

Statement on Modern Slavery and Human Trafficking for the Financial Year 2022

OMV Aktiengesellschaft

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 62 bn and 22,300 employees in 2022, OMV is one of Austria’s largest listed industrial company.

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 2022. It is also a European market leader in base chemicals, fertilizers, and plastics recycling. The Company supplies services and products to customers worldwide through OMV and Borealis, and its two joint ventures Borouge (with ADNOC, based in the UAE and Singapore) and Baystar™ (with TotalEnergies, based in the US).

OMV’s Refining & Marketing business refines and markets fuels and natural gas. It operates three inland refineries in Europe and holds a strong market position in the areas where its refineries are located, serving a strong branded retail network and commercial customers. In the Middle East, it owns 15% of ADNOC Refining and ADNOC Global Trading.

In the Exploration & Production business segment, OMV focuses on the exploration, development, and production of oil and gas in the core regions of Central and Eastern Europe, the Middle East and Africa, the North Sea and Asia-Pacific. In 2022, our daily average production reached to 392kboe/d with a roughly equal share of natural gas with sales volumes amounting to 111.2 TWh. Furthermore, OMV operates natural gas storage facilities with a capacity of 30 TWh and holds a 65% stake in the Central European Gas Hub (CEGH).

To drive sustainable growth and innovation, starting January 1, 2023, OMV reorganized its corporate structure into three business segments: Chemicals & Materials, Fuels & Feedstock, and Energy.

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.

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.

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 2022](#)

a. Humans 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 (principles 4 and 5) 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.

In 2022, we revised our existing Human Rights Policy Statement to include detailed descriptions of our specific human rights commitments, e.g., related to worker's rights and the elimination of all forms of forced or compulsory labor and modern slavery. This review process involved consulting with internal stakeholders of the OMV Group and external consultants and was concluded by the approval of the OMV Executive Board.

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 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 manner in which 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. 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

³ General Conditions of Purchase of OMV Group

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.

Since 2021, OMV has been a member of Together for Sustainability (TfS). 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 helps OMV further embed sustainability into its day-to-day business operations and further cascade sustainability requirements within our supply chain. In 2022, OMV conducted 241 TfS (re)assessments and 12 TfS audits. A total of 328 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 2022, we performed 23 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 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 2022, our group company Borealis was confronted with reports of alleged human trafficking practices conducted by our contractor and its subcontractors at our propane dehydrogenation plant construction site in Kallo, Belgium. The practices were reported to involve exploitation, inadequate compensation, lack of social security, and poor housing conditions. Borealis has zero tolerance for any malpractice and puts stringent measures in place to mitigate related risks. After being informed of the alleged human trafficking practices, Borealis has offered to the extent legally allowed – its financial aid to support the organizations in charge, to provide impacted workers with physical and mental health support, safe shelter, help gaining official work permits, or, if they prefer, relocation. Local authorities' investigations are fully supported, and all requested

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.

information have been provided to the authorities, in full transparency. The Group established a Crisis Management team led by Executive Board member Philippe Roodhooft, conducted thorough internal checks, launched audits and inspections of other contractors, and took other actions to improve monitoring and speaking-up related to our contractors' business conduct. Borealis also encouraged both internal and external stakeholders to use the Borealis Ethics Hotline, through which victims can also submit their grievances. All reports received via this hotline are handled with the utmost priority and in line with legal requirements. Borealis immediately suspended and later terminated all contracts with the contractor due to its non-compliance with their fundamental principles, and retendered the contracts. After careful consideration, Borealis granted the majority of the works to the other contractor and implemented thorough social controls at the Kallo construction site, to respect and value the workers there. Borealis has created Social Compliance team, which reports directly to the Borealis Group Compliance & Ethics Officer and is responsible for monitoring the proper and legal business conduct of Borealis' contractors and all other supply chain partners. This team consists of a Group Social Compliance Manager and currently three Social Compliance Managers, being responsible for the regions Belgium/Netherlands, Austria/Germany/Italy and Finland/Sweden. The Group Social Compliance Manager cooperates closely with colleagues from compliance, procurement, and internal audit functions. The Regional Social Compliance Managers are responsible for audits, spot checks, investigations, due diligence and vetting, and contract reviews in their respective areas. Besides, Borealis has strengthened its speak-up campaign to encourage reporting of suspected or witnessed misconduct. The campaign is specifically targeted at workers of contractors, who are invited to contact Borealis directly in the event of such misconduct. Processes for the vetting, due diligence, and monitoring of supply chain partners have been improved and involve enhanced due diligence requirements for contractors who assign personnel to Borealis sites. Additional training has been provided to raise awareness among internal project teams and contractors and address the detected issues.

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. A review of our Code of Conduct has been initiated and will be completed in 2023. 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 2022, 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 2022, 52% of our employees were trained in human rights. 4,170 employees completed the human rights

e-learning course, and 105 employees participated in (virtual) classroom training on human rights in 2022. Moreover, more than 90 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 2022
<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"> 7,537 employees in the OMV Group trained in business ethics 7,042 employees at Borealis received business ethics training including human rights
<ul style="list-style-type: none"> Be an active member of TfS and run sustainability evaluations for all suppliers covering >80% of procurement spend 	<ul style="list-style-type: none"> OMV has been a TfS member since 2021 35% 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 ⁵ 	<ul style="list-style-type: none"> 8 out of 9 sites in scope assessed
<ul style="list-style-type: none"> Train all OMV Group employees in human rights 	<ul style="list-style-type: none"> 52% of total employees trained in human rights
Target 2030	Status 2022
<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"> 4 assessments conducted in the last 5 years

In 2022, 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 2022, OMV achieved the following ESG rating results, among others:

- Dow Jones Sustainability™ Indices (DJSI World and DJSI Europe) included for the fifth year in a row
- MSCI reaffirmed an AAA rating for the 10th year in a row
- Awarded by ISS ESG with the Prime Status
- 27.4 (medium risk) in the Sustainalytics ESG Risk Rating

⁵ Legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, based on engagement and dialogue.

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 2022](#).

Vienna, June 21, 2023

The Executive Board

				
Alfred Stern	Reinhard Florey	Daniela Vlad	Martijn Arjen van Koten	Berislav Gaso