

BP – Annual Report on the Voluntary Principles on Security and Human Rights January to December 2011

Introduction

This report describes BP's implementation of the Voluntary Principles on Security and Human Rights (the 'Voluntary Principles') during 2011. The structure and the reporting points that follow are numbered to correspond with the Voluntary Principles Reporting Guideline. Our key activities on implementation are also publicly disclosed in BP's annual Sustainability Report.¹

During the last year we have worked to sustain progress in locations where implementation is a priority, including in Azerbaijan, Georgia, Turkey, Indonesia and Iraq.

With respect to risk management procedures BP continued the implementation of a new practice on identifying and managing environmental and social impacts. This practice is mandatory in new projects that are substantial in nature, located in areas that are new to BP or could affect international protected areas², and also for acquisitions that would lead to such projects. The practice forms part of our company's operating management system and includes mandatory requirements on the Voluntary Principles for applicable projects.

A. BP's commitment to the Voluntary Principles

(1) BP continues to support the Voluntary Principles as an operational and practical guideline. Respect for human rights is reflected in our Group Values, Behaviours and Code of Conduct. We are committed to the safety and development of our people and the communities and societies in which we operate. Our approach is built on our value of "Respect", being consistent and having the courage to do the right thing. We support the Universal Declaration of Human Rights and believe that businesses have a responsibility to respect human rights.

BP actively supported the process that led to the adoption by the VPs Extraordinary Plenary in Ottawa of the Governance Rules, incorporation, establishment of a Government Outreach Working Group and the Voluntary Group to develop new, measurable key performance indicators for the Voluntary Principles implementation.

B. Policies, procedures and related activities

(2) *Relevant policies, procedures and guidelines*

In 2006 we developed a guidance note to help BP employees to understand what human rights mean to the company and how human rights issues can be analysed and managed with respect to three broad categories – employees, communities and security arrangements.³ We plan to amend the guidance note in due course, to reflect our response to the Guiding Principles.

¹ The BP Sustainability Report is published on www.bp.com/sustainability. The report will be available from March 2012.

² In the context of the E & S GDP for new projects, 'international protected area' means IUCN (International Union for Conservation of Nature) categories I-IV (environmental), Ramsar wetlands (also environmental) and World Heritage Sites (can be environmental, but often cultural, historical or religious)

³ The guidance note is available on http://www.bp.com/liveassets/bp_internet/globalbp/STAGING/global_assets/downloads/BP_Human_Rights_2005.pdf

In early 2009 we completed and issued a Voluntary Principles Implementation Guideline. This aims to make implementation more effective and consistent, by providing practical tools for our businesses and by integrating guidance into BP's management systems. The guideline, which consists of seven elements addressing risk identification, mitigation and evaluation, has been made available on the BP intranet as dynamic content that will be updated and improved periodically. The extended summary of the guideline is also publicly available on the Security and Human Rights section of the Sustainability Report for 2011 published in www.bp.com.

During 2011, BP commissioned three consultants with expertise in risk management and human rights – Thomas Dimitroff, John Sherman III and David Vermijs – to carry out a detailed comparison of our company-wide policy and practices with the expectations established in the new UN Guiding Principles on Business and Human Rights. They also provided recommendations on how we could amend some of our processes to align them with the Guiding Principles. We have already made minor adjustments to BP's new code of conduct, which took effect on 1 January 2012, making it clear that certain provisions in the code, such as BP's stance on the rights and dignity of communities, relate directly to human rights. During 2012, corporate functions and major businesses in BP plan to identify amendments to some of the company's processes, so that we can work towards alignment with the Guiding Principles over time.

For 2012, we are planning to launch a new "Security Defined Practice" within our operating management system, or OMS, that will require all major projects and operational entities to incorporate the Voluntary Principles impact assessment and the implementation of its findings into their security management plans.

(3) Risk assessment procedures

All our businesses are required to carry out an annual security risk assessment and to incorporate the findings into a security risk management plan. In locations with high security risks, businesses are required by our operating management system to carry out an additional Voluntary Principles screening and impact assessment. An independent internal safety and operational risk function audits the business's compliance with this requirement.

As described in previous reports to the plenary, we developed a survey tool to help businesses to assess risks to people and communities potentially arising from their security arrangements. The tool is integrated within 'Getting Security Right' (GSR)– BP's recommended tool for identifying and mitigating security risks. With the retirement of GSR due to the implementation of the new Security Defined Practice, in 2012 a new standalone tool with the same features will be available on the Group Security intranet site. The aim is to make every security planning exercise aware of the types of risks the Voluntary Principles are designed to help mitigate. Recognizing that many businesses are operating in lower risk environments, BP does not mandate a full assessment in all locations – to help determine the need, the tool requires completion of a quick-check pre-screening exercise. During 2011 we used the survey tool to help with Voluntary Principles assessments of new projects or operations in Egypt (Exploration and production) and Brazil (Biofuels).

During 2009 we added a section on the Voluntary Principles to our protective security survey, which is an additional tool to support security risk assessments for individual facilities. The section consists of a checklist to screen potential risks associated with public and private security provided for a site, such as how personnel are vetted, equipped, trained, deployed and managed. In 2011 new predefined scenarios and risk management activities related to the Voluntary Principles were added to BP's approved on-line Risk Assurance Tool (RAT), used to register all types of risks at the business level.

Another development supporting assessment of security and human rights risks is the roll-out in 2010 of BP's environmental and social 'Group Defined Practice'. This practice is mandatory for new projects that are substantial in nature, located in areas that are new to BP or could affect international protected areas, and also for acquisitions that would lead to such projects. The practice helps such projects to identify and manage their environmental and social impacts, and it resides in BP's Operating Management System. It requires the projects to carry out a screening process for early identification and prioritisation of the potential environmental and social impacts. The screening considers various environmental and socio-economic indicators, which include human rights factors associated with public and private security. Projects whose screening has identified potential impacts on communities and individuals as a result of security arrangements are required to develop and implement mitigation measures consistent with BP's Voluntary Principles Implementation Guideline.

(4) Procedures or mechanisms to report security-related incidents with human rights implications

BP has mandatory procedures for reporting and investigating incidents, which were described in previous annual reports to the plenary. Incident notification to senior management level must be in accordance with the BP Group Defined Practice for Reporting HSSE and Operational Incidents, including cases with a potential human rights aspect. Security incident reporting throughout BP follows a defined process, with incidents classified in terms of their actual or potential severity and recorded in an incident database. An incident that has human rights implications and involves public or private security relating to our activities will normally be reported as a Major Incident Announcement (MIA) or as a High Potential Incident Announcement (HIPO).

BP has a group-wide independent confidential helpline to enable employees or contractors to raise any concerns about possible breaches of the company code of conduct. In several locations, businesses also have site-based or country-based grievance mechanisms to track local stakeholder concerns. For example, in Azerbaijan Georgia and Turkey we maintain a mechanism for individuals from communities impacted by our activities to register and resolve grievances. To date it has been used primarily with respect to land compensation and alleged damage to property. In Azerbaijan, the emergency phone hotline mechanism was established since 2009 to enable affected communities and individuals to report use of force or human rights abuses straight to BP and the State security provider, for further joint investigation. In Georgia, local BP security has also installed "feedback boxes" at all sites to ensure that the workforce can report issues affecting performance regarding human rights.

(5) Procedures to consider the Voluntary Principles in entering relations with private security (see section 11 for further detail relating to specific country operations)

As with any type of contractor, it is mandatory for BP businesses to screen and select private security contractors based on a combination of factors. BP also requires contractors to communicate our health, safety, security and environmental requirements to their employees and subcontractors and demonstrate that they follow them.

Through the annual security management planning process that BP businesses undertake, they are asked to ensure that contracts with security contractors include provisions on ethical conduct in accordance with the Voluntary Principles. A requirement to act in a manner consistent with the Voluntary Principles has also been included as a clause in our general model contract, which was rolled out in 2011. This includes a reference to the International Code of Conduct for Private Security Service Providers.

To support and promote adherence to the Voluntary Principles, we developed within our implementation guideline a standard set of contractual clauses for inclusion in private security service agreements. These address specific performance requirements and rights such as on employment and vetting, deployment and conduct, training, monitoring and assurance and have been included in a number of security contracts around the world.

The contracting process of private security is also covered by the Group Anti-bribery and Corruption Standard and the revised Group Anti-money Laundering Standard. Both documents were launched in 2011 and mandate due diligence on all counterparties through a BP Ethics & Compliance approved risk intelligence data provider, for any adverse information (including human rights allegations).

(6) Procedures or mechanisms to address security-related incidents with human rights implications

We investigate any allegations of human rights abuses in our area of operations. We will also conduct an internal investigation whenever there is credible evidence that our actions or omissions may have played a role in the alleged abuse. Any investigation will normally follow BP's Group Defined Operating Practice on Incident Investigation, using root cause analysis methodology.

When abuses are alleged to have occurred outside our area of operations, our response will take into account the nature of the issue and incident and its relationship to BP's operations, the local political and cultural context, and BP's relationships and influence with relevant stakeholders.

In a few cases BP businesses have developed their own detailed procedures to guide their response to potential security-related incidents with human rights implications. The need for such procedures is determined by the nature of our business and the environment in which we are operating.

For example, in 2005 BP's Tangguh project in Indonesia developed a detailed procedure for reporting and investigating human rights-related allegations associated with its activities. The document, which has been made publicly available on the project's website⁴, describes the steps BP will take as operator on conducting internal inquiries and investigations, on reporting incidents to the Indonesian authorities and on maintaining project records. The procedure is periodically tested and validated through table-top exercising.

In January 2011, we evacuated more than 350 staff, their families and contractors from Egypt due to civil unrest in the country. The necessary aircraft and infrastructure were set up within 24 hours and all affected expatriates were evacuated within four days. Evacuees were brought to south east England where they were provided with onward travel and counselling. BP's 300-plus Egyptian staff were continually supported during this period. Cash was provided when access to banks was unavailable, as well as other necessities such as medicine and food as needed. Workers were contacted every day and kept up-to-date with BP's on-going support mission. All affected people were able to return to Egypt by March.

In Libya, civil unrest broke out in February 2011. The situation was complex as BP's personnel were spread throughout Libya with five remote sites as much as 190 miles apart, including drilling and seismic sites in the Sahara desert. In Tripoli, the teams coordinated the evacuation from residences and hotels, operating in an enforced curfew and avoiding armed roadblocks. In less than 80 hours from the decision being taken to evacuate expatriate staff, all of those who

⁴ www.bp.com/sectiongenericarticle.do?categoryId=9004774&contentId=7009150

requested to leave had departed Libya. A total of 101 personnel were evacuated including BP employees, their families and contractors. All evacuation routes, by land, sea and air, were assessed for risk and BP used two charter flights, three commercial flights and two ferries to complete the evacuation. A warden system was then set up to ensure that all national staff were safe and had access to life support. This was reported back daily to a business support team in the UK.

During 2011 we did not receive any third party complaints or information through other channels about any incidents related to excessive use of force by any private security provider contracted to us.

(7) Promoting awareness

We continue with efforts to raise awareness of the Voluntary Principles across the company. This includes awareness sessions for 'business security representatives' - typically employees working in smaller operations who hold security management responsibility combined with wider tasks such as health and safety. We also have an internal website and e-learning module on the Voluntary Principles to give employees access to basic level instruction.

(8) Promoting implementation internationally

During 2011 BP participated in the "Expert Group Meeting on Responsible Business & Investment in High-Risk Areas" of the UN Global Compact-Principles for Responsible Investment. We have also contributed to the work of oil and gas industry organization IPIECA's human rights task force, which works on human rights issues and good practice in the oil and gas industry.

At the end of 2010 we joined a Voluntary Principles working group on Iraq, which involves a number of other oil companies, NGOs and government representatives with the objective of sharing information on implementation and identifying areas of potential cooperation. During 2011 we met with this group in Washington, Jordan and Ottawa.

C. Country implementation

(9) During the last year our focus on implementation of the Voluntary Principles has continued in Azerbaijan, Georgia, Turkey, Indonesia and Iraq.

(10) Stakeholder engagement

We continue to seek opportunities in Azerbaijan to exchange information with community stakeholders regarding the security arrangements in place for facilities and pipelines. One mechanism used has been the 'Inter-Agency Security Committees'. From 2006 to 2009 BP held more than 250 meetings in communities along the BTC pipeline. These were led by BP field security advisors and attended by BP community liaison officers, local government leaders, land owners and users, and public security officials. During 2009 BP commissioned a survey of more than a thousand people living and working close to the pipelines in Azerbaijan, to learn about peoples' attitudes to BP's performance on security. Then in 2010 we resumed the Interagency Security Committee meetings, with nearly 4,000 people attending sessions in 85 villages along the pipeline. During 2011 nearly 4,500 people from 107 villages attended these sessions again.

In Turkey, since 2006, BTC and Botas International Limited (BIL) the contractor for the Baku-Tbilisi-Ceyhan (BTC) pipeline, have held several "awareness meetings" with communities, local authorities, security forces and national stakeholders as NGOs, Universities and Government. Of

those meetings, 242 were done with villages, 58 with the Gendarmerie and 59 with public institutions. Nearly 5,600 people have attended these sessions.

Between 2009 and 2011, Georgia began the implementation of a stakeholder engagement strategy agreed with our partners in 2008. An average of US\$ 3 million per year was invested on activities to support the creation of a favourable environment for small and medium sized businesses, support of agricultural projects, energy efficiency initiatives in rural areas, technical assistance and energy education.⁵

In Tangguh, Indonesia, we implemented a communication programme during 2010 to update local communities about the security arrangements for our operations and about the role of community policing. More than a thousand people from 15 villages near to our LNG facilities attended the sessions. The programme continued in 2011 with the participation of 461 people from 13 villages.

(11) Voluntary Principles considerations in private security contracting and in arrangements with public security

BP has continued to promote the Voluntary Principles in working with our private security providers in prioritized countries. Detailed requirements to adhere to the Voluntary Principles are included in several of our security contracts in higher risk locations around the world. This includes, for example, Azerbaijan, Georgia, Turkey, Indonesia and Iraq.

In Azerbaijan, our security contractor has employed a full-time training manager to ensure continued new recruit and refresher training on security and human rights.

Assessment of company policies and procedures relating to security and human rights has been an important component in screening and selection of private security contractor support for our business in Iraq. Also in Iraq, we have included a commitment to implement the Voluntary Principles in the technical service agreement for the Rumaila contract area near Basra. This was signed between BP and the Iraqi government in November 2009.

The decision to use armed guards is subject to review and senior level authorisation, which has to be renewed periodically. As of the end of 2011, our operations in Iraq, some BP shipping vessels involved in transiting high risk areas where piracy is a threat, an Air BP terminal in Johannesburg, South Africa (as mandated by local legislation) and facilities in remote parts of the North Slope in Alaska, were the only operations in BP that used armed private security services.

(12) Examples of outreach, education and training for personnel, private security, public security and civil society

Training continues to be a significant area of focus at our liquefied natural gas (LNG) project in Tangguh, Indonesia, supported by BP within the framework of our 'integrated community-based security' (ICBS) programme.

Since the beginning of the project, BP's Tangguh security team have participated in three joint training exercises with the Papua police. The last exercise was conducted in December 2010. The exercises provided opportunities to test civil disturbance management plans and procedures and adherence to the Voluntary Principles in volatile crowd situations. Participants included police officers, mainly from Bintuni Region, BP Security Guards, employees (as role play demonstrators), and some observers which involved military officers, local NGO members, and some local

⁵ See <http://www.bpgeorgia.ge/go/doctype/1339/17880/>

journalists. In all, the exercises included three days of preparatory training, a one-day table top exercise, and then a one-day exercise in the field. The demonstrations included a simulation at sea and on-site.

All of the 305 guards working at the LNG facilities in Tangguh have received basic human rights-related training. The training is conducted every year, with 180 attending in 2011. Some 95% of the guards employed come from the local communities around the facilities. Further Voluntary Principles-related training was provided for 105 police officers and 30 members of the Army during 2011.

We continue to support capacity building for the Georgian government's Strategic Pipeline Protection Department (SPPD), delivered through an international security and training consultancy. The SPPD is the security service assigned by the government to protect the BTC and South Caucasus pipelines in Georgia. The assistance programme involves regular review and discussion of the training received by SPPD on human rights relevant to law enforcement, and of the community relations and policing aspects of their activities. Our support for training on security and human rights in Georgia dates back to 2004.

As we noted in last year's annual report, we see positive signs in terms of the impact of this support. For example, our training consultant stated that the SPPD "has become a full-time community police force and emergency service," operating in extreme mountain winter conditions for more than half the year. "This is a point noted by separate auditing agencies, who speak positively of SPPD in regard to both its interaction with local communities and its adherence to the Voluntary Principles on Security and Human Rights."

In 2010 private security contractors in Georgia attended a course with sessions relating to security and human rights in the "train the trainer" format. This followed up on similar sessions conducted for Intersecurity guards in 2009 in Tbilisi, Supsa and Akhaltsikhe. BP Georgia's security manager and security and human rights coordinator directly participated in the training, helping with specific role play exercises. As the trainings provided by BP covered their entire workforce, the security company is now accountable for training to all the new comers and also refresher trainings to the existing staff. We do bi-annual audits to check compliance with their commitments.

In Azerbaijan, we have been engaging the government and facilitating training on human rights-based security for public security personnel involved in protecting BP operations since 2004. For example, during 2011 Human Rights training was conducted by a TITAN's trainer (guard company) to 52 guards. From 2004 to 2006, all Export Pipeline Protection Department (EPPD) personnel have passed through Human Rights training provided by "Equity International". During that period Equity International nominated 76 EPPD officers as trainers on Human Rights. Currently, every new guard recruited by EPPD completes a mandatory 8 hours "Human Rights" training as part of the induction programme.

In Turkey, BP has delivered a number of awareness workshops for managers from BIL. This initiative began in 2007 when all security guards received instruction covering human rights standards, communication and conflict resolution skills, and the exercise of restraint in the use of force. Earlier in 2007, all security guards from Securitas, a private contractor that provides security for BP's office sites and downstream facilities in Turkey, were provided the same training. During 2009, BIL and Securitas provided a refresh training for guards on the Voluntary Principles, based on the curriculum developed by BP. We continue to routinely verify that the training provided by the security contractor for its guards includes appropriate instruction on the Voluntary Principles. Since the contracts were put in place with BIL and Securitas, no complaints have been received regarding inappropriate conduct or misuse of force by any of the contracted

guards. The training programmes in place for security contractors will continue to be reviewed and conducted on a regular basis.

In Iraq we commissioned in 2010 an external assessment and held a workshop with an international training NGO to identify issues around our engagement with the government's Oil Police Force (OPF), the public security branch assigned to protection of the Rumaila field. This work was intended to inform cooperation with the OPF on training support aligned with the Voluntary Principles. In August 2011, BP and the Oil Police Force signed a formal agreement on delivery of training aligned with the Voluntary Principles.

(13) Company procedures to review progress on implementing the Voluntary Principles

For projects and operations where we have identified risks related to Voluntary Principles adherence, we periodically conduct internal assessments to identify gaps and areas where implementation can be improved. We have also developed a standard evaluation framework to help assess our performance. This includes performance indicators on risk assessment, transparency, response procedures, training and contracting.

Business are regularly reviewed by Regional Security Advisors from our central Group Security function, providing an independent view on risk to the business. Executive summaries of previous reviews are publicly available online.⁶ Group Security has also assigned a Subject Matter Expert on Voluntary Principles to support the reviews.

In certain locations independent monitoring continues to provide an important source of assurance on security and human rights risk management. In Indonesia, the Tangguh Independent Advisory Panel (TIAP), which advises BP on the economic, political and social impacts of the Tangguh LNG project in West Papua, published in March 2011 its eighth report (first report of the second TIAP formed in 2009). The panel's scope includes providing external advice on BP's performance in identifying and managing human rights risk relating to security arrangements. Its reports and BP's responses are available online.⁷

External monitoring continued in Azerbaijan through the independent Social Review Commission. This is chaired by David Rice, senior associate at the University of Cambridge Programme for Industry and includes NGO representatives, human rights experts and an economics student from the Azerbaijan State University.⁸ In 2011 the Commission published its fifth report on BP's economic and operational impacts in Azerbaijan, including its performance on the Voluntary Principles. The commission wrote in the conclusion: "We are assured by much of what we have seen that BP continues to take its social responsibilities seriously in Azerbaijan. We lend our support to much of what BP has done and is doing. We offer the company a set of challenges and advice intended to more firmly anchor BP in Azerbaijan society and grow its beneficial social impact. It is the nature of challenges that they appear extremely difficult, as no doubt these ones will to BP. But it is also the nature of challenges that they can be successfully pursued if accepted and boldly pursued".⁹

In Turkey, the Rural and Urban Development Foundation (RUDF) played the role of independent NGO for monitoring until the end of 2008 when the Resettlement Action Plan "close-out audit"

⁶ For the Azerbaijan review go to: <http://www.bp.com/sectiongenericarticle.do?categoryId=9008490&contentId=7015691>
For the Georgia review go to: <http://www.bpgeorgia.ge/go/doctype/1339/23441/>

⁷ See <http://www.bp.com/sectiongenericarticle.do?categoryId=9004751&contentId=7008791>

⁸ For information about the ASRC members: www.bp.com/genericarticle.do?categoryId=9006625&contentId=7038504

⁹ The ASRC report for 2010 together with the business's response is publicly available here: <http://www.bp.com/genericarticle.do?categoryId=9006625&contentId=7037156>

was conducted. However, we continue regular monitoring of the performance of community development projects with external commissions.

In Georgia, there is a "Single Point of accountability" for the VPs within the security team who maintains a formal VPs implementation plan and performs bi-annual audits of the security contractor in order to check conformance with the required standards. Additionally, company Bouman Risk Management (BRM) provides external monitoring with quarterly equipment audits to the Strategic Pipeline Protection Department (SPPD), to ensure that the equipment provided to the SPPD is used for its intended purpose. BRM also provides reports on HR/VP issues to give us a full and clear picture of the real situation with SPPD. Another means of external assurance is Deloitte & Touche, who carry out the bi-annual audits of the funds provided to SPPD¹⁰.

In December 2011, Gare A. Smith from Foley Hoag, conducted an assessment of human rights and the security voluntary principles for BP Iraq. His recommendations will come shortly to the business.

BP is also taking part in a voluntary project with other companies of the extractive sector to develop new, measurable key performance indicators for the Voluntary Principles implementation, as a way of providing additional assurance to external observers of the process. Professor John Ruggie, who led the development of the new UN-endorsed Guiding Principles for Business and Human Rights, is supervising the process. These indicators will be used to complement Group Security reviews in 2012.

D. Lessons and issues

(14) Lessons and issues from this reporting year and outlook for 2011

A significant development during 2011 was the sale of our exploration business in Pakistan. This Country was one of the few exceptional locations where BP had contracted armed private security services. Safeguards were in place for the carriage of weapons included vetting, training, monitoring and explicit contractual requirements to adhere to the Voluntary Principles. During 2010, our contracted security provider in Pakistan provided human rights-related instruction for guards, including daily morning briefings and periodic classroom-based induction training covering topics such as weapons safety and use-of-force principles. No Human Rights incidents were reported in this operation while it was under BP's control.

The Baku-Tblisi-Ceyhan (BTC) pipeline project was the subject of allegations made in 2003 by several non-governmental organizations, who claimed the project had violated the OECD Guidelines for Multinational Enterprises, a set of voluntary standards and principles for large companies. The UK Department for Business Innovation and Skills is the government agency tasked with responding to OECD Guidelines-related complaints when they involve UK-based companies. The agency originally found all allegations to be baseless and dismissed them. Following a procedural challenge, however, the matter was reopened, and in 2011 the agency issued a revised final statement¹¹.

The agency reiterated that it saw no merit to most of the allegations but stated its view that in a part of northeast Turkey during the early stages of the BTC project BP had failed to "identify specific complaints of intimidation against affected communities by local security forces where

¹⁰ See <http://www.bpgeorgia.ge/go/doctype/1339/23441/>

¹¹ <http://www.bis.gov.uk/policies/business-sectors/low-carbon-business-opportunities/sustainable-development/corporate-responsibility/uk-ncp-oecd-guidelines/cases/final-statements>

the information was received outside of the formal grievance and monitoring channels” and had not taken adequate steps to respond to such complaints.

BP cooperated fully with the agency throughout this eight-year process. We disagree with the agency’s conclusion; in addition to formal consultation and grievance processes, observers from non-governmental organizations monitored the planning and execution of the BTC project. However, we accepted a recommendation to report back to the agency on some ways in which BP could further strengthen the procedures we use to identify and respond to allegations or incidents related to security and human rights. We submitted this report in mid-2011, and it was summarised in the agency’s follow-up to the final statement, bringing the process to a close.

Looking ahead to 2012, we will continue to promote implementation within a consistent broad framework, with mitigation measures tailored to local needs. The need for flexibility, avoiding a ‘one size fits all’ approach to implementation, has been a key learning from several years of experience in BP. Another priority is to ensure that our projects and operations are undertaking sufficiently robust risk assessments to identify security and human rights issues associated with their activities. The roll-out of BP’s group security defined practice will help reinforce this approach. The start of new implementation activities in Iraq and the continuation of good practices in our mature operations, such as Azerbaijan, Georgia, Turkey and Indonesia, will also be key areas of focus.