



Date June 11, 2026

## Statement on Modern Slavery and Human Trafficking for the Financial Year 2025

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 is an integrated company with three robust pillars: Energy, Fuels, and Chemicals. The majority of its more than 22,000 employees work at its integrated European sites, and Group sales from continuing operations amounted to EUR 24 bn in 2025. With a year-end market capitalization of around EUR 16 bn, OMV is one of Austria's largest listed industrial companies. OMV's ambition is to transform into an integrated sustainable energy, fuels, and chemicals company, achieving net zero emissions by 2050.

In **Energy**, OMV explores, develops, and produces crude oil and natural gas with a focus on its three core regions of North, Central and Eastern Europe (CEE), and South. Activities also include the Low Carbon Business and the entire gas business. Daily hydrocarbon production was 305 kboe/d in 2025. While liquids production accounted for 58% of total production, natural gas amounted to 42%. OMV's Gas Marketing & Power business markets and trades natural gas and power in several European countries and also includes the LNG business. Furthermore, 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, as well as a gas-fired power plant in Romania. The Low Carbon Business focuses on more sustainable energy sources, mainly from geothermal energy in Austria and renewable electricity, primarily in Romania.

In **Fuels**, 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 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 16.4 mn t in 2025 and the retail network consisted of 1,708 filling stations in eight European countries at the end of 2025. Fuels is expanding its renewable fuels and sustainable chemical feedstocks offering while also growing its network of EV charging solutions.

In **Chemicals**, OMV was one of the world's leading providers of advanced and circular polyolefin solutions in 2025 with total polyolefin sales of 6.5 mn t, and a European market leader in base chemicals and plastics recycling. In 2025, the Company supplied services and products to customers worldwide through OMV and Borealis, and its two joint ventures: Borouge (with ADNOC, based in the UAE) and Baystar™ (with TotalEnergies, based in the US). With operations in over 120 countries, it offered value-adding, innovative, and circular material solutions for key industries in its five industry clusters: Consumer Products, Energy, Health Care, Infrastructure, and Mobility.

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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 2025 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.



Sustainability is central to OMV's Strategy 2030 and sustainability topics (ESG) are fully integrated into the overall governance structure of the Company. These topics have the same weight as any other business consideration and following the Company's responsible approach to business, they 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 Statement 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 commitments, 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 Code of Conduct sets forth clear rules of behavior in accordance with the UNGC and is aligned 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. The OMV Code of Conduct clause of our General Purchasing Conditions applies automatically to all contracts, if not, the supplier must prove the same standing of the business principles as 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. The human rights due diligence process follows the steps defined in the UN Guiding Principles on Business and Human Rights and can be summarized in four key steps: identify, address, track, and remediate. This due diligence is an ongoing process, applied from the start of new activities and continuing through operations. OMV has created due diligence tools to



identify and assess human rights impacts and risks before starting or acquiring business in new locations. These assessments guide concrete measures to ensure compliance with human rights responsibilities.

Country Entry Checks are done to identify and assess human rights impacts and risks related to OMV's potential business activities in a specific country and propose concrete mitigation measures in the case of positive entry. In 2025, we conducted four country entry checks. Human Rights Impact and Risk Mapping is conducted annually for all site locations 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 and actual adverse impacts we are involved in as needed. 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' rights, diversity and non-discrimination, and the availability of grievance mechanisms. In 2025, we conducted an exit review assessing human rights impacts on its workforce related to OMV's withdrawal from certain operations and asset transfers to the local government. OMV also conducted a review of a branch office's human rights management system, assisted by external experts, leading to recommendations to strengthen worker rights management in joint ventures. These were integrated into an action plan.

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 Code of Conduct. Supplier pre-qualification is part of pre-contractual activities. The goal of the pre-qualification 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.

**Workers in the value chain metrics**

| <b>Workers in the Value Chain</b>  | <b>2025</b> |
|--|-------------|
| • Severe human rights incidents connected to our upstream and downstream value chain   | 0           |
| • Thereof cases of non-respect of international standards reported in OMV's value chain  | 0           |
| • Total human rights grievances raised through SpeakUp Channel and Community Grievance Mechanisms by value chain workers             | 77          |
| • Audits performed by OMV Procurement with an external auditor   | 33          |
| • TfS (re)assessments performed by EcoVadis  | 632         |
| • TfS audits performed   | 23          |
| • Suppliers with a valid EcoVadis score (no more than 3 years old)   | 900         |
| • Suppliers with improved EcoVadis score   | 78%         |
| • Buyers across all locations that attended awareness sessions on sustainable procurement  | 190         |
| • New suppliers screened for social criteria (e.g., child labor, forced labor, and collective bargaining) and environmental criteria | 1,175       |
| • New suppliers assessed with negative social impacts in the supply chain that were disqualified                                     | 0.1%        |
| • Suppliers that were trained in social issues   | 86          |
| • Spend with local suppliers   | 70.9%       |



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. In 2025, no severe human rights incidents including forced labor and human trafficking were found and reported.

#### 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 guides 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 topics of human rights. 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.

By the end of 2025, 78.5% of employees had been trained in human rights. 4,339 employees completed the human rights e-learning course, and 49 employees participated in (virtual) classroom training on human rights in 2025.

#### 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 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:

| Target 2030  | Status 2025   |
|--|---|
| <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 10,501 OMV employees trained in business ethics/anti-corruption in 2025. In addition, 449 OMV employees were trained in competition law in 2025.</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 spends.</li> </ul>  | <ul style="list-style-type: none"> <li>OMV has been a TfS member since 2021.</li> <li>Suppliers covering 80% of procurement spend assessed.</li> </ul>  |
| <ul style="list-style-type: none"> <li>100% of the Community Grievance Mechanisms at all sites in scope assessed against UN Effectiveness Criteria<sup>2</sup>.</li> </ul>   | <ul style="list-style-type: none"> <li>All 7 sites in scope assessed.</li> </ul>  |
| <ul style="list-style-type: none"> <li>Train all OMV Group employees in human rights</li> <li>Conduct human rights assessments and develop action plans for OMV Group operations with a high level of human rights risks every 5 years.</li> </ul> | <ul style="list-style-type: none"> <li>78.5% of total employees trained in human rights.</li> <li>6 assessments (67%) conducted in the last 5 years.</li> </ul>   |

In 2025, 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 forced labor and other human rights related topics. In 2025, OMV achieved the following ESG rating results, among others:

- Included in Dow Jones Best-in-Class Indices Components (DJBIC World and DJBIC Europe)
- MSCI reaffirmed an A rating.

<sup>2</sup> Legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, based on engagement and dialogue.



- Awarded by ISS ESG with the Prime Status.
- High risk 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 2025](#).

The Executive Board

   

Alfred Stern      Reinhard Florey      Martijn Arjen van Koten      Berislav Gaso