



FRAUD & MISCONDUCT REPORTING STANDARD

BP INVESTIGATION GUIDELINES

BP is committed to fulfilling the obligation that all incidents, allegations and suspicions of fraud & misconduct and other breaches of the Code of Conduct are appropriately reported, investigated and disclosed. All investigations are conducted in accordance with the Investigation Guidelines and by appropriately trained and accredited investigators.

Investigation Principles

- Confidentiality – a need to know list should be set for each investigation and be observed.
- Professionalism – investigations must be carried out with integrity, be demonstrably fair and be thorough.
- Competence – appropriately trained investigators for the area under investigation.
- Independence – the investigator must be and must be seen to be independent of the matters they are investigating.
- Objectivity – the work must be carried out in a way that is free of any influence based on personal opinion or bias.
- Protection – for those who make a complaint from retaliation, harassment or intimidation.
- Timeliness – investigations must be conducted on a timely basis but the time scale should reflect the complexity of the incident.

Investigation Stages

- Preliminary fact finding and evaluation – assessment of evidence presented and credibility of the allegations to inform investigation strategy. This stage is prior to the formal investigation commencing and it must not include conducting interviews or contacting suspected individuals.
- Planning – an investigation plan covering the objectives, scope and approach helps to ensure a fit for purpose investigation.
- Fact finding, evidence and interviewing – investigators must be clear to what is or is not fact. They must carefully judge how to obtain evidence, preserve that evidence and maintain the chain of custody of for that evidence. Interviews must be carefully

planned with language used, types of question asked and approach to introducing documents and evidence all contributing to the effectiveness. Fairness and Confidentiality statements should be signed prior interviewing witnesses and retaining documents.

- Final analysis – the aim is assess each piece of information and evidence, how it fits with the other evidence and whether it is sufficient to complete the investigation.
- Reporting and recommendations – Setting out an analysis of facts and evidence. The investigator does not express personal opinions on guilt or innocence of a subject; this is for the decision maker on the incident based on the factual findings. Recommendations may be made of further action, e.g. control improvements.
- Completion and case closure – Communication of the investigation report to the decision maker and of recommendations and regularly re-circulating the lessons learnt.

Compliance with local laws and regulations

Where local legal requirements are more stringent than the BP Investigation Guidelines, such local rule and regulations will apply. Appropriate legal advice should be sought

For further details

View the [Fraud & Misconduct Reporting](#) webpage.

Alternatively you can contact the FMI Team by email on FMReporting@uk.bp.com.