach to mitigating the risk of modern slavery to continue to evolve as we learn from our risk reviews, refine our practices, and further strengthen relevant capability in our businesses and functions.

In conforming with these expectations, bp Australia continues to:

- provide its employees with safe working conditions, as well as market-competitive terms and conditions of employment.
- carry out rigorous pre-employment checks and inductions.
- have policies and procedures in place designed to identify, investigate, and where necessary, take action against modern slavery, including human trafficking, slavery, forced or child labour.
- conduct regular internal training to improve staff awareness of modern slavery, human trafficking, and human rights risks.
- provide a channel for its employees, contractors, and suppliers and their workforces to report concerns and risks through its OpenTalk program.
- articulate its position and expectation of its employees and contractors in line with our **code of conduct**, **human rights policy** and **labour rights** and **modern slavery principles**.

Less material spend categories include: bp Australia also has in place a Dealer compliance program for the majority of Dealer sites. The Assisted Compliance Audit Program, delivered by the Australasian Convenience and Petroleum Marketers Association (ACAPMA), has an external third-party auditor to carry out checks on working conditions on site, including salary and right to work checks.

Joint Ventures

We seek to use our leverage, consistent with the United Nations Guiding Principles on Business and Human Rights to encourage JV operators to act in a manner consistent with the principles underlying the commitments set out in our human rights policy and LRMS principles. We monitor performance and how risk is managed in our JVs, whether we are the operator or not. In JVs where we are the operator, our OMS code of conduct and other policies apply.

When we are not the operator, our OMS is available as a reference point for our businesses when engaging with operators and other participants. We have a bp group framework to assess and manage our exposure related to safety and operational risk – including modern slavery risks – as well as bribery and corruption risk from our participation in non-operated JVs. In some instances, bp employees are directors on the Board of non-operated JVs.

Risk assessment and due diligence

Risk management is an integral part of bp's system of internal control and bp has a risk policy which describes how risks are to be assessed and managed. bp Australia has identified and assessed its modern slavery risks, identified the likelihood of these risks across our activities, assigned specific risk owners and identified appropriate measures to manage these risks as well as improvement opportunities. The risks and the effectiveness of the risk management is regularly monitored and reviewed.

Supplier due diligence

In bp Australia, we are working to systematically embed monitoring activities for our high-risk suppliers. Our mandatory risk assessments undertaken during the sourcing process are designed to identify potential suppliers or activities that require further risk monitoring with respect to modern slavery.

Onboarding new suppliers

New suppliers classified as having a high risk for modern slavery are required to provide documentary evidence that they have implemented appropriate policies, processes and practices to mitigate modern slavery risks. The evidence submitted is assessed prior to contract award, with subsequent corrective action plans included within contract level obligations when required. These are mandatory steps in the sourcing process.

Monitoring existing suppliers

In 2023, bp Australia's mandatory risk assessment process reviewed all suppliers providing onsite services identified as medium to high risk with respect to modern slavery. Risk classification is focussed on the presence of factors such as reliance on low-skilled labour, location of activity and use of recruitment agents within the industry. The outcomes from these risk monitoring activities enable a tiered approach to further interventions if required, including surveying employees of high-risk suppliers on their LRMS rights and protections. Monitoring of medium to high-risk suppliers providing services onsite is visible and reported within bp's Health, Safety, Environment and Carbon compliance management platform, ISNetwork.

Enhancing awareness of LRMS risks with key suppliers remains a focus. In 2023, bp Australia:

- Held a series of three webinars for onsite suppliers within maintenance and onsite engineering on:
 - bp's approach to modern slavery risk identification.
 - Methods of bp support for suppliers in raising LRMS capability management.
- Held routine discussions and exchanges of modern slavery risk management methods with key suppliers as part of active contract management.
- Continued to seek the inclusion of mandatory modern slavery clauses in:
 - new contracts
 - extensions of contracts
 - variations to contracts.

bp Australia's mandatory risk assessment and ongoing supplier analysis includes:

Consideration of LRMS risk in around 500 sourcing cases a year. The outcome of this activity is the following three steps:

- Identification of risk within the category of spend.
- The request and review of supplier LRMS mitigation activities as required.
- Development and contractual agreement of improvement plans as required.

Further intervention if required includes:

Interviews with management and desktop reviews of high-risk onsite suppliers. Questions focus on:

- Supplier policy, procedures and practices on modern slavery risk management.
- Supplier communications with their workforce on modern slavery.

With respect to the import of fuels, bp's international footprint allows for sharing best practice and evolving challenges to managing supply chain modern slavery risk in different regions.

Actions to assess and address risks

Capability development

bp Australia's capability development activities in 2023 included:

- Providing training to employees on our code of conduct, which underpins and reinforces elements of our human rights policy.
- 550 employees completing the 'Supportive Upstander' training program developed by bp Australia for its ANZ workforce. The program is designed to help employees move from being a passive bystander to an active upstander when seeing instances of unacceptable behaviour.
- Specific training for bp Australia's procurement teams, designed to help identify and manage modern slavery risks they may encounter during the procurement process, including during pre-contract supplier due diligence and contracting. We require this training to be completed by new joiners to bp Australia's procurement teams.
- Specific LRMS training available for bp employees and leaders through our online training system.
- Continued implementation of bp Australia's program for conducting workplace labour rights reviews; Site, Engage, Evaluate (SEE) Labour Rights is a system of observation and purposeful due diligence activities to monitor labour rights in the workplace.
- Training for the ANZ People & Culture team on SEE Labour Rights worker interviews, with 12 assessments conducted in 2023.
- LRMS awareness training rolled out to bp Australia Global Business Services (GBS) Customer Team Leaders, focused on the identification of potential risks within their interactions with customers.
- bp's Working with Respect training has been embedded into the induction of retail employees. The training is focussed on the Working with Respect policy and appropriate channels, including EAP (Employee Assistant Program) and OpenTalk.
- Continuing a wellbeing program for retail employees in Australia and New Zealand with a focus on managing customer conflict and EAP awareness.
- Hosting webinars with select suppliers to promote bp's policies and provide information and guidance on how suppliers may assist and align with bp's sustainability aims.



Actions to assess and address risks

Compliance Programs

During 2023, bp Australia continued to rely on the Australasian Convenience and Petroleum Marketers Association (ACAPMA) as a third-party auditor to undertake compliance assessments including adherence to the Modern Slavery Act.

Dealer

To address the risks identified in bp Australia's Dealer network, the majority of Dealer sites are part of the Assisted Compliance Audit Program, delivered by the ACAPMA, whereby an external third-party auditor carries out checks on working conditions on site, including salary and right to work checks.

This program is a required condition for any new and renewed Dealer contracts and includes counterparty due diligence for new independent Dealers. bp Australia holds quarterly Dealer meetings to raise awareness, discuss any issues and agree remedy as needed. The Assisted Compliance Audit Program is further reinforced annually at the bp Australia Dealers' conference. Under each new and renewed Dealer agreement, non-compliance with the Assisted Compliance Audit Program will constitute a material breach, giving bp Australia the right to terminate the agreement.

Aviation

The assessment of modern slavery risk at regional airport air bp operations across Australia continues with the engagement of ACAPMA to complete an audit of several locations across Australia each year. To facilitate the audit program, Airfield Representative (AR) Agreements include modern slavery clauses, the right of a third party appointed by bp to audit their business and provide bp with the right to terminate an agreement for the breach of these clauses. Modern slavery awareness training was completed with key ARs across Australia in 2023 to ensure an understanding of the labour rights and modern slavery and what assistance is available if required.



Actions to assess and address risks

Trading & Shipping

To respond to the potential for LRMS violations in its supply chain, bp Trading & Shipping seeks to assess and address potential LRMS risks through a combination of counterparty due diligence, risk management processes, and LRMS training.

Counterparty due diligence of third parties includes corporate structure vetting, assessment of sanctions, criminal activity, and observation of negative press and social media coverage.

As part of the risk management process, risks are identified and assessed which may include human rights and modern slavery.

Trading

For bp's commodity trading businesses, investment or divestment cases are required to include an alignment assessment against bp's sustainability framework with the purpose of identifying any material sustainability related impacts and risks - including those related to human rights and modern slavery - prior to any authority being granted to take the project forward.

Shipping

For Shipping, all chartering of vessels is managed by bp Trading & Shipping on behalf of bp Australia. This vetting and clearance process aims to review overall suitability for use, and in that process any identifiable instances of worker welfare malpractices would be expected to be raised.

Independent assessments are undertaken of bp operated and third-party seafarers that bp charters that include assessment of potential human rights impacts involving crew treatment and working conditions, as well as safety. These are performed within the Oil Companies International Marine Forum (OCIMF) framework known as Ship Inspection Report Programme (SIRE) (including Maritime Labour Convention status). Additionally, vessels on charter to bp are contractually bound to comply with bp's charter party clause for human rights.

For bp-operated vessels, in addition to the Designated Person Ashore (DPA), Speak Up tools are available to vessel crew members and vessels are equipped with satellite internet.

Separately to bp and industry-led actions, vessels are also routinely boarded by Port State Control inspectors who inspect them for violations, including with respect to LRMS risks, and have authority to detain a vessel in breach until the issue is resolved.

As outlined in the previous bp Australia Modern Slavery statement, a ship repair dockyard used to maintain bp owned and operated vessels has continued to work with their sub-contractors to address issues identified during the onsite assessments carried out in 2022.

Contract Terms

To assist with the management of modern slavery risk within our supply chain, modern slavery clauses continue to be inserted into new contracts as well as extensions and supply variations. This assists with the visibility, leverage and oversight of modern slavery risks within our supply chain.

Dealer participation in the bp Australia buying group allows bp Australia to set terms and manage modern slavery risks with retail suppliers. This includes, for example, the incorporation of modern slavery risk mitigating contractual provisions into our commercial arrangements with buying group suppliers and supplier due diligence processes described earlier in this statement.

Remediation and grievance mechanisms

Where we identify that we have caused or contributed to modern slavery we are committed to remedying or participating in the remedy of the impact of modern slavery on the individual(s). Our human rights policy states that we do not impede access to state-based judicial processes.

Remediation

If we consider that our contractors or suppliers have failed to act consistently with our expectations or with their obligations, then we try to work with them to resolve any issues and provide remedy for adverse human rights impacts in accordance with the UN Guiding Principles on Business and Human Rights. If a serious breach is found and no corrective action is taken, we reserve the right to terminate contracts.¹

Grievance mechanisms

We encourage a speak-up culture among employees, contractors and suppliers. In addition to requiring bp employees to report human rights abuses, we expect them – and encourage contractors, communities and other third parties – to speak-up if they see something which they think could be unsafe or unethical. At our sites we help make sure that contractors and their workers are aware of our confidential and anonymous helpline OpenTalk and, where relevant, community complaints systems and workforce grievance mechanisms. Our code of conduct, which is provided to our suppliers and referred to in our standard supplier agreements, includes the details of OpenTalk. We promote the use of these channels with zero tolerance for retaliation and consider acts of retaliation to be misconduct.

Given the variety of matters our customer care representatives handle, training and education has been provided should any concerns be raised that relate to modern slavery via our Customer Care Line. Should this occur, the matter will be reviewed by the modern slavery working group to determine appropriate course of action, subject to local laws in relation to the management of such reports. Any urgent matters are raised directly to People and Culture (P&C) Partnering who are trained on the SEE Labour Rights Assessments.



For Shipping, there is an additional active on-board grievance process for direct reporting pursuant to conformance with the International Safety Management code, which requires a shore based Designated Person Ashore to be available to take grievance calls.

1. In discussing remedy in this statement, we have included how we address LRMS concerns raised through Opentalk and issues identified through LRMS due diligence, whether or not an adverse impact on an individual's rights occurred. Actions discussed may therefore include risk prevention or mitigation actions as well as remedy itself.



Assessing the effectiveness of our approach

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Assessing the effectiveness of our approach

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

bp Australia assesses its performance in relation to managing modern slavery risk via ongoing assessment and reporting to its modern slavery working group and ethics and compliance committee. bp Australia continues to take steps to strengthen its ability to identify, prevent and remedy concerns through the integration of LRMS principles into bp Australia's OMS training, risk reviews and enhanced contractual frameworks.

bp Australia has made progress on the focus areas set out in bp Australia's 2022 modern slavery and human trafficking statement, and the bp Australia modern slavery working group continues to meet regularly to advance these focus areas across the Australian business.

bp Australia tests the effectiveness of its approach through regular working group meetings where agenda items include monitoring of training, ensuring procurement contracts have appropriate clauses and reviewing OpenTalk cases for evidence of LRMS grievances.

Within the Australia and New Zealand LRMS working group key modern slavery risk priorities are evaluated in accordance with the risk action plans. This includes:

- Procurement of goods and services
- Product sourcing and shipping
- Staff labour rights and training
- Dealer conformance via ACAPMA reporting
- Speak up (grievance) monitoring and reporting.

The Ethics and Compliance committee of senior executives within bp Australia provide oversight on LRMS performance and progress on the monitoring of effectiveness. This committee meets quarterly and is supported by the Australia and New Zealand modern slavery working group, which includes representatives from a cross-section of bp businesses.



Maintaining our progress

We know there is more work to do and that we achieve our best when we address the challenges we face through stakeholder and industry collaboration.

As we continue to strengthen the effectiveness of our approach, our focus areas will continue to include:

- Developing contract-owner skillsets in upholding adherence to relevant contract clauses.
- Knowledge sharing and learning on LRMS best practice from industry and leading suppliers.
- Embedding our LRMS framework into the way we do business.
- The roll out of Upstander Training to all ANZ employees.
- Reinforcing Respect at Work policy and channels for raising concerns such as OpenTalk, including references to OpenTalk in retail site handbooks.
- Creating a systemic approach for People & Culture (P&C) teams to conduct SEE Labour Rights reviews.
- Verification at supplier site visits through piloting implementation of SEE Labour Rights program on such visits.
- Ongoing alignment with bp global standards and global governance.

Consultation and collaboration

This statement was prepared by the bp Australia modern slavery working group, which includes individuals from our businesses and functions such as procurement, people and culture, corporate affairs, Health, Safety, Environment & Carbon (HSE&C) and legal with responsibility across Australia.

The statement has been prepared in consultation with each of the reporting entities outlined on page one, and their owned and controlled entities. Information and data are collated from all business units, and despite operational differences, bp Australia has a relatively centralized approach to working which means that ongoing consultation is built into our business structure.

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

This statement was reviewed by members of bp Australia's Ethics and Compliance Committee, and senior representatives from the reporting entities and with internal consultation from owned and controlled entities, via the bp Australia modern slavery working group. The statement was then sent to the bp Australia Group Pty Ltd and BP Australia Pty Ltd boards and for review and approval.



Frédéric Baudry

Senior vice president,
Mobility, convenience and midstream Asia Pacific

This statement has been approved by the boards of BP Australia Group Pty Ltd, BP Australia Pty Ltd and Castrol Australia Pty Ltd, in compliance with the Australian Modern Slavery Act and signed by Frédéric Baudry in his capacity as President and director of bp Australia, BP Australia Pty Ltd, BP Australia Group Pty Ltd, BP Developments Australia Pty Ltd, Castrol Australia Pty Ltd.

Mandatory reporting criteria in the Modern Slavery Act 2018 (Cth)

Mandatory Criteria	Page
Identify the reporting entity; Details of approval by the relevant principal governing body or bodies; Describe the process of consultation with any entities that the reporting entity owns or controls	2, 16
Describe the structure, operations and supply chains of the reporting entity	4, 5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	6
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	8, 9, 10, 11, 12, 13
Describe how the reporting entity assesses the effectiveness of such actions	15, 16



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