



# Renewable Energy & Human Rights Benchmark 2023 Company Profile

Company name bp

Sub-sectorProject developerOverall score30.4 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: <u>business-humanrights.org</u>

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)<sup>†</sup>

#### A. Policy commitments and governance

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

<sup>\*</sup> For information on the ACT methodology and scoring criteria please refer to the World Benchmarking Alliance.

<sup>&</sup>lt;sup>†</sup> 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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to remedy	2	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: <a href="mailto:bp.com">bp.com</a> ]
			• 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: <a href="mailto:bp.com">bp.com</a> ]
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1
	Trom the top		Met: Board level responsibility for HRs [2022 Sustainability Report, 2023: bp.com]
			Not Met: Describes HRs expertise of Board member [2022 Sustainability Report,
			2023: <u>bp.com</u> ] & [Corporate governance_web, N/A: <u>bp.com</u> ]
			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: <a href="mailto:linkedin.com"><u>ihrb.org</u></a> ] & [Human Rights Day_Linkedin, N/A: <a href="mailto:linkedin.com"><u>linkedin.com</u></a> ]

#### B Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility	1.5	The individual elements of the assessment are met or not as follows:
	and resources		Score 1
	for day-to-day		• Met: Score of 1 on A.1.2.a
	human rights		• Met: Senior responsibility for HRs implementation and decision making [Business
	functions		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: <u>bp.com</u> ] & [Human Rights_web, N/A:
			<u>bp.com</u> ]
			• Met: Day-to-day resources and expertise allocation in own operations [Business
			and human rights policy, 05/2020: <a href="mailto:bp.com">bp.com</a> ] & [2022 Sustainability Report, 2023:
			<u>bp.com</u> ]
			• Not Met: Resources and expertise allocation in supply chain [2022 Sustainability
			Report, 2023: bp.com] & [2021 Modern Slavery and Human Trafficking St,
			24/06/2022: <u>bp.com</u> ]
B.2.1	Identifying	1.5	The individual elements of the assessment are met or not as follows:
	human rights		Score 1
	risks and		• Met: Describes process of identifying risks in own operations [2021 Modern
	impacts		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 global risk identification system incl. stakeholder consultation
			[2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] & [2022
			Sustainability Report, 2023: <u>bp.com</u> ]
İ			• Met: Describes how risk identification system is triggered by new circumstances
			[2021 Modern Slavery and Human Trafficking St, 24/06/2022: bp.com]
			• Not Met: Describes risks identified in relation to new circumstances [2022
			Voluntary Principles Annual Report, 2023: <u>voluntaryprinciples.org</u> ]
B.2.2	Assessing human	1	The individual elements of the assessment are met or not as follows:
	rights risks and		Score 1
	impacts		• Met: Describes assessment process and discloses salient HRs risks [2021 Modern
			Slavery and Human Trafficking St, 24/06/2022: <u>bp.com</u> ] & [Modern Slavery and
			Human Trafficking St 2020, 25/06/2021: <a href="mailto:bp.com">bp.com</a> ]
			• Met: Describes how process applies to supply chain [Modern Slavery and Human
			Trafficking St 2020, 25/06/2021: <a href="mailto:bp.com">bp.com</a> ] & [Business and human rights policy,
			05/2020: <u>bp.com</u> ]
			Not Met: Public disclosure of results of HRs risk assessment
			Score 2
			Not Met: Meets all requirements under score 1
			Not Met: Describes how assessment involved affected stakeholders [2022]
			Sustainability Report, 2023: <u>bp.com</u> ] & [2021 Modern Slavery and Human
			Trafficking St, 24/06/2022: <u>bp.com</u> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and	0	The individual elements of the assessment are met or not as follows:
	acting on human		Score 1
	rights risks and		Not Met: Describes system to prevent, mitigate and remediate HRs issues [2021]
	impact		Modern Slavery and Human Trafficking St, 24/06/2022: bp.com] & [2022
	assessments		Sustainability Report, 2023: <u>bp.com</u> ]
			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
B.2.4	Tracking the	1	The individual elements of the assessment are met or not as follows:
	effectiveness of		Score 1
	actions to		Met: Describes system for evaluation effectiveness of actions [Modern Slavery
	respond to		and Human Trafficking St 2020, 25/06/2021: bp.com]
	human rights		Met: Example of lessons learned from evaluation effectiveness of actions
	risks and		[Slavery and human trafficking statement 2019, 06/2020: bp.com]
	impacts		Score 2
			Met: Meets all requirements under score 1
			Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating	1	The individual elements of the assessment are met or not as follows:
	on human rights		Score 1
	impacts		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

### C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s)for workers	2	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] & [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] & [Business and human rights policy, 05/2020: bp.com]
C.2	Grievance mechanism(s) for external individuals and communities	1	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] & [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] & [Supplier Expectations, 2019: bp.com]  • Not Met: Expects supplier to convey expectation to their suppliers [Business and human rights policy, 05/2020: bp.com] & [Supplier Expectations, 2019: bp.com]
C.7	Remedying adverse impacts	1.5	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 Traffecking 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

### **CSI.** Responsible lobbying and political engagement fundamentals

Indicator Code	Indicator name	Score (out of 2)	Explanation
CSI.18	Responsible lobbying and political engagement fundamentals	O O	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. [] Obtain approval before engaging in any lobbying activities'. 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 20210 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 publi
			<ul> <li>Not Met: Meets all requirements under score 1</li> <li>Not Met: Disclosure of expenditures on lobbying activities</li> <li>Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)</li> </ul>

## 2. Salient human rights risks (40% of total)

### D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Commitment to FPIC (in line with ILO No.169): The 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 [Indigenous Peoples], seeking to apply the principles of free, prior and informed consent (FPIC) where practical, ideally prior to the commencement of activities'. However, no description of the process for determining who is an indigenous person and what constitutes customary, ancestral, or collective lands, territories, and resources found. It adds: '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 the methodology's wording criteria. [Business and human rights policy, 05/2020: bp.com]  • Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: 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 bydrogen and apmonic' [hp backs Australia's energy future N/A: hp com]
D.2.PD	Engagement with all affected communities	0.5	hydrogen and ammonia'. [bp backs Australia's energy future, N/A: bp.com]  The individual elements of the assessment are met or not as follows:  Score 1  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 loca

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: 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: <u>bp.com</u> ] & [2021 Modern Slavery and Human Trafficking St, 24/06/2022: <u>bp.com</u> ]
			Not Met: 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. [] Engage 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, LGBTQA+,
			children) [except in the AREH case]. [bp backs Australia's energy future, N/A:
			bp.com] & [2022 Diversity, equity and inclusion Report, 2023: bp.com] Score 2
			Not Met: Analysis of stakeholder views on company's HRs issues: The 2021     Sustainability Report indicates (Taxabayas told us that they halisy a way are
			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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Rights issues. In addition, in case of individual group inputs, another extra case would be expected in order to award this subindicator. The 2022 Sustainability Report, explains the pilot project in Trinidad and Tobago. However, no summary analysis of the input/views given by stakeholders on human rights issues found. The 2021 Modern Slavery and Human Trafficking St discloses assessment tools and examples of findings in its assessments in 18 operated businesses: 'Top three onsite monitoring activities used were site walkovers and worker interviews, payroll checks and checks on working hours and overtime. These identified risks in wages, employment terms, working hours and discrimination'. However, it is not clear the specific outcomes of its engagement with workers, as it indicates that the findings came from three different activities. [2021 Sustainability Report, 31/03/2022: bp.com] & [2022 Sustainability Report, 2023: bp.com]  • Not Met: Describes how stakeholders views influenced company's HRs approach: The 2021 Sustainability Report indicates how these views have influenced their actions: 'We launched a strategy education campaign and also identified focus areas to build on, strengths that influence engagement, key emerging concerns to address and ways to build greater inclusion'. However, although the Company describes actions taken as a result of workers' feedbacks, it is not clear how these are connected to Human Rights issues. The 2021 Modern Slavery and Human Trafficking St discloses assessment tools and examples of findings in its assessments in 18 operated businesses: 'These identified risks in wages, employment terms, working hours and discrimination'. However, no further description found of how these views have influenced the development or monitoring of its human rights approach. [2021 Sustainability Report, 31/03/2022:
			bp.com] & [2021 Modern Slavery and Human Traffecking St, 24/06/2022: bp.com]
	ownership sharing policy		Score 1  Not Met: Commitment to identify benefit and ownership sharing  Not Met: Commitment includes right to decide own priorities for communities Score 2  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. [2022 Sustainability Report, 2023: bp.com]  Not Met: Including a timebound actions plan and reporting targets: No timebound action plan and reporting on targets developed in consultation with communities including marginalised groups at heightened risk of energy poverty, including also the value chain was found Score 2  Not Met: Public support for government policies addressing energy access

# E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land	0	The individual elements of the assessment are met or not as follows:
	and natural		Score 1
	resource tenure		• Not Met: Commitment to respect land ownership/natural resources as in VGGT.
	rights		Discloses how identifies legitimate tenure holders.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Not Met: Disclosure of locations of projects including numbers in urban, rural, natural areas</li> <li>Score 2</li> <li>Not Met: Extends expectation to business relationships</li> <li>Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose</li> </ul>
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 PS5 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 PS5 [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: Description of approach to physical and economic displacement

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or	0	The individual elements of the assessment are met or not as follows:
	sourcing from		Score 1
	conflict-affected		Not Met: Commitment to heightened HRDD in conflict affected areas: The 2022
	areas		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

Indicator name	Score (out of 2)	Explanation
Evidence of security provider human rights assessments	O.5	Explanation  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 reports 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
Responsible sourcing of	0	ICoCA members.  If direct employment of security, commitment to follow ICoCA itself.  The individual elements of the assessment are met or not as follows:  Score 1
minerals: Arrangements with suppliers		<ul> <li>Not Met: Statement on OECD Guidance aligned due diligence</li> <li>Not Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers</li> <li>Not Met: Describes work with suppliers on risk assessment and improving DD Score 2</li> <li>Not Met: Disclosure of supply chain mapping</li> </ul>
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
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
	Responsible sourcing of minerals: Arrangements with suppliers  Responsible sourcing of minerals: Arrangements with suppliers  Responsible sourcing of minerals: Risk identification in mineral supply chains	Responsible sourcing of minerals: Risk identification in mineral supply chains  Responsible sourcing of minerals: Risk identification in mineral supply chains  Responsible sourcing of minerals mith suppliers  Responsible sourcing of minerals: Risk identification in mineral supply chains

### **G.** Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Commitment to	0.5	The individual elements of the assessment are met or not as follows:
	respect the rights		Score 1
	of human rights		Met: Zero tolerance of threats/attacks on HRDs: The Business and Human Rights
	and		Policy indicates: 'In respect of our activities, we will not tolerate or contribute to
	environmental		attacks, or physical or legal threats, against those safely and lawfully exercising
	defenders		their human right to freedom of expression, peaceful protest or assembly, including
	40.040.0		where they are acting as human rights defenders (HRDs)'. [Business and human
			rights policy, 05/2020: 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: <u>bp.com</u> ]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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]
			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]
			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: <u>bp.com</u> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Met targets or explains why not or how improve H&S management systems: 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]
H.2.PD	Forced labour risk management	0.5	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]

ced labour in own ops fficking St indicates:
·
fficking St indicates:
procurement processes
n rights questionnaires.
olementation of the
ided in our OMS
of bp teams with
and communities'.
, people and culture,
ind some also received
Trafficking St notes:
awareness-raising
ent in 2020. This
aimed at people who
as, HSE&C, human
wareness of labour
increased worker
in our industry or
vides role specific
ge the risks of modern
asures and remedies'.
s various examples of
r different range of
rums in Azerbaijan and
ons and to understand
200 contractor
ery and Human
and human trafficking
ationship: The 2020
indard contract
tly with our code and
ct in a manner
tions, we look to work
pple affected. If a
e reserve the right to
support[s] the
odern Slavery and
s follows:
er codes and contracts:
me, as per employment
num, national legal
orded through a time
ductions, to secure a job
nalties as a disciplinary
notes: 'The below
k to check performance
oliers'. It adds: 'Workers
s and overtime rates
and hours worked are
rkers do not suffer
ervice, nor
ure´. [Supplier
lavery principles 2019,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time: 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 b</li></ul>
H.4.PD	Prohibition of forced labour: Restrictions on workers	0.5	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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• 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]  Score 2  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 include
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 Statement indicates: 'Our standard contract template require contractors and suppliers to act consistently with our code and Human Rights policy'. The Business and Human Rights Policy states: 'we respect freedom of association and collective bargaining. [] We will abide by applicable domestic laws concerning non-interference in our workers' right to form or join a trade union or to bargain collectively, as well as their right not to do so. Where our employees wish to be represented by trade unions or works councils, we will co-operate in good faith with the bodies that our employees collectively choose to represent them. In situations where freedom of association is restricted or prohibited by law, we will be open to and supportive of alternative means of worker representation and engagement'. The document BP's Expectation of its Suppliers adds: 'There is no discrimination in employment practices based on [] union membership [] 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'. [Supplier Expectations, 2019: bp.com] & [Business and human rights policy, 05/2020: bp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Describes work with suppliers on FoA/CB: Regarding union engagement, the 2022 Sustainability Report indicates: 'We support our employees' right to make a fully informed choice for collective representation and we work hard to build constructive relationships with unions and works councils. In 2022, we reached contract agreements with unions across a number of our manufacturing sites. We also worked with European Works Council leaders to jointly develop a new contract that will better serve bp and our employees in the European Union in future'. However, although the Company discloses some of its efforts in relation to freedom of association and collective bargaining, no evidence found on how it works to support its suppliers on the same matter. [2022 Sustainability Report, 2023: <a href="bp.com">bp.com</a> ] Score 2  Not Met: Assessment of scope of restriction of FoA/CB in supply chain  Not Met: Analysis of trends demonstrating progress
H.6.PD	Living wage (in supply chains)	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Requirements on living wage in supplier codes and contracts  Not Met: Describes work with suppliers on living wage, beyond tier 1 suppliers  Score 2  Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions

### I. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Environmental	0.5	The individual elements of the assessment are met or not as follows:
	impact		Score 1
	assessment and		Met: Conducts public EIA and CIA for renewable energy projects: The Business
	remediation		and Human Rights Policy indicates: 'We work to embed human rights into
			environmental and social impact assessments, or undertake independent
			assessments of potential adverse human rights impacts, as appropriate'. The
			Company's webpage indicates: 'bp and EnBW have submitted their Environmental
			Impact Assessment (EIA) scoping request for the Morgan wind farm's generation
			assets to the Planning Inspectorate. This is the next step in delivering this project
			which is expected to provide up to 1.5GW of clean energy []. The report explains
			how we will go about assessing and understanding any potential impacts the
			project may have on the environment'. The EIA contains a session on 'Cumulative
			effects assessment'. However, although the Company provides an example of EIA,
			which includes a Cumulative effects assessment, it is not clear it undertakes both
			public environmental impact assessments and cumulative impact assessments for
			all its renewable energy projects. In future assessments, the Company will also be
			expected to explain or demonstrate under what circumstances it undertakes
			Cumulative Impact Assessments for its renewable energy projects in order to meet
			this criteria. [Business and human rights policy, 05/2020: <u>bp.com</u> ] & [bp and EnBW
			submit EIA - Morgan wind farm_web, 15/06/2022: enbw-bp.com
			Not Met: Assessments comply with Espoo Convention and/or the EU
			Environmental Impact Assessment Directive and fulfil certain standards
			Score 2
			Not Met: Reports on compliance with government-mandated remediation fund
			requirements: The 2022 Annual Report indicates: 'Environmental laws also require
			bp to remediate and restore areas affected by the release of hazardous substances
			or hydrocarbons associated with our operations or properties. These laws may
			apply to sites that bp currently owns or operates, sites that it previously owned or
			operated, or sites used for the disposal of its and other parties' waste. []
			Additions to our environmental remediation provision reflect new liabilities and
			scope/cost reassessments of the remediation plans of a number of our sites in the
			US and Europe. The charge for environmental remediation provisions in 2022
			arising from new sites was \$67 million (2021 \$33 million and 2020 \$8 million)'.
			However, it is not clear it includes renewable projects. [2022 Annual Report,
			10/03/23: <u>bp.com</u> ]
			Not Met: Reports on how an entity guarantees payment for environmental
1.2.00	I if a social a	0	restoration or compensation
I.2.PD	Life cycle	0	The individual elements of the assessment are met or not as follows:
	assessment		Score 1
			Not Met: Expectation for suppliers to conduct regular public life cycle     accessments (including risks soleted to row material sourcing waste, and
			assessments (including risks related to raw material sourcing, waste, and
			decommissioning)
			Score 2
			Not Met: Requires suppliers to have action plans to address adverse impacts
			identified

### J. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
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-timed'. 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 o
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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • 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]

#### K. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Diversity, equality & inclusion training for management and employees	0	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Provides mandatory and regular training as per ILO No 190: The 2022  Sustainability Report indicates: 'Our workforce DE&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&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] & [2022 Diversity, equity and inclusion Report, 2023: bp.com]  Score 2  Not Met: Requires suppliers to do the same  Not Met: Provides materials and access to resources for trainings
K.2.PD	Gender balance and sensitivity	0.5	The individual elements of the assessment are met or not as follows:  Score 1  Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain  Not Met: Demonstrates progress through annual reporting  Score 2  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]
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,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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 transition<sup>‡</sup>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 reand/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-skills 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 upskilling, 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.

<sup>‡</sup> Assessment for this sub section has been conducted by the World Benchmarking Alliance, see: <a href="https://www.worldbenchmarkingalliance.org/publication/oil-and-gas/">https://www.worldbenchmarkingalliance.org/publication/oil-and-gas/</a>

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.6.PD	Fundamentals of	0.5	The individual elements of the assessment are met or not as follows:
	advocacy for		• Met: Discloses process(es) for aligning its lobbying activities with policies and
	policies and		regulation supporting the just transition.
	regulation on		• Not Met: Discloses where its lobbying activities do not align with policies and
	green and decent		regulation that support the just transition.
	job creation,		• Not Met: Discloses action plan addressing misalignment of lobbying activities
	employee		with policies and regulation that support just transition.
	retention,		• Not Met: Demonstrates lobbying for just transition and regulations enabling
	education and		green and decent jobs, reskilling and/or social protection
	reskilling, and		
	social protection		
	supporting a just		
	transition		

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

			•
Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation		No allegations meeting the REB severity threshold were found
	No 1		

#### **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<sup>5</sup> 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 and remedying 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 within, or any results that may be obtained from using its content. BHRRC does not have any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies. That said, the assessment process has been conducted by BHRRC and its research partner the EIRIS Foundation in good faith and in the spirit of dialogue and cooperation.

Neither this content, nor any examples cited, constitute investment advice, nor should it be used to make any investment decision without first consulting one's own financial advisor and conducting one's own research and due diligence. BHRRC does not receive any payment, compensation, or fee for the use or citation of any information included in this content. To the maximum extent permitted by law, BHRRC disclaims any and all liability in the event any information, commentary, analysis, opinions, advice, and/or recommendations prove to be inaccurate, incomplete, or unreliable, or result in any investment or other losses. We reserve the right to disallow users from further using our data if, in our assessment, these are used to attempt, perpetuate, or cause harm and violations of human rights.

This work is the product of the Business & Human Rights Resource Centre, licensed under a Creative Commons <a href="Attribution-NonCommercial-ShareAlike 4.0">Attribution-NonCommercial-ShareAlike 4.0</a> International License. Commercial use of this material or any part of it will require a license. Those wishing to commercialise the use of this work should contact the Business & Human Rights Resource Centre.

Indicators in Themes A, B, C, L and first section of M and Low-Carbon Transition scores (ACT) are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution 4.0 International License. To view a copy of this license, visit <a href="https://creativecommons.org/licenses/by/4.0/">https://creativecommons.org/licenses/by/4.0/</a>

<sup>&</sup>lt;sup>§</sup> 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.

<sup>\*\*</sup> Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.