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BP's expectations of its suppliers

BP's Code of Conduct (the "**code**") underpins our expectations of our suppliers, including contractors, vendors, service providers and contingent labour ("**suppliers**"), their employees and suppliers. These expectations are not replacements or substitutes for the code itself or applicable laws, nor do they amend contracted obligations.

We want our suppliers to strive for sustainability in their supply chain, and innovation and excellence in their delivery. As a BP supplier, we also expect you to commit to, and act in accordance with our code.

We ask that you communicate these expectations to your employees, suppliers and business partners who may provide goods or services to BP, and that you:

Compliance with laws

1. Comply with all laws and regulations applicable to the goods and services being provided.

Health, safety and the environment ("HSE")

2. Conduct business in a way that supports BP's HSE goals of no accidents, no harm to people and no damage to the environment by taking a systematic approach to managing operating activities and HSE risks, complying with applicable HSE laws and regulations, and seeking to continuously improve health, safety and environmental performance. Encourage your workforce and suppliers to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.

Bribery and corruption, money laundering, conflicts of interests and anti-competitive conduct

3. Promote transparency and accountability in the conduct and administration of business, including having in place effective processes and procedures to proactively prevent:
 - a) Bribery and corruption, including expressly prohibiting the direct or indirect giving, paying, promising or accepting of anything of value to obtain, retain or direct business, to secure an improper advantage or to influence someone including government officials to improperly perform their duties.
 - b) Money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.
 - c) Actual or apparent conflicts of interest between personal and business interests, including using BP information and resources for improper gains.

- d) Anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.
- e) Inappropriate provision of gifts, entertainment, or meals to BP personnel or third parties representing BP. When legitimately required in rare cases, they should be of modest value and appropriately-timed.

International trade law

4. Comply with applicable international trade laws. Classify in advance, with appropriate labelling, documentation, licenses and approvals completed, all products intended for import or export, including the transfer or sharing of restricted software, technical data, or technology.

Human rights and modern slavery

5. Respect the human rights and dignity of all people and meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights including:
 - a) Ensuring no use of forced or compulsory labour, human trafficking, child labour, slavery or servitude and that all work is conducted voluntarily, without threat of penalty or sanction and not based on deception. These and other expectations are outlined in BP's Labour Rights and Modern Slavery Principles appended to this document.
 - b) Identifying, avoiding, minimizing or mitigating and remedying any human rights impacts on communities.

Protecting confidential information

6. Have effective protocols in place for securing and protecting BP information including:
 - a) Respecting the proprietary and intellectual property rights of BP.
 - b) Having information classification protocols and adopting industry best practices, on sharing, protecting and securing information.
 - c) Observing all data privacy legal requirements on the collection, processing and transfer of BP personal data
 - d) Reporting any suspected or actual information security incidents that impact BP information or systems to BP as soon as practically possible.

Non-discrimination, grievance processes and freedom of association

7. Provide a workplace which:
 - a) Is free from harassment, intimidation, inhumane treatment and discrimination based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender or marital status.
 - b) Has mechanisms to allow workers to speak up or raise grievances without fear of retaliation.
 - c) Respects individual choices on trade union or works council membership within the appropriate national legal framework.

Ethics and compliance

8. Have a programme in place to promote awareness and embed ethical business practices and compliance with laws in your business.

Speak up

9. Promote a “speak-up” culture that does not tolerate retaliation. Provide a means for your employees, your suppliers and your business partners to speak up if they see something that is unsafe, unethical or potentially harmful involving BP’s businesses or activities. They may inform a member of BP’s management, or use BP’s confidential OpenTalk help line.

References:

For further information please refer to the following:

- BP Code of Conduct <http://code.bp.com>
- UN Guiding Principles on Business and Human Rights http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
- OpenTalk: **You can reach OpenTalk through the following:**
 - **+44 (0) 800 917 3604** in the UK
 - **+1 800 225 6141** in the US
 - **+1 704 540 2242** a ‘collect call’ number which will accept your call without any charge to you.
 - You can find a full list of local numbers and also submit a report at opentalkweb.com.

BP Labour Rights & Modern Slavery Principles

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

Our expectation is that workers in our operations, joint ventures and supply chains are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination, or harassment. The below principles are intended to assist our businesses as they work to check performance on this expectation, including with our contractors and suppliers.

1. Terms: Workers have clear, written employment terms before deployment in a language they understand, and in line with terms at point of recruitment, which are consistently upheld.¹

2. Legal status: Workers are legally authorized to work for their employer and possess the necessary visas, work permits, and any similar legal documentary requirements.

3. Protection of Young Persons: Workers below 15 or the legal minimum working age (whichever is higher) are not hired, either directly or indirectly.

4. Fees: Employers are responsible for all costs and fees associated with recruitment of workers regardless of the manner or location of the imposition or collection of the fee. Workers do not pay recruitment or other fees² irrespective of the method of payment or by whom it was collected. Workers do not suffer unlawful pay deductions, to secure a job or for continued service, nor disproportionate monetary penalties as a disciplinary measure.

5. Passports and papers: Worker passports, travel identification or work authorization papers are not withheld. Workers may choose to lodge their passports or other papers with employers if they genuinely consent to doing so and can freely access them upon request without penalty or delay.

6. Free movement: Workers are free to terminate employment upon reasonable notice without penalty. Workers are not prevented from leaving worksites or employment, except for reasonable safety or security reasons.

7. Pay: Workers are paid on time, as per employment terms. Wages, benefits and overtime rates meet, as a minimum, national legal standards. Wages paid and hours worked are accurately recorded through a time keeping system.

8. Working time and rest: Workers are not required to work unreasonable hours, hours beyond legal limits, or without appropriate breaks and defined leave periods.

9. Grievance: A grievance process is in place by which workers can make complaints, including anonymously, and receive appropriate responses and timely updates on the status of concerns. Concerns may be raised through any process (formal or informal) without fear of retaliation, discrimination or harassment.

10. Working conditions and accommodation: Workers enjoy a safe and hygienic working environment. Access to clean toilet facilities, potable water, and if appropriate, sanitary facilities for food storage are provided. Accommodation and food, where provided, is clean, safe and meets the basic needs of the workers.

11. Discrimination and harassment: There is no discrimination in employment practices based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation or any other characteristic prohibited by law. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not tolerated.

12. Freedom of Association: In conformance with local law, where workers choose to be represented by trade unions or works councils, employers will cooperate in good faith with the bodies that the employees collectively choose to represent them.

13. Controls: Contractors, suppliers and non-operated joint ventures develop and maintain adequate processes and controls to implement, communicate, monitor and remediate identified deficiencies with regard to the above, including in their supply chains.

Where there is a difference between these principles and a legal requirement or collective agreement, seek to apply the provision which affords greater protection to workers, without violating domestic law or the collective agreement.

¹ Contracts as a minimum contain the following elements: employer, nature of work, expected regular working hours, including overtime hours, rates of pay, lawful wage deductions, pay cycle, benefits, including overtime, leave entitlement and rest days, provisions for repatriation.

² Fees include: payments in connection with recruitment, termination, placement, visas or work permits, government levies, medical examinations, airfare or costs of other mode of international transportation, security deposits and bond, transportation from the airport or disembarkation point to dormitories or facility.