



# Modern Slavery and Human Trafficking Statement 2023

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28 June 2024

# About this statement

This statement relates to the financial year ending 31 December 2023. It describes our approach to assessing and addressing the risk of modern slavery in connection with our business and supply chains. It is published by BP p.l.c. and its relevant subsidiaries<sup>a</sup> in compliance with the UK Modern Slavery Act 2015.

## About bp and our supply chain

We are a global energy business with operations in Europe, North and South America, Australasia, Asia and Africa.

We operate in 61 countries, employ 87,800 people and have around 35,000 suppliers. These include contractors, vendors, service providers and contingent labour, many of whom also have further suppliers<sup>b</sup>.

We recognize the potential for labour rights violations in our industry and supply chain, and we focus our efforts where we believe that risk is greatest.

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



<sup>a</sup> References in this statement to 'bp', 'we', 'our' and similar terms are to BP p.l.c. and its subsidiaries generally, to one or more of them, or to those who work for them. BP p.l.c. and its subsidiaries are separate legal entities. bp subsidiaries included in scope of this statement are: Air BP Ltd, Arco British Ltd, LLC, BP (Abu Dhabi) Ltd, BP Eastern Mediterranean Ltd, BP Exploration (Alpha) Ltd, BP Exploration (Azerbaijan) Ltd, BP Exploration (Caspian Sea) Ltd, BP Exploration (Delta) Ltd, BP Exploration (Epsilon) Ltd, BP Exploration Operating Company Ltd, BP Gas Marketing Ltd, BP International Ltd, BP Kuwait Ltd, BP Marine Ltd, BP Middle East Ltd, BP Oil UK Ltd, BP Pensions Trustees Ltd, BP Shipping Ltd, BP Wiriagar Ltd, Britoil Ltd, Castrol Ltd, Chargemaster Ltd, Lubricants UK Ltd, and Wiriagar Overseas Ltd (BVI).

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



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## More information

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

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# Introduction

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

At group level, we set expectations for how our businesses conduct their activities, through channels such as our code of conduct, human rights policy, labour rights and modern slavery (LRMS) principles and Operating Management System (OMS). All our businesses are required to conduct their activities in conformance with the applicable expectations and manage the risks associated with them, including modern slavery risks. Our businesses often establish local requirements or other processes to help them do this.

Our work to identify LRMS risks in bp, and to implement relevant activities, is carried out by several teams. These include our central LRMS specialists, who provide support and advice across bp, including in relation to local LRMS due diligence; our social practitioners, who work in the field at specific projects and operations; members of our procurement, people & culture (P&C) and health, safety, environment & carbon (HSE&C) teams; and contract-accountable managers.

In 2023 we:

- Updated our pre-contract risk assessment and due diligence processes to improve their effectiveness. Read more on [page 6](#).
- Increased the number of operated businesses implementing the LRMS requirements in our OMS. The number of operated businesses that had risk assessed at least a sample of their contractor base increased to 88% by the end of 2023 (64% 2022). Read more on [page 5](#).
- Carried out 15 on-site supplier assessments – building on those carried out in 2022. Read more on [pages 6 and 7](#).
- Developed and made available training for around 40 frontline staff about how to carry out field conversations with contractor workforces. Read more on [page 8](#).
- Engaged more than 400 contractor representatives in LRMS, through various forums, to build LRMS capability and encourage them to carry out due diligence in their business and supply chains. Read more on [page 10](#).



# Governance of modern slavery

The risk of modern slavery is a serious concern. The BP p.l.c. board and our executive leadership team regularly review our progress in identifying and addressing potential modern slavery issues in higher-risk parts of our businesses and supply chains.

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 processes. At executive level, the group operations risk committee reviews our progress in managing the risks of modern slavery.

The LRMS governance group meets on a quarterly basis to oversee and track LRMS performance. It is comprised of senior leaders from the HSE&C, sustainability, P&C and procurement teams. The implementation of relevant activities is supported by our LRMS working group.

 [Read more about sustainability governance in the \*\*bp Sustainability Report 2023 pages 13 and 14\*\*](#)

## Our policies related to modern slavery and human trafficking

We are committed to respecting workers' rights, in line with the International Labour Organization Core Conventions on Rights at Work and we expect our suppliers to do the same. We set out this commitment in our human rights policy.


Our expectation is that workers in our operations and supply chains are treated with respect and care and are not subject to abusive or inhumane practices, such as child labour, forced labour, trafficking, slavery or servitude, discrimination, or harassment. Our LRMS principles are intended to assist our businesses and suppliers as they work to check performance against these expectations.

 [Read more about our policies in our \*\*Modern Slavery and Human Trafficking Statement 2020\*\*](#)

 [Read our human rights policy and LRMS principles: \*\*bp.com/humanrights\*\*](#)

## Grievance mechanisms

We encourage a speak up culture among our employees and supplier workforce. In addition to requiring our employees to report human rights abuses, we expect them to speak up if they see something that they think could be unsafe, unlawful or unethical. We encourage suppliers, communities and other third parties to do the same. At our sites we help ensure that contractors and their workers are aware of our confidential global helpline OpenTalk and, where relevant, our community complaints systems and workforce grievance mechanisms. We promote the use of these channels with zero tolerance for retaliation, which we consider to be misconduct.




 [Read more about access to remedy on \*\*page 8\*\*](#)

## Supporting psychological safety and a speak-up culture

Building and maintaining a speak-up culture is a continuous process. By talking with contractor workforces in many different locations we have learned about the various situations that can affect their sense of psychological safety and make it less likely that they will speak up about LRMS risks. These situations include alleged discrimination or harassment, along with the fear of retaliation such as dismissal. We also heard that workers' sense of psychological safety can be affected to a greater extent if they are on temporary or short-term contracts when these situations arise. To support workers' psychological safety and an effective speak up culture, we are collaborating with contractors around the world to find ways to reach out to workers and improve communication.

# Risk, remedy and capability

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# Risk assessment and due diligence

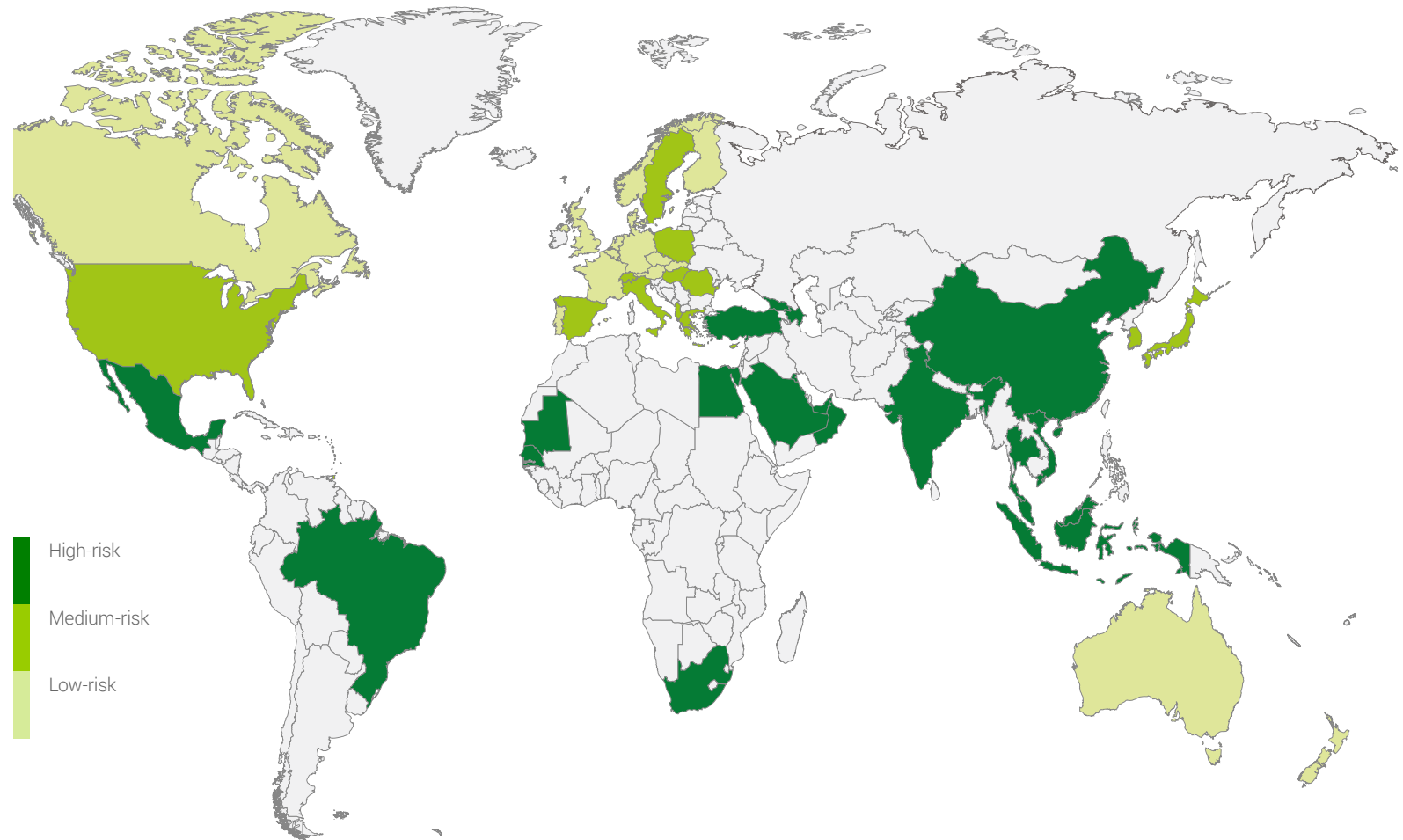
Before contracts are awarded, we consider suppliers' scope of work and location. This helps us conduct risk assessments and prioritize our due diligence activities.

## Our risk assessment approach

As a first step we use external labour rights and modern slavery (LRMS) data sources, such as Maplecroft risk indices, to generate risk heatmaps for the countries in which we operate. Each country is then categorized as low, medium, or high risk. To perform risk assessments, country-level risk is then used in conjunction with the scope of work conducted and the workforce composition.

Risk assessment is included as a requirement in our Operating Management System (OMS) processes. This approach is designed to enable our businesses to determine if any further due diligence and actions are required to adequately mitigate supply chain LRMS risks. Our operated businesses are working towards conformance with this requirement, and 88% of them had risk assessed at least a sample of their supplier base by the end of 2023 (an increase from 68% at the end of 2022). In 2023 we also issued our Projects practice guidance and a risk assessment tool to help our Projects organization better manage LRMS risks and facilitate supplier risk assessments.

Illustrative risk assessment heatmap of the main countries in which bp operates



# Risk assessment and due diligence

## Supplier due diligence


We have continued to improve our pre-contract risk assessment process. In 2023 we updated our sourcing tool to automate the identification of supplier risk ratings, eliminating the need for practitioners to use a separate tool for this process.

As part of the pre-contract assessment, high-risk suppliers are required to provide our procurement teams with documentary evidence that they have implemented appropriate policies, processes and practices to manage LRMS risks. This evidence includes reviewing suppliers' policies and procedures against indicators such as recruitment practices, pay and rest periods. This approach enables us to assess if suppliers can meet our LRMS requirements. In 2023 we increased the number of pre-award assessments completed to 245 (135 2022) and aim to complete even more in 2024.

We work with our suppliers to agree corrective action plans to address any gaps that are identified. In our contracts we also reference our expectations that suppliers should work in ways that are consistent with the bp human rights policy.

 [Read more about our pre-contract risk assessment process in our \*\*Modern Slavery and Human Trafficking Statement 2020 page 7\*\*](#)

LRMS risk assessment is also ongoing across our existing supplier base, including contractor risk assessment and regular monitoring activities with contractors at our sites as part of our businesses due diligence under OMS.

 [Read more about our OMS in our \*\*Modern Slavery and Human Trafficking Statement 2021 page 7\*\*](#)

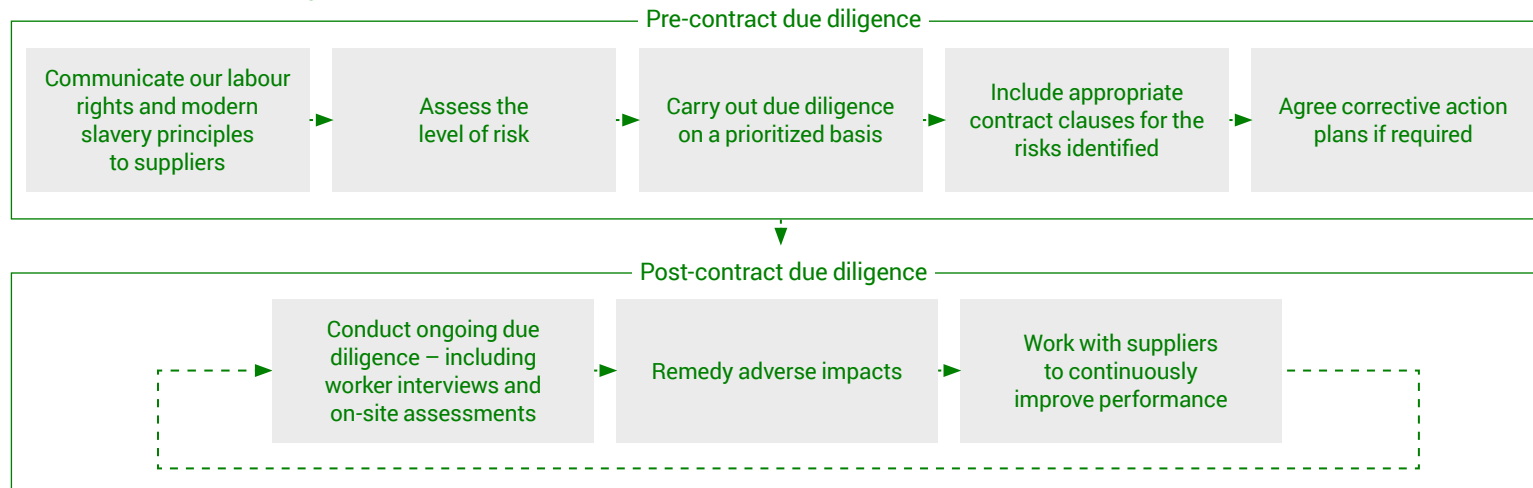
Our contractor risk assessment criteria include worker composition (for example, the presence of migrant workforces), use of recruitment agents, workforce skill levels, and the number of supply chain tiers. We supplement our risk assessment processes with information from our speak up channels and the worker interviews conducted as part of our monitoring activities. 84% of our operated businesses now undertake worker interviews at our sites as part of routine monitoring activities (72% 2022). In 2023 we carried out

interviews with more than 400 workers. We use the information sourced through these channels along with other business information to help us decide where best to deploy our resources for further on-site assessments.

In 2023 we carried out 15 on-site assessments of contractors working at our sites (11 2022). These assessments were carried out by bp employees who had completed relevant training. They involved talking with the contractor's management team, reviewing documents and interviewing a representative sample of workers (especially vulnerable workers) to assess suppliers' performance against our LRMS requirements.

Where our assessments and monitoring activities identified concerns, we worked with suppliers to devise prioritized corrective action plans and reviewed their performance during contract review meetings. These corrective action plans are currently being implemented.

## Elements of supplier due diligence






# Risk assessment and due diligence

## Promoting the employer pays principle

Our supplier assessments have shown that although many suppliers have a human rights policy (or equivalent) stating that workers should not pay any recruitment fees, these policies do not always specify that the employer should pay the costs instead. Consequently, employers' responsibility to pay is not made clear or communicated along the supply chain and workers employed by tier 1 and tier 2 suppliers can end up paying recruitment fees. We are working with suppliers to update their policies and procedures, so they explicitly state employers' responsibility to pay costs associated with recruitment. We are also engaging with them to understand how these updates will affect their recruitment and staffing plans.

 Read more about the findings from our 2023 on-site assessments on [page 8](#)

## Trial for assessing global suppliers

The majority of our Wells organization's spend is with a handful of strategic suppliers that provide services for bp in several locations. Rather than carrying out on-site assessments at each location, we have developed an alternative approach for global suppliers.

This includes an initial assessment (comprising a review of documentation and interviews with key management) of a company's LRMS-related policies and processes, along with an assessment of how:

- These are communicated and deployed to their local operations and adapted to meet their needs.
- These are communicated and deployed to their supply chain.
- The company oversees the implementation and effectiveness of those policies and processes.

Based on the outcome of this initial assessment, along with a profile of the bp locations served and the workforce provided by the supplier, we assess the delivery of our LRMS requirements in a sample of locations being serviced by a given supplier. This stage of assessment includes interviews with local supplier management teams, review of documents (for example, worker terms and conditions, pay and hours records) and interviews with their workforce, including sub-contractor workers.

This process is carried out with mutual learning in mind and facilitates a more productive dialogue with key suppliers. We work with suppliers to develop corrective action plans to address any gaps highlighted and to identify opportunities for more systematic improvements.

In 2023 the Wells team used this approach to interview more than 90 workers while assessing three suppliers that provided more than 1,200 workers to bp locations. We have incorporated lessons learned from this approach into our 2024 work plan, aiming to enhance our relationships with our first tier global suppliers and focus our resources on encouraging them to make systematic improvements to LRMS performance.



# Providing our workers with access to remedy<sup>a</sup>

Our human rights policy states that we do not impede access to state-based judicial processes. If we cause or contribute to adverse impacts on human rights, we provide for, or co-operate in, their remediation through legitimate processes intended to deliver effective remedy, while not preventing access to other forms of remedy if justified.

Concerns, including those related to human rights, can be raised through our confidential global helpline OpenTalk. It is available in 75 languages and can be accessed all day, everyday on the telephone or internet, by employees, the wider workforce, communities, business partners and other stakeholders. Anyone has the right to contact OpenTalk anonymously, except where this is prohibited by law. All concerns are taken seriously, and we do not tolerate retaliation of any kind. bp employees or contractors and their workforce can submit a report to OpenTalk at [opentalkweb.com](https://opentalkweb.com)

At the end of 2023 84% (48% 2022) of our operated businesses had communicated aspects of labour rights to our contractor workforces – during inductions and toolbox talks and by displaying promotional posters on-site. These actions promote worker rights topics and are intended to further reinforce awareness of OpenTalk.

We have been working to develop our ability to monitor LRMS concerns raised through OpenTalk, improve the availability of expert support for investigating concerns and facilitate remedy for workers. Concerns raised through OpenTalk or other speak up channels are reviewed during the concerns management process and at the end of 2023 we had closed 71% of LRMS-related concerns raised through OpenTalk and other speak up channels in 2023. The main issues raised related to

discrimination, harassment, working hours and pay. Once substantiated concerns have been addressed, we work to identify root causes and set out actions to prevent issues arising in future.

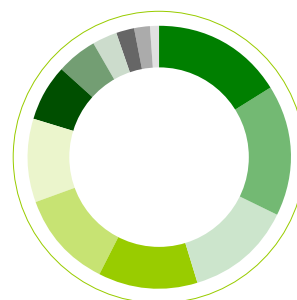
## Access to remedy: issues and responses

The chart on this page highlights issues identified during 15 on-site contractor assessments performed by our central LRMS teams in 2023. It shows that issues related to pay, working time, terms and conditions and grievance mechanisms were the most prevalent, corresponding in part with the prevalence of issues raised by contractor workforces through our complaints mechanisms. Through our on-site assessments we have carried out in-depth interviews with around 400 workers (as a standalone due diligence activity) across 15 suppliers, from a total workforce of more than 4,900.

Issues related to discrimination and harassment account for 5% of issues identified through on-site assessments and 29% of LRMS-related concerns raised through OpenTalk or other speak up channels. Using these different channels helps us uncover issues in our supplier workforces.

We work with suppliers to tackle discrimination and harassment and with our operated businesses to promote an inclusive culture in which bp employees, suppliers and their workforce, feel comfortable to speak up about any concerns.

## Issues identified in on-site assessments



Working time and rest	16%	Discrimination, harassment and wellbeing	5%
Pay	16%	Passports, documents and legal status	3%
Terms, conditions and contracts	13%	Free movement	2%
Systems and controls	12%	Protection of young workers	2%
Grievance	12%	Freedom of association	1%
Fees	10%		
Working conditions and accommodation	7%		

## Issues identified in supplier workforces

## Example of remedy provided by suppliers

Non-payment, late payment and partial payment of wages, overtime pay and holiday pay.

- Workers repaid.
- Improvements made in record-keeping systems and processes, including payslips.

Extended working hours and rotations.

- Improved record keeping.
- Implemented oversight process to check that limits were maintained.

Inaccuracy of worker terms and conditions.

- Terms and conditions updated and issued to workers and explanations given.

<sup>a</sup> In discussing remedy in this statement we have included how we address LRMS concerns raised through OpenTalk and issues identified through LRMS due diligence, whether or not an adverse impact on an individual's rights occurred. Actions discussed may therefore include risk prevention or mitigation actions as well as remedy itself.

## Providing our workers with access to remedy

We have completed on-site assessments of 28 suppliers since 2021, with 25 of these still currently supplying bp. The assessments of these 25 suppliers, which covered all topics set out in our LRMS principles, identified around 600 issues requiring actions. We continue to work with these suppliers on close-out of actions<sup>a</sup>. It can take time for suppliers to resolve issues and for us to verify close-out, so we are developing systems and guidance to help facilitate remedy and implement preventative measures with our suppliers.

### Suppliers' recruitment and deployment of foreign migrant workers

Although the recruitment and use of foreign migrant workers is associated with higher LRMS risks to them, if done correctly it can provide them with beneficial opportunities. To try and ensure this is the case, we are working with suppliers in various locations to encourage them to adopt and implement the employer pays principle and check that the recruitment agents they use provide clearer written terms and conditions to workers. We are also encouraging our suppliers to interview their direct and indirect workforces on a regular basis to find out if they believe they were recruited responsibly or otherwise. If suppliers discover that practices such as worker payment of recruitment fees or costs were used, then they can work to address these practices, with our support.



<sup>a</sup> We verify close-out of issues through a combination of desktop review of information provided by suppliers and/or worker interviews, as appropriate to the nature of the action.



# Training and capability building

Through training and expert technical guidance, we are continuing to develop and build the capability required to effectively identify and manage labour rights and modern slavery (LRMS) risks.

Our approach to providing training and capability building for our workforce focuses on meeting three specific needs:

**1 Raising awareness** of LRMS issues amongst employees across bp. This aims to improve understanding of the risks they present and help employees identify other potential issues during their daily work, so they can serve as our first line of defence. To enable this, in 2023 we:

- Ran online and face-to-face LRMS training, which was completed by around 480 employees, including those working in our operations, communications & external affairs (C&EA), people & culture (P&C) and procurement teams.

**2 Building capability** to meet our due diligence requirements through targeted training that enables employees to identify and manage LRMS risks, engage with workers on the ground and provide these workers with the means to share their concerns with us, confident that we will address them. In 2023 we:

- Provided targeted training for more than 290 of our procurement and contracting practitioners.
- Trained around 90 employees to carry out worker interviews.

**3 Developing specialist skills** required by a small group of employees to carry out more in-depth due diligence on suppliers and their systems. In 2023 we:

- Provided 10 employees in relevant roles with focused training about how to carry out in-depth on-site assessments. This training, which covered document reviews and worker and management interviews, was developed in partnership with an expert third-party organization. It will support our capacity to engage frontline contractor workforces and assess the conditions in which they operate.



## Building capability with suppliers

We are working to encourage suppliers to take ownership of LRMS due diligence in their businesses and their own supply chains. Doing so involves explaining our expectations of them, engaging with them on LRMS as a key issue and giving them the chance to learn through ongoing dialogue with us. For example, in 2023 our expectations of contractors and their sub-contractors were discussed at supplier forums in Azerbaijan, Mauritania, Senegal and Trinidad. More than 400 contractor representatives attended these events.



# Progress and next steps

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# Assessing the effectiveness of our approach

We are working to improve our ability to identify, prevent and remedy labour rights and modern slavery (LRMS) issues.

## LRMS performance metrics and data

We use a group-wide system to collate performance data related to LRMS and help us measure, support and manage performance. We are working to increase the number of internal reporting entities that provide this data, with 28 doing so in 2023 (21 2022).

Measure	Examples of supporting metrics	Purpose	Example data points
Systematic approach to identification, prevention and management of LRMS risks.	<ul style="list-style-type: none"> <li>Ongoing monitoring activities.</li> <li>Types and numbers of issues identified.</li> <li>Presence and status of action plans to address issues identified.</li> </ul>	Understand trend data relating to issues identified and proportion of action plans in progress.	Our entities select and deploy tools to manage LRMS risks on a risk prioritized basis and considering local context. 26 entities used worker interviews, 19 performed checks on working hours and overtime, 16 performed payroll checks, 17 performed supplier assessments.
Number of contractors who closed out corrective actions plans <sup>a</sup> within the agreed timeframes.	<ul style="list-style-type: none"> <li>Number of contractors assessed, with corrective actions in place.</li> <li>Number of contractors that closed out corrective action plans within the agreed timeframes.</li> </ul>	To track if contractors are currently addressing issues raised, within agreed timeframes.	Around 400 contractors had corrective action plans <sup>a</sup> in place for 2022 and 2023, of which more than 280 were closed out within the agreed timeframes, giving a close-out rate of 72%. We expect our contractors to progress the remaining actions.
Number of workers impacted by issues identified through worker interviews and/or on-site assessments and remedy facilitated.	<ul style="list-style-type: none"> <li>Number of workers impacted by issues related to recruitment fees, passport retention, wages or working time.</li> <li>Number of workers for whom remedy was provided by suppliers to address issues related to recruitment fees, passport retention, wages or working time.</li> </ul>	To track how many workers impacted by key issues and if remedy is provided by contractors.	Around 2,200 workers impacted by issues raised in 2022 and 2023 related to fees, passports, wages and/or working time. Remedy has been provided for around 600 of these workers to date, the rest are in the process of being remedied <sup>b</sup> .

## Consultation and collaboration

Collaborating with our stakeholders and peers is central to our approach as we work to strengthen our ability to assess and address modern slavery risks in our businesses and supply chain.

In 2023 we contributed to the UN Global Compact UK Network's Modern Slavery Act Working Group and Building Responsibly, as a member

of both organizations. We are also a member of the Global Business Initiative on Human Rights and contributed to their peer learning sessions which were attended by their expert human rights advisors. These included in-depth discussions about LRMS-related topics.

We continued to play an active role in the social responsibility, human rights and supply chain working group of Ipieca<sup>c</sup>. Its key related focus

areas in 2023 included encouraging cross-industry discussions about worker engagement and responsible recruitment.

We also worked with a small group of businesses in the energy industry with the goal of improving the rights and welfare of migrant workers in our shipyard supply chains, which are central to responsible business conduct and a just transition. As a first step, we drafted a set of principles and

guidelines in consultation with suppliers and civil society organizations. The aim is to improve accommodation and transport for migrant workers, drive the employer pays principle and implement effective grievance mechanisms. The next step is to pilot the principles and guidelines.

We plan to look for further opportunities to collaborate and engage with expert external stakeholders.

<sup>a</sup> Corrective action plans included here can arise from various due diligence activities such as pre-contract assessments, assessment of existing suppliers, investigation of OpenTalk concerns, worker interviews and on-site assessments.

<sup>b</sup> We verify close-out of issues through a combination of desktop review of information provided by contractors and/or worker interviews, as appropriate to the nature of the action.

<sup>c</sup> Ipieca is the global oil and gas association dedicated to advancing environmental and social performance across the energy transition. It brings together members and stakeholders to lead in mainstreaming sustainability by advancing climate action, environmental responsibility and social performance across oil, gas and renewables activities.

# Our progress and looking ahead

We are open to constructive challenge and expect our approach to managing labour rights and modern slavery (LRMS) risks to evolve. We know there is still work to do and that we can achieve more when we address shared challenges through collaboration.

In 2023 we made progress on the focus areas set out in our 2022 modern slavery and human trafficking statement.

Focus area	Status	Progress in 2023
<b>Systems and due diligence</b> <ul style="list-style-type: none"><li>• Increase the number of suppliers evaluated.</li><li>• Increase the number of on-site assessments on a risk prioritized basis.</li></ul>	Progress made	<ul style="list-style-type: none"><li>• Increased pre-award evaluations to 245 (135 2022).</li><li>• Increased number of on-site assessments to 15 (11 2022).</li></ul>
<b>Building capability</b> <ul style="list-style-type: none"><li>• Continue to build our business teams' capability to engage with workers.</li><li>• Provide on-the-job training and establish a peer support network for on-site assessors to share experience.</li></ul>	Progress made	<ul style="list-style-type: none"><li>• Trained around 50 employees to carry out worker interviews.</li><li>• Used on-site assessments to provide on-the-job training to improve performance over time.</li></ul>

## Future objectives

Our objectives for the future include:

- Continue to scale LRMS risk management activities to cover additional suppliers.
- Broaden focus to include goods suppliers.
- Build more guidance and support on remedy.



### Murray Auchincloss

chief executive officer,  
28 June 2024

This statement has been approved by the board of BP p.l.c. and of each of its relevant subsidiaries, in compliance with the UK Modern Slavery Act. It was approved by the board of BP p.l.c. on 06 June 2024.

 Read more at [bp.com/sustainability](https://www.bp.com/sustainability) and [bp.com/humanrights](https://www.bp.com/humanrights).

**Give your feedback**

Email the corporate reporting team  
at [corporatereporting@bp.com](mailto:corporatereporting@bp.com)



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