



bp Australia modern slavery and human trafficking statement 2022

29 June 2023



About this statement

This statement relates to the financial year ending 31 December 2022. It is published by 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), and Castrol Australia Pty Limited (ACN 008 459 407), each as reporting entities within the meaning of the term set out in the Australian Modern Slavery Act 2018 (Cth).

Unless explicitly stated otherwise, in this statement:

1. a reference to 'bp', 'bp group', 'we' or 'our' and similar terms relate 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 including Castrol Australia Pty Limited.

About bp group and our supply chain

We are a global energy business with operations in Europe, North and South America, Australasia, Asia and Africa. We currently operate in 62 countries, employ around 67,600 people and have around 39,000 suppliers. These include contractors, vendors, service providers and contingent labour, many of whom also have further suppliers.

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 continue to identify parts of our supply chain as focus areas for their work to manage labour rights risks, including modern slavery.

Reporting entities

BP Australia Pty Ltd is the main trading entity for bp's customer and product operations in Australia. Also included in the scope of this statement is BP Developments Australia Pty Ltd, the main trading entity for bp's gas operations in Australia. BP Australia Group Pty Ltd is a holding company for BP Australia Pty Ltd and BP Developments Australia Pty Ltd. Castrol Australia Pty Limited is the main trading entity for bp's lubricants business in Australia. All reporting entities have BP p.l.c. as their ultimate parent company.

BP Australia Pty Ltd, BP Developments Australia Pty Ltd and Castrol Australia Pty Limited's ultimate parent company is BP p.l.c.

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

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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).

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- 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, and to help the world get to net zero. bp 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 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 a number of major domestic and regional Australian locations. In 2022, operation of the bp Kwinana terminal transitioned to Australian Terminals Operations Management (ATOM). bp is a joint venture partner of ATOM, that operate all bp terminals in Australia.

The bp Kwinana refinery is transitioning to the Kwinana Energy Hub, which plans to produce sustainable aviation fuel (SAF) and biodiesel from bio feedstocks by 2026. It will also integrate with the site's existing import terminal operations and plans for green hydrogen production, which are currently being assessed in a feasibility study.

In 2022, bp announced it will operate the Australian Renewable Energy Hub in the Pilbara region of Western Australia. It intends to supply renewable power to local customers and produce green hydrogen for the domestic Australian market and export it to major international users. These low carbon energy projects are in early-stage development.



bp Australia

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, whether at import terminals, airports or other depots.
- 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 other countries.
 - 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 and office supplies).
 - The sourcing of food, beverages, and other goods and services offered for sale at bp Australia's retail sites.
 - Labour and services.

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

bp Australia's non-related third-party expenditure, excluding fuels, was approximately \$1.6bn in 2022. This includes a supply chain of over 1,900 suppliers, the most material of which are domiciled in Australia, the US, China and Malaysia, although 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 estate.

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 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 employs their staff directly and are free to set the prices of their automotive fuels independently. A significant proportion of bp Australia's customers is our Dealer network, that sell to end-users.

bp Australia partners with bp's Trading & Shipping entities based in Singapore for fuel imports. bp Australia also purchases fuel from market participants locally, the majority of which have had a strong Australian presence for many years. This fuel can be sourced from a range of domestically produced suppliers and the international market.

Joint venture (JV) activity

bp Australia is a participant in many joint ventures 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, examples of JVs bp Australia participates in include those that 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 a term used in policy and law to describe 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 carry out a review of modern slavery risks over the course of 2022 in relation to sourcing of goods and services, our retail networks and our workforce. Key risk areas include:

- Our selection of goods and services supply chains for retail sites where goods or services are delivered using lower-skilled labour.
- The workforce of our company-controlled retail sites.
- The workforce and supply chains of non-company-controlled retail sites. Key risks may arise from businesses with potentially less corporate governance and oversight, where workers are vulnerable e.g. low-skilled and/or foreign visa holders.
- Workforce and supply chains of major and regional airport operations. Major airports are operated by a fully owned subsidiary, Air Refuel, that operates to an Air Refuel Code of Conduct that aligns with the bp Code of Conduct. Regional airport air bp operations are managed by Airfield Representatives (AR) that are contracted to air bp to provide management services to an individual airport.

The assessed risk of modern slavery across bp Australia's operations is considered low. bp Australia's workforce is located in Australia, which is a relatively low-risk jurisdiction, according to Maplecroft risk indices, due to robust regulatory requirements. We also have in place various protections for employees including contracts,

various industrial instruments and policies and procedures, which are described below.

Joint venture activity

We know that, through the conduct of their activities, our business partners – including operated and non-operated JVs, contractors and suppliers – can have direct adverse impacts on human rights and we can be linked to this impact. For this reason, we want to work with business partners that share our commitments to human rights, safety, ethics and compliance.

We seek to use our leverage, consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs) to encourage business partners to act in a manner consistent with the principles underlying the commitments set out in bp's human rights policy. 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 Operating Management System (OMS), code of conduct and other policies apply.

Where we are not the operator, our OMS is available as a reference point for bp businesses when engaging with operators and other participants. We have a bp group framework to assess and manage bp's exposure related to safety and operational risk – including modern slavery risks – as well as bribery and corruption risks from our participation in non-operated JVs. Where appropriate, we may seek to influence how risk is managed in these types of ventures.






Supply chain

bp Australia has identified the following high-risk activities in our supply chain:

- Suppliers operating in countries that pose a high degree of risk.
- Activities where the workforce is considered vulnerable due to factors such as poverty levels; ethnic, religious or gender minorities; and migrant workers.
- IT and telecommunications hardware.
- Services that rely on manual labour such as construction, catering and cleaning.
- Certain types of goods including food and beverages, coffee, confectionery, tobacco, fresh fruit, and other merchandise.
- Uniforms and personal protective equipment (PPE).
- Trading and shipping, where the products in our supply chain are sourced globally.

Assessing and addressing modern slavery

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Our approach to modern slavery

bp Australia supports the elimination of all forms of modern slavery. Modern slavery is a term used in policy and law to describe forms of exploitation that constitute serious violations of human rights, including human trafficking and forced labour. This type of exploitation is contrary to our commitment to respect human rights.

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 OMS.

Our Australian businesses are required to conduct their activities in conformance with these expectations and manage the risks, including modern slavery, associated with them. Our local 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 continue to work with and learn from others.

We expect our approach to managing 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, in connection with its operations:

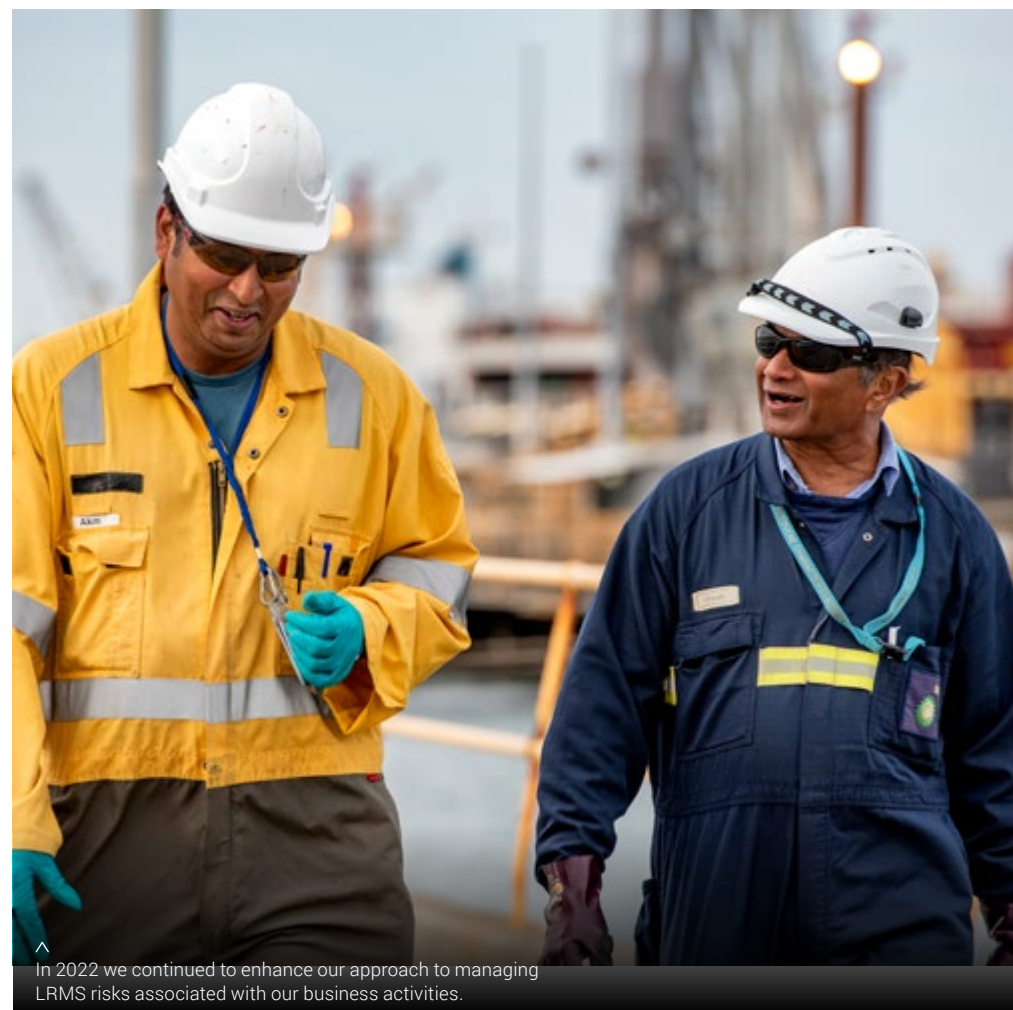
- Provides its employees with safe working conditions, as well as market-competitive terms and conditions of employment.
- Carries out rigorous pre-employment checks and induction.
- Has in place policies and procedures designed to identify, investigate, and where necessary, take

action against modern slavery, including human trafficking, slavery, forced or child labour.

- Conducts regular internal training to improve staff awareness of modern slavery, human trafficking, and human rights risks.
- 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), uses an external third-party auditor to carry out checks on working conditions on site, including salary and right to work checks.
- Provides its employees, contractors, and suppliers and their workforces a channel to report concerns and risks through its OpenTalk program.
- Clearly articulates its position and expectation of its employees and contractors in its code of conduct, human rights policy and labour rights and modern slavery principles as outlined in bp group requirements.

More information

-  [Read our previous modern slavery and human trafficking statements at: bp.com/reportingcentre](https://bp.com/reportingcentre)
-  [Read our human rights policy and labour rights and modern slavery principles at: bp.com/humanrights](https://bp.com/humanrights)
-  [Read our code of conduct at: bp.com/codeofconduct](https://bp.com/codeofconduct)



^ In 2022 we continued to enhance our approach to managing LRMS risks associated with our business activities.



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 their 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 procurement process are designed to identify any potential suppliers or activities that require further risk monitoring with respect to modern slavery.

During 2022, we developed a new risk assessment program for bp Australia to be rolled out in 2023. For currently contracted suppliers, our mandatory risk assessment process will review all suppliers identified as medium–high-risk with respect to modern slavery on an annual basis. The outcomes from these risk monitoring activities will enable a tiered approach to further interventions if required, including surveying employees of high-risk suppliers on their LRMS rights and protections.

New suppliers classified as high-risk are required to provide documentary evidence they have implemented appropriate policies, processes and practices. This is a mandatory step in the procurement process. Documentary evidence of compliance with bp's requirements related to high-risk suppliers is obtained and assessed prior to contract award, with subsequent risk plans included within contract level obligations. Ongoing monitoring of medium–high-risk suppliers providing services onsite is managed within bp's

Health, Safety, Environment and Carbon (HSE&C) compliance management platform, ISNetwork.

Enhancing awareness of LRMS risks with key suppliers and contractors is also a focus. During 2022, bp Australia:

- Held a series of webinars for onsite suppliers on:
 - bp's approach to modern slavery risk identification.
 - Methods of bp support for suppliers in raising LRMS capability management.
- Held focused discussions and exchanges of modern slavery management methods with key suppliers.
- Inserted modern slavery clauses within:
 - All new supplier contracts.
 - All extensions of supplier contracts.
 - All variations to supplier contracts.

bp Australia's ongoing supplier analysis includes:

- Detailed questioning of medium–high-risk site suppliers. Questions focus on:
 - Supplier policy, procedures and practices related to modern slavery management.
 - Internal communications with employees.

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

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

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



Actions to assess and address risks

Capability development

Our capability development activities in 2022 included:

- Providing training on our code of conduct, which underpins and reinforces elements of our human rights policy. This is mandatory for all bp employees.
- Specific training for our 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 our procurement teams.
- Specific LRMS training available for bp employees through our online training system.
- An Australian-developed program for conducting site labour rights reviews; Site, Engage, Evaluate (SEE) Labour Rights is a system of observation and interactive methodology for conducting workplace-based monitoring of labour rights.
- Training for the ANZ People & Culture team on SEE Labour Rights, resulting in five assessments conducted in 2022.
- SEE Labour Rights Training rolled out to bp Australia Global Business Services (GBS) Customer Team Leaders, focused on the identification of potential risks within their interactions.
- bp's Working with Respect training has been embedded into the induction of retail Australia and New Zealand employees. The course is focused on the Working with Respect policy and appropriate channels, including EAP (Employee Assistant Program) and OpenTalk.
- Launching a wellbeing program to retail employees in Australia and New Zealand with

a focus on managing customer conflict and EAP awareness.

- Hosting of webinars with our supplier pool to promote bp's policies and provide information and guidance on how suppliers may assist and align with bp's sustainability aims.

Compliance Programs

bp Australia has engaged the Australasian Convenience and Petroleum Marketers Association (ACAPMA) as a third-party auditor to undertake compliance assessments including adherence to the Modern Slavery Act. This includes salary and right to work checks.

Dealer

To address the identified risks in bp Australia's Dealer network, the majority of Dealer sites are part of the Assisted Compliance Audit Program, delivered by 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 breaches at regional airport air bp operations across Australia commenced in 2022 with the engagement of ACAPMA to complete an audit of a number of locations. To facilitate the initial audit program and possible future audits, Airfield Representative (AR) Agreements have been updated to include the right of a third party appointed by air bp to audit their business. Under each new and renewed AR Agreement additional clauses relating to bp's modern slavery policy have been included, providing air bp with the right to terminate an agreement for a breach of this policy.

Trading and shipping

To address risks identified in fuel supply, all chartering of vessels is managed by bp Trading & Shipping on behalf of bp Australia. Prospective vessels are required to be vetted and cleared prior to fixing a vessel via a charter party. The vetting and clearance process aims to identify instances of specific worker welfare malpractices. This includes contraventions of the Maritime Labour Convention (MLC) and Ship Inspection Report Programme (SIRE) which is utilised by charterers, ship operators, terminal operators, and government bodies concerned with ship safety and used to ascertain whether vessels are well managed.


Once a vessel is fixed for a journey, the key interactions with vessel captains and owners is also via bp's Trading & Shipping organisation. The local bp Australia team remain aware of modern slavery risks within shipping and the need to speak up if they believe significant risk is present, as outlined in bp's code of conduct.

bp Trading & Shipping assesses the ship repair dockyards that are used to maintain its owned and operated vessels. Recognising this is a high-risk LRMS activity, onsite LRMS assessments have been conducted at all dockyards that could potentially be used to overhaul or repair its vessels.

Contract terms

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

Dealers can get the benefit of risk management due diligence that bp undertakes in respect of a supplier. Dealer participation in the bp Australia buying group allows bp Australia to set terms and deal with suppliers in a manner consistent with the reduction of modern slavery risk. This includes, for example, the incorporation of modern slavery risk mitigating contractual provisions into our commercial arrangements with suppliers. Dealers participating in the bp Australia buying group also get the benefit of due diligence that bp undertakes in respect of a supplier.

 [Read more about key group modern slavery developments on our website.](#)

Actions to assess and address risks

Case study: Reimbursement of recruitment fees

Since 2016, bp has worked with a Malaysian signware supplier, including to the bp Australia retail business, to improve LRMS performance. As a first step, the company committed to a reduction in recruitment fees charged to workers, limiting this to two months' salary, the legally permissible level in Malaysia. During a contract renewal negotiation process, bp's category lead worked with the supplier to gain their commitment to the employer pays principle – meaning that the supplier would cover all recruitment agency fees and recruitment expenses for any future recruitment. During negotiations, it was agreed that current workers would also be reimbursed, resulting in 84 workers receiving approximately two months' salary.





Governance of modern slavery

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 our progress in identifying and addressing potential modern slavery issues in higher-risk parts of our businesses and supply chains.

In Australia, the ethics and compliance committee of senior executives within bp Australia and Castrol Australia provide oversight on LRMS performance. 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.

Our policies related to labour rights, modern slavery and human trafficking

We are committed to respecting workers' rights, in line with the International Labour Organization Core Conventions on Rights at Work and we expect our contractors, suppliers and JV partners to do the same.

Our expectation is that workers in our operations, JVs and supply chains are treated with respect and care and are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination or harassment.

Our LRMS principles are intended to assist our businesses, contractors and suppliers as they work to check performance on this expectation.

We set out more details on our policies, including our code of conduct, human rights policy and labour rights and modern slavery principles on the bp website.

Operating Management System (OMS)

Our practices for the management of environmental and social performance are included in our OMS.

Our OMS requires bp operations and projects to assess LRMS risks and to put in place effective controls in a proportionate and systematic way. If issues arise, our central team of experts continue to support the businesses to facilitate remedy for workers.

Code of conduct and human rights policy




Our code of conduct and human rights policy clearly state bp's support for the elimination of all forms of modern slavery such as human trafficking, forced labour and child labour. Our code of conduct is based on our values and clarifies the principles and expectations for how we work. It applies to all bp Australia employees.

Employees are required to report any human rights abuse in either our operations, or those of our contractors and other business partners. The code makes explicit reference to the role all parties can play in the elimination of human trafficking, forced labour and child labour.

Our human rights policy commits us to respect all internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

It also references the core labour standards as described in the ILO Core Conventions on Rights at Work. We recognise our responsibility to avoid complicity in human rights abuses – including modern slavery – as described in the UN Guiding Principles on Business and Human Rights (UNGPs) and continue to incorporate these principles into our business processes.

More information

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Remediation and grievance mechanisms

Where we identify that we cause or contribute to modern slavery, we are committed to remedying or participating in the remedy of the impact of modern slavery on the individuals affected. Our human rights policy states that we do not impede access to state-based judicial processes. If we cause or contribute to adverse impacts on human rights, we provide for or co-operate in their remediation through legitimate processes intended to deliver effective remedy, while not preventing access to other forms of remedy if justified.

If we identify that our employees do not adhere to our code of conduct and policies, this may result in disciplinary action, up to and including termination of employment. 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 people affected. If a serious breach is found and no corrective action is taken, we reserve the right to terminate contracts.

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 an appropriate course of action, subject to local laws, in relation to the management of such reports. Any urgent matters will be raised directly to People and Culture (P&C) Partnering who are trained on the SEE Labour Rights Assessments.

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 global 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.

Assessing the effectiveness of our approach

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Assessing the effectiveness of our approach

bp Australia assesses its performance in relation to managing our modern slavery risk via ongoing assessment and reporting to the modern slavery working group and ethics and compliance committee. We are taking steps to strengthen our ability to identify, prevent and remedy concerns through the integration of LRMS principles into our operating management system, training, risk reviews and enhanced contractual frameworks.

We have made progress on the focus areas we set out in our bp Australia modern slavery and human trafficking statement 2021, and the bp Australia modern slavery working group continues to meet regularly to advance these focus areas across the Australian business.

We test the effectiveness of our approach through regular working group meetings where agenda items include monitoring of training, ensuring procurement contracts have correct clauses and reviewing OpenTalk cases for evidence of LRMS grievances.

Working group

Within the modern slavery working group, key modern slavery risk priorities are evaluated in accordance with the risk actions 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 monitoring of effectiveness and actions to assess progress, and determine remedy as needed, is a key monitoring focus of the working group. Progress is reported to the Ethics and Compliance Committee quarterly.



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We are continuing to develop and build the capability required to manage modern slavery risks to our workforce.



Maintaining our progress

We are open to constructive challenge and expect our approach to managing the risk of modern slavery to continue to evolve. We know there is more work to do and that we achieve our best when we address the challenges we face through collaboration.

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

- Continuing to develop contract-owner skillsets in upholding adherence to relevant contract clauses.
- Knowledge sharing and learning on LRMS best practice from leading suppliers.
- Embedding our LRMS framework into the way we do business.
- Rolling out Upstander Training to all ANZ employees from June 2023.
- Reinforcing our Respect at Work policy and channels for raising concerns such as OpenTalk.
- Creating a systemic approach for people and culture teams to conduct SEE Labour Rights reviews.
- Increasing the number of risk-based modern slavery contract terms for goods and services providers.

Consultation and collaboration

This statement was prepared by the bp Australia modern slavery working group, which includes individuals from our businesses and key enablers such as procurement, people and culture, corporate affairs, HSE and legal with responsibility across Australia.

This statement has been prepared in consultation with each of the reporting entities outlined on page 1, and their owned and controlled entities. Information and data is 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. This statement was reviewed and approved by the bp Australia Group Pty Ltd and BP Australia Pty Ltd boards.

Frédéric Baudry

Senior vice president

Mobility, convenience and midstream Asia Pacific

Regions, corporates and solutions Asia Pacific

President bp Australia, BP Australia Pty Ltd, BP Australia Group Pty Ltd, BP Developments Australia Pty Ltd, Castrol Australia Pty Limited

This statement has been approved by the boards of BP Australia Group Pty Ltd, BP Australia Pty Ltd and Castrol Australia Pty Limited, in compliance with the Australian Modern Slavery Act.



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