



bp Australia modern slavery and human trafficking statement 2024



28 June 2025



About this statement

This statement relates to the financial year ending 31 December 2024 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)
- BP Energy Asia Pte Limited (ABN 77 549 205 033)
- BP Australia Supply Pty Limited (ACN 654 274 852)

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.
4. all references to 'bp Australia' exclude references to the lightsource bp group entities. During the reporting period, lightsource bp was a non-operated joint venture, with bp completing the acquisition of shares in lightsource bp in October 2024.

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, No. 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
BP Energy Asia Pte Limited (ABN 77 549 205 033)	Main trading entity for bp's power trading in Australia	Level 17, 717 Bourke Street, Docklands VIC 3008
BP Australia Supply Pty Limited (ACN 654 274 852)	Main trading entity for bp's refining and products trading business in Australia	Level 17, 717 Bourke Street, Docklands VIC 3008

About bp group and our supply chain

bp is an integrated energy business with operations in Europe, North and South America, Australasia, Asia and Africa. In 2024, we operated in 61 countries and employed 100,500 people. We have around 31,000 suppliers, these include contractors, vendors, service providers and contingent labour, many of whom also have their own suppliers¹.

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 businesses and functions identify areas of focus in our supply chain for their work to manage labour rights risks, including modern slavery risks.

1. Suppliers is used as a collective term in this statement. Where we use the term contractors this refers to suppliers who are service providers to our businesses, usually when these services are provided at a bp site. Contractors and their workforce at our sites have been the focus of much of our supply chain labour rights risk management to date.

Each of the reporting entities, as well as all their owned and controlled entities, are incorporated in Australia, except for BP Energy Asia Pte Limited which is incorporated in Singapore and registered as a foreign company in Australia.

All of the above 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).



Contents



In this statement:

Introduction	 4
bp Australia	 5
Our operations and supply chain	 6
Risk of modern slavery in our operations and supply chain	 7
Assessing and addressing modern slavery	 8
Our approach to mitigating modern slavery risk	 9
Risk assessment and due diligence	 10
Actions taken to address modern slavery risk	 11
Remediation and grievance mechanisms	 14
Assessing the effectiveness of our approach	 15
Assessing the effectiveness of our approach	 16
Maintaining our progress	 17

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




How to navigate this report

-  Go to another page of this report
-  Go to an online reference



Introduction

In this section:

bp Australia		5
Our operations and supply chain		6
Risk of modern slavery in our operations and supply chain		7



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 and market competitive terms of employment.

bp is a major energy provider in Australia. bp maintains its integrated energy position in Australia through its import terminals across the country, strategic equity in natural gas in the North West Shelf and Browse projects, and low carbon energy opportunities including the Kwinana Energy Hub, the Australian Renewable Energy Hub and bp pulse. These activities support integration with bp's established customer-facing businesses by growing diverse offers to road, electric vehicle charging, aviation, mining and marine customers, while also enabling our trading centre to integrate value around our participation in both customer and products, and upstream energy projects.

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 bp-owned terminals in Australia is managed by Australian Terminal Operations Management (ATOM).

In October 2024, bp completed its acquisition of its remaining interest in Lightsource bp, a leading developer and operator of utility-scale solar and battery storage assets. While bp has taken on full ownership, Lightsource bp will retain its standalone operating model and is not included in the scope of this year's report.

Being part of the bp group enables bp Australia to share global expertise, research and development with Australian business partners, customers, and community stakeholders.





Our operations and supply chain

bp Australia's operations can be broadly categorised 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.
- The trading of power and environmental products.

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 specialised 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 (PPE) 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, power and environmental products, was approximately \$1bn in 2024. This includes a supply chain of approximately 1,000 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

Lower spend categories include:

- Commercial services and supplies
- IT services
- Machinery and electrical equipment
- Professional services
- Real estate
- Cleaning services
- Utilities
- Labour hire

Automotive fuels are supplied and marketed through bp Australia's national network of more than 1,300 retail service stations. Of that number, approximately 350 retail service stations are wholly owned and operated by bp Australia, and approximately 1,000 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 operate retail fuel outlets and sell direct to consumers while Distributors typically supply bulk fuel to end-users.

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 wildbean cafe 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 and Distributors are responsible for staffing their operations.

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 and power trading. bp Australia also purchases fuel from local market participants. As such, this fuel can be sourced from a range of domestic suppliers and the international market.

Trading & Shipping procure fuel products from a range of third parties in different countries. In 2024, Trading & Shipping sourced fuel imports into Australia from countries primarily in the Asian region.

Trading & Shipping also trades physical power sourced from domestic generation and environmental products in Australia.

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

Throughout 2024, bp Australia continued to review and monitor modern slavery risks in the sourcing of goods and services, in relation to bp Australia's retail networks and workforce.

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

- In the workforce of our company-controlled retail sites performing jobs that do not require prerequisite qualifications or prior experience.
- 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 could be more vulnerable e.g. migrants holding temporary visas.
- Our selection of goods and services supply chain for retail sites where goods or services are produced 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 Walk Free Foundation, to be a jurisdiction with a lower prevalence of, and vulnerability to, modern slavery due to Australia's relatively 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 countries like Australia, particularly in sectors such as agriculture, construction and cleaning.
- bp Australia's employment practices include various protections for employees including individual's right to access the Fair Work Ombudsman, freedom of association and enterprise bargaining, compliance with at least minimum wage, and policies and procedures on working conditions.
- In relation to non-operated JVs, we use the 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.

Supply chain





bp Australia has identified the following areas where we may be linked to modern slavery in our supply chain:

- Suppliers operating in, or sourcing from, countries with a higher prevalence of, and vulnerability to, modern slavery. This includes fuel and lubricants sourced from these markets.
- 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 can make workers more vulnerable. Suppliers providing construction, food, catering and cleaning services are examples of suppliers with these risk factors.
- Inherent risks in global supply chains for IT and telecommunications hardware, electronics, uniforms, PPE, shipping, vehicles, vessels, machinery, batteries, EV charging stations, construction materials, 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 aircraft refuellers and we work with Airfield Representatives in relation to conditions of employment for their staff.



Assessing and addressing modern slavery

In this section:

Our approach to mitigating modern slavery risk		9
Risk assessment and due diligence		10
Actions taken to address modern slavery risk		11
Remediation and grievance mechanisms		14



Our approach to mitigating modern slavery risk

bp recognises our responsibility to respect human rights as set out in the International Bill of Human Rights and the core labour standards as set out in the ILO Declaration on Fundamental Principles and Rights at Work.

BP p.l.c. sets expectations for how our businesses conduct their activities, including through our **Code of Conduct, Business and Human Rights Policy** and **Labour Right and Modern Slavery Principles** (LRMS Principles) and Operating Management System (OMS). Our human rights policy aligns with the UN Guiding Principles on Business and Human Rights. They are 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.

bp Australia businesses are required to conduct their activities in conformance with the applicable 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 policies, systems and controls set out 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 appropriate, facilitate remediation of modern slavery, including human trafficking, slavery, and forced or child labour.
- conduct 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 bp's global helpline **OpenTalk** administered by an independent company.
- articulate its position and expectation of its employees and contractors in line with our **Code of Conduct, Business and Human Rights Policy** and **Labour Right and Modern Slavery Principles**.

bp Australia also has in place a Dealer compliance program for the majority of Dealer sites. The Assisted Compliance Audit Program, delivered annually by the **Australasian Convenience and Petroleum Marketers Association** (ACAPMA), has an external third-party auditor to carry out checks on areas including employment and safety.

Joint ventures (JVs)

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.



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 monitored and reviewed including on a quarterly basis at the ANZ LRMS Working Group meetings.

Supplier due diligence

In bp Australia, we have embedded monitoring activities for our high-risk suppliers. In 2024 we updated our sourcing tool by automating the identification of supplier risk ratings, removing some of the potential for error and easing the administrative steps for our practitioners.

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.

Automation of identifying risk in the sourcing process

Sourcing activities use process automation to ensure initial allocation of modern slavery risk based on a combination of country and industry level risks. Both the service category (where the service is delivered) and the goods category (where the product originates from) are interrogated.

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 2024, bp Australia's mandatory risk assessment process reviewed suppliers providing onsite services identified as medium to high risk with respect to modern slavery determined by category and industry risk ratings. 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 who provide services onsite are visible and reported within bp Australia's Health, Safety, Environment and Carbon compliance management platform, ISNetwork.

In 2024, bp Australia:

- Held routine discussions and exchanges on modern slavery risk management methods with first tier 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.

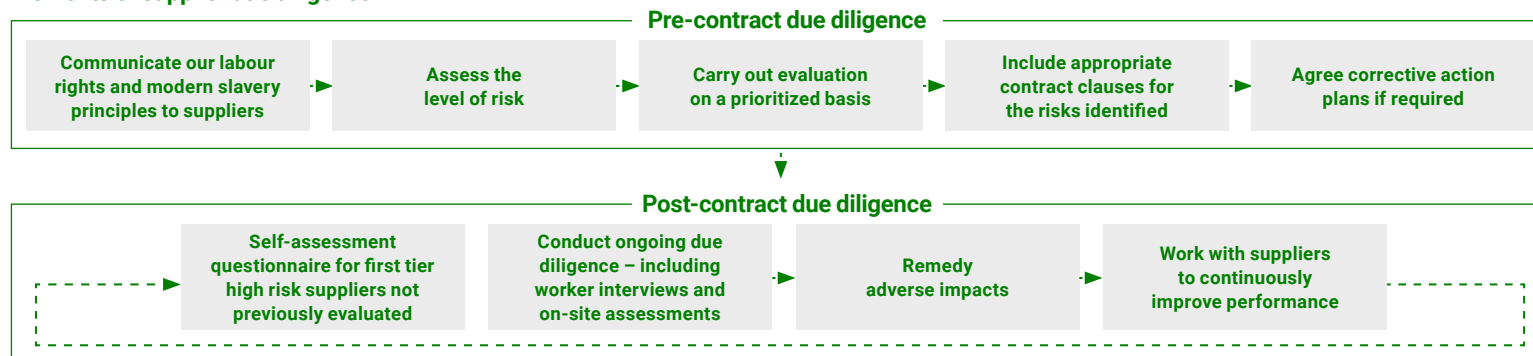
The outcome of this activity is the following three steps:

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

Where appropriate, further intervention 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.

Elements of supplier due diligence



a Suppliers are considered evaluated when all their self-assessment questionnaires are submitted and reviewed, and corrective action plans, where issued, are communicated to the supplier.



Actions taken to address modern slavery risk

Capability development

bp Australia's capability development activities in 2024 included:

- Updating of internal LRMS training and awareness materials to align with current risk profile and to promote mitigation actions in place.
- Rolling out mandatory modern slavery training to approx. 250 bp employees engaged in supplier facing roles.
- Providing training to employees on our code of conduct, which covered elements of our human rights policy.
- 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, followed by a regular refresh.
- Continued delivery of bp Australia's program for conducting workplace labour rights reviews; Site, Engage, Evaluate (SEE) Labour Rights - 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 25 assessments conducted in 2024 (an increase on the previous year).
- 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.
- LRMS awareness training provided to bp Australia Global Business Services (GBS) Customer Team Leaders, focused on the identification of potential risks within their interactions with customers.





Actions taken to address modern slavery risk

Compliance Programs

In 2024, bp Australia continued to work with the Australasian Convenience and Petroleum Marketers Association (ACAPMA) as a third-party auditor to undertake compliance assessments.

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, where 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 an opportunity to work with Dealers on improvements, and the right to terminate the agreement.

Aviation

The assessment of modern slavery risk at regional air bp airport operations across Australia continues with ACAPMA. 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 2024 to ensure an understanding of LRMS risk indicators and the assistance available if required.





Actions taken to address modern slavery risk

Trading & Shipping

bp Australia works with bp's Trading & Shipping teams based in Singapore to manage fuel imports and power trading activities.

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 capability 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 LRMS.

Shipping

For Shipping, all chartering of vessels is managed by bp Trading & Shipping on behalf of bp Australia. Chartering involves a process of vetting and clearing which aims to review overall suitability for use. This includes a review of identifiable instances of worker welfare malpractice.

Independent assessments are undertaken globally of bp-operated and third-party vessels that bp charters. Such assessments include human rights issues including crew treatment and working conditions, as well as safety. These are performed within the Oil Companies International Marine Forum (OCIMF) through a Ship Inspection Report Programme (SIRE) (a series of inspections which includes Maritime Labour Convention status). Vessels on charter to bp are 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 should crew members feel the need to report suspected abuses.

Separate 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 issues, and have authority to detain a vessel in breach until the issue is resolved.

Contract Terms

To assist with the management of LRMS risk within our supply chain, modern slavery clauses continue to be included 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 LRMS risk mitigating contractual provisions into our commercial arrangements with buying group suppliers and supplier due diligence processes described earlier in this statement.

In 2024, all new distributor contract terms included LRMS clauses, approximately 50 agreements. The LRMS clauses are a program-required condition for any new and renewed Distributor and Distributor Supply Site contracts and include counterparty due diligence for new independent Distributor and Distributor Supplied Sites.





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 raise modern slavery concerns 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 for bp-operated vessels, 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

In this section:

Assessing the effectiveness of our approach	 16
Maintaining our progress	 17



Assessing the effectiveness of our approach

The risk of modern slavery is a serious concern.

We are working to improve our ability to identify, prevent and address LRMS issues.

bp Australia assesses its performance in relation to managing modern slavery risk via ongoing assessment and reporting to its modern slavery working group bi-monthly meetings 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 its 2023 modern slavery 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 its bi-monthly Australia and New Zealand LRMS 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 LRMS working group, which includes representatives from a cross-section of bp businesses and functions in Australia and New Zealand.





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 bp Australia continues to strengthen the effectiveness of our approach, our focus areas include:


- Continuing to develop capability and skillsets of contract-owners.
- Increased procurement governance and validation through:
 - quarterly self-verification of LRMS awareness and application of monitoring tools.
 - annual verification of mitigations in place via a group-level validation process
- Knowledge sharing and learning on LRMS best practice from industry and leading suppliers.
- Continuing to embed our LRMS framework into the way we do business.
- The continuous updating and rollout of LRMS training modules to all supplier facing employees and senior leaders.
- Promoting bp's 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 bp personnel to conduct monitoring through SEE Labour Rights – Field Conversations.
- Ongoing formal implementation of SEE Labour Rights reviews during site 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. Despite operational differences, bp Australia has a relatively centralised approach to working which is conducive to consultation within our business structure.

Stakeholder collaboration and learning 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.

 [Read more about the bp group's approach to modern slavery risk management 2023.](#)

This statement was reviewed by members of bp Australia's Country Leadership Forum, and senior representatives from the reporting entities and with internal consultation with owned and controlled entities, via the bp Australia modern slavery working group. The statement was reviewed and approved by the boards of BP Australia Group Pty Ltd, Castrol Australia Pty Ltd, BP Energy Asia Pte Limited and BP Australia Supply Pty Limited



Lucy Nation

Country President, bp Australia

This statement has been approved by the boards of BP Australia Group Pty Ltd, Castrol Australia Pty Ltd, BP Energy Asia Pte Limited and BP Australia Supply Pty Limited in compliance with the Australian Modern Slavery Act and signed by Lucy Nation in her capacity as Country President of bp Australia and director of BP Australia Group Pty Ltd



Cross reference to 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, 17
Describe the structure, operations and supply chains of the reporting entity	5,6
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	7
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	9, 10, 11, 12, 13, 14
Describe how the reporting entity assesses the effectiveness of such actions	16
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	17



bp Australia
Level 17, 717 Bourke Street
Docklands VIC 3008