



Date June 26, 2024

Statement on Modern Slavery and Human Trafficking for the Financial Year 2023

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (hereinafter referred to as "Act") and explains the steps OMV Aktiengesellschaft and its group companies (hereinafter referred to jointly as "OMV") have taken, and are continuing to take, to ensure that modern slavery or human trafficking is not taking place within OMV's supply chain and associated businesses.¹

1. Business Structure

OMV produces and markets oil and gas, as well as chemical products and solutions in a responsible way and develops innovative solutions for a circular economy. With Group sales of about EUR 39 bn and 20,600 employees in 2023, OMV is one of Austria's largest listed industrial companies.

In Chemicals & Materials (C&M), OMV is one of the world's leading providers of advanced and circular polyolefin solutions, with total polyolefin sales of 5.7 mn t in 2023. It is also a European market leader in base chemicals and plastics recycling. The Company supplies services and products to customers worldwide through OMV and Borealis, and its two joint ventures Borouge and Baystar™.

In Fuels & Feedstock, OMV operates three refineries in Europe: Schwechat (Austria) and Burghausen (Germany), both of which feature integrated petrochemical production, and the Petrobrazi refinery (Romania). In addition, OMV holds a 15% share in ADNOC Refining and in ADNOC Global Trading in the UAE. The retail network consisted at the end of 2023 of 1,666 filling stations (2022: 1,803) in eight European countries.

In Energy, OMV explores, develops, and produces crude oil and natural gas in its three core regions of Central and Eastern Europe, the Middle East and Africa, and the North Sea. Daily hydrocarbon production was 364 kboe/d in 2023, with a nearly equal share of liquids and natural gas production. In the Gas Marketing & Power business, OMV markets and trades natural gas and power in several European countries, and it also includes its LNG business. It holds a 65% stake in the Central European Gas Hub (CEGH) and operates natural gas storage facilities with a capacity of around 30 TWh in Austria and Germany, and a gas-fired power plant in Romania.

Sustainability and circularity lie at the center of OMV's Group Strategy 2030². OMV aims to become a net-zero business by 2050, accelerate the energy transition, and proactively expedite the transition from a linear to a circular economy. We build positive relationships with our employees, communities, suppliers, and other stakeholders by addressing social and economic effects of the transition to an environmentally sustainable economy.

¹ Subsidiaries within OMV Group that met the turnover threshold applicable under section 54 of the Act for the financial year 2021 will publish separate statements with additional details on their activity, on their supply chain and on their controls they have in place to prevent modern slavery and human trafficking.

² For more detailed information, please refer to the [OMV Sustainability report 2023](#)



2. OMV's relevant Policies regarding Human Rights

OMV strongly opposes forced labor, slavery, child labor, and human trafficking. The focus on forced labor and human trafficking prevention is part of OMV's larger effort to respect and realize human rights. The respect for and realization of human rights has been fundamental to OMV's activities for many years and is an essential part of the OMV Corporate Strategy 2030.

a. Human Rights Policy and Matrix

OMV's publicly available human rights policy commits us to respect and avoid infringing internationally recognized human rights as set out in the Universal Declaration of Human Rights and in internationally recognized standards, including those of the International Labor Organization (ILO) core treaties. Accordingly, OMV, Borealis and OMV Petrom have signed the United Nations Global Compact (hereinafter referred to as "UNGC") and are fully committed to implementing the UNGC principles on human rights including the elimination of all forms of forced and compulsory labor as well as the OECD Guidelines for Multinational Enterprises.

OMV is committed to respect worker's rights as set out in the eight Fundamental Conventions and the Declaration on Fundamental Principles and Rights at Work of the ILO, specifically the principles of freedom of association and right to collective bargaining, the elimination of all forms of forced or compulsory labor and modern slavery, the effective abolition of child labor, the elimination of discrimination, and a safe and healthy working environment.

Human rights are universal values that guide our conduct in every aspect of our activities. To implement its human rights policy, OMV has mapped its salient human rights responsibilities related to its relevant stakeholders (especially own employees, contractors, and their employees, etc.) in a comprehensive Human Rights Responsibility Matrix which constitutes the basis for our activities in the field of human rights and serves as a fundamental tool for their implementation. This matrix includes the particularly sensitive areas of modern slavery, child labor, human trafficking and forced labor and ensures active management of risks with respect to human rights related to OMV's business activities.

b. OMV's Code of Conduct

The UNGC's human rights principles are reflected in OMV's Code of Conduct. It explains the way OMV behaves as an organization. Our Code of Conduct stipulates that suppliers must support OMV's principles and commitments. This mitigates supply chain risks such as forced labor, slavery, and human trafficking. To ensure adherence to OMV's human rights values by the business and its suppliers, and thus that forced labor, slavery and human trafficking are not taking place in its own business nor its supply chain, OMV has incorporated a Code of Conduct in its General Conditions of Purchase of OMV Group³. Suppliers are obliged to comply fully with the content of the Code of Conduct and the General Conditions of Purchase. Should OMV discover at any time a failure to comply with the conduct expected of its suppliers, business partners and other third parties, it commits to work proactively with them to redress any failing. OMV has a zero-tolerance approach and in any circumstance where it believes such a collaborative approach is inappropriate or ineffective, it will strongly consider ceasing all business with that supplier or counterparty.

³ [General Conditions of Purchase of OMV Group](#)



3. Due Diligence Processes and Risk Assessment

We recognize our responsibility to avoid complicity in human rights abuses – including modern slavery – as described in the UN Guiding Principles on Business and Human Rights (UNGPs) and continue to incorporate these principles into our business processes. Our Human Rights Due Diligence (DD) encompasses the following four steps: 1. assessing actual and potential human rights impacts associated with our current and future business activities; 2. integrating and acting upon the DD findings in our activities; 3. tracking effectiveness of our DD actions; and 4. communicating on how these impacts are being addressed. It includes the continuous engagement (consultation) of external stakeholders, including those being impacted. We use our risk assessment findings to derive concrete measures to reduce the risk of direct and indirect involvement in potential human rights violations.

When selecting suppliers, OMV assesses potential risks with particular focus on countries where forms of modern slavery and human trafficking are prevalent. Tools such as evaluations and audits assess and monitor supplier compliance with the principles outlined in OMV's Code of Conduct. Our assessment of suppliers' ESG management and performance covers human rights, occupational health and safety, social responsibility, business ethics, compliance, and environmental performance. Where a supplier does not act with integrity or does not have suitable controls in place, OMV will consider whether it can work with the supplier to implement improvements or needs to terminate the relations with the supplier.

Supplier prequalification is part of pre-contractual activities. The goal of the prequalification process is to screen potential suppliers before bringing them on board to ensure that only those suppliers that meet our HSSE and sustainability standards can be considered for future collaboration. Sustainability assessments and audits form further stages of supplier due diligence.

OMV has been a member of Together for Sustainability (TfS) since 2021. As a joint initiative and global network of almost 50 companies, TfS sets the de facto global standard for the environmental, social, and governance performance of chemical supply chains. The TfS program is based on the principles of the UN Global Compact and Responsible Care®. Being a TfS member, OMV further embeds sustainability into its day-to-day business operations and further cascade sustainability requirements within our supply chain. In 2023, 224 TfS (re)assessments performed by EcoVadis and 08 TfS audits. A total of 303 OMV suppliers achieved a valid EcoVadis score.

OMV conducts supplier audits during the prequalification process and/or during contract execution. The aim of the audits is to measure the performance of our suppliers (including HSSE and sustainability) and define actions, which will enable them to optimize their performance and meet OMV requirements. In 2023, we performed 40 audits covering sustainability topics in addition to the audits done through TfS.

OMV also maintains localized Community Grievance Mechanisms (CGMs) as per UNGP's Effectiveness Criteria⁴. The CGMs help OMV and those potentially impacted by its operations resolve issues in a non-judicial manner and, depending on the case, offer access to a solution. Grievances can be communicated verbally or in writing and can be expressed in local languages. They can be lodged by email, phone, through our community relations and development staff working

⁴ The UN Effectiveness Criteria require the grievance mechanism to be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.



locally and other locally dedicated channels, as well as at a corporate level. They are also available to supply chain workers. The CGMs help to detect any incidents relating to human rights with respect to business activities and supply chains in all the countries where OMV operates. In 2023, 19 grievances under the human rights category⁵ received and resolved from external stakeholders but no violation of child labor, forced labor, human trafficking, etc.

In 2022, our group company, Borealis was confronted with reports of alleged human trafficking practices conducted by the contractor and its subcontractor at the construction site in Kallo, Belgium. Since the allegation, Borealis has taken many steps to reduce the risk of social misconduct and malpractices and advanced its organizational set-up both in terms of competence and governance, such as setting up a Global Social Compliance Team and promotion of a speak-up culture within the organization, as well as for supplier onboarding with a focus on social compliance. The Borealis Ethics Hotline was also opened to external whistleblowers and a process description implemented in the Borealis Management System (BMS), explaining in detail how to handle any such reports.

The OMV Group always seeks to improve and is strongly committed to further strengthening its processes and mitigation measures to prevent any maltreatment and disrespect of workers' human rights in the supply chain.

At corporate level, we analyzed the HSSE and Procurement directives for contractor management and prepared a detailed checklist for human rights compliance to be used at site level. The revised human rights e-learning refers specifically to human rights in business relations, and the new OMV Group Human Rights Policy Statement details our human rights commitment related to labor rights and business partners in line with business best practice and international standards. At local level, individual monitoring initiatives were implemented to ensure our business partners' compliance with human rights. Among these were spot checks and HSSE walks, the inclusion of human rights in service quality meetings and evaluation criteria with our contractors, the confirmation of contractor employees' employment registrations with local labor offices, detailed checks of framework contracts, and intensified promotion of our human rights training options. Furthermore, all business entities developed short- and mid-term plans to intensify human rights management in contractor relations.

4. Training and Awareness Raising

OMV offers a group wide training program, which equip our employees with an understanding of our human rights management process and give them a space to work on concrete operational issues and local challenges. In 2023, we developed and launched a new human rights e-learning course, which guides employees through human rights norms and situations. The content of this 35-minute training session is based on an internal needs survey conducted among subject matter experts dealing with human rights topics. It teaches a basic understanding of human rights in the business context and provides insight into our specific responsibilities, for example related to labor rights of our own and contractors' employees as well as severe human rights violations such as child labor, forced labor, and human trafficking. The training is mandatory for all employees and our Executive Board and top leadership management encourages the employees throughout the Group to complete the human rights e-learning program, including a personal video message of our CEO. Until 2023, 71% of

⁵ Human rights category grievances include just and favorable working conditions at contractors, child and forced labor, indigenous rights, etc. For more information, see [Human Rights](#).



our employees were trained in human rights 7,124 employees completed the human rights e-learning course, and 170 employees participated in (virtual) classroom training on human rights in 2023. Moreover, more than 205 buyers across all locations attended awareness sessions on sustainable procurement.

Additionally, the regrettable incidents in Kallo increased awareness for labor-related risks in our contractual relations throughout the Group and led to a further strengthening of our processes and mitigation measures to prevent any maltreatment and disrespect of workers' human rights, e.g., through local spot checks, inclusion of human rights in service quality meetings and evaluation criteria with our contractors, and other initiatives at local and corporate level.

5. Key Performance Indicators and Assurance Structures

Sustainability lies at the center of OMV's Group strategy 2030, and clear targets and actions are formulated to be achieved. Concrete targets and actions are set to be achieved by 2025 & 2030. We have committed ourselves publicly to various targets supporting human rights and the elimination of modern slavery and human trafficking in our business relations:

Target 2025	Status 2023
<ul style="list-style-type: none"> Promote awareness of ethical values and principles: conduct in-person or online business ethics training for all employees. 	<ul style="list-style-type: none"> 9,285 employees in the OMV Group trained in business ethics. 303 employees at Borealis received tailored classroom/virtual training sessions on Ethics & Compliance.
<ul style="list-style-type: none"> Be an active member of TfS and run sustainability evaluations for all suppliers covering >80% of procurement spending. 	<ul style="list-style-type: none"> OMV has been a TfS member since 2021. 40.6% of A suppliers (suppliers covering >80% of Procurement spend) assessed.
<ul style="list-style-type: none"> Assess Community Grievance Mechanism of all sites against UN Effectiveness Criteria. i6 	<ul style="list-style-type: none"> 8 out of 9 sites in scope assessed.
<ul style="list-style-type: none"> Target 2025 	<ul style="list-style-type: none"> Status 2023
<ul style="list-style-type: none"> Train all OMV Group employees in human rights 	<ul style="list-style-type: none"> 71% of total employees trained in human rights.
<ul style="list-style-type: none"> Conduct human rights assessments and develop action plans for all OMV Group operations with a high level of human rights risks every 5 years. 	<ul style="list-style-type: none"> 6 assessments conducted in the last 5 years.

In 2023, OMV continued to be rated as best in class in various Environmental, Social, and Governance (ESG) rating agencies who cover a wide range of criteria, including policies for child and forced labor and other human rights related topics.

In 2023, OMV achieved the following ESG rating results, among others:

- Dow Jones Sustainability™ Indices (DJSI World and DJSI Europe) included for the sixth year in a row.

⁶ Legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, based on engagement and dialogue.



- MSCI reaffirmed an AAA rating for the 11th year in a row.
- Awarded by ISS ESG with the Prime Status.
- 27.4 (medium risk) in the Sustainalytics ESG Risk Rating.

OMV undergoes a yearly, external assurance process for its sustainability reporting, which includes an audit of human rights and supply chain management structures and reporting on KPIs. For more information about OMV's approach to human rights, please refer to the OMV Sustainability Report 2023.

The Executive Board

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