

# OMV Human Rights Policy Statement

## 1 CEO Statement

We at OMV believe that respecting human rights and upholding the highest ethical business standards are of the utmost importance. Our operations and business activities could impact our stakeholders, including for instance our own employees and those of our business partners as well as communities. Conducting our business in accordance with the highest ethical standards, which includes respect for human rights, is key to OMV's purpose and strategy.

With our OMV Human Rights Policy Statement, we commit to honor human rights in all our business activities, to address adverse human rights impacts we are involved in and to take adequate measures for their prevention, mitigation and, where appropriate, remediation.

Alfred Stern, Chairman of the Executive Board and Chief Executive Officer of OMV Aktiengesellschaft

## 2 Our commitment to human rights

Human rights are universal and guide our conduct in every aspect of OMV's activities. Human rights are inalienable, and every person is inherently entitled to them. OMV respects human rights as contained in the International Bill of Human Rights (the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and in internationally recognized treaties, including the International Labour Organization's (ILO) Declaration on Fundamental Rights and Principles at Work and its instruments<sup>1</sup>. Accordingly, OMV and OMV Petrom have signed the UN Global Compact and are fully committed to the UN Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises. This commitment to human rights is embedded in each business approach and supports adherence to the UN Sustainable Development Goals (SDGs).

Also as part of its Human Rights Policy Statement, OMV is also committed to equality and freedom from discrimination, including racial discrimination or discrimination on any other ground such as gender, sexual identity, age, color, ethnic or social origin, genetic features, language, religion or belief, political

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<sup>1</sup> Freedom of Association and Protection of the Right to Organise Convention No. 87  
Right to Organise and Collective Bargaining Convention No. 98  
Forced Labour Convention No. 29 (and its Protocol)  
Abolition of Forced Labour Convention No. 105  
Minimum Age Convention No. 138  
Worst Forms of Child Labour Convention No. 182  
Equal Remuneration Convention No 100  
Discrimination (Employment and Occupation) Convention No. 111  
Occupational Safety and Health Convention No. 155  
Promotional Framework for Occupational Safety and Health Convention No. 187

or any other opinion, membership of a national minority, indigenous origin, property, marital or family status, disability, health status, including mental health, or any other status.

The primary duty for the protection of human rights lies with states. In line with UNGPs, OMV has accepted the responsibility to respect and avoid infringing human rights of others in relation to all our business activities. We are committed to addressing adverse human rights impacts we are involved in and to take adequate measures for their prevention, mitigation and, where appropriate, remediation, and we strive to advance positive impacts on human rights where possible.

In meeting our human rights responsibilities, OMV acts in strict compliance with applicable national law. Where national law falls short of OMV standards, based on international human rights law, OMV is guided by its higher standards while complying with applicable laws.

### **3 Human rights due diligence**

Following the UN Guiding Principles on Business and Human Rights, our Human Rights Due Diligence encompasses the following four steps: 1. identifying and assessing actual and potential human rights impacts and risks associated with our current and future business activities; 2. integrating and acting upon the due diligence findings in our activities; 3. tracking effectiveness of our due diligence actions; and 4. communicating on how these impacts and risks are being addressed. It includes the continuous engagement (consultation) of external stakeholders, including those being impacted.

We are then committed to a rightsholders' perspective, ensuring that next to business-related risks, actual and potential impact on human rights is professionally assessed, always considering severity (combination of scale, scope and irremediability) of any impact, and acted upon accordingly. In this ongoing due diligence OMV thus makes use of internal or external resources.

### **4 Specific commitments**

OMV has mapped its salient human rights issue areas related to its relevant stakeholders (own workforce, workers in the value chain, and affected communities) 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.

OMV commits itself to these salient human rights and requires from its employees as well as from its business partners to adhere to the same principles, which are also contained in our Code of Conduct.

#### **4.1 Workers' rights**

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 the right to a safe and healthy working environment.

OMV strongly opposes the use of forced or compulsory labor, trafficking in human beings, slavery, servitude, and child labor. With our Code of Conduct, we request our employees and business partners

to ensure that all work is conducted voluntarily, without threat of penalty or sanction, and not based on deception, including ensuring that workers do not pay recruitment fees.

OMV respects the right to form and join trade unions, meaning it will not discourage membership or participation in trade unions and refrain from actions undermining adequate collective representation including collective bargaining. In case of national law prohibiting the establishment of formal employees' representation, OMV seeks to allow alternative forms of adequate representation of employees' interests always within the relevant legal framework.

We ensure compliance with locally applicable decent and adequate wage standards, working and rest time and overtime payment provisions that ensure a dignified standard of living for employees and their families and are in line with ILO working hours standards. Where local labor rights standards fall short of OMV standards, based on international human rights law, OMV is guided by its higher standards while complying with applicable laws.

OMV is committed to ensuring fair treatment and equal opportunities for all employees. Employees and job applicants are not discriminated against on any grounds, and OMV has zero tolerance for discrimination, bullying and sexual and other harassment and abuse in working relationships, including the failure to act.

OMV aims to adhere to the highest standards to provide its employees and contractors/suppliers within OMV safe workplaces. Our Safety Management System is based on the OMV HSSE Policy, the HSSE Directive, and various corporate regulations.

We are committed to ensure a high level of care for our employees' well-being, physical and mental health across the Group. Our Group-wide health care standard includes preventive initiatives such as targeted health promotion campaigns, the assessment of health risk mitigation, and curative care as provided by our OMV HSSE Policy.

## 4.2 Security provisions

We commit to respecting human rights and International Humanitarian Law (IHL) while maintaining security and safety of our staff and operations by acting in a manner consistent with all relevant laws and international standards or initiatives. As an engaged member of the Voluntary Principles on Security and Human Rights (VPs) Initiative, we are committed to respect the VPs and expect our business partners to adhere to both the VPs and the International Code of Conduct for Private Security Service Providers (ICoC). This specifically but not exclusively applies to our interactions with public and private security forces.

Following a preventive, defensive, and community-oriented approach, we integrate local security and community engagement strategies, specifically in high-risk settings. We engage surrounding communities and consider their security concerns when planning and implementing security-related activities.

Prevention and avoidance of the use of force is our priority, implying that means and methods used to protect people must always be chosen based on risks faced and the local context. We are committed to not wear, transport, or store lethal weapons on our property and we expect our business partners to comply with this commitment whilst they are on our workplaces.

### 4.3 Groups in vulnerable circumstances

We are aware of the fact that our operations could impact some of our stakeholders, including the communities where we operate. Our social license to operate is based on upholding human and labor rights and developing positive relationships with surrounding communities. We are fully committed to respect, fulfill, and support the fulfillment of human rights in our direct surroundings as well as in wider society and to avoid or mitigate any adverse impact on their health or safety that may arise from project-related activities. A special focus lies on those persons and groups with a high likelihood of being in vulnerable circumstances such as children, women, indigenous peoples, and human rights defenders. We are committed to further address any adverse impacts on local culture, religion, customs, traditions, indigenous peoples' rights, legitimate land, or livelihoods in our business activities as well as by our community funding projects.

We are committed to community consultation and recognize the principle of free, prior, and informed consent in accordance with International Finance Corporation (IFC) Performance Standard 7, and ILO Convention 169. We acknowledge indigenous peoples as social groups with identities that are distinct from mainstream groups in national societies, have special inherent rights and are often among the most marginalized and more likely to be in vulnerable circumstances.

OMV recognizes and respects legitimate tenure rights related to the ownership and use of land and natural resources (including water) as set out in the IFC Performance Standard 5. We are willing to avoid involuntary resettlement and furthermore follow a zero-tolerance policy for illegitimate land grabbing, and we respect the right to water.

In case of OMV interference with the rights of local communities, especially those of indigenous peoples, we are committed to develop adequate mitigation, reparation, and compensation plans, in close consultation with all relevant stakeholders, including the host government.

OMV recognizes the specific role and vulnerability of human rights defenders. We strongly oppose any threats, intimidation and physical, verbal, or legal attacks against human rights defenders in relation to our operations.

### 4.4 Environment & climate change

As part of OMV Sustainability Framework, OMV recognizes the right to a clean, healthy, and sustainable environment as a human right that is intrinsically linked to a wide range of other human rights. Sustainability and circularity lie at the center of OMV strategy, and we are fully committed

- to continuously improve the carbon efficiency of our operations and product portfolio,
- to support and accelerate the energy transition,
- to proactively expedite the transition from a linear to a circular economy and to become a net-zero business by 2050,
- to act on responsible natural resources management,
- and to minimize environmental impacts by preventing water and soil pollution, reducing emissions, using natural resources efficiently, and avoiding biodiversity disruption, with the overall aim to build a sustainable world worth living in for everyone.

Cognizant of the social impacts that the energy transition entails, OMV is committed to contributing to a Just Transition<sup>2</sup> for our employees and communities, and to addressing the social and economic effects of the transition to an environmentally sustainable economy.

## 5 Grievance management & commitment to remedy

We regard grievance mechanisms as a key tool for preventing and managing adverse impacts on local communities, employees, and other stakeholders. Following the UN Effectiveness Criteria, we aim to address all grievances received, regardless of whether they stem from real or perceived issues and whether the complainant is identified or anonymous. Our mechanisms are aimed to offer a channel for identifying potential adverse impacts, resolving grievances and provide where we have caused or contributed to a negative impact remedy to the rightsholders. We recognize that this does not hinder the stakeholders' right to access judicial or other remedies. Grievers shall be protected against retaliation as laid down in the OMV Code of Conduct, and we request our business partners to also prohibit retaliation, as legally provided. With our Code of Conduct, we request our business partners to have, to the extent permissible by law, also an accessible and effective grievance mechanism (or other mechanism in accordance with the applicable law) in place for their own workers and other stakeholders to report any breaches of human rights.

## 6 Awareness & engagement

Professional human rights training and awareness raising are crucial for bringing our human rights commitment to life. We provide online training to all our employees across the Group, deliver classroom training modules and webinars for specifically exposed positions and offer capacity-building and exchange of experience related to human rights to our business partners. Internal awareness-raising campaigns inform our own workforce about our commitments and responsibilities as well as specific human rights issues.

We consider stakeholder engagement as an integral part of our human rights due diligence and are strongly committed to engaging with affected rightsholders on actual and potential human rights impacts.

Our Human Rights Policy Statement is published on our website, and we report on our performance in various channels, ranging from direct dialogue with our stakeholders to formal reporting in the Sustainability Statement as part of the Annual Report in line with legal requirements and international reporting standards.

More information: [www.omv.com/humanrights](http://www.omv.com/humanrights)

Approved by OMV Executive Board

November 2022, revised January 2026

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<sup>2</sup> "Just Transition" refers to addressing social and economic effects of the transition to an environmentally sustainable economy as stated in the ILO Guidelines for a Just Transition.