Company Name: BP  
Industry: Extractives  
Overall Score (*): 53.9 out of 100

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<thead>
<tr>
<th>Theme Score</th>
<th>Out of</th>
<th>For Theme</th>
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<td>5.4</td>
<td>10</td>
<td>A. Governance and Policies</td>
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<td>6.0</td>
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<td>F. Transparency</td>
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(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the 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 CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

### A. Governance and Policies (10% of Total)

**A.1 Policy Commitments (5% of Total)**

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<tr>
<th>Indicator Code</th>
<th>Indicator Name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</thead>
</table>
| A.1.1          | Commitment to respect human rights | 2 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: General HRs commitment: The Company code of conduct states 'We seek to conduct our business in a manner that respects the human rights and dignity of people'. [Code of Conduct, 04/06/2018: bp.com]  
• Met: International Bill of Rights: The Company Human Rights Policy states 'We respect internationally-recognized human rights, as set out in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.' [Human Rights Policy, 2018]  
Score 2  
• Met: UNGPs: The Company states that they 'recognise their responsibility to respect human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights.' [Human Rights Policy, 2018]  
• Not met: OECD |
| A.1.2          | Commitment to respect the human rights of workers | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: ILO Core: The Company Human Rights Policy states 'We respect internationally-recognized human rights, as set out in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.' [Human Rights Policy, 2018]  
• Not met: UNGC principles 3-6  
• Not met: Explicitly list All four ILO apply to EX BPs: The Company states that the Human Rights Policy applies to every employee and officer in every BP wholly owned entity, and in joint ventures (JVs) to the extent possible and reasonable |
given BP’s level of participation. In situations where BP does not have overall control of a JV, we will do everything we reasonably can to make sure JVs and JV partners follow similar principles. The Company’s document ‘BP’s expectations of its suppliers’ applies to Contractors—however, this does not cover core ILOs. The document states that the ‘BP’s Code of Conduct underpins our expectations of our suppliers, including contractors...’ However, the Code of Conduct does not cover the Core ILO elements. [Code of Conduct, 04/06/2018: bp.com & Human Rights Policy, 2018]

Score 2
- Not met: Explicit commitment to All four ILO Core: The Code of Conduct does not cover all ILO core. [Code of Conduct, 04/06/2018: bp.com]
- Met: Respect H&S of workers: The Company Code of Conduct covers health and safety requirements. This includes expectations to comply with HSSE requirements.
- Met: H&S applies to EX BPs: The Company Code of Conduct covers health and safety requirements. This includes expectations to comply with HSSE requirements.

The Code of Conduct applies to joint ventures and third parties - the Company also states 'we expect and encourage all our contractors and their employees to act in a way that is consistent with our code. The Company also states on their website 'Our standard model contracts include health, safety and security requirements. through bridging documents, we define how our safety management system co-exists with those of our contractors to manage risk on a site. And for our contractors facing the most serious risks, we conduct quality, technical, health, safety and security audits before awarding contracts.' [Code of Conduct, 04/06/2018: bp.com]

A.1.3 EX Commitment to respect human rights particularly relevant to the industry (EX) 0.5

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

Score 1
- Met: Voluntary Principles (VPs) participant: BP is a signatory to the Voluntary Principles on Security and Human Rights. [Human Rights Policy, 2018]
- Not met: Uses only ICoCA members: BP Georgia’s Private Security contractor has become a member of the ICOCA. However, The Company has not stated a commitment to only working with ICoCA members.
- Not met: Respecting indigenous rights: Even though it has mentioned in its human rights policy that ‘we will consult with those who may be affected, including indigenous peoples, where this is possible and appropriate, while meeting applicable legal requirements.’ the Company indicated that it is committed to respecting indigenous rights. [Human Rights Policy, 2018]
- Not met: ILO 169
- Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)
- Not met: Expects BPs to respect these rights

Score 2
- Not met: FPIC commitment
- Not met: Voluntary Guidelines on Tenure Rights
- Not met: IFC performance standards
- Not met: Zero tolerance for land grabs
- Not met: Respecting the right to water
- Not met: Expects BPs to commit to all these rights

A.1.4 Commitment to engage with stakeholders 1

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

Score 1
- Met: Commits to stakeholder engagement: The Company Human Rights policy states ‘we will consult with those who may be affected, including indigenous peoples, where this is possible and appropriate, while meeting applicable legal requirements.’ The Company human rights policy also states ‘. Where BP identifies that we have caused or directly contributed to adverse impacts on the human rights of others, BP shall provide for or cooperate in the remediation of the adverse impacts through legitimate processes.’ [Human Rights Policy, 2018]

Score 2
- Not met: Commits to engage stakeholders in design: The Company states that they will continue to take a constructive and progressive role in human rights-related multi-stakeholder initiatives. However, it is not clear whether these initiatives will include the Company’s affected and potentially affected stakeholders. [Human Rights Policy, 2018]
- Not met: Regular stakeholder design engagement

A.1.5 Commitment to remedy 1.5

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

Score 1
- Met: Commits to remedy: The Company has indicated in its human rights policy that where it ‘identifies that it has caused or directly contributed to adverse impacts on the human rights of others, BP shall provide for or cooperate in the
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</table>
| A.1.6          | Commitment to respect the rights of human rights defenders | 0                | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Zero tolerance attacks on HRDs (HRDs)  
Score 2  
• Not met: Expects EX BPs to reflect company HRD commitments                                                                                             |
| A.2.1          | Commitment from the top                 | 1                | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: CEO or Board approves policy: The Company Code of Conduct is signed by the CEO and covers a general commitment to human rights. [Code of Conduct, 04/06/2018: bp.com]  
• Met: Board level responsibility for HRs: The Company has indicated that its safety, ethics and environment assurance committee (SEEAC) at board level ‘has oversight of human rights, including review of our performance in assessing and managing risks associated with modern slavery.’ [Governance and Risk, Jul 2019: bp.com]  |
| A.2.2          | Board discussions                       | 2                | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Board/Committee review of salient HRs: The Company discloses that the SEEAC (safety, ethics and environment assurance committee) looks at the processes that BPs executive team use to identify and mitigate operational and non-financial risk. The Company clarified in 2017 this included reviewing human rights related risks, and in particular included a review of how BP is managing modern slavery risks. [Sustainability Report, 2017: bp.com]  
• Met: Examples or trends re HR discussion: The Company clarified in 2017 this included reviewing human rights related risks, and in particular included a review of how BP is managing modern slavery risks. Following this, the Company conducted Modern Slavery Risk Reviews in parts of their supply chain. [Sustainability Report, 2017: bp.com]  
Score 2  
• Met: Both examples and process                                                                                                                        |
| A.2.3          | Incentives and performance management   | 0.5              | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Incentives for at least one board member: The Company's director remuneration includes elements relating to safety and operational risk. Contractor health and safety is included in these KPIs. [Annual Report 2018 and 20F, 29/03/2019: bp.com]  
• Not met: At least one key EX RH risk, beyond employee H&S: There is no evidence that the H&S of local communities are included in the health and safety incentives.  
Score 2  
• Met: Performance criteria made public                                                                                                                  |
## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

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<thead>
<tr>
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<th>Explanation</th>
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</table>
| B.1.1          | Responsibility and resources for day-to-day human rights functions | 0.5              | The individual elements of the assessment are met or not as follows: 
Score 1  
• Met: Commits to ILO core conventions: See indicator A.1.2  
• Not met: Senior responsibility for HR: The Company has described responsibility related to the implementation of the Voluntary Principles in its security team in Georgia but no overall description of responsibilities for human rights are described. In addition, in its ‘Governance and risk’ document, the Company indicates: 'Supported by dedicated committees, our executive team oversees BP’s performance in a wide range of areas: The group operations risk committee reviews progress on carbon management, safety performance and potential modern slavery risks; The group people committee looks at employee issues, including capability, reward and diversity; The group ethics and compliance committee reviews breaches against our code of conduct'. However, it is not clear whether there is a senior level position/body in responsible for human rights issues.  
Score 2  
• Met: Day-to-day responsibility: On its website, ‘Governance and risk’, the Company discloses the following: 'Our human rights working group, which is made up of representatives from across the business, considers current and emerging human rights risks of potential group significance, reviews existing and proposed management of such risks and escalates identified human rights risks to executive team level as necessary. Business functions and local operations are responsible for implementing actions to help us meet our human rights policy commitments and relevant group requirements, such as providing channels for local communities to raise concerns'. [Governance and Risk, Jul 2019: bp.com]  
• Not met: Day-to-day responsibility for EX BRs |
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<td></td>
<td>the applicable requirements of the OMS framework’. [BP disclosure in CHRB Platform]</td>
<td>Score 2</td>
<td>• Not met: Audit Ctte or independent risk assessment: In its Slavery and Human Trafficking Statement 2018, the Company indicates: 'The board and executive management of BP p.l.c. continue to be engaged in reviewing our progress in identifying and addressing potential modern slavery issues within higher risk parts of our businesses and supply chains. At the BP p.l.c. board level in 2018, the main board reviewed and approved our 2017 slavery and human trafficking statement and through its safety, ethics and environment assurance committee [SEEAC] reviewed our approach to assessing and managing risks associated with modern slavery. At executive management level, the group operations risk committee reviewed progress on managing the risks of modern slavery. [...] Our internal audit function also conducted an audit, which concluded in March 2018, of the design effectiveness of BP’s governance framework and approach to managing modern slavery risk in our business and supply chains’. However, it is not clear if the assessment was overseen by the Board Audit Committee. [Slavery and human trafficking statement 2018, Jun 2019: bp.com]</td>
</tr>
<tr>
<td>B.1.4.a</td>
<td>Communication /dissemination of policy commitment(s) within Company’s own operations</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: The Company’s Business and Human right policy is published on the Company’s website in 23 languages. The Company states 'This policy applies to every BP employee and officer in BP wholly-owned entities, and in joint ventures to the extent possible and reasonable given BP’s level of participation.' The Company’s human rights policy explicitly states that they respect internationally-recognized human rights, as set out in the International Bill of Human Rights and the ILO Fundamental Principles and Rights at Work. The 8 ILO fundamental conventions, also known as core conventions are subsumed by the ILO Fundamental Declarations on Rights at Work. [Business and Human Rights policy, 2013: bp.com &amp; Human Rights Policy, 2018] Score 2 • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience</td>
</tr>
<tr>
<td>B.1.4.b</td>
<td>Communication /dissemination of policy commitment(s) to business relationships</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy to EX contractors and joint ventures: The Company states 'Our standard procurement contracts include a requirement for suppliers to respect internationally recognized human rights, with a specific ban on the use of forced, trafficked or child labour.' The Company also discloses 'As one example, we provided training to contractors and sub-contractor teams working on our Tangguh expansion project in Indonesia. We discussed the risks faced in our industry and emphasized the individual role we all play in spotting potential signs and reporting concerns'. In addition, in its document 'BP’s expectations of its suppliers’, the Company indicates to its suppliers: 'We ask that you communicate these expectations to your employees, suppliers and business partners who may provide goods or services to BP'. However, this is only one example, and it is not clear how extractive business partners are communicated the human rights policy. The Company also uses an example of working with a joint venture partner in Saudi Arabia to improve labour rights. However, it is not clear whether this is a consistent approach across operations [Human Rights - additional information, Apr 2019: bp.com &amp; Supplier expectations, 2017: bp.com] • Not met: Including to EX BPs (removed) Score 2 • Not met: How HR commitments made binding/contractual: The Company states in their procurement code of conduct that they 'seek to work with third parties who operate under principles that are similar to this Code. This includes making a contractual commitment where it is feasible to comply with the applicable laws and work in line with the Code.' The Company states that they will seek to terminate contracts where they believe they have not met the companies standards. However, as contractual commitment is carried out 'where it is feasible’, it is not clear whether this is a general practice. [Procurement Code of Conduct, 2017: bp.com] • Not met: Including on EX BPs</td>
</tr>
<tr>
<td>Indicator Code</td>
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<tr>
<td>B.1.5</td>
<td>Training on Human Rights</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<td>- Not met: Scores at least 1 on A.1.2: See A.1.2</td>
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<td>- Not met: Trains all workers on HR policy commitments: The Company states that 'To reach more of our employees around the world, we converted our training on labour rights and modern slavery risk into e-modules. While the training is open to any BP employee, it is primarily aimed at people who work on projects, in operational roles and in functions such as procurement, human resources and ethics and compliance.' However, this means that not all workers have been trained on human rights obligations. [Human Rights - additional information, Apr 2019: bp.com]</td>
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<td>- Met: Trains relevant EX managers including security personnel: The Company states that its human rights training 'is primarily aimed at people who work on projects, in operational roles and in functions such as procurement, human resources and ethics and compliance. The training raises awareness of labour rights and modern slavery, how to spot the warning signs and what to do if someone suspects a worker is at risk.' The Company also indicates that it provides 'training on the [Voluntary] principles for those employees who are accountable for managing security and conduct assessments to identify areas where we can improve.' In addition, in its Slavery and Human Trafficking Statement 2018, the Company indicates: 'For those who may work at site level on projects or operations, training helps them to identify potential labour rights issues and modern slavery in practice and what steps to take. It addresses: awareness of labour rights, modern slavery and labour practices associated with increased worker vulnerability; how modern slavery risk indicators may occur in our industry or supply chains; and how to identify warning signs. It also provides role-specific information on some ways individuals can help identify and manage the risks of modern slavery, including by implementing effective prevention measures and remedies.' [Human Rights - additional information, Apr 2019: bp.com &amp; Slavery and human trafficking statement 2018, Jun 2019: bp.com]</td>
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<td></td>
<td>- Not met: Both requirements under score 1 met</td>
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<tr>
<td>B.1.6</td>
<td>Monitoring and corrective actions</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<td></td>
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<td>- Not met: Scores at least 1 on A.1.2: See indicator A.1.2</td>
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<td></td>
<td>- Not met: Monitoring implementation of HR policy commitments [Human Rights - additional information, Apr 2019: bp.com]</td>
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<td>- Not met: Monitoring EX BP's: The Company states that they look at labour rights and modern slavery issues by taking 'a risk-based approach to monitoring our contractors and suppliers by considering: Countries that pose a high degree of risk, as identified by risk analytics firm Verisk Maplecroft and other data sources; Activities that rely on manual labour, such as construction, catering, cleaning and certain types of manufacturing; Factors related to the vulnerability of the workforce, such as poverty levels, ethnic, religious or gender minorities and migrant workers.' However, this approach seems to refer only to risk assessment. No details found on monitoring. [Human Rights - additional information, Apr 2019: bp.com]</td>
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<td>- Not met: Score of 2 on A.1.2: See A.1.2</td>
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<tr>
<td>B.1.7</td>
<td>Engaging business relationships</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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</table>
|               |                                      |                 | - Not met: HR affects selection EXs business partners: On its website, 'Supplier expectations', the Company states: 'We will develop and strengthen relationships with suppliers who are committed to and act in accordance with our code of
### B.2 Human Rights Due Diligence (15% of Total)

<table>
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</table>
| B.2.1 | Identifying: Processes and triggers for identifying human rights risks and impacts | 2 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Identifying risks in own operations: In the 2018 report, the Company indicates: 'We are developing a more systematic approach to managing the risk of modern slavery and other labour rights issues by building it into our management systems, processes and procedures. Some of our business activities and parts of our supply chain may pose a higher risk of labour rights and modern slavery issues than others. Since 2016 we have been taking a risk-based approach to monitoring our contractors and suppliers by considering: Countries that pose a high degree of risk, as identified by risk analytics firm Verisk Maplecroft and other data sources; Activities that rely on manual labour, such as construction, catering, cleaning and certain types of manufacturing; Factors related to the vulnerability of the workforce, such as poverty levels, ethnic, religious or gender minorities and migrant workers'. In 2017 report, the Company indicated that 'focus areas including human rights aspects such as resettlement and modern slavery; […]. However, there is no further information on how it revises extractive business partners human rights performance before starting business with them.  
[Supplier Expectations, Jul 2019: bp.com]  
• Met: HR affects on-going EX business partner relationships: The Company indicates in its Slavery and Human Trafficking Statement 2018 that ‘if a contractor or supplier fails to act in a manner consistent with our expectations or their contractual obligations, we look to work with them to resolve the issue to improve the situation of the people affected. If a serious breach is found and no corrective action is taken, we reserve the right to terminate contracts.’ [Slavery and human traffickingstatement 2018, Jun 2019: bp.com]  
Score 2  
• Not met: Both requirement under score 1 met  
• Not met: Working with EX business partners to improve performance |

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</table>
| B.2.8 | Approach to engagement with potentially affected stakeholders | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Stakeholder process or systems: In its Sustainability Report 2018, the Company indicates: 'Our stakeholders are the many individuals and organizations who are affected in some way by BP’s activities – whether it is in our role as an energy provider, an employer or as a business that helps boost local economies through jobs and revenue. We engage with our stakeholders and listen to their differing needs and priorities in our daily work. The input and feedback we receive helps inform the decisions we make.' However, CHRB could not find a description of how it has identified its stakeholders. [Sustainability Report 2018, Apr 2019: bp.com]  
• Met: Frequency and triggers for engagement: The Company describes its engaging activities and the frequency of these activities by stakeholder group: Employees, Investors, Communities, NGOs, Governments, Contractors and Suppliers. For instance: 'Communities: Talking with local people helps us better understand the potential impacts of our activities and look for ways to work that align with their needs. The engagement process typically begins long before any physical work has started and continues throughout the lifespan of a project. We engage with local communities through public consultations, as well as regular and ad hoc meetings with community representatives.' [Sustainability Report 2018, Apr 2019: bp.com]  
Score 2  
• Not met: Engagement includes EX business partners workers  
• Not met: Engagement includes EX business partners communities  
• Not met: Analysis of stakeholder views and company’s actions on them |

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**Note:** The content includes references to various reports and statements, which are not included in the text due to the constraints of the format. For more detailed information, please refer to the original sources provided in the document.
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| **B.2.2**      | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 2 | Score 2  
• Met: Ongoing global risk identification: See above. In addition, the Company also states that in preparing their sustainability report (which covers human rights) the Company met with around 100 different organisations, to hear what issues matter most to their stakeholders. The Company states that they included issues in the sustainability report if they were highlighted as high importance in terms of business impact and stakeholder concern, the company then discusses how human rights was highlighted as a material issue in 2017, and in particular worker welfare, the rights of people in communities, and security and human rights. The Company then breaks down these issues and our they addressed them. In 2017 it prioritised 17 businesses to evaluate modern slavery risks. [Human Rights - additional information, Apr 2019: bp.com & Our Stakeholders and Issues, 06/06/2018: bp.com]  
• Met: In consultation with stakeholders: Furthermore the Company indicates: 'Using this approach, we have been reviewing the risk of modern slavery at selected businesses, including mapping supply chains to identify high-risk contractors. This initial screening has led to further due diligence through questionnaires or on-site labour rights assessments, including worker interviews.' [Human Rights - additional information, Apr 2019: bp.com]  
• Met: In consultation with HR experts: The Company utilises Verisk Maplecroft analytic data. The Company also uses third party experts, such as Verité, for their labour rights audits. The Company states in its Human Rights additional information 2017: 'We conduct labour rights audits or assessments when appropriate. Focus areas tend to be working hours, recruitment processes, freedom of movement, employment contracts and channels for workers to raise complaints.' [Human Rights - Additional Information, 2017 & Human Rights - additional information, Apr 2019: bp.com]  
• Met: Triggered by new circumstances: The Company indicates: 'Since 2016 we have been taking a risk-based approach to monitoring our contractors and suppliers by considering: Countries that pose a high degree of risk, as identified by risk analytics firm Verisk Maplecroft and other data sources; Activities that rely on manual labour, such as construction, catering, cleaning and certain types of manufacturing; Factors related to the vulnerability of the workforce, such as poverty levels, ethnic, religious or gender minorities and migrant workers.' [Human Rights - additional information, Apr 2019: bp.com]  
• Met: Explains use of HRIAs or ESIA (inc HR): The Company includes human rights in impact assessment requirements for certain projects. The Company states that they screen their 'major projects to identify and manage any potential impacts, including human rights....These findings inform our impact assessments and the mitigation measures we put in place during project design, construction and operations.' [Human Rights - Additional Information, 2017]  

The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Salient risk assessment (and context): In its Human Rights -additional information document, the Company states: 'We are developing a more systematic approach to managing the risk of modern slavery and other labour rights issues by building it into our management systems, processes and procedures. Some of our business activities and parts of our supply chain may pose a higher risk of labour rights and modern slavery issues than others. Since 2016 we have been taking a risk-based approach to monitoring our contractors and suppliers by considering: Countries that pose a high degree of risk, as identified by risk analytics firm Verisk Maplecroft and other data sources; Activities that rely on manual labour, such as construction, catering, cleaning and certain types of manufacturing; Factors related to the vulnerability of the workforce, such as poverty levels, ethnic, religious or gender minorities and migrant workers. Using this approach, we have been reviewing the risk of modern slavery at selected businesses, including mapping supply chains to identify high-risk contractors. This initial screening has led to further due diligence through questionnaires or on-site labour rights assessments, including worker interviews. In 2018 18 businesses were under review. The assessments focus on key warning signs, such as passport retention, recruitment or other fees, wage deductions, employment contracts, working hours, shift patterns and living conditions.' In addition, the Company highlights that their material human rights risks in 2017, as identified by their stakeholders, include worker welfare, rights of people in communities and security and human rights. The Company states that subject matter experts from across BP complete the initial prioritization of these issues. [Human Rights - additional information, Apr 2019: bp.com & Our Stakeholders and Issues, 06/06/2018: bp.com] |
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</table>
| B.2.3 | Integrating and Acting: Integrating assessment findings internally and taking appropriate action | 2 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Action Plans to mitigate risks: The Company highlights that their material human rights risks in 2017, as identified by their stakeholders, include worker welfare, rights of people in communities and security and human rights. The Company states that subject matter experts from across BP complete the initial prioritization of these issues. The company then has addressed these three core human rights issues with how they have addressed these issues. This has been validated by Ernst and Young and the Company’s sustainability committee. [Our Stakeholders and Issues, 06/06/2018: bp.com]  
• Met: Including amongst EX BPs [Human Rights - additional information, Apr 2019: bp.com]  
• Met: Example of Actions decided: In its latest Human rights-additional information document, the Company discloses information about the independent assessments of labour conditions in its contractor workforce in Oman, where it works with contractors that employ migrant workers: ‘The assessments, which included terms of recruitment and employment, identified issues related to working practices, passport retention, recruitment fees and worker grievance mechanisms. Since the initial assessments three years ago, we’ve made significant progress by working with our contractors to: Develop action plans to reduce the risk of modern slavery on site and in their supply chains; Put in place policies that prohibit forced labour, including specifically requiring employers to pay recruitment fees and preventing restriction on workers’ freedom of movement; Improve how we communicate our expectations on labour rights to our contractors, including hosting management forums to raise awareness and share good practices.’ [Human Rights - additional information, Apr 2019: bp.com]  
Score 2  
• Met: Both requirements under score 1 met |
| B.2.4 | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: System to check if Actions are effective: The Tangguh Independent Advisory Panel (TIAP), set up in 2002 provides guidance to BP on the non-commercial aspects of its operations in Tangguh, Indonesia. As part of this work, it held engagement sessions with local and international NGOs in the UK and US to share the results of TIAP’s 2015 assessment and some of the highlights and challenges of BP’s social development programmes. Stakeholders discussed issues such as security and human rights and the progress of indigenous Papuan development through local enterprises. TIAP provided BP with several suggestions for possible improvements to the joint training exercise and BP plans to work with the police to develop further scenarios in line with the recommendations within the report. Nevertheless, details of overall system(s) for tracking the actions taken in response to human rights risks assessment and for evaluating effectiveness of actions have not been disclosed by the Company. [Annual Report on the Voluntary Principles on Security and Human Rights, 2017: bp.com & Sustainability Report, 2017: bp.com]  
• Not met: Lessons learnt from checking effectiveness  
Score 2  
• Not met: Both requirement under score 1 met |
| B.2.5 | Communicating: Accounting for how human rights impacts are addressed | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Comms plan re identifying risks: The Company has communicates that it has a system to identify human rights risks and impacts including own operations and extractive business partners (see B.2.1). [Human Rights - additional information, Apr 2019: bp.com & Our Stakeholders and Issues, 06/06/2018: bp.com]  
• Met: Comms plan re assessing risks: The Company has communicated that it has a system to assess which are its human rights issues, including a disclosure of these |
### C. Remedies and Grievance Mechanisms (15% of Total)

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<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
| C.1            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
- Met: Channel accessible to all workers: The Company's code of conduct refers to 'Open Talk', which it describes as 'BP’s global helpline, is a confidential way to get answers to your questions and to raise concerns. It is administered by an independent company, is available every day of the week at any time, day or night, and can accommodate calls in more than 75 languages. You can contact Open Talk anonymously from most locations'.  
  
The Company Human Rights - Additional Information document states that Open talk can be utilised by anyone (incl. all workers) to raise concerns anonymously for human rights related grievances.  
  
The Company has also indicated that: 'Government assigned protection of the BTC and South Caucasus pipelines in Georgia comes from the Strategic Pipeline Protection Department (SPPD). Private Security of our sites is provided by 'Veziri'. BP security team has installed 'feedback boxes' at all sites to ensure that the workforce can report issues affecting performance regarding human rights. 'Veziri' also implemented a grievance system using an online submission tool for anonymous grievances. Further to this, BP Georgia has created a procedure for 'Cooperation and Investigation in Response to Allegations of Human Rights Abuses'. [Code of Conduct, 04/06/2018: bp.com]  
Score 2  
- Not met: Number grievances filed, addressed or resolved: The Company does disclose in 2017 that the company did not receive any third party complaints about any incidents related to excessive use of force. However, other quantitative information regarding human-rights related grievances is not disclosed. [Annual Report on the Voluntary Principles on Security and Human Rights, 2017: bp.com]  
- Met: Describes accessibility and local languages: The grievance mechanism Open Talk can accommodate calls in 'more than 75 languages.' The grievance mechanism is independently operated, and can be accessed anonymously. Furthermore, there is the option of a 'collect call' number which will accept calls without any charges to the complainant. The Code of conduct states that Open talk is administered by an independent company, is available every day of the week at any time, day or night, and can accommodate calls in more than 75 languages. [Code of Conduct, 04/06/2018: bp.com] |

| C.2            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 2   | The individual elements of the assessment are met or not as follows:  
Score 1  
- Met: Grievance mechanism for community: The Community can access Open Talk, BPs independently operated grievance mechanism. In addition to having Open Talk, the Company requires each of their operating sites to document how they manage community complaints. The Company has clarified to CHRBy 'Yes: any employee, contractor or other third party can contact BP’s confidential helpline, OpenTalk. This includes complaints from communities in relation to impacts associated with activities of BP’s extractive business partners, where BP is not the operator.’ No new relevant evidence in latest report. [Code of Conduct, 04/06/2018: bp.com & Human Rights - Additional Information, 2017]  
Score 2  
- Met: Describes accessibility and local languages: The grievance mechanism Open Talk can accommodate calls in 'more than 75 languages.' The grievance mechanism is independently operated, and can be accessed anonymously. Furthermore, there is the option of a 'collect call' number which will accept calls without any charges to the complainant. Furthermore, the Company OMS requires that BP entities |
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| C.3            | Users are involved in the design and performance of the channel(s)/mechanism(s) | 1.5 | The individual elements of the assessment are met or not as follows:  
  - Score 1  
    - Met: Engages users to create or assess system: The Company monitors the number of calls that come through the Open Talk mechanism. If the Company believes the number of calls have gone down, remedial action is taken. The Company has a case study that describes their South Caucasus Pipeline Expansion project - regular reviews of employee terms and conditions, welfare and grievances by experienced employee relations professionals within the contractor organizations. The Company states that it is 'sharing what we learned from this assessment with our businesses around the world.' No new relevant evidence in latest report. [Human Rights - additional information, Apr 2019: bp.com & Sustainability Report, 2015: bp.com]  
    - Met: Description of how they do this: Related to their 'human rights focus areas' is consultation and grievance mechanisms. However, the Company does not go into further detail as to how they engage with users on system performance. No new relevant evidence in latest report. [Sustainability Report, 2017: bp.com]  
    - Not met: Engages users on system performance: The Company states that one of their 'human rights focus areas' is consultation and grievance mechanisms. However, the Company does not go into further detail as to how they engage with users on system performance. No new relevant evidence in latest report. [Sustainability Report, 2017: bp.com]  
    - Not met: Provides user engagement example on performance  
    - Met: EX BPs consult users in creation or assessment: The Company discloses how it worked together with a non-operated joint venture partner. The Company worked together with the partner to support them in assessing the risk of modern slavery - and as a result the Company held meetings with contractors on worker rights and welfare during site visits and checked the recruitment, working practices and worker grievance mechanisms of shortlisted companies. No new relevant evidence in latest report. [Sustainability Report, 2017: bp.com] |
| C.4            | Procedures related to the mechanism(s)/channel(s) are publicly available and explained | 0.5 | The individual elements of the assessment are met or not as follows:  
  - Score 1  
    - Not met: Response timescales: Open Talk is administered by an independent company. The website opentalkweb.com, is available to everyone in 12 different languages representing the countries in which we operate, and provides many more phone numbers and facility to take a complaint in over 75 languages. The Group Ethics and Compliance Officer is responsible for the Code of Conduct. [Code of Conduct, 04/06/2018: bp.com]  
    - Not met: How complainants will be informed: The Company states "We listen and respond to concerns; establish and implement a process to receive communications; update complainants on progress and the outcome of their complaint" and "we communicate with the individuals who raised the concern throughout the process and also respond formally at the end". However, they do not clarify how the complainants will be informed. No new relevant evidence in latest Report. [Human Rights - Additional Information, 2017]  
    - Met: EX BPs communities use global system: The Company encourages employees, contractors, communities and other third parties to speak up if they see something they think could be unsafe or unethical…anyone can ask questions and raise concerns anonymously in Open Talk. The Company OMS requires that BP entities establish and implement a process to receive communications from key communities and stakeholders, respond to their concerns, identify and manage impacts and record and act on their external commitments. Community members can make grievances related to operated joint venture BP operations. No new relevant evidence in latest report. [Human Rights - Additional Information, 2017] |
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<td></td>
<td>Score 2</td>
<td></td>
<td>• Met: Escalation to senior/independent level: Information regarding complaints is stated in the Company's operating management system. The company discloses &quot;As an example, at our South Caucasus Pipeline Expansion (SCPX) project in Azerbaijan, all grievances are logged and investigated. The details are then discussed and recommendations are proposed at the grievance investigation panel, which includes company legal, social, land and environmental team members and managers. Senior management are involved for more serious and complex issues.&quot; No new relevant evidence in latest Report. [Human Rights - Additional Information, 2017]</td>
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<td>C.5</td>
<td>Commitment to non-retaliation over complaints or concerns made</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Public statement prohibiting retaliation: The Code of Conduct covers human rights. The Code of Conduct states that BP 'does not tolerate retaliation. We consider acts of retaliation to be misconduct. Retaliation can take many forms, for example: threats, intimidation, exclusion, humiliation, and raising issues maliciously or in bad faith.' Bob Dudley's note on the Code of Conduct states 'Please have the courage to speak up if you see anything that appears to breach this Code. Your concerns will be considered seriously - and BP will not tolerate retaliation against anyone.' [Code of Conduct, 04/06/2018: bp.com] • Met: Practical measures to prevent retaliation: The Company states that it is the responsibility of managers to be a positive role model and support team members by 'doing your part to make sure that no one experiences retaliation for speaking up or co-operating in an investigation.' [Code of Conduct, 04/06/2018: bp.com] Score 2 • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation</td>
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<tr>
<td>C.6</td>
<td>Company involvement with State-based judicial and non-judicial grievance mechanisms</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)</td>
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<tr>
<td>C.7</td>
<td>Remediying adverse impacts and incorporating lessons learned</td>
<td>1.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes how remedy has been provided: The Company states 'If we do cause, or contribute to, adverse impacts on the human rights of communities near our operations, we are committed to providing for, or co-operating in, making it right.' The Company then describes case study examples of how they have negotiated grievances with communities. For example, in Trinidad &amp; Tobago, the Company conducted seismic surveys to develop the Juniper gas field which affected people working in the local fishing industry as it meant they could not work in the area for safety reasons. Following consultations with fishing associations and communities, we made payments for temporary loss of livelihood to those affected. ' [Sustainability Report, 2017: bp.com] • Not met: Says how it would remedy key sector risks Score 2 • Met: Changes introduced to stop repetition: In its website section 'Responding to human rights concern at sea', the Company describes its actions taken responding a human rights issue related to salaries payment: 'We reviewed our contracting process for hiring the vessel and decided to take steps to enhance the due diligence aspects of our spot-chartering activities in the North Sea. We asked existing and potential suppliers to answer a targeted set of human rights questions – tailored to the marine industry and based on IPIECA guidance – and to provide documentary evidence of their processes and practices. Based on their answers and our existing due diligence checks, we created a prequalified pool of spot-charter companies. From our work in the North Sea, we found that some of the shipping companies reviewed already have adequate procedures in place. Others have made improvements to their procedures. For example, one company has undertaken to conduct annual audits of the agencies that recruit and hire their seafarers to check that they comply with our requirements on labour rights. Those who did not meet our requirements are no longer working for us.' [Responding to human rights concerns at sea, Ap 2019: bp.com]</td>
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### D. Performance: Company Human Rights Practices (20% of Total)

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| D.3.1          | Living wage (in own extractive operations, which includes JVs) | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not met: Living wage target timeframe or achieved  
• Not met: Describes how living wage determined  
Score 2  
• Not met: Pays living wages  
• Not met: Reviews living wages definition with unions |
| D.3.2          | Transparency and accountability (in own extractive operations, which includes JVs) | 2 | The individual elements of the assessment are met or not as follows: Score 1  
• Met: Member of EITI: The Company is a founding member of the EITI. [Revenue Transparency, 07/06/2018: bp.com]  
• Met: Reports of taxes and revenues beyond legal minimums: The Company publishes a ‘payments to governments’ report that reports taxes beyond legal minimums. [Report on payments to government, 31/12/2017: bp.com]  
Score 2  
• Met: Reports taxes and revenue by country: The ‘payment to governments’ yearly report breaks down taxes, royalties, fees, bonuses and infrastructure improvements paid by country breakdown. [Report on payments to government, 31/12/2017: bp.com]  
• Met: Steps taken re non EITI countries: In 2017, the Company supported EITI implementation in a number of countries were they operate - including in Iraq and Trinidad & Tobago. [Revenue Transparency, 07/06/2018: bp.com] |
| D.3.3          | Freedom of association and collective bargaining (in own extractive operations, which includes JVs) | 0 | The individual elements of the assessment are met or not as follows: Score 1  
• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation  
• Not met: Discloses % covered by collective bargaining  
Score 2  
• Not met: Both requirement under score 1 met |
| D.3.4          | Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs) | 2 | The individual elements of the assessment are met or not as follows: Score 1  
• Met: Injury Rate disclosures: The Company reports the recordable injury frequency for its total workforce (2018: 0.20 , 2017: 0.22) and also separately for Employees and Contractors. [Sustainability Report 2018, Apr 2019: bp.com]  
• Met: Lost days or near miss disclosures: The Company reports day away from work cases frequency for its total workforce (2018: 0.048 , 2017: 0.055) and also separately for Employees and Contractors. [Sustainability Report 2018, Apr 2019: bp.com]  
Score 2  
• Met: Set targets for H&S performance: The Company indicates in its Sustainability Report 2018 that its safety goals is ‘to have no accidents, no harm to people and no damage to the environment.’ The Company also notes that remuneration for executives is linked to performance against safety performance indicators (Recordable Injury Frequency and Tier 1 incidents). [Sustainability Report 2018, Apr 2019: bp.com] |
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<tr>
<td>D.3.5</td>
<td>Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Process to identify indigenous rights holders • Not met: How engages with communities in assessment: In its website section 'Engaging with communities', the Company indicates: 'When planning new projects we assess the potential impacts on communities, such as health and safety, resettlement, labour rights, use of water and local livelihoods. This helps to identify early on whether any activities could affect the rights of people living in nearby communities and to find ways to prevent or mitigate those impacts. We consult with communities so that we can understand their expectations and address concerns. [...] We require our businesses to identify and respond to concerns, as well as record and act on any commitments'. However, there is no further information describing how it engages with indigenous communities in carrying out the assessment. [Engaging with communities, Ap 2019: bp.com] Score 2 • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal</td>
</tr>
<tr>
<td>D.3.6</td>
<td>Land rights (in own extractive operations, which includes JVs)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Approach to identification of land tenure rights holders: The Company disclosed to the CHRB, as published on the BHHRC website, &quot;Our operating management system (OMS) includes requirements for our projects that wherever possible a community or communities not be moved from their principal place of dwelling. OMS also provides guidance on physical and economic resettlement if this is necessary, including how to identify legitimate land tenure rights.&quot; However, this information does not detail how the company engages with the affected or potentially affected communities in the process. [BP Response to CHRB Initial Assessment 2018, 22/08/2018: business-humanrights.org] • Not met: Describes approach to doing so if no recent deals Score 2 • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals</td>
</tr>
<tr>
<td>D.3.7</td>
<td>Security (in own extractive operations, which includes JVs)</td>
<td>2</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: How implements security (inc VPs or ICOC): The Company publishes an annual report to the Voluntary Principles. The Company provides ‘training on the principles for those employees who are accountable for managing security and conduct assessments to identify areas where we can improve.’ [Annual Report on the Voluntary Principles on Security and Human Rights, 2017: bp.com &amp; Human Rights - additional information, Apr 2019: bp.com] • Met: Example of respecting HRs in security: The Company states that ‘BP continues to build relationships in our non-operated joint ventures which enable us to discuss and share our approach to security and human rights across our operations. In particular in 2017 we have worked closely with Kosmos Energy to learn from each other’s approaches across a number of projects we are working on together.</td>
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Throughout the year BP undertook a series of briefings to key internal stakeholders, delivered VPSHR training and supported VPSHR Risk Assessments (VPSHR-RA) and in-country implementation processes in a number of countries, including Trinidad, Mauritania, Senegal and Egypt. ' [Annual Report on the Voluntary Principles on Security and Human Rights, 2017: bp.com]

• Met: Ensures Business Partners follow security approach: As above with regards to joint ventures. The Company also states 'As with any type of contractor, BP businesses screen and select private security contractors based on a combination of factors.' These factors include alignment to human rights policy. [Annual Report on the Voluntary Principles on Security and Human Rights, 2017: bp.com]

Score 2

• Met: Assesses and involves communities: The Company describes how local operations implement actions to help meet security and human rights commitments, such as providing channels for local communities to raise concerns. The Company provides an example of the Integrated Community Based Security (ICBS) concept which is implemented in Tangguh is built on working in an ongoing fashion with the local community; ICBS establishes shared responsibilities for maintaining security. [BP Response to CHRB Initial Assessment 2018, 22/08/2018: business-humanrights.org]

• Met: Working with local community: The Company describes the Integrated Community-Based Security Concept (ICBS) which is implemented in Tangguh. 'The Integrated Community-Based Security (ICBS) concept which is implemented in Tangguh is built on working in an ongoing fashion with the local community; ICBS establishes shared responsibilities for maintaining security. Local communities, government bodies and security forces are all given a role in resolving conflict issues. The Field guidelines which govern the provision of security at Tangguh require use of a community policing system, in which dialogue with communities and mechanisms for conflict prevention and resolution play a key part." [BP Response to CHRB Initial Assessment 2018, 22/08/2018: business-humanrights.org]

D.3.8 Water and sanitation (in own extractive operations, which includes JVs)

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

Score 1

• Met: Action to prevent water and sanitation risks: In its Human Rights-additional information document, the Company indicates: 'we consider the potential effect our activities might have on the surrounding community’s right to water and sanitation. If we identify a potential impact, we put in place preventive and corrective actions. We did not identify any such impacts from our proposed freshwater withdrawals in the project appraisals we carried out in 2017'. [Human Rights - Additional Information, 2017]

Score 2

• Not met: Water targets considering local factors: In its 'Water performance' report, the Company discloses some figures related to its water management programme, however, no specific information found related to water stewardship taking into account water use by local communities and other users in the vicinity of its operations. [Water performance 2018, 2018: bp.com]

• Not met: Reports progress in meeting targets and shows trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

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<tr>
<td>E(1).0</td>
<td>Serious allegation No 1</td>
<td></td>
<td>No allegations meeting the CHRB severity threshold were found, and so the score of 43.10 out of 80 points scored in themes A-D &amp; F has been applied to produce a score of 10.78 out of 20 points for theme E.</td>
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F. Transparency (10% of Total)

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<tr>
<td>F.1</td>
<td>Company willingness to publish information</td>
<td>3.16 out of 4</td>
<td>Out of a total of 38 indicators assessed under sections A-D of the benchmark, BP made data public that met one or more elements of the methodology in 30 cases, leading to a disclosure score of 3.16 out of 4 points.</td>
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| F.2 | Recognised Reporting Initiatives | 2 out of 2 | The individual elements of the assessment are met or not as follows: Score 2
• Met: Company reports on GRI: According to its website the Company reports 'in accordance with the core option of the Global Reporting Initiative standards.' It discloses a GRI Reporting Table. [GRI Reporting Table, 2018: bp.com] |

| F.3 | Key, High Quality Disclosures | 0.8 out of 4 | BP met 2 of the 10 thresholds listed below and therefore gets 0.8 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples |
A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snapshot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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<td>• Met: Score 2 for A.2.2 : Board discussions</td>
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<td>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</td>
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<td>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</td>
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<td>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</td>
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<td>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</td>
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<td>• Not met: Score 2 for C.7 : Remediying adverse impacts and incorporating lessons learned</td>
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<td>Demonstrating a forward focus</td>
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<td>• Not met: Score 2 for A.2.3 : Incentives and performance management</td>
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<td></td>
<td>• Not met: Score 2 for B.1.2 : Incentives and performance management</td>
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<td>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)</td>
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<td>• Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)</td>
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