Renewable Energy & Human Rights Benchmark 2023
Company Profile

Company name: bp
Sub-sector: Project developer
Overall score: 30.4 weighted average

Section score Weighting For section
63.2% 20% 1. UNGP core indicators
18.2% 40% 2. Salient human rights risks
N/A 20% 3. Serious allegations
21.8% 20% 4. ACT assessment as conducted by the World Benchmarking Alliance*

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found here: business-humanrights.org

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment
1. UNGP core indicators based on the 2022 CHRB methodology (20% of total)*

A. Policy commitments and governance

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<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1.1</td>
<td>Commitment to respect human rights</td>
<td>2</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: International Bill of Human Rights [Business and human rights policy, 05/2020: bp.com] Score 2 • Met: Commitment to UNGPs [Business and human rights policy, 05/2020: bp.com]</td>
</tr>
<tr>
<td>A.1.2.a</td>
<td>Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work</td>
<td>2</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles [Business and human rights policy, 05/2020: bp.com] • Met: Explicitly lists all four ILO core principles [Business and human rights policy, 05/2020: bp.com] Score 2 • Met: Expects suppliers to commit to ILO core principles [Supplier Expectations, 2019: bp.com] • Met: Explicitly lists all four ILO core principles for suppliers [Supplier Expectations, 2019: bp.com] &amp; [Business and human rights policy, 05/2020: bp.com]</td>
</tr>
</tbody>
</table>

* For information on the ACT methodology and scoring criteria please refer to the World Benchmarking Alliance.
† Scores for section 1 have been fully aligned with the 2023 edition of the World Benchmarking Alliance (WBA) Corporate Human Rights Benchmark and detailed explanations are available on the WBA CHRB website.
### A. Indicator Code A.1.4

#### Indicator name
Commitment to remedy

#### Score (out of 2)
2

#### Explanation
The individual elements of the assessment are met or not as follows:
- **Score 1**
  - Met: Commitment to remedy adverse HRs impacts [Business and human rights policy, 05/2020: bp.com]
  - Met: Expects suppliers to make this commitment [Supplier Expectations, 2019: bp.com]

- **Score 2**
  - Met: Commitment to collaborate with judicial or non-judicial mechanisms [Business and human rights policy, 05/2020: bp.com]
  - Met: Commitment to work with suppliers on remedy [Business and human rights policy, 05/2020: bp.com]

### A.2.1

#### Indicator name
Commitment from the top

#### Score (out of 2)
0.5

#### Explanation
The individual elements of the assessment are met or not as follows:
- **Score 1**
  - Met: Board level responsibility for HRs [2022 Sustainability Report, 2023: bp.com]
  - Not Met: Describes HRs expertise of Board member [2022 Sustainability Report, 2023: bp.com] & [Corporate governance_web, N/A: bp.com]

- **Score 2**
  - Met: Board member/CEO signal importance of HRs in their communications [COP26 High-Level Dialogue on Business and Human Rights in the Just Transition_web, N/A: ihrb.org] & [Human Rights Day_Linkedin, N/A: linkedin.com]

### B Embedding respect and human rights due diligence

#### B.1.1

#### Indicator name
Responsibility and resources for day-to-day human rights functions

#### Score (out of 2)
1.5

#### Explanation
The individual elements of the assessment are met or not as follows:
- **Score 1**
  - Met: Score of 1 on A.1.2.a
  - Met: Senior responsibility for HRs implementation and decision making [Business and human rights policy, 05/2020: bp.com]

- **Score 2**
  - Met: Describes day-to-day responsibility for implementing HRs commitments [Business and human rights policy, 05/2020: bp.com] & [Human Rights_web, N/A: bp.com]

#### B.2.1

#### Indicator name
Identifying human rights risks and impacts

#### Score (out of 2)
1.5

#### Explanation
The individual elements of the assessment are met or not as follows:
- **Score 1**
  - Met: Describes process of identifying risks in own operations [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com]
  - Met: Describes process for identifying risks in business relationships [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com]

- **Score 2**
  - Met: Describes how risk identification system is triggered by new circumstances [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com]

#### B.2.2

#### Indicator name
Assessing human rights risks and impacts

#### Score (out of 2)
1

#### Explanation
The individual elements of the assessment are met or not as follows:
- **Score 1**
  - Not Met: Public disclosure of results of HRs risk assessment

- **Score 2**
  - Not Met: Meets all requirements under score 1
<table>
<thead>
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<tbody>
<tr>
<td>B.2.3</td>
<td>Integrating and acting on human rights risks and impact assessments</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes system to prevent, mitigate and remediate HRs issues [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] &amp; [2022 Sustainability Report, 2023: bp.com] • Not Met: Describes how global system applies to supply chain [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] • Not Met: Example of actions decided on at least 1 salient HRs issue [2022 Sustainability Report, 2023: bp.com] Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken</td>
</tr>
<tr>
<td>B.2.4</td>
<td>Tracking the effectiveness of actions to respond to human rights risks and impacts</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes system for evaluation effectiveness of actions [Modern Slavery and Human Trafficking St 2020, 25/06/2021: bp.com] • Met: Example of lessons learned from evaluation effectiveness of actions [Slavery and human trafficking statement 2019, 06/2020: bp.com] Score 2 • Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions</td>
</tr>
<tr>
<td>B.2.5</td>
<td>Communicating on human rights impacts</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Provides two examples of comms with stakeholders [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] Score 2 • Not Met: Describes challenges to effective comms and how it is working to address them</td>
</tr>
<tr>
<td>C.1</td>
<td>Grievance mechanism(s) for workers</td>
<td>2</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all workers [Code of Conduct (Our Code), 01/01/2023: bp.com] Score 2 • Met: Grievance mechanism available in appropriate languages and workers made aware [Our approach to sustainability_web, N/A: bp.com] &amp; [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] • Met: Describes how workers in supply chain access grievance mechanism [Business and human rights policy, 05/2020: bp.com] • Met: Expects suppliers to convey expectation to their suppliers [Supplier Expectations, 2019: bp.com] &amp; [Business and human rights policy, 05/2020: bp.com]</td>
</tr>
<tr>
<td>C.2</td>
<td>Grievance mechanism(s) for external individuals and communities</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all external individuals and communities [Business and human rights policy, 05/2020: bp.com] Score 2 • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware [OpenTalk_web, N/A: secure.ethicspoint.com] &amp; [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] • Not Met: Describes how external individuals/communities access grievance mechanism [Business and human rights policy, 05/2020: bp.com] &amp; [Supplier Expectations, 2019: bp.com] • Not Met: Expects supplier to convey expectation to their suppliers [Business and human rights policy, 05/2020: bp.com] &amp; [Supplier Expectations, 2019: bp.com]</td>
</tr>
<tr>
<td>C.7</td>
<td>Remediying adverse impacts</td>
<td>1.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes approach taken to remedy adverse HRs impacts [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] Score 2 • Met: Describes changes to systems, processes and practices to prevent future impacts [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified</td>
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</table>
### CSI. Responsible lobbying and political engagement fundamentals

<table>
<thead>
<tr>
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</table>
| CSI.18         | Responsible lobbying and political engagement fundamentals | 0                | The individual elements of the assessment are met or not as follows: Score 1  
* Not Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Code of Conduct indicates: ‘In accordance with applicable laws, bp exercises its right to make its position known on relevant issues. As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not those of bp. [...] Ob...’ However, no further information found on the Company’s lobbying and political engagement approach. The subindicator looks for a publicly available policy statement setting out its lobbying and political engagement approach. [Code of Conduct (Our Code), 01/01/2023: [bp.com]]  
* Not Met: Publicly available policy statement that specifies the Company does not make political contributions: Regarding political contributions, the 2021 GRI Content Index indicates: ‘We prohibit the use of bp funds or resources to support any political candidate or party. We recognize the rights of our employees to participate in the political process and these rights are governed by the applicable laws in the countries where we operate’. However. Commitments are expected to be placed in formal policy documents. The Code of Conduct adds: ‘In accordance with applicable laws, bp exercises its right to make its position known on relevant issues. As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not those of bp. Do not use company funds or resources to support any political candidate or party. [...]’. However, the statement on not using funds or resources seems to refer to individuals, rather than the Company’s policy. This subindicator looks for a publicly available policy statement that specifies that the Company does not make political contributions. [2021 GRI Content Index, 03/2022: [bp.com]] & [Code of Conduct (Our Code), 01/01/2023: [bp.com]]  
Score 2  
* Not Met: Meets all requirements under score 1  
* Not Met: Disclosure of expenditures on lobbying activities  
* Not Met: Requirement for third-party lobbyists to comply with the Company’s lobbying and political engagement policy (or policies). |

### 2. Salient human rights risks (40% of total)
#### D. Indigenous Peoples’ and Affected Communities’ Rights

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<tr>
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</table>
| D.1.PD         | Commitment to respect indigenous peoples’ rights   | 0.5              | The individual elements of the assessment are met or not as follows: Score 1  
* Not Met: Commitment to respect indigenous peoples’ rights with explicit reference to UN Declaration: The Business and Human Rights Policy indicates: ‘We respect the rights of indigenous peoples (IPs) and, where they may be affected by our business activities, our approach and actions aim to be consistent with the principles set out in international standards for consultation and engagement with IPs, including the ILO’s Indigenous and Tribal Peoples Convention (ILO169), the UN Declaration on the Rights of Indigenous People (UNDRIP). Our guidance references IFC Performance Standard 7 and recognizes that it is important that we identify and consult with IPs, seeking to apply the principles of free, prior and informed consent (FPIC) where practical, ideally prior to the commencement of activities’. However, although there’s a commitment to respect the rights of indigenous peoples, the subindicator also expects a commitment to the UNDRIP, and the wording ‘aim to be consistent with’ is not considered a formal statement of commitment according to the methodology’s wording criteria. The subindicator looks for a commitment to respect indigenous peoples’ rights which is in line with international law and standards, through its own operations as well as its value chain. [Business and human rights policy, 05/2020: [bp.com]]  
Score 2  
* Not Met: Description of process for identifying indigenous persons and customary lands. |
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<thead>
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<tbody>
<tr>
<td>D.2.PD</td>
<td>Engagement with all affected communities</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<td><strong>Score 1</strong></td>
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<td>• Not Met: Describes how local communities identified and engaged in the last two years: The 2021 Sustainability Report indicates: ‘We engage with a range of stakeholders […]. Our engagement takes many different forms. […] We identify our main stakeholder groups as employees, investors and shareholders, customers, society, government and regulators, and supply chain partners. […] We engage regularly with employees through internal communications and ‘Pulse’ surveys’. The engagement with employees in 2021 entailed: ‘Weekly ‘Pulse Live’ surveys were sent to a representative sample of employees to gather continuous feedback. Our annual ‘Pulse’ survey was sent to all employees. Our businesses and leadership regularly communicated with employees through webcasts and virtual events’. However, although the Company explains how it engaged with workers, no further details found, including the process to identify and engage with other stakeholders, including communities or workers amongst extractive business partners. The 2022 Sustainability Report indicates: ‘Our OMS [operating management system] requires projects to identify, engage and consult with affected people and to seek feedback on our proposed or actual activities, potential impacts and mitigation measures’. It adds: ‘at our Fowler Wind Farm in Indiana, US, we engage regularly with over 500 families who live and work adjacent to the site. […] We have put in place formal and informal feedback mechanisms and we respond promptly to resolve any concerns raised’. Also, it provides details of a pilot project in Trinidad and Tobago: ‘In collaboration with our strategic partner […] we are working to assess the quality of our community relations. In Trinidad and Tobago we have piloted a framework for evaluating corporate performance from a community perspective. This pilot will inform our approach in other locations’. The 2021 Modern Slavery and Human Trafficking St indicates: ‘Our workforce includes bp employees and contractor workforces. […] [In response to COVID-19 restrictions] we have trialled some remote methodologies to assess suppliers and to interview workers. […] we have trialled a remote methodology for on-site assessment in Azerbaijan. This involved an experienced assessor remotely supporting an in-field team to help it engage with local management, review documents and carry out telephone interviews with workers. The trial identified and addressed a number of issues faced by workers that would have been difficult to identify through desktop review alone’. Finally, ‘We have also developed a ‘good worker interviews’ module, which was piloted in 2021. This will enhance our ability to engage more regularly with our contractor workforce on the ground and open up conversations to enable teams to identify issues and red flags that might require further investigation’. However, although the Company discloses different examples of recent engagement as well as that it indicates that identifying affected people is part of its OMS, no further description of the process by which identifies stakeholders with whom to engage, particularly local communities. [2021 Sustainability Report, 31/03/2022: bp.com] &amp; [2022 Sustainability Report, 2023: bp.com]</td>
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<td></td>
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<td>Met</td>
<td>Provides two examples of engagement with communities: The 2022 Sustainability Report indicates: ‘at our Fowler Wind Farm in Indiana, US, we engage regularly with over 500 families who live and work adjacent to the site. [...] We consider how the community may be impacted by our daily work. We have put in place formal and informal feedback mechanisms and we respond promptly to resolve any concerns raised’. Also, it also provides details of a pilot project in Trinidad and Tobago: ‘In collaboration with our strategic partner [...] we are working to assess the quality of our community relations. In Trinidad and Tobago we have piloted a framework for evaluating corporate performance from a community perspective. This pilot will inform our approach in other locations’. The 2021 Modern Slavery and Human Trafficking St adds: ‘Our workforce includes bp employees and contractor workforces. [...]’ [In response to COVID-19 restrictions] we have trialled some remote methodologies to assess suppliers and to interview workers. [...] we have trialled a remote methodology for on-site assessment in Azerbaijan. This involved an experienced assessor remotely supporting an in-field team to help it engage with local management, review documents and carry out telephone interviews with workers. The trial identified and addressed a number of issues faced by workers that would have been difficult to identify through desktop review alone’. Finally, ‘We have also developed a ‘good worker interviews’ module, which was piloted in 2021. This will enhance our ability to engage more regularly with our contractor workforce on the ground and open up conversations to enable teams to identify issues and red flags that might require further investigation’. [2022 Sustainability Report, 2023: bp.com] &amp; [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com]</td>
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<td></td>
<td></td>
<td>Not Met</td>
<td>Examples of engagement refer to marginalised groups and provide additional detail: The document bp backs Australia’s energy future explains its Asian Renewable Energy Hub (AREH) project in the Pilbara region of Western Australia, in indigenous land: ‘bp has completed the acquisition of a 40.5 percent equity stake and commenced operatorship of the Asian Renewable Energy Hub (AREH) project in the Pilbara region of Western Australia. [...] Subject to regulatory approvals and entering an Indigenous land use agreement with the Nyangumarta People based on the principle of free, prior and informed consent, the project plans to deliver onshore wind and solar power generation to produce green energy and produce hydrogen and ammonia’. The document Stretch Reconciliation Action Plan, for business partners Australia, indicates: ‘We are committed to respecting the rights of First Nations peoples and, where they may be affected by our business activities, our approach and actions aim to be consistent with the principles of free, prior and informed consent (FPIC) set out in international standards for consultation and engagement with First Nations peoples. [...] We recognise the cultural significance of Nyangumarta Country and with a dedicated Indigenous Engagement Manager we look forward to working alongside the Traditional Owners and local communities in the development of the 6,500-square kilometre site’. The Indigenous Engagement Manager is responsible of delivering various actions, including: ‘Continuously develop Indigenous Engagement Strategies to meaningfully engage with Aboriginal and Torres Strait Islander stakeholders and organisations in the communities where we operate. [...] Partner with Traditional Owners of lands on which we operate to develop commitments and programs that create value for communities. [...] Work with Aboriginal and Torres Strait Islander staff and Indigenous Business Resource Group (BRG) to continuously improve our anti-discrimination policy [...]’. The Company provided additional comments regarding how a gas plant in Indonesia is building connections with local communities. It has also made reference to the 2022 Diversity, equity and inclusion Report describing different actions of inclusion it carries out, for instance: building future women leaders in Singapore; the inclusion of 40 migrant in a skills workshop or its programme ‘Leadership Inclusion for Talent’, aimed at under-represented minority talents. However, no description found of how affected communities [of the engagements mentioned in the previous sub indicator, as well as in the engagement that took place in the AREH] were identified and if and how traditionally marginalised groups were included (for example, women, indigenous peoples, afro-descendants, religious minorities, people with disabilities, LGBTQIA+, children) [except in the AREH case]. [bp backs Australia’s energy future, N/A: bp.com] &amp; [2022 Diversity, equity and inclusion Report, 2023: bp.com]</td>
</tr>
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<td></td>
<td></td>
<td>Not Met</td>
<td>Analysis of stakeholder views on company’s HRs issues: The 2021 Sustainability Report indicates: ‘Employees told us that they believe we are progressing with our transformation, but some of them told us they do not fully understand our strategy’. However, although the Company provides a summary analysis of workers views, it is not clear how these views are connected to Human</td>
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</table>
| D.3.PD         | Benefit and ownership sharing policy | 0 | The individual elements of the assessment are met or not as follows: 
Score 1 
- Not Met: Commitment to identify benefit and ownership sharing 
- Not Met: Commitment includes right to decide own priorities for communities 
- Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing 
- Not Met: Disclosure how affected communities participated in decision-making |
| D.4.PD         | Local wind & solar energy access, affordability | 0 | The individual elements of the assessment are met or not as follows: 
Score 1 
- Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The 2022 Sustainability Report indicates: ‘We have a number of initiatives under way to help support access and affordability. In 2022 we launched our social investment policy, making access to affordable low carbon energy one of our focus areas for social investment activities where relevant. We reached an agreement with C-Quest Capital (CQC) to support the growth of its operations in India, where it is implementing projects focused on reducing carbon emissions and on giving Indian families access to sustainable energy services and clean energy technologies. One of the activities we are supporting through this partnership is a carbon offset project that aims to distribute up to 50 million efficient LED lightbulbs to Indian families living in poor rural areas. We are providing carbon finance and a long-term purchase agreement for carbon credits generated from this activity. In Angola we are supporting a CQC project that aims to deploy efficient cookstoves to 500,000 rural households. The project is expected to generate its first carbon credits in 2023, for which bp has a long-term purchase agreement. These CQC projects are designed to support several UN Sustainable Development Goals, including improved health, gender equality and affordable and clean energy. We are piloting methods to independently quantify and certify these co-benefits’. However, no evidence was found of actions taken including value chain: The 2022 Sustainability Report, 2023: bp.com |
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| E.2.PD         | Just and fair physical and economic displacement policy implementation including free, prior and informed consent | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: The Business and Human Rights Policy indicates: ‘We avoid involuntary resettlement of communities and/or individuals, but if this is not possible our guidance for where we need to access or acquire land for our operating activities is aligned with the principles outlined in International Finance Corporation (IFC) Performance Standard 5’. However, having a ‘guidance’ that is aligned to IFC PS 5 is not considered an equivalent to commit to follow IFC Performance Standard 5 (when physical and economic displacement for a project is determined to be necessary) as it seems to be used as ‘guidance’. This sub indicator looks for an explicit commitment to follow IFC PS 5 [Business and human rights policy, 05/2020: bp.com]  
• Not Met: Commitment not to relocate without FPIC and to providing compensation: The document Business and human rights policy indicates: ‘Our guidance references IFC Performance Standard 7 and recognizes that it is important that we identify and consult with IPs, seeking to apply the principles of free, prior and informed consent (FPIC) where practical, ideally prior to the commencement of activities’. However, ‘seeking to apply where practical’ is not considered a formal statement of commitment according to CHRB wording criteria. The sub indicator looks for a commitment to not relocate or displace affected communities without obtaining free, prior, and informed consent (FPIC) as well as to provide just and fair compensation, as agreed during the FPIC and resettlement process with relevant stakeholders. No further evidence found. [Business and human rights policy, 05/2020: bp.com]  
Score 2  
• Not Met: Publishes statistics on numbers affected by relocations (current and planned projects)  
• Not Met: Publishes regular reviews of living conditions after relocation  
• Not Met: Description of approach to physical and economic displacement |

**F. Security and conflict-affected areas (incl. responsible mineral sourcing)**

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</table>
| F.1.PD         | Operating in or sourcing from conflict-affected areas | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Commitment to heightened HRDD in conflict affected areas: The 2022 Voluntary Principles Annual Report indicates: ‘We also strengthened our security and human rights risk assessment process by introducing components of the Voluntary Principles Initiative Conflict Analysis Tool for Companies. As of January 2023, our teams have begun to assess conflict risks using this new process which will inform security responses and could help to reduce these risks while taking local conditions into account’. The document Improving People’s Lives discloses the Company’s 2025 targets on Just transition, including: ‘Security and human rights risk assessment with include conflict analysis’. However, this subindicator looks for an explicit commitment to address the heightened human rights risks associated with operations in or sourcing from conflict-affected and/or high-risk areas. No further evidence found. [2022 Voluntary Principles Annual Report, 2023: voluntaryprinciples.org] & [Improving People’s Lives, 2021: bp.com]  
• Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens  
Score 2  
• Not Met: How stakeholders are involved in the process to mitigate risks |
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</table>
| F.2.PD        | Evidence of security provider human rights assessments | 0.5 | The individual elements of the assessment are met or not as follows:  
  Score 1  
  • Not Met: Regularly conducts risk assessment regarding security forces: The Company has an Annual report on the Voluntary Principles on Security and Human Rights. The 2022 VPSHR Annual Report indicates: ‘we updated our security risk management process by introducing a new risk assessment tool (the tool is part of wider security risk management process and was deployed in 2022). It includes further verification of our private security contractors’ commitment to conduct security activities in line with our code and human rights policy. As of January 2023, our teams have begun using this tool to regularly evaluate and, where necessary, escalate concerns or risks to relevant stakeholders, including […] We also strengthened our security and human rights risk assessment process by introducing components of the Voluntary Principles Initiative Conflict Analysis Tool for Companies. As of January 2023, our teams have begun to assess conflict risks using this new process which will inform security responses and could help to reduce these risks while taking local conditions into account. Throughout 2022 bp continued to deliver VPSHR training and supported VPSHR risk assessments and in-country implementation processes in several countries including Azerbaijan, Georgia, Indonesia and Oman’. However, the Company is also expected to publicly report on its outcomes. No further evidence found. [2022 Voluntary Principles Annual Report, 2023: voluntaryprinciples.org]  
  Score 2  
  • Met: Commitment to Voluntary Principles on Security and HRs: BP is a signatory to the Voluntary Principles on Security and Human Rights. [Business and human rights policy, 05/2020: bp.com]  
  • Not Met: If applicable, discloses use of private security providers and uses only ICoCA members. If direct employment of security, commitment to follow ICoCA itself. |
| F.3.PD        | Responsible sourcing of minerals: Arrangements with suppliers | 0 | The individual elements of the assessment are met or not as follows:  
  Score 1  
  • Not Met: Statement on OECD Guidance aligned due diligence  
  • Not Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers  
  • Not Met: Describes work with suppliers on risk assessment and improving DD  
  Score 2  
  • Not Met: Disclosure of supply chain mapping |
| F.4.PD        | Responsible sourcing of minerals: Risk identification in mineral supply chains | 0 | The individual elements of the assessment are met or not as follows:  
  Score 1  
  • Not Met: Describes risk identification and disclosure in line with OECD Guidance: The 2022 Form SD indicates: ‘bp has implemented a conflict minerals compliance plan that is intended to ensure compliance with Rule 13p-1. bp has undertaken the following steps: […] Carried out a group wide review of bp’s products including a review of product databases which provide details of the composition of bp’s end products, in order to identify any that contain conflict minerals. The outcome of this review was that a conflict mineral was detected in an additive that was used in one of our lubricants products in 2022’. However, this subindicator looks for the description of its processes for identifying and prioritising risks and impacts in its supply chain as set out in the OECD Guidance in relation to renewable energies business (solar/wind). The Company is also expected to disclose the risks identified. [2022 Form SD, 2023: sec.gov]  
  Score 2  
  • Not Met: Expectation of suppliers to disclose supply chain mapping  
  • Not Met: Risk identification process covers all minerals |
| F.5.PD        | Responsible sourcing of minerals: Risk management in the mineral supply chain | 0 | The individual elements of the assessment are met or not as follows:  
  Score 1  
  • Not Met: Suppliers using minerals in equipment provided to describe steps taken to respond to risks in supply chain  
  • Not Met: Those suppliers to describe monitoring of risk prevention/mitigation measures  
  • Not Met: Those suppliers to disclose significant improvement over time  
  Score 2  
  • Not Met: How suppliers and affected stakeholders engaged on strategy  
  • Not Met: Processes cover all minerals |
### G. Protection of human rights and environmental defenders

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<th>Explanation</th>
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</table>
| G.1.PD         | Commitment to respect the rights of human rights and environmental defenders | 0.5 | The individual elements of the assessment are met or not as follows:  
- **Score 1:**  
  - **Met:** Zero tolerance of threats/attacks on HRDs: The Business and Human Rights Policy indicates: 'In respect of our activities, we will not tolerate or contribute to attacks, or physical or legal threats, against those safely and lawfully exercising their human right to freedom of expression, peaceful protest or assembly, including where they are acting as human rights defenders (HRDs)'. [Business and human rights policy, 05/2020: [bp.com]](bp.com)  
  - **Not Met:** Expectation on business partners in value chain to make this commitment  
- **Score 2:**  
  - **Not Met:** Description of how working with HRDs to create safe and enabling environment: The 2022 Sustainability Report indicates: ‘We are a member of several organizations that focus on supporting civil dialogue, transparency and capacity building, including [...] the Voluntary Principles on Security and Human Rights Initiative (VPI) and IPIECA. We are aware of the vulnerabilities of human rights defenders, including those who speak up for local communities near our operations. [...] Through the VPI and together with other organizations, including IPIECA, we are helping address these issues’. However, no description of the work carried out with human rights defenders [to create safe and enabling environments for civic engagement and human rights at local, national or international levels] found. [2022 Sustainability Report, 2023: [bp.com]](bp.com) |

### H. Labour rights (incl. protection against forced labour)

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<th>Explanation</th>
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</table>
| H.1.PD         | Health and safety | 0.5 | The individual elements of the assessment are met or not as follows:  
- **Score 1:**  
  - **Met:** Discloses quantitative H&S information (injury rates or lost days, and fatalities): The 2022 ESG Datasheet discloses figures on fatalities within its workforce in 2022: 2. As for the recordable injuries frequency for its workforce for the same time period: 80. [2022 ESG data, 2023: [bp.com]](bp.com)  
  - **Not Met:** Expectation extends to relevant business relationships: The Supplier Expectations indicates: ‘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’. However, it is not clear the Company expects all relevant suppliers, contractors, subcontractors, and other business relationships to disclose quantitative information on health and safety for its workers related to injury rates or lost days (or near miss frequency rate) and fatalities. [Supplier Expectations, 2019: [bp.com]](bp.com)  
- **Score 2:**  
  - **Met:** Sets targets for H&S performance (including injury rates or lost days and fatalities): The CEO’s letter [within the 2022 Sustainability Report] indicates: ‘We want zero accidents, zero people hurt - that will always be our goal’. The Report adds: ‘The aim we set in 2021, to eliminate fatalities, life-changing injuries and tier 1 process safety events, provided the basis for our strategic focus in 2022 along with our work to embed a consistent safety culture’. [2022 Sustainability Report, 2023: [bp.com]](bp.com) |
The 2022 Sustainability Report indicates: `We want to do better on safety performance and to help us do this we are making our OMS simpler, clearer and even more rigorous. These updates to our OMS will emphasize an even closer focus on human performance, our Safety Leadership Principles and the International Association of Oil & Gas Producers’ (IOGP) Life Saving Rules. [...] We deeply regret that in 2022 four people lost their lives while at work for bp. In February 2022 a contractor driving for Aral in Germany, lost his life in a vehicle collision on a highway. In April 2022 a specialist tank contractor lost his life in an explosion while repairing a tank at an Aral retail site in northern Germany. In September 2022 two bp employees lost their lives in a fire at our Toledo refinery in the US. [...] We recognize the value of industry standardization and consistent rules in our aim to improve our safety performance – for example, the IOGP Life Saving Rules. We continued rolling out and embedding these rules across our operating businesses in 2022, to supplement our existing safety practices and strengthen our OMS. We will continue this process in 2023. We also piloted the IOGP Process Safety Fundamentals, to improve awareness of process safety risks and highlight how our own processes can help us manage them. [...] We took action to improve safety for those driving on behalf of bp in several ways – for example, issuing a group-wide alert that emphasized how important it is to be aware of vulnerable road users. A second alert was issued to help improve contractors’ oversight processes for land transportation. We require all newly purchased or leased light vehicles used on behalf of bp to have a 5-star New Car Assessment Program safety rating (where available).` [2022 Sustainability Report, 2023: bp.com]

The individual elements of the assessment are met or not as follows:

**Score 1**

- **Not Met:** Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: The 2022 Sustainability Report indicates: ‘the S&SC [safety and sustainability committee] has oversight of Human Rights, including modern slavery’. The 2021 Annual Report adds: ‘The role of the Safety and Sustainability Committee (S&SC) is to oversee the execution and review the processes that are established and maintained by the leadership team to identify and mitigate significant non-financial risk’. The 2022 Modern slavery and human trafficking statement adds: ‘the Safety and Sustainability Committee of the BP p.l.c. board annually reviews our approach to assessing and managing risks associated with modern slavery, as part of our governance process’. The S&SC is a Board committee. However, it is not clear the Committee is tasked with oversight of its supply chain policies that addresses forced labour. Moreover, it is not clear how the experiences of affected workers or relevant stakeholders informed board discussions. No further evidence found. [2022 Sustainability Report, 2023: bp.com] & [Annual Report and Form 20-F 2021, 18/03/2022: bp.com]
- **Not Met:** Suppliers to have these arrangements in place
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<tr>
<td>H.3.PD</td>
<td>Prohibition of forced labour: Wage practices</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Requirements on paying in full and on time in supplier codes and contracts: The Supplier Expectations indicates: ‘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. [...] Workers do not suffer unlawful pay deductions, to secure a job or for continued service, nor disproportionate monetary penalties as a disciplinary measure’. The Labour Rights and Modern Slavery Principles notes: ‘The below principles are intended to assist our businesses as they work to check performance on this expectation, including with our contractors and suppliers’. It adds: ‘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. [...] Workers do not suffer unlawful pay deductions, to secure a job or for continued service, nor disproportionate monetary penalties as a disciplinary measure’. [Supplier Expectations, 2019: bp.com] &amp; [Labour rights and modern slavery principles 2019, 2019: bp.com]</td>
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The 2020 Modern Slavery and Human Trafficking St discloses various case studies related to modern slavery. For instance, in Port Klang Plant Malaysia: ‘The initial assessments in 2017 focused on the recruitment, hiring and employment of foreign migrant workers, but also identified issues in relation to Malaysian contract workers engaged on a casual basis with informal working arrangements. In recognition that this was not aligned with our labour rights and modern slavery principles, the business incorporated the expectations of the principles into tendering documents when the existing contracts expired. Only contractors who would provide more job security, formal employment contracts and related benefits were considered for the tender. As a result, more than 170 workers benefited from guaranteed monthly income, paid annual leave, sick pay and access to social insurance’. There is another example of the Company action on workforce grievances: ‘Via a programme of grievance mechanisms […] the business identified a number of workers who had repeatedly been paid late since COVID-19 had started, contributing to financial hardship for subcontractor businesses. Working with the relevant contractors, we developed a plan to bring all wage payments up to date, resulting in 87 workers being paid in the region of $94,400 in overdue wages. The team followed up with workers to check that they had received their monies, but also to understand the impact that the delays in repayment had on them’. In Oman Air business partners: ‘As part of bp’s systematic approach, the business carried out worker interviews and identified that 15 workers had not received salaries for the last three months. This was raised with the contractor who explained salary delays were a result of COVID-19 workflow disruption from other customers which had caused cash flow issues. The business worked with the contractor to repay workers outstanding salaries before authorising payment of the final invoice to the contractor’. The Company discloses other case studies in the more recent Statements, including complaints being remediated in Mexico and Azerbaijan [2021 Modern Slavery and Human Trafficking St], as well as the reimbursement of recruitment fees in Malaysia [2022 Modern Slavery and Human Trafficking St]. However, current evidence seems to be corrective actions in response to non-compliances or grievances raised. It is not clear how it proactively works with suppliers to pay workers in full and on time. [Modern Slavery and Human Trafficking St 2020, 25/06/2021: bp.com] & [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com]

Score 2
• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain
• Not Met: Analysis of trends demonstrating progress

The individual elements of the assessment are met or not as follows:
Score 1
• Met: Requirements on free movement in supplier codes and contracts: The Supplier Expectations indicates: ‘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. […] 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’. [Supplier Expectations, 2019: bp.com]
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| H.5.PD | Freedom of association and collective bargaining | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The 2020 Modern Slavery and Human Trafficking St discloses the example of Oman Khazzan & Ghazeer: ‘bp’s 2019 statement outlines the approach this business has taken to establish a workforce welfare programme. [...] The Oman business has worked with their contractors on a journey of continuous improvement for the workforce provided to the business. As a result, a comparison of induction statistics for the Oman business between 2017–2020 showed significant improvements made across the key areas of focus. For example, 96% of workers said they had an option to hold their passport compared to 81% in 2019 and 99% of workers reported not paying a recruitment fee in 2020. To achieve these changes bp has worked with its contractors over several years, who have had to make a number of updates to the way they recruit and employ workers. Improvements continue, for example this year a key construction contractor decided to enable workers to keep their own passports in a place they felt was safe. This was a fundamental change for the contractor, and it has updated its hiring polices at corporate level, not just for business partners. Activities on site are transitioning from the Project (construction) to operations phase, reducing the number and demographics of workers on site. The business recognises the importance of responsible demobilisation and continues to survey its workforce to make sure any concerns are captured and acted upon. However, evidence seems to relate exclusively to extractive business, not renewable. [Modern Slavery and Human Trafficking St 2020, 25/06/2021: bp.com]  
Score 2  
• Not Met: Describes working with suppliers on free movement of workers: The 2020 Modern Slavery and Human Trafficking St discloses the example of Oman Khazzan & Ghazeer: ‘bp’s 2019 statement outlines the approach this business has taken to establish a workforce welfare programme. [...] The Oman business has worked with their contractors on a journey of continuous improvement for the workforce provided to the business. As a result, a comparison of induction statistics for the Oman business between 2017–2020 showed significant improvements made across the key areas of focus. For example, 96% of workers said they had an option to hold their passport compared to 81% in 2019 and 99% of workers reported not paying a recruitment fee in 2020. To achieve these changes bp has worked with its contractors over several years, who have had to make a number of updates to the way they recruit and employ workers. Improvements continue, for example this year a key construction contractor decided to enable workers to keep their own passports in a place they felt was safe. This was a fundamental change for the contractor, and it has updated its hiring polices at corporate level, not just for business partners. Activities on site are transitioning from the Project (construction) to operations phase, reducing the number and demographics of workers on site. The business recognises the importance of responsible demobilisation and continues to survey its workforce to make sure any concerns are captured and acted upon. However, evidence seems to relate exclusively to extractive business, not renewable. [Modern Slavery and Human Trafficking St 2020, 25/06/2021: bp.com]  
• Not Met: Assessment of scope of restriction in supply chain  
• Not Met: Capacity building to enable suppliers to cascade forced labour policies down supply chain: The 2020 Modern Slavery and Human Trafficking St indicates: ‘Our training and capability building activities include: ‘Improving site and contractor understanding of our labour rights and modern slavery principles and of their role in promoting them. This includes awareness on ethical recruitment, including the employer pays principle, the need to identify any recruitment fees that might have been paid and to reimburse, as appropriate – as well as not withholding worker passports. We know that early engagement with our contractors, suppliers and joint ventures, before undertaking labour rights risk assessments, is important in building awareness and capability to support preventative, corrective or remedial actions. Securing reimbursement of recruitment fees is an ongoing challenge but one we continue to tackle through dialogue, setting our expectations pre-contract and discussing solutions at industry level’. The 2021 Modern Slavery and Human Trafficking St adds: ‘LRMS was discussed at contract forums in Oman, Azerbaijan and Trinidad & Tobago during 2021, to help explain bp’s expectations and understand efforts already underway in our contractor base. Around 300 contractors attended these events’. However, it is not clear it engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or that it trains suppliers below the first tier on such policies in the renewable energy sector. Moreover, the Company is expected to provide evidence that it measures the effectiveness of this capacity building. [Modern Slavery and Human Trafficking St 2020, 25/06/2021: bp.com] & [2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com]  
<p>| bp.com | bp.com | bp.com | bp.com |</p>
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<tbody>
<tr>
<td>H.6.PD</td>
<td>Living wage (in supply chains)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1</td>
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## I. Right to a healthy and clean environment

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<tr>
<td>I.1.PD</td>
<td>Environmental impact assessment and remediation</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1</td>
</tr>
<tr>
<td>I.2.PD</td>
<td>Life cycle assessment</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1</td>
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## J. Transparency and anti-corruption

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</table>
| J.1.PD         | Anti-corruption due diligence and reporting | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Commitment to prohibiting bribes to public officials: The Code of Conduct indicates: ‘We do not tolerate bribery and corruption in any form in our business. Comply with anti-bribery and corruption laws, regulations and bp anti-bribery and corruption requirements and support efforts to eliminate bribery and corruption worldwide. Work to make sure that our business partners share and comply with our requirements. Do not offer or accept bribes, kickbacks or any other kind of improper payment, including facilitation payments. Keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes’. However, it is not clear it commits to prohibiting bribes to public officials. [Code of Conduct (Our Code), 01/01/2023: bp.com]  
• Not Met: Expectation extends to relevant business relationships: The Supplier Expectations indicates: ‘Promote transparency and accountability in the conduct and administration of business including having in place effective processes and procedures to proactively prevent: 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. Money laundering, including the act of hiding illegal funds [...] or giving such funds apparent legitimacy. [...] 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-sided’. However, it is not clear the Company expects business partners to commit to the principles outlined in the OECD Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions including, at a minimum, prohibiting bribes to foreign public officials. [Supplier Expectations, 2019: bp.com]  
Score 2  
• Not Met: Reports on any complaints on corruption and bribery: The 2022 Sustainability report indicates: ‘As in 2021 the most frequently raised concerns related to bullying, harassment and discrimination, with these accounting for nearly half of all concerns. The second most common issue was alleged fraud’. However, no further information regarding any corruption or bribery complaints or concerns received via its grievance mechanism/channels for internal and external individuals and communities found. [2022 Sustainability Report, 2023: bp.com]  
• Not Met: Reports that no such complaints were made |
| J.2.PD         | Payments to governments & contract transparency | 0.5 | The individual elements of the assessment are met or not as follows: Score 1  
• Met: Publishing a tax CbCR in line with GRI 207-4, or discloses payments made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects: The Company reports annually on payments to governments. It indicates: ‘BP p.l.c. has prepared the following consolidated report (‘Report’) on payments to governments in accordance with the Reports on Payments to Governments Regulations [...]. The Regulations require payments to be reported by project’. It includes a reporting on ‘Fees’, which the Company defines by: ‘In preparing this Report, bp has included licence fees, rental fees, entry fees and all other payments that are paid in consideration for new and existing licences and/or concessions. Fees paid to governments for administrative services are excluded’. In the 2023 Assessment of EITI supporting companies, when asked the question ‘Are the disclosures disaggregated by project?’, the answer is ‘yes’. It adds the following comment: ‘bp discloses taxes and payments to governments in non-EITI implementing countries. [...] The company discloses taxes and payments to governments disaggregated by project’. However, no information found on the payments made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects. The company however publishes a Tax Report, including a CbCR - in line with GRI 207-4. In future assessments, the Company will be expected to demonstrate it publishes a tax CbCR and a report on its payments to governments at project level, including for purchase or rent of land or natural resources related to its renewable energy projects [2021 Report on payments to Governments, 2022: bp.com] & [2022 Tax Report, 2023: bp.com]  
• Not Met: Disclosure of terms, contracts, agreements for those payments |
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<td>Score 2</td>
<td>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI: The 2022 Sustainability Report indicates: ‘We support transparency about the flow of revenue from our oil and gas activities to governments through EITI, which supports the disclosure of payments made to, and received by governments in relation to oil, gas and mining’. However, this sub indicator looks for a publicly declaration of support for governments to publicly disclose contracts and licenses that govern renewable energy projects, in specific, in line with the EITI Standard. No further evidence found. [2022 Sustainability Report, 2023: bp.com]</td>
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**K. Diversity, equality and inclusion**

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<tbody>
<tr>
<td>K.1.PD</td>
<td>Diversity, equality &amp; inclusion training for management and employees</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<td>Score 1</td>
<td>• Not Met: Provides mandatory and regular training as per ILO No 190: The 2022 Sustainability Report indicates: ‘Our workforce DE&amp;I [diversity, equity and inclusion] highlights included: […] Continuing the roll-out of our Race4Equity training programme which is now mandatory for employees in the US and UK, having been delivered to more than 90% of our most senior leaders’. Similarly, the 2022 Diversity, Equity and Inclusion Report notes its progress in 2022: ‘Race4Equity training completion’. It explains the Race4Equity training: ‘[it] explores concept such as meritocracy, allyship and the origins of race’. It adds: ‘almost 100% of our group and senior leaders who assigned the programme have completed it […]. Around 7,000 employees at first level leader and below have completed the programme since April 2022 […]. The programme is now mandatory for employees in the US and UK’. However, it is not clear DE&amp;I provided is mandatory and regular beyond US and UK. The training should be according to the ILO Convention 190, to its staff on all types of contracts on equality, equity, diversity, anti-discrimination (including gender-based violence), and the Company’s policies and mechanisms for addressing it. [2022 Sustainability Report, 2023: bp.com] &amp; [2022 Diversity, equity and inclusion Report, 2023: bp.com]</td>
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<td>Score 2</td>
<td>• Not Met: Requires suppliers to do the same</td>
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<td>• Not Met: Provides materials and access to resources for trainings</td>
<td></td>
</tr>
<tr>
<td>K.2.PD</td>
<td>Gender balance and sensitivity</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<td>Score 1</td>
<td>• Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain</td>
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<td>• Not Met: Demonstrates progress through annual reporting</td>
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<td>Score 2</td>
<td>• Met: Women and non-binary people make up at least 40% of the Company’s board of directors and executives, or executive board: The 2022 Diversity, Equity and Inclusion Report discloses data on its leadership team composition for 2022: Female – 55%, male – 45%. As for Board composition: Female – 46%, male – 54%. [2022 Diversity, equity and inclusion Report, 2023: bp.com]</td>
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| K.3.PD         | Gender wage gap reporting | 0 | The individual elements of the assessment are met or not as follows: |
|                |                | Score 1         | • Not Met: Has closed gender wage gap: The 2022 UK Gender and Ethnicity Pay Gap Report discloses gender pay gap figures: ‘2022 mean gender pay gaps [in the UK] (%): 12.5 bp oil; 14.9 bp exploration; 27.1 bp pulse; 14.9 bp plc; 3.8 bp express shopping. It has not closed the gender wage gap. Evidence is expected to be Company wide. [2022 UK Gender and Ethnicity Pay Gap Report, 2023: bp.com] |
|                |                | • Not Met: Timebound commitment to close gender wage gap: The 2022 UK Gender and Ethnicity Pay Gap Report indicates: ‘We have committed to an ambition of gender parity for the top levels of leadership (top 120 roles) by 2025 and an ambition of parity for all executive level employees (group leaders) by 2030. And we have committed to an ambition of 40% female representation for the next layer of senior leadership (senior level leaders) by 2030. Our understanding of gender identity is evolving and our ambitions will reflect this over time’. However, this commitment seems to be limited to leading and senior positions. Moreover, it is not clear this commitment goes beyond the UK context. [2022 UK Gender and Ethnicity Pay Gap Report, 2023: bp.com] |
|                |                | • Not Met: Reports information at company level across multiple pay bands: As indicated above, the 2022 UK Gender and Ethnicity Pay Gap Report discloses gender pay gap figures: ‘2022 mean gender pay gaps [in the UK] (%): 12.5 bp oil; 14.9 bp exploration; 27.1 bp pulse; 14.9 bp plc; 3.8 bp express shopping. However,
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| no report on wage gap information at the Company level across multiple pay bands found. | [2022 UK Gender and Ethnicity Pay Gap Report, 2023: bp.com]  
Score 2  
* Not Met: Expects business relationships to do the same |

**JT. Just transition³**

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| JT.1           | Fundamentals of social dialogue and stakeholder engagement in a just transition | 1                | The individual elements of the assessment are met or not as follows:  
• Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations  
• Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.  
• Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition.  
• Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition. |
| JT.2           | Fundamentals of just transition planning                                       | 0.5              | The individual elements of the assessment are met or not as follows:  
• Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.  
• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers.  
• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders  
• Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships. |
| JT.3.PD        | Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce | 1.5              | The individual elements of the assessment are met or not as follows:  
• Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.  
• Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders.  
• Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.  
• Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups. |
| JT.4.PD        | Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce | 1                | The individual elements of the assessment are met or not as follows:  
• Met: Public commitment to re-and/or up-skilling workers displaced by the transition to a low carbon economy.  
• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.  
• Met: Demonstrates measures taken to provide re-and/or up-skilling, training or education opportunities for relevant stakeholders.  
• Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups. |
| JT.5.PD        | Fundamentals of social protection and social impact management for a just transition | 0                | The individual elements of the assessment are met or not as follows:  
• Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.  
• Not Met: Discloses its processes for identifying impacts of low carbon transition on workers’ and affected stakeholders’ social protection.  
• Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers’ social protection.  
• Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders’ social protection. |

³ Assessment for this sub section has been conducted by the World Benchmarking Alliance, see: [https://www.worldbenchmarkingalliance.org/publication/oil-and-gas/](https://www.worldbenchmarkingalliance.org/publication/oil-and-gas/)
<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| JT.6.PD        | Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition | 0.5 | The individual elements of the assessment are met or not as follows:  
- **Met:** Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.  
- **Not Met:** Discloses where its lobbying activities do not align with policies and regulation that support the just transition.  
- **Not Met:** Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.  
- **Not Met:** Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection |

### M. Responses to Serious Allegations (20% of total)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>M(1).0</td>
<td>Serious allegation No 1</td>
<td></td>
<td>No allegations meeting the REB severity threshold were found</td>
</tr>
</tbody>
</table>

**Disclaimer**

This scorecard is based on assessments of publicly available documents on companies’ websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates are not included for this year’s Benchmark. As such this scorecard should be seen as a reflection of feedback received as of September 2023.  

The use of the label “Not met” in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates. While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating andremedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.  

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for electric utilities and oil and gas companies, based on the World Benchmarking Alliance’s Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores as indicators have been tailored to reflect their position in renewable energy value chains.  

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology. BHRRC does not make any guarantee or other promise, representation, or warranty as to the truth, accuracy, reliability or completeness of the statements of fact contained herein, or any results that may be obtained from them, or any statements of opinion, analysis, opinions, advice, and/or recommendations.  

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1 Cut-off dates: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.

2 Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.