

## Statement on Modern Slavery and Human Trafficking for the financial year 2017

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.<sup>1</sup>

### 1. Business Structure

OMV produces and markets oil and gas, innovative energy and high-end petrochemical solutions – in a responsible way. OMV Upstream explores and produces oil and gas in Europe, the Middle East, Africa, Russia and Australasia. Downstream Oil (incl. Petrochemicals) operates three refineries in Austria, Germany and Romania, an international multibrand filling station retail network, and a high-quality commercial business. Downstream Gas is a fully integrated value-added gas sales and logistics business.

### 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 promote human rights. The respect for human rights has been fundamental to OMV’s activities for many years and is an essential part of the sustainability strategy.<sup>2</sup>

#### a. Humans Rights Policy and Matrix

OMV has implemented a human rights policy that sets out OMV’s understanding and responsibility for the protection of human rights. It is the guiding principle for dealing with human rights issues in all aspects of the daily business life.<sup>3</sup>

To implement its human rights policy, OMV has mapped its responsibilities in a comprehensive human rights matrix. This matrix includes the particularly sensitive areas of slavery, child labor, human trafficking and forced labor and ensures active management of risks with respect to human rights within OMV’s supply chain. In 2017, the Human Rights Matrix has been supplemented by a reference to the UN Protocol on Human Trafficking.

#### b. OMV’s Code of Conduct

OMV is a signatory of the United Nations Global Compact (hereinafter referred to as “UNGC”) and fully committed itself to implementing the UNGC principles on human rights including the elimination of all forms of forced and compulsory labor. The UNGC principles on human rights are reflected in OMV’s Code of Conduct. It explains the manner in which OMV behaves as an organization and how OMV expects its employees, contractors and suppliers to act.<sup>4</sup>

To ensure adherence to OMV’s human rights values by the business and its suppliers, and to ensure that forced labor, slavery and human trafficking is not taking place in its own business nor its supply chain, OMV has incorporated a Business Ethics Policy and Code of Conduct. OMV requires all of its supply chain partners to become co-signatories of the Business Ethics Policy or the Code of Conduct.

Should OMV discover at any time a failure to comply with the conduct expected of its suppliers and counterparties, 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 cease all business with that supplier or counterparty.

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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 2017 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.

<sup>2</sup> For more detailed information, please refer to [OMV Sustainability Report 2017](#)

<sup>3</sup> For more detailed information, please refer to [OMV’s Human Rights Policy Statement](#)

<sup>4</sup> For more detailed information, please refer to [OMV’s Code of Conduct](#)

### 3. Due Diligence Processes and Risk Assessment

The selection of suppliers comprises an assessment of potential risks with particular focus on countries where forms of modern slavery and human trafficking are prevalent.

Moreover, OMV uses tools, such as 360-degree feedback, supplier evaluations, and audits, to evaluate and monitor its suppliers' adherence to the principles outlined in OMV's Code of Conduct. For the reviewing of its main suppliers, OMV engages regularly external supply chain auditors. The selection of the suppliers to be audited is based on a broad risk assessment, including forced labor risks. 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.

### 4. Key Performance Indicators and Assurance Structures

OMV defined key performance indicators to measure compliance with its human right policy in order to manage and steer the performance of OMV and its supply chain partners.

OMV maintains a grievance mechanism with respect to its business activities and supply chains to detect any incidents relating to human rights in all the countries where OMV operates.

As part of the supply chain assessment, OMV's sustainability performance has been evaluated by using external sustainability assessment platforms (EcoVadis and NQC-BMW). These platforms cover a wide range of criteria, including policies for child and forced labor, and performance on social, environmental, health and safety topics. OMV has been assessed for the second time by EcoVadis and placed in the top 30% performers.

### 5. Training

OMV offers a group wide training program, comprising class room trainings and an e-learning tool, with the aim of increasing human rights awareness. The class room training program focuses on employees active in high risk countries.<sup>5</sup>

Vienna, June 26, 2018

The Executive Board



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<sup>5</sup> For more detailed information, please refer to [OMV Human Rights Training](#)