

Date June 16, 2025

## Statement on Modern Slavery and Human Trafficking for the Financial Year 2024

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 value chain and associated businesses<sup>1</sup>.

### 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 revenues of about EUR 34 bn and nearly 24,000 employees in 2024, 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 6.3 mn t in 2024. 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 (F&F), 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. OMV's total global processing capacity amounts to around 500 kbbl/d. Fuels and other sales volumes in Europe totaled 16.2 mn t in 2024 and the retail network consisted at the end of 2024 of 1,702 filling stations in eight European countries. F&F is expanding its renewable fuels and sustainable chemical feedstocks offerings while also growing its network of EV charging solutions.

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 340 kboe/d in 2024, with a slightly higher 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. The Low Carbon Business focuses on more sustainable energy sources from geothermal energy and renewable electricity, primarily in Romania, and is venturing into Carbon Capture and Storage (CCS).

OMV Sustainability Framework 2030 covers all ESG-related material topics relevant to OMV and are fully integrated into the overall governance structure of the Company. These topics have the same

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<sup>1</sup> Subsidiaries within OMV Group that met the turnover threshold applicable under section 54 of the Act for the financial year 2024 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.



weight as any other business consideration and, following the Company's responsible approach to business, are integrated into the daily operation and management processes of the Company.

## **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, which has been fundamental to OMV's activities for many years.

### **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 impacts and risks with respect to human rights related to OMV's business activities.

### **b. OMV's Code of Conduct**

The OMV's Code of Conduct sets forth clear rules of behavior in accordance with the UNGC and are in line with international human rights and labor standards. Its principles guide OMV's behavior towards its internal and external stakeholders and serve as the basis for many other of our policies and guidelines. Our Code of Conduct stipulates our firm commitments to upholding human rights in all aspects of our operations and throughout our value chain. The company explicitly states a zero-tolerance policy towards forced or compulsory labor, human trafficking, slavery, and servitude. Compliance with the Code of Conduct is mandatory for everyone acting on behalf of, with, and for our company. OMV Code of Conduct clause of our General Purchasing Conditions apply automatically to all contracts, if not, the supplier must proof the same standing of the business principles as of OMV. Violations are reported and are met with consequences.

## **3. Due Diligence Processes and Risk Assessment**

We recognize our responsibility to respect human rights– including modern slavery – in our business activities and relationships 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 and risks 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 impact and risk assessment findings to derive concrete measures to reduce the risk of direct and indirect involvement in potential adverse human rights impacts.

Country Entry Checks are done to identify and assess human rights impacts and risks related to OMV's potential business activities in that country and propose concrete mitigation measures in the case of positive entry. In 2024, we conducted three country entry checks. Human Rights Risk Mapping is done at country level annually and further due diligence actions and human rights training needs are defined with the objective of ensuring we do not cause or contribute to negative human rights impacts on our rightsholders and address all potential adverse impacts accordingly. The Human Rights Compliance Check is used to examine a business partner's policies and processes addressing human rights issues such as forced labor, child labor, human trafficking, just and favorable working conditions, communities and indigenous peoples, diversity and non-discrimination, and the availability of grievance mechanisms. In 2024, we conducted a Human Rights Self-Assessment of our business in a country with high human rights risks with the support of external human rights experts. The review showed that OMV country business has formalized systems in place to manage human rights impacts, which help in integrating and implementing human rights commitments. However, a detailed human rights impact assessment is recommended to identify the actual and potential impacts of business activities and operations on workers and communities in more depth. Additionally, engagement with rightsholders and effective monitoring of management measures should be strengthened.

At OMV, we recognize that our value chain workers are essential stakeholders. We conduct regular assessments and audits (e.g., HSSE, human rights) of our supply chain to identify and address potential human rights impacts, engaging directly with value chain workers and their representatives to understand their concerns and perspectives. We collaborate with our suppliers and business partners to promote fair labor practices and ensure compliance with international human rights standards.

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.

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 human rights, HSSE and other 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. The TfS program is based on the principles of the UN Global Compact and Responsible Care®. Being a TfS member, OMV further cascades sustainability requirements within its supply chain. In 2024, there were 13 TfS audits conducted and 570 TfS (re)assessments performed via EcoVadis platform, with a total of 697 OMV suppliers holding a valid EcoVadis score (no more than 3 years old).

OMV conducts supplier audits during the prequalification process and/or during contract execution. The aim of the audits is to measure the performance of its suppliers (including HSSE and sustainability) and define actions, which will enable them to optimize their performance and meet OMV



requirements. In 2024, OMV performed 42 audits covering sustainability topics in addition to the audits done through Tfs.

At OMV, grievance mechanisms are crucial tools for preventing and managing adverse impacts on local communities, employees, and other stakeholders, including workers in our value chain. These mechanisms provide a channel for identifying potential adverse impacts, resolving grievances, and offering remedies to rights holders where we have caused or contributed to a negative impact. The grievance channels help us to detect any incidents relating to human rights with respect to business activities and supply chains in all the countries where OMV operates. In 2024, two grievances under the human rights category<sup>2</sup> received and resolved from external stakeholders. No case of child labor, forced labor, or human trafficking has been identified. 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, including those of value chain workers.

At corporate level, we have updated our human rights management system and prepared a roadmap for its implementation in OMV businesses. 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 have plans to intensify human rights management in contractor relations.

#### **4. Training and Awareness Raising**

OMV offers a group wide training program, which equips our employees with an understanding of our human rights management process and gives them a space to work on concrete operational issues and local challenges. Our mandatory human rights e-learning course for employees guide 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. Until 2024, 80% of our employees have been trained in human rights. 6,868 employees completed the human rights e-learning course, and 23 employees participated in (virtual) classroom training on human rights in 2024. Moreover, 105 buyers across all locations attended awareness sessions on sustainable procurement.

#### **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 by 2025 & 2030. We have committed ourselves publicly to the following targets supporting human rights and the elimination of modern slavery and human trafficking in our business relations:

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<sup>2</sup> 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.



Target 2025	Status 2024
<ul style="list-style-type: none"> <li>Promote awareness of ethical values and principles: conduct in-person or online business ethics training for all employees.</li> </ul>	<ul style="list-style-type: none"> <li>A total of 1,201 OMV employees were trained in person in business ethics/anti-corruption in 2024. In addition, 107 OMV employees were trained in competition law in 2024. This number consists of 296 OMV employees who were trained in person in competition law and 811 employees who completed the e-learning program on competition law. A total of 629 employees (2023: n.r.) at Borealis received bespoke classroom/virtual training sessions on anti-corruption (2024: 323)/ competition law (2024: 306)</li> </ul>
<ul style="list-style-type: none"> <li>Be an active member of TFS and run sustainability evaluations for all suppliers covering &gt;80% of procurement spend.</li> </ul>	<ul style="list-style-type: none"> <li>OMV has been a TFS member since 2021.</li> <li>Suppliers covering 65% of procurement spend assessed.</li> </ul>
<ul style="list-style-type: none"> <li>Assess Community Grievance Mechanism of all sites against UN Effectiveness Criteria<sup>3</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>8 sites in scope assessed.</li> </ul>
<ul style="list-style-type: none"> <li>Train all OMV Group employees in human rights</li> </ul>	<ul style="list-style-type: none"> <li>80% of total employees trained in human rights.</li> </ul>
<ul style="list-style-type: none"> <li>Conduct human rights assessments and develop action plans for all OMV Group operations with a high level of human rights risks every 5 years.</li> </ul>	<ul style="list-style-type: none"> <li>7 assessments (70%) conducted in the last 5 years.</li> </ul>

In 2024, 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 2024, OMV achieved the following ESG rating results, among others:

- Dow Jones Sustainability™ Indices (DJSI World and DJSI Europe) included
- MSCI reaffirmed an A rating.
- Awarded by ISS ESG with the Prime Status.
- Low ESG Risk Rating by the Sustainalytics.

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's Combined Annual Report 2024](#).

The Executive Board

Alfred Stern      Reinhard Florey      Martijn Arjen van Koten      Berislav Gaso

<sup>3</sup> Legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, based on engagement and dialogue.

